

Comments by Dr P Hoad on “Sustainability Appraisal of the Birmingham Development Plan, Revised Sustainability Report, March 2015”.

Introduction

This document is a response to the document “Sustainability Appraisal of the Birmingham Development Plan, Revised Sustainability Report, Birmingham City Council, March 2015.” This revised document has been provided for comment by the BDP Inspector. This document was provided on 24th March 2015 with comments having to be received by the programme officer by 10th April 2015.

However, the areas of comment have been limited to the following parts of the document:

- Section 5, all (pages 75-86);
- Appendix A, pages A8 & A9 only;
- Appendix B, all (pages B1-B10);
- Appendix C, pages C6 - C28 only;
- Appendix D, pages D14 - D16 only; and
- Non Technical Summary, Table Headed “Choice of Options over reasonable alternatives in respect of the SUE and Strategic Employment Site”, on pages viii - ix

The following sections are therefore titled according to the relevant section reviewed, together with a final summary.

Section 5 (pages 75-86)

Table 5.1 of the report provides a comparison of the Sustainability Appraisal for a 5,000 dwelling site and a 10,000 dwelling site. This comparison shows up some inconsistencies in the approach taken. For example, for sustainability objectives 12, 13 and 14 the conclusion is that a 5,000 dwelling site would have a neutral impact (as indicated by the character “0” on a yellow background) whilst a 10,000 dwelling site would be “Likely to be unsustainable and have minor adverse impacts on the SA Objective”. Yet a 10,000 dwelling area is merely two 5,000 dwelling sites. If having one 5,000 dwelling site has a neutral impact how is it that adding another one will then have a negative impact. The simple answer is that a 5,000 dwelling sites is not neutral, it would have a negative impact. Having a 10,000 dwelling site is then more neutral (roughly we could say twice as a bad overall or just as bad but over twice as large an area). This does demonstrate that the assessment is playing down potential impacts.

The limited additional information given in Appendix B which appears to provide the background to Table 5.1 gives no real explanation for this issue. For the 5,000 household development the following is claimed “Impacts on historic environment, with greater opportunity to minimise impacts by selecting a less-sensitive area.” For the 10,000 household development the following is claimed

“Additional impact through requirement to take areas with higher value assets.” So what the analysis would seem to be claiming is that with only 5,000 household to be built it is possible to pick and choose the bits of land taken to use only the worst bits of land, therefore not spoiling the area. Then only when the second 5,000 household are built does this selective approach not work and the development spills over into the better land. This is a very spurious approach. There is no diagram or other evidence to show how the land taken by the 5,000 household land is in anyway different to the land required for the 10,000 household developed (apart from its size).

The existing plans are for a solid block of land to be taken for around 5,000 households, the location being primarily dictated by the local transport network not the quality of the land. The idea that this has taken only the worst bits of land is hardly credible.

Similarly the 5,000 household scenario gives a positive result for sustainable transport whereas the 10,000 household scenario give a neutral result. Again, there seems no real logic for this. Whatever can be achieved for the first 5,000 households surely could be achieved for the second 5,000. Indeed given the likely economies of scale it is more likely that the larger scenario should give greater benefits.

The additional information in Appendix B would suggest that the Council believes that the 10,000 household development has a weakness that there would be a risk of “non-delivery of a critical mass of housing that would trigger the required level of infrastructure.” This seems to be an unusual stance for the Council to take, as it indicates that the Council does not believe in its own forecasts for population growth. Furthermore the council has made a commitment in BDP Policy TP27 (“The location of new housing”) which states “Proposals for new residential development should: ... Be adequately serviced by existing or new infrastructure which should be in place before the new housing is provided.” Hence the claimed problem is non-existent, the trigger being the decision to give approval for the development not the actual construction of the houses themselves.

The analysis would have been more informative if it had also considered a smaller development size that 5,000 households (for example taking 2,500 households as half the size of the current proposals rather than double the size at 10,000). The overall conclusion of the analysis seems to be that a 5,000 household development would be better than a 10,000 household development, which clearly comes down to the fact that the former is half the size of the latter. Given that the size is so important, then surely a site smaller than 5,000 households would be even better. By not undertaking this analysis the impression is that a 5,000 household size is by magic the best possible case. What is more likely is that a 5,000 household was the first size proposed and all subsequent analysis is aimed at justifying this choice.

Undertaking an analysis covering three different development sizes would have also required the Council to undertake a more rigorous analysis as there would be a greater requirement for internal consistency. As discussed above, going from 5,000 households to 10,000 households can change a positive impact (“+”) to a neutral impact (“0”), so would the Council have been prepared to say that reducing it to 2,500 households would have a very positive impact (“++”)?

