

Stephen Gwynne – Birmingham Citizen

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?

I wish to propose a revision to the plan in general and to the existing green belt policy in particular since I wish to argue that the plan and the incorporated green belt policy does not demonstrate a bias in favour of sustainable development.

In very basic terms sustainable development (SD) is the creation of natural resources from natural resources since essentially this form of development replenishes the natural capital stock from which artificial resources can be made, whereas in very basic terms, unsustainable development (UnSD) is the creation of artificial resources from natural resources since essentially this form of development depletes the natural capital stock from which artificial resources can be made. Of course UnSD can be mitigated by recycling, upcycling and sharing activities which effectively slows down the rate of natural resource depletion but essentially the same logic applies since even if these activities are utilized to their most efficient degree, the functional value of artificial resources always depreciates over time whereas the functional value of natural resources always appreciates over time. Hence this simple framework identifies what can be classed as positive or sustainable development, i.e natural resource replenishment and what can be classed as negative or unsustainable development i.e natural resource depletion. Obviously human sustainability requires some level of natural resource-depletion but in order to constitute SD this must be compensated with natural resource-replenishment at the same time.

In this respect, sustainable economic development (being the generation and replenishment of natural capital) is absolutely essential in being able to deliver the homes, business and industrial units, infrastructure and the thriving local places that Birmingham needs as stated as one of the core planning principles within the NPPF but also to be able to satisfy the five guiding principles of SD as per the UK SD Strategy. Therefore, in order to demonstrate a bias in favour of SD, it is absolutely necessary for a plan to have as its primary vision, objective and strategy, natural resource replenishment at a level that is higher than the anticipated level of resource-depletion that is contained within a plan. As such a plan needs to give greater priority to the development of green infrastructure compared to the development of grey infrastructure.

Obviously the current Birmingham Development Plan (BDP) fails almost entirely to demonstrate a bias in favour of SD when viewed from this basic but straightforward framework since apart from a few minor mentions of the importance of allotments and community gardens (i.e food growing activities) and a few brief mentions of the need to enhance biodiversity there is no primary strategy that actively endeavours to generate natural resources at a scale that outweighs the anticipated levels of depletion which are significantly noticeable within the plan despite the fact that para15 of the NPPF clearly states that all plans should be based upon and reflect the presumption in favour of SD with clear policies that will guide how the presumption should be applied locally.

In fact, the BDP goes so far down the path of unsustainable development, i.e the depletion of natural resources, that even a sizeable part of the Green Belt at both Langley and Peddimore are to be given over to unsustainable development although they are erroneously referred to as sustainable when clearly they are not since neither of these green belt policies are associated with natural resource replenishment. In fact rather than being examples of sustainable development the opposite is true and not only is natural capital being destroyed in the form of active farmland but the unsustainable urban extension and its associated employment site wishes to facilitate and encourage yet even more resource-depletion activities and lifestyles within the Birmingham region. Obviously to actively encourage a policy of resource-depletion on what is currently valuable green infrastructure does not constitute exceptional or very special circumstances since this proposed green belt development in itself not only fails to demonstrate a bias in favour of SD but also fails to comply with the duty to identify priority areas for 'sustainable' economic regeneration, 'sustainable' infrastructure provision and environmental enhancement as per para22 of the NPPF.

In conclusion, in order to satisfy the need to create a plan that has a bias in favour of SD and simultaneously satisfy para22 of the NPPF, I propose that instead of developing the unsustainable urban extension at Langley and the associated grey employment sites at Peddimore, we maximise on the potential of Birmingham's Green Belt and create a Birmingham Green Belt Forest at these sites instead. This will ensure that in part measure at least, we are endeavouring to create some significant level of SD within the plan (and within the Birmingham region as a whole) by ensuring that our overall objective and vision within the plan is to replenish natural resources rather than deplete them. In this respect, let's use this exciting opportunity to create a plan that demonstrates a genuine bias towards sustainable economic development and not one that is biased towards unsustainable economic development.

Obviously it is a strategy of natural capital generation over and above natural capital depletion that will ensure that the plan is able to meet the needs of the present without compromising the ability of future generations to meet their own needs and so I also argue that a Birmingham Green Belt Forest would in itself, by virtue of its inherent sustainability, be able to fulfil the criteria of very special or exceptional circumstances that is required to justify developing on Green Belt land .

Lastly and very briefly I would like to mention that it might well be necessary to release further areas of Green Belt land in order to create a even larger Green Belt Forest in order that it can compensate for the anticipated levels of resource-depletion currently contained within the rest of the plan. This decision I imagine will require an evidence-based assessment to determine what size of forest would indeed compensate and so outweigh the anticipated levels of resource-depletion within the plan. However I feel it needs to be pointed out that if resource-depletion does outweigh resource-replenishment and further Green Belt land is not released for a Green Belt Forest, then in order for the plan to satisfy the bias in favour of SD, the only option would be to reduce the intended level of resource-depletion within the plan in order that the right balance between natural resource-replenishment and natural resource-depletion remains consistent with the UK SD Strategy.

Thank-you for listening