



1st September 2017 66/2017

#### THE VALUE OF TREES

#### STATEMENT BY THE CHURCH ENVIRONMENT COMMISSION

There are various references to trees in the Bible, including some that refer to the "tree of life". Apart from their metaphorical meanings, trees do provide a great service to humankind. Their greatest contribution is much closer to home than the inspiration that they provided and continue to provide to poets, painters and musicians over the ages. Apart from providing the raw material for various goods they also provide an immense service in the form of carbon sequestration, reducing pollution, shelter from the sun, recreational space where people can interact with nature and the obvious aesthetic value both in rural as well as urban areas.

The Church Environment Commission (KA) notes with satisfaction that Government is to embark on a new drive to plant trees, namely on Comino and other parts of the island. This is commendable. The KA augurs that Government's commitment in this regard is sustained and intensified and makes use of the best qualified people in this area. The KA hopes that more areas in the country are earmarked for afforestation.

The KA's suggestions for such continued commitment towards tree planting in the country are the following:

## 1. Include tree planting along the roads that are going to be rebuilt over the next seven years under the Government's €700 million plan

The KA notes that Government has embarked on a large-scale project to rebuild roads. We appeal to Government to include tree-planting, where this is technically possible, in the design of the rebuilding of the roads. Due to their width some roads can accommodate such trees. There are various trees that can be planted along such roads. There are highly qualified people in the country that Government can refer to in the optimal choice of trees to be planted. We appeal to Transport Malta not to regard a road just as a passage for vehicles but also as a passage for pedestrians who need to be in contact with nature in an urban environment. Care should be taken so that road widening does not remove trees where this can be avoided through wise design.

#### 2. Plant trees in urban areas and amend the Development Notification Order

Trees in urban areas have been under constant assault for a long time. They have been regarded for a long time as an obstacle to projects, both public and private. Although it is understandable that in certain cases there would be no alternative for the removal of trees, the KA is not convinced

that enough efforts, skills and innovation have been resorted to in order to ensure that trees in urban areas are safeguarded. The vast majority of the Maltese population lives in urban areas. Trees in urban areas have a direct, immediate and intimate impact on the people who live in such areas. As the law currently stands, namely the Development Notification Order (DNO) which allows development to be carried with minimum or no notification to the Planning Authority, trees in such areas can be destroyed without any evidence being presented that all efforts have been made to spare the trees from destruction. The fact that minimum public consultation is carried out does not augur well for the preservation of the relationship between people and trees.

The DNO specifically states that the formation, laying out, alteration or improvement of roads by Government agencies and Local Councils are permitted without the requirement to notify the Planning Authority. There are some exceptions where a permit or notification to the authorities is required but not in the case of the destruction of trees unless these are protected under the Trees and Woodland Protection Areas Regulations 2011. Under these Regulations, although certain trees are protected in all locations, there are others which are protected only if situated in designated protected areas and outside development zones. Moreover, a distinction exists between trees in Urban Conservation Areas where they are protected and the same species of trees which, although situated in urban areas, lie outside Urban Conservation Areas and are therefore not protected. People do not live only in Urban Conservation Areas but also in other urban areas which are not designated as Urban Conservation Areas. The importance of trees to the community is not diminished by whether they are situated in Urban Conservation Areas or other urban areas. Trees in large private gardens in urban areas also have an important function as a lung for such areas and their importance should be recognized at law and in local plans and planning policies.

# 3. Compile, through the Environment and Resources Authority, a list of sites in urban areas which contain trees that give such sites their special character

There are sites in Malta which have an impressive tree cover but which do not enjoy any protection given that the Development Notification Order allows their removal without a rigorous planning process including public consultation. Such sites are neither in urban conservation areas nor in protected areas or outside development zones. Such sites include streets lined with trees on both sides and the mature trees provide rare street canopies in the country. Such trees are prominent landmarks which give such streets their unmistakable character. Such sites do not enjoy any protection and therefore we appeal to the Environment and Resources Authority to compile a list of such sites to be protected under the Trees and Woodland Protection Regulations 2011.

### 4. Abandon plans for a racetrack at Ta' Qali and plant more trees to enlarge the recreational area

Ta' Qali is a large recreational open space where many trees have been planted and grown to maturity and where thousands of Maltese families enjoy some breath of fresh air, peace and quiet. However, Government has plans to approve or build a racetrack in this area. The KA appeals to Government to backtrack on such a project. Ta' Qali should be safeguarded as a prime countryside-like recreational area for families. It was reported that the choice of Ta' Qali was due to it scoring most points when compared to other sites. However, in coming up with such a score

it seems that the impact that such a project would have on the character of such a recreational area was totally brushed aside. It is not enough to sugar-coat the racetrack project with "educational" aspects. This is a site which has a great potential to have more trees planted on it, thus upgrading it as a prime recreational area for all Maltese families. More trees at Ta' Qali would enhance the contact with nature that so many families in Malta are deprived of.

The KA sincerely hopes that during this period of the year when care for Creation is given more prominence, the authorities concerned would seriously consider its appeals, for the good of all. In the words of Pope Francis: "The urgent challenge to protect our common home includes a concern to bring the whole human family together to seek a sustainable and integral development, for we know that things can change" (Laudato Si' Par.13).