Understanding Table 5.1 is also difficult as it is not clear the baseline against which the comparisons are being made. When measuring the impact of 5,000 dwellings, is this being compared against a scenario where there are no new dwellings at all, or where 5,000 dwellings are built elsewhere but

not as part of a “sustainable urban extension”; and if the latter where would such buildings be built, would they be on previously undeveloped land or would they be on brownfield land?

According to Table 5.1, in terms of the Pollution impact (objectives 15, 16, 17 and 18) a 5,000 dwelling site apparently is given a “+” mark, meaning that it is “Likely to be sustainable and contribute to the SA Objective”. Yet how can building houses on a Green Belt land be sustainable? This can only be if the Council is to take an attitude that sustainability will only be taken account of within certain limited areas, such as land that is currently Green Belt, while elsewhere it would be a case of letting development go ahead without any reference to sustainability. This would not be a realistic approach and seems more consistent with a bias in the analysis to come up with a conclusion that supports the original proposals of the City Council. The issue of sustainability should be taken into account everywhere within the city and not simply raised where it happens to be convenient to the Council. Otherwise we effectively seem to be blackmailed into releasing land on the Green Belt by the Council saying that if they can’t develop sustainably there then they will go ahead and build unsustainably elsewhere.

Beneath Table 5.1 there is a “Commentary on character and sustainability performance of the scenarios”. The second of the points made states “There is an absence of any evidence which shows how the traffic impacts from a larger development could be accommodated on the network. No agreement with the Highways Agency has been reached in respect of a larger scheme creating considerable uncertainty over the traffic impacts of a larger development.” Given that the Council has a traffic model which has been used with the BDP this supposed lack of evidence can only be due to the Council choosing not to undertake the analysis rather than any real problem in gathering the evidence. Updating the model to take account of the larger development size would hardly be difficult.

Having identified this problem the Council should therefore have undertaken the analysis rather than ignoring it. From the evidence previously submitted which shows that for the scenario currently proposed by the Council the network would not be able to cope, it would be inevitable that with 10,000 households placed on the Green Belt the road network it would be very much worse than it is now or with 5,000 households added. The Council’s decision to ignore this problem does seriously undermine the credibility of the analysis.

From the comment quoted above it is also clear that the Council sees the solution to the problem lying with Highways Agency. This should not be the case and it is up to the Council, as the relevant planning authority, to solve this problem. The Highways Agency is responsible for the England’s strategic road network not for resolving problems at new housing developments. Indeed the Highway’s Agency would have a responsibility for protecting the strategic road network from being clogged by large local developments and are hardly expected to promote new trunk roads just for the benefit of a new housing development.

The fourth point of the commentary (which is the second full bullet point on page 77) states “Concentrating development at one location would be more predictable with the provision of new infrastructure linked to specific trigger points within the phasing of delivery”. However this is in contradiction to the BDP. Policy TP27 (“The location of new housing”) of the BDP states “Proposals for new residential development should: ... Be adequately serviced by existing or new infrastructure which should be in place before the new housing is provided.” This is an important commitment

made by the Council in the BDP, and one that should not be ignored or lost. The Council has committed itself to a certain size of development and that the required infrastructure would be in place before the new housing starts. Therefore there should not be a case of trigger points and phased delivery. There is one trigger point and one phase, the fact that this all should be in place before a single house is built. This is an important aspect that would make 5,000 households more practical than 10,000 given the up-front costs of delivering the new infrastructure.

The fifth point of the commentary (which is the third full bullet point on page 77) states “A development of around 5,000 dwellings in a single location is preferable over a series of small sites because of the ability to deliver supporting infrastructure as part of a single masterplan which can be appropriately phased.” This is not correct. By breaking the desired 5,000 dwellings into smaller sites and spreading these through the city it is quite possible that the overall additional infrastructure required would be much reduced. In transport terms the Council have probably chosen the worst possible scenario by adding all the additional traffic in one location thereby overloading the local road network, a network which is already over-capacity. Breaking the development into smaller chunks would make it more likely to be able to accommodate these chunks into areas where the conditions are less problematic. With the city centre being such a major draw for jobs, greater allocation of new dwellings in and close to the city centre would be much more realistic.

