

Chris Rose  
15 Thirlmere Rd., Barnehurst.  
DA7 6PU  
07590 046502 / [chrisrose@gn.apc.org](mailto:chrisrose@gn.apc.org)  
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Attention: [spandtteam@bexley.gov.uk](mailto:spandtteam@bexley.gov.uk)  
Deadline 5<sup>th</sup> Sept



As if the earth really mattered

## AN ALTERNATIVE 'GROWTH' STRATEGY

### **Bexley Natural Environment Forum's response to Bexley Council's 'Bexley's Growth strategy – Our emerging vision'.**

**Bexley Natural Environment Forum's** is the umbrella body for Friends of Parks and Open Spaces groups, local wildlife experts and conservationists and sustainability campaigners in the Borough. We campaign for the protection, restoration and enhancement of sites and habitats across Bexley for the benefit of wildlife and people, and deliver thousands of hours of volunteer work per annum to that end.

### **Introduction and principles**

We reject the Council's 'Growth' strategy, which promotes wholly the wrong direction of travel, being based as it is on the damaging and unsustainable model of never-ending resource-consumption-growth, more traffic and more concrete. This is again at odds with the claim of sustainability that was at the heart of the Local Development Framework. That document was itself internally flawed, providing no credible, resource-costed evidence that it would meet the sustainability objective, and should have been rejected by HM Inspectorate for failing to meet the required 'evidence base' test.

We are told at one and the same time that 'there is no alternative' to the Council's prescription, unyet it clearly believes that public policy can then affect the outcomes. We reject this fundamental determinism and woeful lack of leadership on the greatest underlying issue of our time, which is to move from the UK's three-planet lifestyle to one that can be safely sustained within the one-planet resource limit that actually applies in the real world, and that does not depend on exporting our excessive ecological footprint abroad or off-loading the burden of cost into the diminished options that will be left for future generations and the very existence of other species.

We reject the implied Micawberish 'something will turn up' approach to resource constraints which can only become more problematic as other nations chase after our historic 'development' model, including the embedded assumption that we can keep 'inventing' ever more land within which to squeeze and juggle a variety of ever-growing and competing demands. We are where we are because of a cascade through time of myriad conscious decisions made by politicians and others. We can, by the same means, deliver a different future if we so choose.

## **Our seven principles**

**1)** We believe that having failed to halt biodiversity loss by the previously agreed date of 2010, the UK Government, among many others, was right to sign up to the 'Aichi Targets' set out in the Strategic Plan for Biodiversity 2011–2020 under the Convention on Biological Diversity (CBD)

<http://www.cbd.int/doc/strategic-plan/2011-2020/Aichi-Targets-EN.pdf>

Target 4: By 2020, at the latest, Governments, business and stakeholders at all levels have taken steps to achieve or have implemented plans for sustainable production and consumption and have kept the impacts of use of natural resources well within safe ecological limits.

We hold that Bexley Council is part of government, or at least a 'stakeholder', and should work to reduce its ecological footprint accordingly in line with the commitment this country has made to the rest of the world. We accept that the economy is a wholly-owned subsidiary of the environment and not, as Bexley Council clearly believes, the other way around. Significant changes in our economic goals and practices are therefore required.

**2)** We support contraction and convergence, whereby those over-consuming reduce consumption to sustainable levels, and resources are re-distributed to ensure equitable shares of the (materially) smaller cake – prioritising the least well off (at home and abroad) who may need to consume more, and with an increased emphasis on quality of life. There would be a net decrease in resource consumption. Many things can and should increase, but the list will not be headed by concrete.

**3)** To ensure that 'de-growth' is supported, investment should be channelled towards actions, technologies and processes that will significantly reduce our impact on the environment, through reducing resource consumption and the efficiency of use (and re-use) of what we do take. Polluting by-products and wastes should be progressively reduced, and those that cannot be safely dealt with by biological processes eliminated.

**4)** A sense of urgency is required, but the benefits of a shift to true sustainability will be delivered over a transition period. The benefits in terms of improving the energy and water efficiency of homes should be directed at the less well off first, and key habitats such as the marshes should have priority for enlargement as Bexley's Local Development Framework policy of a managed decline in the need for, and a consolidation of industrial land comes into play.

