

P-05-801 Save the trees and ground in Roath Mill and Roath Brook Gardens before it's too late – Correspondence from Petitioner to Committee, 10.05.18

**Response on behalf of Roath Brook Trees campaign group
to letter from NRW and Addendum dated 24th April 2018**

We are pleased that NRW acknowledge that they will not remove trees unless “absolutely necessary”. We remain confident that far from being absolutely necessary the removal of the trees from Roath Mill Gardens and Roath Brook Gardens is in fact absolutely unnecessary and we remain committed to proving to NRW’s satisfaction that the flood protection, that they profess to be required, is not necessary or alternatively can be carried out at far less cost to the environment.

We accept that NRW are planting 200 saplings at Roath Park. However their broad generalisation that the removal of up to 38 mature trees is made up for by the planting of 200 saplings in Roath Recreation Ground only evidences once more NRW’s failure to recognise the genuine concerns of residents. The planting of trees in Roath Recreation Ground not only has no impact whatsoever on the loss of amenity value of the neighbouring parks¹ (see further point 2 below) but, perhaps more alarmingly, given NRW’s status as the body charged with protecting our environment, completely fails to acknowledge the environmental impact of the removal of just one mature tree:

“We know that some of the key ecosystem services delivered by trees – such as air quality and urban cooling, to name but two – are positively correlated to canopy size. This is why there has been such an emphasis on increasing canopy cover in recent years. To fully ‘replace’ the canopy volume of a mature tree in the short term would likely require the planting of hundreds of trees in the vicinity of the original – an impossibility in an urban environment with all of the challenges and restrictions on space that we have to contend with. Canopy targets will not be met by tree planting alone; retention of existing trees is just as important.”²

1. Current risk of flooding should be recalculated following the completion of Phase 1 and 2 work
4. Information about how schemes are prioritised on an all-Wales basis

The campaign group did not request that the flood risk be recalculated by itself (as suggested in NRW’s response 1). The request which has been made consistently and which was repeated in our response to the Petitions Committee of 19th February (see paragraph 3.6) was that “*NRW recalculate the Communities at Risk Register in light of the work to be completed on Phases 1 and 2 and explain, in light of that, why the Phase 3 works should be prioritised over other areas at greater risk within Wales.*”

¹ See for example “UK Parks save NHS more than £111 million a year”, Guardian 7th May
<https://www.theguardian.com/uk-news/2018/may/07/uk-parks-save-nhs-111m-year-study-suggests>

² the Arboricultural Association website at <https://www.trees.org.uk/News-Blog/News/Trees-and-footways-a-tree-officer’s-view>

This is no more than a request for NRW to do what they have done previously: to use the CaRR tool to assess the risk to the “Roath” community once the phase 1 and phase 2 works have been completed. If the analysis of Roath as a community is useless now, it was similarly useless when the calculation was originally done.

The Response of 19th February also set out the basis of the calculations used by the Campaign Group to place the community between 100 and 150 on the CaRR. Rather than NRW simply recalculating the position of Roath, using information wholly in their possession, they seek to criticise the methodology of the Campaign Group or suggest micro-analysis (which has not been requested) is not possible.

The key questions of NRW remain: What position would Roath be in the CaRR after the completion of Phases 1 and 2 work? Could the projected spend of £500k be better utilised elsewhere?

The apparent refusal of NRW to answer these questions is telling but also concerning given it is wholly reliant on Welsh Government funding for this projects and similar, more pressing, projects elsewhere.

2. Further details about the methodology of the options appraisal

We continue to believe that the option appraisal process was entirely flawed as, whilst it assessed the benefits, costs, impact and risks of each option it completely failed to take into account the environmental impact and cost of the option chosen.

As stated in paragraphs 3.7 to 3.11 of the response of 19th February we believe that NRW should, on all future projects and any re-evaluation of this project, carry out an assessment of the environmental costs of the works utilising the iTree method or similar methodology³.

Further and subject to the outcome of the discussions referred to in 3. below it is likely that the Campaign Group will require NRW to carry out the options appraisal again should the ultimate scheme design need to take account of a significantly reduced rainfall figure.

The campaign group are also likely to require the input of Cardiff Council into any such appraisal process, given their ownership of the relevant facilities including Roath Park Lake (the Council have failed to engage at all with the campaign group despite numerous requests and the current pause).