The sixth point of the commentary (which is the fourth full bullet point on page 77) states “In its favour, a larger development will yield greater economic benefits to Birmingham through a larger workforce and household expenditure, and greater opportunities for the provision of affordable housing.” The Council has argued that the dwellings on the Green Belt are required for the city’s natural population growth, yet this statement indicates that the Council is seeking to increase the number of dwellings to encourage more growth and gain benefit from it, and that in this instance the assessment is definitely about increasing the population over and above its baseline expectations (which is inconsistent with other assessments).

The final paragraph of section 5.1 is obscured by a figure, as reproduced below, and so is not actually properly legible. This is something that should have been identified when the document was reviewed. The fact that this was not identified indicates that this document has not been read properly before issuing and this does beg the question whether this has been properly reviewed and understood by the Council and its consultants, and therefore undermines its credibility.



In light of the above characteristics, the overall conclusion is that an extension of road infrastructure provision associated with a development of up to 10,000 dwellings, on higher value land (greenfield, landscape and cultural heritage areas) would compromise

5.2 Assessment of Strategic Housing Sites



The opening of first paragraph of page 85 states “Concentration of the majority of growth on sustainable neighbourhoods will help to maintain and reinforce community vitality, and absorb pressures for the outward growth of the City.” The latter part of this sentence is clearly nonsensical. By allowing development on the Green belt land edge of the city, this is not absorbing pressures, it is giving way to or even increasing the pressure for outward growth of the City. There is nothing sustainable in this. The idea that the current proposals will “maintain and reinforce community

vitality” is pure speculation. The addition of such a vast housing estate will not in itself have anything to do with any community vitality. All around the city there are examples of housing developments where community facilities such as local shops were included and they often include boarded up units, graffiti and other signs of lack of vitality because they do not fit in with the actual needs of the local community. The City Council is merely repeating the mistakes of the past but by using the word “sustainable” somehow hope that something magical will happen and the past will not repeat itself.

The second bullet point of page 86 states “Close attention to design issues of areas and buildings will be critical in ensuring that high standards are achieved in practice, particularly in respect of ensuring the energy efficiency of new buildings, using opportunities to incorporate district heating networks, cycle and footpaths, and the incorporation of green infrastructure which serves multiple purposes.” The reference to high standards being “achieved in practice” is good reminder that with all the nice words that have been used in the policy documents and the supporting evidence, it all depends upon whether much notice is actually taken of this in practice. The common expectation is that once the go ahead has been given to building on Green Belt, this will revert to yet another housing estate like any other built in the City in the past and that it will be no more “sustainable than what has previously been placed on the Green Belt. The fact the Council’s own document raises this question no doubt reflects the ease with which the sustainable claims could be ignored in the future, and hardly gives local residents any confidence in the process.

The fourth and final bullet point of page 86 states “Clear links between housing and service provision and job creation as part of the concept of ‘sustainable neighbourhoods’ need to be established. Further work is required on establishing the form and function of such areas, in particular what changes to their current structure are needed to help create the conditions for more sustainable living and their integration with adjacent areas.” This is an odd statement to add at the end of this section. If there is evidence that there are clear links “between housing and service provision and job creation as part of the concept of ‘sustainable neighbourhoods’” then this should have been stated. If there is no evidence then none should be stated. Instead the Council seems to want to start making evidence for this, and to actively bias their analysis by setting out to establish supporting information for their case that does not exist at present. Had the report been impartially written it might at best have called for an investigation of any such links but this goes beyond this to predetermine what needs to be found.

Appendix A, pages A8 & A9 only

The summary for the Langley site set out in Table GA5, on page A8 does show a clear bias in favour of developing on Green Belt land. Under the pollution categories, this development apparently has a neutral impact which is clearly wrong. Turning agricultural land into houses and roads can hardly be considered to be environmentally neutral. Both during and after construction there will be negative impacts. Perfectly good top soil will be damaged if not removed completely by the building process. New house owners will have to take a lot of effort to establish their gardens. Therefore it is not credible to claim that the will be a neutral impact on soil quality.

Under the CO₂ emissions the development is claimed to have positive impact which is even more incredible. Why would placing new houses on the edge of the City be considered to have a positive effect on “Reduce the need to travel”? This can only increase the need for travel either when compared against not doing anything or compared against putting new houses closer to the city centre. The supposed positive impact on Sustainable Transport could only be justified by an approach that assumes that additional transport is to be provided regardless, and that the new population is being added there to pay for this, and if we didn’t have the population we would be left with the problem of paying for this unused infrastructure.