**5)** To ensure that we are getting maximum benefit from the investment put into these changes, the accounting methodology should shift to take factor in better measures of 'economic progress' and well-being, get away from Gross Domestic Product (which bundles up any activity, good or bad, as 'positive') and place a strong emphasis on longer term environmental and social costs, not just goods and money.

**6)** To ensure neighbourhoods are maintained where people want to live and work throughout their lives, to protect lasting places which are attractive, accessible and safe, and to safeguard the things that already make Bexley a good place to live and work requires grown up dialogue with the public about all the 'human want' pressures that are working against this, and what fair, transparent and consensual steps can be taken to diminish those. In doing so we should also bear in mind the impact that at our own multi-planet lifestyle has on other parts of the world. We do not believe that the 'vision' of a never-ending tide of 'development', embodied and effectively accepted by Bexley Council as the underlying philosophy behind this document, can achieve these aspirations. We instead wish to see a future in which we help repair, extend and enhance places which deliver ecosystem services, provide homes for our fellow species and greater physical and mental well-being for our citizens.

**7)** To achieve what needs to be done - embracing the life-support system limits of our planet, and delivering happy fulfilling lives within that reality - requires harnessing the talent, creativity and ingenuity of our residents, and the development of new ways of thinking and application of existing skills to different ends, as well as the learning of new ones. We see this as a life-affirming challenge and not a backward-looking encumbrance.

**Some of the positive changes we want to see would include, but not be limited to:**

- We wish to see a growth in water security by recognising natural limits, rather than expecting demand to be satiated by construction of expensive reservoirs elsewhere in the country, by piping water from the north or through other energy-intensive technical fixes that cannot be covered from purely renewable sources. This would include rainwater capture and grey water recycling retrofits, and as a required standard in all new build, as well as green or brown roofs to reduce run-off rates. This would cut demand, decrease flood risk – as would a ‘starter’ policy of no net reduction in the amount of permeable surfaces (which Islington Council adopted) - and prevent damaging over-abstraction (as has happened on the Darent). Natural England’s ‘State of the Natural Environment 2008’ report said that ‘population increases and other social changes, such as more single-person households (see Section 5.1.2.1), will increase the demand for water. These effects will be most apparent in south-eastern England, the driest part of the country, exacerbating existing impacts and further jeopardising water-dependent habitats and species that require adequate water to adapt to the impacts of climate change.’ Thames Water has told a Council scrutiny committee that compulsory metering will likely only reduce demand by 10% and will not on its own head off the need for new reservoir capacity. There is no reference to this critical issue in the ‘Growth’ leaflet.

- We see a necessity for increased food security, and a shift away from cultivation and distribution systems based on fossil fuels. The UK imports 40% of its food, and 75% of its biofuels (DEFRA/JNCC figures). All the trends point to rising food prices in the medium to long term. Allotments should be absolutely protected from ‘development’ and new growing areas established in places where this would probably benefit wildlife, as well as people, such as on currently mown ‘lawns’ around housing estates and on school fields, which latter would also have educational benefits. There is no reference to this critical issue in the ‘Growth’ leaflet.

- We support growth towards greater energy independence and security by ramping up measures to cut energy use and initiatives such as facilitating the setting up of community-owned renewable energy companies to rent local roofs for solar panels with profits shared between the property owners and the community, with a return in interest on any loans boosting public coffers. See:

[http://www.greenwisebusiness.co.uk/news/oxford-city-council-signs-pioneering-investment-deal-with-renewable-energy-firm-4398.aspx#.U\\_8pUcVdWSo](http://www.greenwisebusiness.co.uk/news/oxford-city-council-signs-pioneering-investment-deal-with-renewable-energy-firm-4398.aspx#.U_8pUcVdWSo)

<http://www.morerenewables.co.uk/>

Apart from a vacuous statement that ‘We will also need to make sure that this growth is properly supported by the right infrastructure ...’ there is no reference in the ‘Growth’ leaflet to how the increase in energy demand that will be generated by 22,000 new homes can be squared with the large net cuts in carbon dioxide emissions required.

Any new homes should be to Passivhaus standards, not the Government’s water-downed approach to ‘zero carbon’ buildings.

