



ENVIRONMENT PLYMOUTH

Response to LET'S TALK ARMADA WAY Consultation.

Dear Louise, Rowan and Martin,

As you might imagine a range of issues have been raised by members and colleagues and I have done my best to list them under specific headings but in no particular order. Because the 'environment' is inter-connected the wide range of subjects covered is easily within our brief as an environmental organisation.

Consultation – the general feeling is that this word is misleading as we are being asked to respond to a plan that is already a presentation document. The 'consultation' should have occurred in advance of the plans being drawn up as they are now being offered to the community as a foregone conclusion. This design process is the same as before with no consulting or request for early input from the many interested parties. This is a failing that requires resolving, as presenting plans in this way allows little possibility for influence and leaves people marginalised or disinterested. It seems nothing was learned by PCC or its officers over the fiasco that became national news and an embarrassment to the City with the unnecessary felling of mature trees. Misleading the public, wasting money in challenging legal decisions and insulting concerned groups or individuals over their worries has become the Council's modus operandi. This is unhelpful in moving forward and a seeming derogation of civic responsibility. Consulting relevant groups and individuals at the early stage would have helped alleviate this problem.

Trees – we largely welcome the additional number of trees being planted but with a number of concerns;

The inclusion of a '**Tree of Heaven**' is concerning as it has a poor reputation. *"Ailanthus leaks toxins into the ground which prevent the germination and establishment of other species in its vicinity. It is very tolerant of pollution and soil disturbance and at home in an urban habitat, earning it the nickname 'Ghetto Palm' in New York. It is also fiercely resistant to human intervention and will respond to cutting by throwing out underground suckers which can damage pavements, drainage systems and building foundations. All parts of the tree produce a nauseating odour suggestive of rancid cashew nuts."*

Although **The Environment Agency** does not yet register Ailanthus as invasive it is listed by the **European Plant Protection Organisation** in the **top 25 alien invasive plants** posing 'an important threat to plant health, environment and biodiversity'.

Studies show up to **40% of urban tree plantings die** within seven years, far too early to realise their benefits, which indicates it is always better to preserve more mature trees. Urban trees face unique challenges, such as excess warmth due to an urban heat 'island effect', a surfeit of nutrients from dog urine, and underwatering. Poor, under-resourced management is also a factor. Unhealthy microbiomes, which may arrive with new trees or develop as a result of poor management, or bad luck, are always a threat in a scheme such as this. Evidence of the long-term management plans and funding to deliver this would have been preferable. Lack of openness about this is in opposition to the Council's promises made earlier this year.

Replanting existing established trees – is a great concern to many of our members. The success rate is low unless they are really carefully and properly handled during all stages of the transplant process and then properly maintained. There is considerable evidence that translocation (as practised in the UK) doesn't work. Sticking them in a hole and walking away is a remedy for their unnecessary deaths.

Retaining existing mature trees – it seems this option doesn't exist; **it must**. The design only needs minor modification to include them. The trees are; **007 – Cockspur Thorn; 045 - Whitebeam; 118 – Sorbus; 119 – Japanese Maple; 120 – Japanese Maple; 125 – Sorbus**. The Cabbage Palms, which we thought were to be translocated and have a reasonable success rate, seem now to be incorporated. The threatened trees are all good and healthy and already benefit the environment in all the ways that trees do. They should be allowed to continue to provide advantages to the public health.

'**Levelling work**' - has been used as a reason for removal of some trees. This is a spurious excuse as the levelling can easily be moved a few metres without impeding users and then retaining mature trees.

The **Labour council** committed to **keeping all existing trees**, yet have allowed the designers to exercise their ideas over the fate of established trees. This is **against the Council Leader's own pledge** and the feelings of so many who expressed their wish to keep the remaining trees.

Our feeling is that **PCC planners don't want to change the design to include these trees**. The design has already been altered from the previous one and if this consultation is to be meaningful then modifications will be requested. Are they simply to be ignored?

Lighting – while the emphasis on good lighting is important it should not be at the detriment to nature. If this is to be a positive place for wildlife, then particularly birds, bats, insects and nocturnal feeders, need to be considered. Warm white as opposed to bright white LEDs would be preferred and care to ensure the lighting scheme reflects suitable day/night balances to ensure the welfare of the wildlife choosing to live there.

Cycle paths – this is a potential accident waiting to happen. Bicycles crossing pedestrian areas in the way they do seems hazardous. We already encounter the urban danger of electric bikes on pavements, with their users showing a total disregard of pedestrian safety. Toddlers, the elderly, phone users are among the obvious users at potential risk. If the **cycle lane changes** from east/west west/east were at the existing streets people would be more alerted, in the same way they are when they cross a road.

Rodents – it is suspected that rats and other rodents infest the disused watercourse underground. While there are several opinions within EP, including all life is sacred, it is more generally felt that the best action is for them is to be humanely killed rather than dispersed. Pest control must not be environmentally detrimental in the wider aspect. This will need to happen in a timely manner as advised by an EHO. There is a large risk of numerous diseases and infections through these animals. There is a high level of infestation currently in the city and a danger Plymouth will become Hamelin if not dealt with properly.

Old water storage tanks – here there is a risk of existing **biofilm contamination** with inherent dangers to public health. Also, a Legionella Risk Assessment should be done.

Childrens' play area – the size of this is likely to become an irritation to many rather than a pleasure to the few. Reducing the size could be considered beneficial.

Felled trees - it was suggested that chippings from the felled trees could be used as a safety layer in the play area, there is no mention of this. Are over 100 mature trees to be totally discarded from the design?

Water features – all water features are a risk and completely useless if unmaintained. The existing fountains in the city are regularly not working or abused. The potential exists for the same to happen to the new features. How is this to be prevented?

Design – shows wide unshaded paved surfaces. With **climate change** bringing hot summers and wet winters tree cover is essential for modifying the effects on people and places. Spacing of trees as well as numbers must be considered. Instead of tight canopy trees, thought should be given to more spreading varieties. Also to shading sails, which have been incorporated elsewhere.

Chess tables – might be a nice addition. They exist in lots of cities and even if not used for chess double as regular tables. It allows players time to enjoy the nature too.

Bins – throwing contaminated waste into recycling bins ruins the whole collection. Clear notices should guide users as to what can and can't be put in the 'green' bin.

Maintenance – unfortunately past experience has shown that new schemes and especially **new plantings are neglected** immediately after installation. Trees need up to 5 years regular care to establish development. What is the maintenance programme? Is it fully funded? What is included in it?

Additional planting – reference is made to an additional 147 trees planted in the south of Armada Way. An urban-forest outside the Crowne Plaza? This grassy island has a number of mature trees on both sides, although a few have been lost in recent years it still means a very dense planting. Is this the aim and is it suitable?

Suds – is mostly a good idea but there is little information about the working of the SUDs system. No detailed plans have been provided despite requests from several groups. Can we see these details before the finish of the consultation, or is there a problem?

Costings – these must have been broken down for the different aspects of the scheme. Could we please know the costs, particularly for contentious aspects like the translocation, and for things like adapting the plans to accommodate changes requested from the consultation? Or is there no such proviso?

Hugh Janes

Chair, Environment Plymouth