In the commentary beneath Table GA5 it is stated “The character of the development in respect of high quality design, the provision and use of sustainable transport, trip generation, and waste management for example, will determine its sustainability credentials, but these will only become apparent towards the end of the plan period and beyond.” This is quite unbelievable and undermines any credibility this development has of being “sustainable”. The development needs to be sustainable from day 1. As soon as the first building is begun, it should have been designed in a sustainable manner and the construction process should be a sustainable one. By the time the first resident takes possession the sustainability of the development should have been established. The Langley area is due to be developed well before the time horizon of the plan period, and hence stating that the development will not be sustainable until towards the end of the plan period is effectively to admit that the development is not sustainable. What does the Council expect to happen between the construction of the development and the subsequent achievement of sustainability? Are all the residents to settle in to perfectly ordinary houses, and get used to driving to work etc. and behaving like anywhere else in an unsustainable manner, and then one day something magical happens and everyone changes how they live.

This indicates that the development is not really sustainable and the Council is hoping to delay the point at which serious measures have to be implemented, or as is more likely the case never actually implement them (the “sustainable” credentials merely being a method of releasing the land rather than being seriously considered).

Table GA6, on page A9, has similar flaws to those identified with Table GA5. Again despite converting green-field land into an industrial area, this is claimed to have a neutral impact on the environment, which is quite unbelievable. It also claims a positive impact in terms of Natural Landscape. How it can be seriously considered that changing the existing vista of green fields into an industrial site, which at best would comprise a series of large concrete and metal boxes, would be a positive impact is impossible to comprehend. Again this demonstrates how poorly this assessment has been considered and how it is fundamentally biased in favour of development.

In the commentary under Table GA6 it states “There are negative sustainability effects such as loss of greenfield land, the historic environment and climate change ...” yet in the table the impact on the Natural Landscape (Objective 13) has been put as positive, the impact on the Built and Historical Environment has been put as neutral and the impact on climate change is put as neutral. Therefore the text in the commentary is inconsistent with the table it is supposed to be commenting on (and the commentary appears to give the more honest assessment). This mismatch between text and table suggests that the table has not been thought through correctly and is not supported by any actual substance.

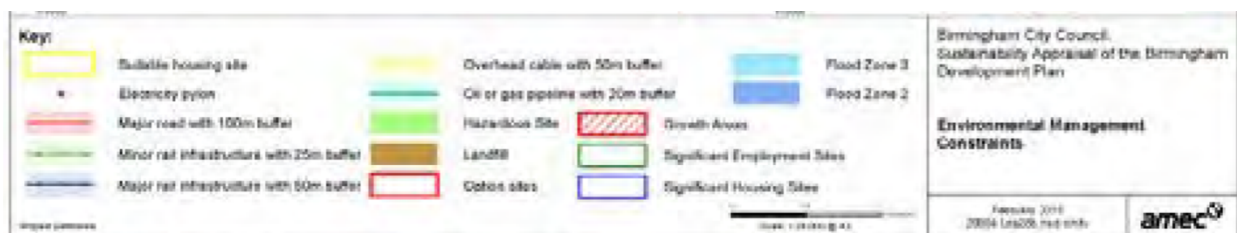
In the commentary, the only positive thing that can be said about the site is that it is close to the motorway. However there are many areas much closer to the motorway and accessed by much better roads.

Appendix B, all (pages B1-B10)

Comments on statements made in Appendix B are included in the comments on Section 5 (pages 75-86).

Appendix C, pages C6 - C28 only

The quality of the plans provided in this section is very poor. Too large an area has been covered in a single plan which has then been given inadequate space on the page (in particular by placing two such plans on each page). The images seem to derive from a jpeg or other format where resolution is lost in order to minimise file size. This means some text is unreadable (for example the scale, or even the Ordnance Survey Licence number for which there is a legal requirement to include). This shows a lack of care in producing information of sufficient quality to back up the Council's case, and a failure of the Council to properly read the document that has been produced in its name. The image below is an example from page C8 showing how unreadable the text is.



On Page C12, for Objective 6 “Reduce the need to travel: Ensure development reduces the need to travel” Area A1 is considered to be likely to be unsustainable, whilst area A2 is considered to be likely to be sustainable. With the two combined the conclusion is that they would be likely to be sustainable. Yet Areas A1 and A2 are next to each other and hardly of much significant different. Why there should be such a significant difference on the need to travel between these two adjacent areas is not explained. Similarly on page C16 areas B1 and B2 which are adjacent to one another are assessed differently: developing B1 is considered to be neutral in terms of travel, but B2 is positive, and with the two combined it is considered positive. This is all nonsensical and shows that the assessment has been conducted in a very arbitrary way.