3. Recent discussions with the local community

The campaign group agree that discussions with NRW have, following an initial period of complete inertia (when the NRW message was that the works would carry on regardless) have been constructive. The current hiatus in the works is welcomed by the campaign group, and it is hoped that NRW will pay due regard to the findings of the hydrologist engaged by the campaign

³ <https://naturalresources.wales/guidance-and-advice/environmental-topics/your-neighbourhood/green-spaces/urban-trees/?lang=en>

group whose credentials they have endorsed. Those initial findings, which are due to be discussed with NRW, appear to demonstrate that more up to date and accurate rainfall and flood data is available which could result in no works, or less invasive works being required.

However the fact that the campaign group have had to engage a hydrologist, after months of campaigning has demonstrated a fundamental inequality in the current system, and in how local voices are heard. The campaign group are fortunate in having a variety of professionals able to devote both time and money to the cause, and in possessing individuals willing to stand in the park to prevent tree felling until NRW and/or Welsh Government were willing to listen. The petition itself would have been to no avail had NRW not been convinced to pause works. In order to continue to fight to protect the parks the Campaign group has raised over £2,900 through crowdfunding backed by over £1,500 raised through community events. Other less affluent areas may be unable to raise such funds to be able to effectively enable their voice to be heard, or to question what may be imposed upon them.

Conclusion

We have commented further upon NRW's addendum below, however given NRW's commitment to being an "*evidence-based organisation*" and their reliance on a careful analysis of "*best evidence and due process*" we would request the Committee to ensure NRW:

- Reassess the community of Roath after Phases 1 and 2 and confirm its position on the CaRR;
- Objectively consider the finding of the hydrologist appointed by the Campaign Group; and
- If works are deemed necessary carry out a proper consultation providing full details of the flood risk and evaluating, amongst other costs, the true environmental cost of the works.

We would also ask the Committee to consider how similar campaigns can be better supported in the future.

Further Comments on the Addendum

1) Consultation

NRW have been asked on numerous occasions through formal FOI requests to set out, by reference to their “Key Consultation Events” the actual flood risk communicated to the public at those events. NRW have repeatedly refused the request to do so. It is submitted by the Campaign Group that this is because of the vague unspecified nature in which the risk was presented.

Whilst NRW have accepted an error existed in some materials between October 2016 and March 2017 the extent of such an error has still not been acknowledged, despite numerous requests. By way of example the campaign group have recently discovered that a letter written to a significant number of local residents on behalf of NRW in September 2016 also contained a similar error about the extent of the flood risk. In any event the more troubling conclusion from this error is that in the face of this NRW continue to contend that the initial consultation was correct (and presumably informed residents). However their own project manager, and numerous NRW staff laboured under a completely false, and hugely exaggerated, apprehension of the true flood risk for over six months at a key time for the project, pronounced that to the public, and stood uncorrected by any other member of NRW management or staff. A suggestion that residents and others had been fully informed by this time is therefore simply inconceivable.

NRW have also accepted that at no time did they ever communicate the discrete flood risk relating to Phase 3 works (on which they now rely at section 1 of their letter) to residents.

Whilst it is therefore noted that there are those in the community who are concerned about flood risk, many of these are likely to be ill-informed, and may not even understand whether their property is at risk let alone the extent of that risk. NRW's own statement that they have not misinformed residents about the Roath Brook Gardens work because they have always said it is Medium Risk fails to acknowledge the fundamental fact that they will remain at Medium Risk even after the work is complete evidencing the complete lack of worth of such a statement.

The suggestion that there may exist a “*silent majority of residents at flood risk*” (even if acknowledged as unverified) is simply embarrassing for an alleged “*evidence-based organisation*”. The petition, strength of support in the parks and continued financial support for the campaign speaks for itself. NRW will themselves be aware of the feedback at workshops held by them which was overwhelmingly (and in the region of at least 90 to 95%) against the works being carried out.

NRW's own suggestions as to what the community may or may not understand, or may or may not want, points only to one logical conclusion: a fresh consultation based on clear and objectively based facts.

2) Flood Risk Prioritisation

NRW are referred to paragraph 3.4 of the Response of 19th February. Any further analysis of Roath's new position in the CaRR is a matter entirely in the hands of NRW.

3) Roath Flood Scheme Proposal

The committee are invited to view the current status of works during phase 1 and 2 and the trees planted as part of Phase 3 and reach their own conclusions.

Roath Brook Trees Campaign Group, 10th May 2018