

Stephen Gwynne

Matter E: Green Belt policy, the Langley Sustainable Urban Extension [SUE] allocation and the Peddimore employment allocation (BDP policies TP10 & GA5-6)

Main issues: Does the Plan comply with national policy in its approach to the Green Belt? Are the Langley SUE and Peddimore employment allocations justified and deliverable? Should other Green Belt and/or major greenfield allocations be made?

This submission relates to all questions.

It is my argument (and the argument of others) that the Birmingham Development Plan (BDP) does not comply with national policy in its approach to the Green Belt. In the first instance, before it can be established that exceptional circumstances exist to justify damaging/destroying portions of Birmingham's green belt, adequate objectively assessed evidence (OAE) needs to be provided to show that the strategy of economic growth through population increase will result in positive social, economic and environmental sustainable development (SD). If it is established that economic growth through population increase will indeed result in positive social, economic and environmental SD outcomes then further OAE would be required to show what level of population increase will result in SD. In short, the only type of OAE that could be presented to justify increasing the housing stock and developing employment zones to a level that requires further human development on green belt land and hence claim exceptional circumstances is OAE that demonstrates without doubt that encouraging economic growth through population increase to a level that requires green belt development will lead to social, economic and environmental SD outcomes.

At present, the Birmingham Development Plan (BDP) does not refer to any OAE to show that pursuing a strategy of economic growth through population increase will result in SD, nor any OAE to show that further human development on green belt land will result in SD and so in turn the BDP does not refer to any OAE to justify increasing the housing stock and in turn the creation of employment zones in order to accommodate and provide jobs for Birmingham City Council's desired population increases. In fact current statistics from the ONS show that in the period in which economic growth through population increase has been actively encouraged, this has had the effect of having a downward pressure on real net national disposable incomes, a downward pressure on the value of human and social capital, an increased pressure on the availability of natural resources, an increased pressure on ecological ecosystems and an increased pressure on UK's ecological carrying capacity. This has resulted in increased prices for energy and construction materials, a continued depletion of natural resources and the continued degradation of our green infrastructure. In all, current OAE shows that a strategy of economic growth through population increase has in fact reduced the social, economic and environmental well-being for a great many of the UK population including our non-human ecological family and so, far from seeing a positive effect on SD indicators, a strategy of encouraging economic growth through population

increase is resulting in negative SD effects on our communities and our environment¹² (See appendices 1-3).

In order to assess the housing needs of Birmingham, Birmingham City Council (BCC) have relied upon population projection figures from the Office of National Statistics (ONS) but these figures in themselves do not provide any OAE that building these dwellings or developing employment zones will result in sustainable development (SD). In actual fact, the figures only indicate what level of economic migration might be expected if suitable accommodation was provided and so any decision to build additional housing or employment zones would be to simply encourage economic migration and in turn encourage economic growth through population increase but without any OAE to justify these actions.

In short, without adequate OAE to show that encouraging population growth will result in SD then no evidence is being provided to prove, justify or validate the plan's argument that green belt land must be made available in order to accommodate the strategy of economic growth through a human population increase in Birmingham. Similarly, neither does the plan provide any evidence to show that the strategy of economic growth through a human population increase in Birmingham will result in sustainable economic growth. In this respect, considering that projections of population increase do not in themselves constitute evidence that encouraging economic growth through population increase will result in SD, there is no OAE to justify or warrant applying the principle of exceptional circumstances.

Obviously making the unjustified decision to increase human development on green belt land could have severely negative SD outcomes for both present and future generations and in this respect the precautionary principle should be applied to ensure that current levels of social, economic and environmental well-being are preserved and not deteriorated due to unintended consequences.

As this objectively assessed report by the Campaign to Protect Rural England and Natural England entitled 'Green Belts – A Greener Future'³ makes clear:-

The social, economic and environmental impacts of green belt land converge around the multiple benefits that green belt land offers to the general public in that by having land free from built development near major urban areas delivers multiple objectives and a range of ecosystem services essential to the health and well-being of human societies. Green infrastructure is particularly important to the successful functioning of urban areas and the relationship to rural areas around them. The Green Belts already make a huge contribution to green infrastructure. With new challenges presented by climate change, along with additional pressure for new housing in the future, the Green Belts and all urban fringe land surrounding towns and cities could take on an even more significant role in providing an environmental resource for England's population. Therefore, a multifunctional approach to land use is essential to combine the range of activities essential to human sustainability – such as production of local food,

¹ <http://www.ons.gov.uk/ons/rel/wellbeing/measuring-national-well-being/reflections-on-measuring-national-well-being--may-2014/info-insights-across-society.html>

² <http://www.dailymail.co.uk/news/article-2534072/British-families-lose-influx-cheap-labour-Romania-Bulgaria-Miliband-admits-call-close-low-wages-loophole.html>

³ <http://www.cprecamb.org.uk/pdf/green-belts-a-greener-future-summary.pdf>

educational visits, access for recreation and provision of sustainable energy – that can be integrated with each other and across as much land at the same time as possible.