Appendix D, pages D14 - D16 only

On page D14 under objective 5 (Sustainable Transport), both Area D and Area C are judged to be neutral. Yet the commentary clearly identified that there is “Poor access to rail stations (Sutton 5km), but good access to the strategic road network (A38) which could encourage car travel.” Therefore this can hardly be considered neutral. Instead it should be likely to be unsustainable. This

commentary correctly identifies the close proximity of the A38 but fails to mention the M42, the close proximity of which is claimed in Table GA6 to be of benefit to Site D. The analysis is therefore inconsistent and seems to be selectively choosing facts to suit the final outcome.

Non Technical Summary, Table Headed “Choice of Options over reasonable alternatives in respect of the SUE and Strategic Employment Site”, on pages viii – ix

The first part of this table compares a 5,000 household development with a 10,000 household development. This summary states the obvious in that the smaller development has a smaller impact, with less cumulative impact on landscape, biodiversity, cultural heritage and the current road infrastructure. The issue of the impact on the current road structure however is not a clear as would appear in this summary table as this issue has not actually been investigated properly. In the commentary for Table 5.1 it is stated that “There is an absence of any evidence which shows how the traffic impacts from a larger development could be accommodated on the network.” This essentially means that the issue has not been looked at rather than evidence being found that this traffic could not be accommodated. Given the Council currently claims that the additional traffic from the current proposals (of 6,000 households) can be accommodated within the existing road network it seems unusual that this seems to be an absolute problem with a slightly larger site.

The rejection of a 10,000 household development seems also to lie on claimed uncertainties over the future provision of infrastructure. Why this should be more uncertain than for the 5,000 household development is not clear. For each development there should be a proper assessment of the needs of the development. The uncertainties in each case should be the same.

At the bottom of page ix it is stated “Concentration of the majority of growth on sustainable neighbourhoods throughout the City will help to maintain and reinforce community vitality, and absorb pressures for the outward growth of the City.” As identified elsewhere, building on Green Belt land will not “absorb pressures for the outward growth of the City” but actually encourage it. The paragraph also states “Concentrating development in existing centres provides wider sustainability benefits through limiting the need to travel (particularly cross-town trips), providing alternative travel options based around public transport, walking and cycling, and in so doing reducing air pollution.” The release of Green Belt land is not an example of development in an “existing centre”. This will be a wholly new area of development.

Summary

Overall the information provided in this document shows that the analysis has been undertaken in an inconsistent manner, the only real consistency in it being the bias towards the development of Green Belt land and the justification after the fact of the choice of areas C and D for future development.

The text ignores an explicit commitment by Birmingham City Council set out in Policy TP27, that any new infrastructure required for new housing will be in place before any development takes place. Instead it seeks to argue some sort of phased development to support its view that there will be some form of uncertainty if the Council should decide to choose a larger area to develop.

Furthermore it undermines the credibility of the claimed sustainable nature of the new developments. The commentary beneath Table GA5 states “The character of the development in respect of high quality design, the provision and use of sustainable transport, trip generation, and waste management for example, will determine its sustainability credentials, but these will only become apparent towards the end of the plan period and beyond.” If the site is to be sustainable it must be sustainable from its very inception, not at some vague point in the future, especially if this is beyond the timeframe of the current BDP.

It is quite understandable that the new development would not actually be sustainable, as the council has been claiming, so in part this revelation is less of a surprise. What is odd is how the council expects this sustainability to increase over time. Is there going to be some new that the first houses to be built will have garages but those built later on will not (and may not even have their own drive to park their car)? Is the Council going to encourage occupancy to begin with and then impose some penalty later on? Encouraging people to use more sustainable modes of travel or to adopt more sustainable lifestyles would need to begin as soon as people take occupancy, not some time later. If there is going to be some delayed intervention, then surely this would be possible to do for existing developments and hence any part of Birmingham could be considered to be “sustainable” and the Langley site would no longer be special.

It is at least refreshing that the Council should admit that at present the “sustainability credentials” of the development are not apparent. However, the Council needs to take the next step and understand that this is because the “sustainability credentials” of the development are non-existent. The analysis shows no objectivity in its findings and positive impacts seem to have been plucked out of thin air. How changing perfectly good agricultural land into a housing development can be considered sustainable given the inevitable impact of increased pollution (to air, land, noise, etc.) and subsequent loss of soil quality and increase in CO₂ emissions is hard to understand. Instead it seems that there has been a bias towards claiming any change to be sustainable. The impression the reader gets is that this study was undertaken by a housing developer who can look at a mass of houses and think that this is the natural state of the world, but is made unwell by the sight of a green field.