- We want to see greater ambition on recycling, including an explicit commitment to become a 'zero waste' Borough, with plans not just for a major increase in the recycling rate (46% - nearly half - of all waste collected here is still thrown away) BUT ALSO in the local availability of recycled products, creating more sustainable local jobs. Recycling alone is not the answer as it uses energy, and if you are recycling 10% more of 50% more stuff you are not reducing your ecological footprint. The hierarchy is reduce, re-use then recycle, and this is conveniently being forgotten. Where national legislation is lacking, the Council should talk to local businesses about the costs of waste and litter and seek voluntary schemes to reduce unnecessary bags and packaging etc. Ultimately, we need to move to a position where by and large, if it is not recyclable here, it can't be sold here.

- We support a growth in air quality
- We want greater safety on our streets
- We wish to see an increase, not ongoing decrease, in the aesthetic qualities of our neighbourhoods and the amount of wildlife they can support

For these reasons we wish to see a reduction in vehicular traffic and traffic speed, supporting a decrease in congestion, pollution, vehicle ownership and reversal of the loss of front gardens to car parking.

- We support greater substitution of private transport by public transport as part of an overall plan to reduce fossil fuel use, and to increase land-use efficiency by reducing the amount swallowed up by what will be low priority uses such as parking spaces. There should be more emphasis on increasing modal shift to walking and cycling, and the use of technology to reduce the need for office workers to spend hours a day travelling.

- We ask for an increase in the number of stars that can be seen, restoring the birthright of our residents to see the marvels of the night sky, by turning off street lights (between, say, the hours of 1-5am) in residential and non-safety critical areas, prioritising streets that would help create corridors between important wildlife sites for the movement of nocturnal animals. This would also save significant amounts of money at a time of major budget cuts.

- We wish to see an improvement in the ecological quality of our designated Sites of Importance for Nature Conservation, some of which the 2013 review has identified as being degraded, rather than fudging the issue by proposing that some such parts are simply taken outside of the boundaries. There should be guidance for private owners of such sites, some of whom have badly damaged sites, perhaps through having insufficient information. There should be an ambition to improve lower ranked sites to a higher grade, and bring other open spaces up to a level where they too qualify for SINC status.

- We want a growth in the size of key wildlife sites, such as the marshes, which have been repeatedly chipped away at by new development approvals. This can be achieved by allowing adjacent brownfield to return to nature rather than building on it, such as at Erith Marshes, as the Council's policy on the reduced need for industrial land and consolidation of it comes into effect. We should look for opportunities to establish new strategic ground-level and light-pollution-reduced corridors between key sites/habitats as land becomes vacant. Some of the corridors proposed in the 2013 SINC review are really 'stepping stones' for species that can and do fly strongly, and over larger distances. They are no great advance for Hedgehogs, Toads, Slow Worms and the like.

- We wish to see an increase in the ecological integrity of rivers by digging more sections out of the concrete (Wansunt) and removing the Vitbe mill sluice (Cray).

- We want a growth in biomass (the amount of plants and animals) in the Borough. Big gains can be made in seeds and insect numbers, and from there birds and bats, by cutting less vegetation and less often, and by more sophisticated management regimes where these would be beneficial (paid for by doing less overall). Bexley Council claims that it wishes to protect and

enhance biodiversity in parks and open spaces. DEFRA makes it clear that biodiversity includes not just the numbers of species, but population ranges and sizes. The 'State of nature' report 2013 found that of 3,148 species monitored, 60% have declined over the last 50 years, and 31% have declined strongly. We are doing long-term damage to the web of life in our country that runs both deep and wide. Tinkering around the edges with schemes to try and revive the fortunes of a handful of species are no more than a short-term and very limited fix. Middle-aged residents of the Borough will remember when butterflies, Sparrows and Starlings were all much more numerous. We should seek to bring the 'landscape' approach to conservation into the city. That means protecting and expanding what we have, not quintupling the projected house-building numbers.

- We wish to see greater public engagement in protecting and restoring the environment around us. That needs improved education in hard resource realities and management, ecology, planning, finance and the workings of political processes, as well as how these issues intersect.

- We see it as particularly important to ensure that children are immersed in nature, and not wrapped in too much cotton wool.