Therefore, taken together with the above OAE indicating a decrease in social and economic well-being, the negative environmental impacts envisaged by the Sustainability Appraisal and the failure of projected population figures in themselves to justify green belt development, the current evidence shows clearly that choosing to pursue a strategy of economic growth through population increase to a level that requires green belt development will not only result in either uncertain or negative SD outcomes as supported by the Sustainability Appraisal but will potentially threaten the viability and the integrity of the National Planning Policy Framework itself.

Similar conclusions have also been reached by other studies conducted this year which show that a strategy of economic growth through population increase will likely result in civilization collapse⁴⁵ and so on the basis of currently available OAE, the green belt must be preserved in order to ensure an adequate degree of food and energy security for both the present and future populations of Birmingham, let alone retaining them for their beneficial effects on social well-being.

In effect, to degrade or destroy the green belt in the name of a strategy that is unable to justify itself cannot be considered sustainable development from any perspective that seeks a consensus about what it means to be socially, economically and environmentally sustainable for the majority of human and non-human beings. In turn, to seek to mastermind a plan that seeks to destroy green infrastructure and all that it supports both in human and ecological terms without an extremely detailed Sustainability Appraisal is in my opinion (and the opinion of others) tantamount to recklessness.

Proposed changes

1. To produce and refer to adequate OAE to justify and show that the strategy of economic growth through population increase will result in positive social, economic and environmental SD outcomes.
2. To produce and refer to adequate OAE to show what level of economic growth through population increase will result in positive SD outcomes.
3. To produce and refer to adequate OAE to show that economic growth through population increase to a level that requires green belt boundary revision results in positive SD outcomes in order to provide adequate OAE that justifies applying the principle of exceptional circumstances.

⁴ <http://www.theguardian.com/environment/earth-insight/2014/mar/14/nasa-civilisation-irreversible-collapse-study-scientists>

⁵ http://www.theguardian.com/commentisfree/2014/sep/02/limits-to-growth-was-right-new-research-shows-were-nearing-collapse?CMP=fb_gu

4. To produce and refer to a comprehensive Sustainability Appraisal that details in depth the potential social, economic and environmental SD impacts of further human development on green belt land.

5. A Birmingham Peoples Referendum to democratically determine the level of population increase, which is to be accompanied with the required OAE in 1-4 above.

Appendices

1. Measuring National Well-being: Insights across society, the economy and the environment -May 2014.

Office of National Statistics <http://www.ons.gov.uk/ons/rel/wellbeing/measuring-national-well-being/reflections-on-measuring-national-well-being--may-2014/info-insights-across-society.html>

2. Sustainable Development Indicators - July 2014.

3. British families will 'lose out' from influx of cheap labour from Romania and Bulgaria, Miliband admits in call to close low wages loophole – January 2014.

<http://www.dailymail.co.uk/news/article-2534072/British-families-lose-influx-cheap-labour-Romania-Bulgaria-Miliband-admits-call-close-low-wages-loophole.html>

4. Nasa-funded study: industrial civilisation headed for 'irreversible collapse'? March 2014

<http://www.theguardian.com/environment/earth-insight/2014/mar/14/nasa-civilisation-irreversible-collapse-study-scientists>

5. Limits to Growth was right. New research shows we're nearing collapse. September 2014.

http://www.theguardian.com/commentisfree/2014/sep/02/limits-to-growth-was-right-new-research-shows-were-nearing-collapse?CMP=fb_gu

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Ref – Examination Hearing BDP 2014

To whom it may concern

I'm not sure if it is too late or not but I feel it necessary to include a formal statement of my position to help others better understand my proposed changes to About Birmingham, its vision, strategies and objectives as well as my proposed changes with regards green belt policy.

To explain In ecological terms,

Sustainability is created by encouraging diversity which in turn encourages a system to be stable, healthy and so resilient in the face of external stress. In this respect, encouraging ecological diversity, including human diversity, should be the core goal of the BDP. If social, economic, cultural, political and ecological well-being is the goal.

From this perspective of sustainability, it is seen that it is only by facilitating and creating system diversity that human social, economic and ecological sustainability and well-being will be achieved. In other words, by encouraging system diversity, a human system will experience more sustainability and well-being through being more stable, healthier and more resilient in the face of external stress. Hence any development/planning/economic vision, strategies or objectives need to have diversity enhancement as their main guiding principle.

In effect, the objective of the BDP would be to socially, economically and ecologically develop a human species/system that distributes resources in such a way as to create the greatest diversity of species, genes, habitats, communities and societies and the greatest diversity of links between species, genes, habitats, communities and societies.

Therefore, I strongly suggest that the BDP should incorporate as its core vision, diversity enhancement which I argue will not only make Birmingham the most forward green city in the world but also the most sustainable, the most resilient and the most healthy city in the world.

With respect to green belt policy, since evidence needs to be shown to determine which strategy options will enhance the diversity of the green belt the most. Suggested options are :-

- 1) A strategy of economic growth through human population increase that is facilitated by green belt boundary revisions, i.e. a human economic growth strategy
- 2) A strategy of actively enhancing green belt diversity with case by case evidenced-based social, economic, cultural, political and ecological assessments, i.e a steady-state human economic policy
- 3) A strategy of precaution which largely preserves the green belt as it is for the time being until such time as a comprehensive body of evidence exists in order to be better informed of how to manage diversity enhancement in the green belt, i.e a temporary human economic de-growth trajectory.

Many thanks

Steve Gwynne