The poor quality of the analysis and bias towards concluding sustainable impacts is shown up in the comparison of a 5,000 household site with a 10,000 household site. The analysis for the 5,000 household site repeatedly finds positive impacts, yet when the additional 5,000 households are then included for the large total somehow these positive impacts are lost, so that the while first 5,000 households seem to have a positive effect the next 5,000 have a negative effect, showing the lack of rigour and consistency in the assessment.

There is a claim that somehow “A larger development will take more sensitive land (i.e. greenfield land with cumulative impacts on landscape, biodiversity and historic environment resources)”. This is an unsubstantiated claim as the area required to be used for the 5,000 or 10,000 is not identified. This land might be related to the area required for the Langley development, yet as this is for about

6,000 houses so a smaller area would need to be identified for the 5,000 households and a larger area for the 10,000. Only when such areas are identified could a proper analysis be undertaken. For example, does the area taken for the 10,000 households but not taken for the 5,000 households actually be any different in quality etc.?

The areas used for the comparisons should also be defined so that it is clear that the analysis is not simply “cherry picking” the possible benefits, by assuming a different area of development as they see fit under each of the objectives. For example, it might be possible to choose an area that contains what is considered to be the worst land and for this to accommodate 5,000 households, but having identified that land how does it relate to the other objectives? It may be poorly connected to transport for example, or have less “Sense of Place”. The analysis would have had to have been undertaken by a number of individuals, each expert in the objectives that the sites were assessed under. (The scope of such objectives is such that a relatively large group of people would be required to cover all aspects with confidence.) Each individual could easily look at the total available area and choose a very specific area that best fits their speciality and objective(s), and this would be the inevitable result without any overall plan that explicitly identified the two areas being considered in the comparison. If such a plan existed it should have been presented as part of the supporting evidence. No such plan has been produced and hence it must be concluded that it does not and has never existed, and as a result the analysis is of no real value.

The lack of any substantive plan to consider the impact of the development follows on from the Langley proposals, where no plan has been submitted to show how the site could be laid out and all the facilities provided. Under Policy GA5 of the BDP, for Langley the Council has claimed that “The development will need to achieve the highest standards of sustainability including the use of low carbon energy generating technologies such as Combined Heat and Power.” How it will be possible to locate a CHP Station within the Langley site and then get people to live next to a power station is unclear, unless a massive amount of land is given over to provide a buffer zone around it. Though of course, the most likely outcome is that such a power station would never be built. If the Council actually put the ideas into plans the various ideas might become more concrete and it might be found, for example, that a 10,000 household site is more conducive to having a CHP plant than a 5,000 household site, but which in turn would then require proportionately more land to accommodate it (which might mitigate against the potential benefits of the CHP station). Without putting things on paper such matters cannot be considered correctly.

This lack of substantive information against which to check how the analysis has been derived means there is no way to check what the Council committed to in this analysis, and therefore there is no way to check the consistency between different assessments as well as checking that these commitments are adhered to in the future. As discussed above, the Council has alluded to their being a Combined Heat and Power station to support the Langley development, which would contribute to its sustainable credentials (indeed it is the only real evidence of any sustainability within the development) yet in the BDP this is couched in a very ambiguous fashion i.e. “The development will need to achieve the highest standards of sustainability including the use of low carbon energy generating technologies such as Combined Heat and Power.” There is no actual absolute commitment and the use of phrases such as “will need to” rather than “will have”, and “such as” mean that the Council has not really stated they will do anything different to any previous development on the Green Belt. Also, just because a method of generating power is “low carbon

energy” does not make it sustainable. After all, under this assertion we could well be getting a nuclear power station with all the associated problems.

With the Council failing to make any firm commitments how can the Council be held to account if and when what actually is built on the ground differs from what the assessment assumed. The process needs to be transparent and traceable, not something that is kept behind closed doors. Without this substantiation this report is merely an interesting collection of tables with abstract symbols and colours. Rather than answering any questions, after going through the report the reader is left even less informed and wondering what exactly was being considered

Ultimately the fact that the areas considered in this 5,000 vs 10,000 analysis have not been defined destroys any credibility of the analysis. After all, how is it possible to assess an area if that area has never been defined, let alone compare two areas if neither area has been defined?

Therefore, overall the document does not provide any confidence in the process that has been undertaken with regard to sustainable development.