- There needs to be greater emphasis placed on delivering Biodiversity Action Plans, including those that are in the hands of the Council (rather than volunteers) and are currently stalled, such as allowing woodland edge 'bleed out' (transitional scrub) and (re-)creating additional heathland sites.

- As part of this we wish to see a growth in the number of active Friends Groups for parks and open spaces, which can help deliver biodiversity-enhancing management work and other improvements that will benefit users. We are seeking to play an active part in this by various means, including our web platforms at:

<http://www.bexleywildlife.org/>

<https://www.facebook.com/pages/Bexley-Wildlife/177977672396633>

- We look to improved physical and mental health from these changes, which would result in less stress, more pleasant areas to live in, more exercise and better connection with nature.

## **Our objections to and concerns about specific proposals**

### **Housing allocations**

BNEF members sat through the Local Development Framework examination in public, and listened to Council Officers telling us what a good job they had done in holding down the number of dwellings projected in the plan to what they thought was a reasonable limit that would avoid excessive 'over-development'. According to Appendix A on p108, the total estimated housing allocation for the Borough was 4,545 by 2026, with 438 in Belvedere. This figure was accepted as adequate by HM Inspectorate, and published by the Council only 2.5 years ago.

We are now being asked to comment on a 'Growth Strategy' leaflet in which that figure has magically jumped - without explanation - nearly fivefold to 22,000, with 11,000 of these (22x what the LDF claimed) in Belvedere. Whilst stating that these are numbers that the Council has calculated could be squeezed in during the period, the implication is clearly that the Council supports and wishes to see those numbers come to fruition in practice.

These numbers were not in anyone's 2014 local election manifestos. In any case these figures make a mockery of the LDF 'public consultation'/'agreement', and represent a serious breach of public trust on that process, and in turn undermines faith in the Detailed Policies and Sites consultation that closed in autumn 2013 and for some reason will not be discussed in public until sometime in 2015.

In the light of the huge discrepancy in these figures (notwithstanding the extra 4 year time period covered by the latter document), we think the Council should re-open a proper, honest and open public consultation about these numbers, with all the relevant data on the table.

You do not publish such large changes in numbers without first having produced a site-by-site list of exactly how many houses you think you can fit where to back them up. BNEF wrote to the Council asking for a copy of this list on 23<sup>rd</sup> August. On 26<sup>th</sup> August we wrote asking for an explanation of the vast discrepancy between the figures in the LDF and those in the 'Growth strategy'. As of September 1<sup>st</sup>, we have not received a reply to either letter.

### **Flood risk**

We are very concerned by the worrying reference to 'The addressing of barriers to development such as flood risk'. This smacks very strongly of taking us away from what we should be doing, which is working with the flow of nature by restoring the ecological integrity of local rivers and their floodplains as much as possible, and instead going back to 'hard engineering' solutions in which the wider environment is a 'problem' to be fixed. The Council has already flunked the opportunity to carry out river restoration at the BT Island site in Crayford, despite our representations on the matter, and contrary to the effort it has made through Riverside gardens. Instead it has prioritised maximising retail space and car-parking. The Council needs to clarify its commitment to the implementation of the Water Framework Directive, which includes hydromorphological quality such as river bank structure, river continuity and substrate of the river bed.

### **Biased questions / presentation**

Some of the questions are grossly biased, for example:

'2. Given that this change is happening now and is set to continue, to what extent do you agree that the Council should plan for more homes and jobs so we get the most benefit?'

Assumes there is no alternative. Ever.

'4. Do you think that new crossings are needed across the River Thames between the Blackwall Tunnel and the Dartford Crossing to support new and better houses and jobs?'

Clearly loaded, and gives the Council the get-out of saying that they are still needed for some other reason, so it can ignore all the 'nos'.

'6. Please indicate which river crossings you would support and why.'

No option to reject any bridge.

In addition, the bridge in the leaflet's cover illustration is clearly a crass attempt to (sub)consciously sway public opinion on this controversial issue, and a matter on which the Council was until very recently clearly opposed in practice, because you can't have more bridges without the increase in traffic that the Council was implacably against.

Here is Gareth Bacon as recently as May 2013:

<http://www.bbc.co.uk/news/uk-england-london-22499647>.

‘Mr Bacon urged Mr [Boris] Johnson to "rule out a fixed-link crossing in that area".

Mr Bacon, who is also a councillor for Bexley in south-east London, said he is not opposed to a crossing somewhere in east London, but that the roads in his borough were "simply too small" to support the traffic from a new bridge.

"One of the principal roads is little more than a country track," he said.’

We call upon the Council to clarify its position and the reasons for the apparent change, and to promise that there will be no new roads, or widening of existing roads, through Sites of Importance for Nature Conservation or other open spaces or that will prejudice the reconnection of such sites through the (re-)creation of ground-level habitat corridors.

We contend that all of this is a serious misuse of taxpayer’s money, and note that TfL are in any case carrying out yet another ‘consultation’ of their own on these crossing/bridge proposals at this time.

### **Fundamental omissions**

The ‘environment’ is only mentioned 3 times, and two of those mentions make exactly the same point about air quality, the third is essentially about improving poor residential surroundings – both of which matters are caused by the policies advocated in this leaflet. There are no explicit references to the ‘natural’ environment or biodiversity, simply a vague implication that we may generously let a bit of these things survive by ‘safeguard[ing] the things that already make Bexley a good place to live and work ’ – but it is not clear what the Council truly believes these things to be. It is apparently going to ‘direct growth .... away from valued open space’, whatever that means when it is supporting plans for 700 houses on the Grade 1 SINC at Erith Quarry.

There is no real acknowledgement of the major environmental costs of ‘growth’ and no recognition of the importance of protecting and restoring ecosystem services.

There is nothing about pushing the boat out in terms of sustainability standards.

This leaflet says it all about the Council’s current concerns (or lack of them). Cut Bexley’s priorities to a 3 page summary, and wildlife and the environment disappear, which pretty much tallies with the low priority and subservient status given to these matters in the major strategic planning documents.

Despite the implication that the authors are the best people to save us from any possible negative effects (which by implication they clearly see as minor) of trends they pretend are beyond their control, the reality is that they actively support them. This is not ‘Vision’, it is either collaboration, or at best capitulation. It is certainly not the leadership required in the second decade of the 21<sup>st</sup> century

### **An end to net ‘growth’**

It is widely held that the UK is significantly exceeding the limits which it has now signed up to meeting under the Convention on Biological Diversity, referenced above.



See, for example, the World Wildlife Fund's One Planet Future webpage:

[http://www.wwf.org.uk/about\\_wwf/building\\_a\\_one\\_planet\\_future.cfm](http://www.wwf.org.uk/about_wwf/building_a_one_planet_future.cfm)

'If everyone in the world consumed natural resources and generated carbon dioxide at the rate we do in the UK, we'd need three planets – not just one – to support us. The impacts – not least climate change, deforestation and the loss of numerous species – are already starting to affect us all.'

The New Economics Foundation's 2010 'Growth isn't possible' report found that environmental constraints were real and immediate. The NEF also argued

<http://www.neweconomics.org/gen/ecological-debt-day-250909.aspx>

that the UK entered 'ecological debt' for the year 2009 on Easter Sunday, and the world as a whole on 25 September of that year.

In June 2012 the world's 105 science academies – including the Royal Society, the UK's national academy of science produced a statement highlighting the global challenges of population and consumption and calling upon world leaders to take decisive action.

<http://royalsociety.org/news/iap-population-consumption/>

The Royal Society made it clear that 'The most developed and the emerging economies must stabilise and then reduce material consumption levels'.

The onus is clearly on the UK, as the sixth richest in the world, and one of the most grossly over-consuming countries, to significantly cut resource consumption. The required cut would appear to be of the order of two thirds.

## **Real world**

We need a vision rooted in the real world, not a myopic continuation of the 20<sup>th</sup> century approach in which there are supposedly infinite resources to be consumed by infinite numbers of people. One that is about delivering true sustainability, not Bexley's negative and irrational prospectus of a sustained and never-ending growth in resource consumption and concrete that can only degrade the environment further. The alternative is a necessary, but also a richer and more fulfilling future.

**US social scientist Kenneth Boulding : 'If you believe exponential growth can go on in a finite world, you are either a madman or an economist'.**