

British National Party
Election Agent's Office
13 Nelson Street
King's Lynn PE30 5DY
edith_crowther@yahoo.co.uk

Greater Norwich Development Partnership (GNDP)
c/o Programme Officer
1 Lower Farm Cottages
Puttock End, Belchamp Water, Sudbury, Suffolk
CO10 7BA

2nd February, 2011

Examination of JCS – Broadland, Norwich and South Norfolk Council
REPRESENTOR I.D. 11743 – British National Party

RESPONSE TO INSPECTOR'S PROPOSED CHANGES
IC7 - *Soundness Changes and amended Green Infrastructure diagrams*

1) The changes made here by the Inspector are a ray of hope. They may not appear highly significant, but they are, because they shift the balance of power – ever so slightly, but perceptibly – towards the natural world and away from economic growth in a Local Authority Planning context.

This is obedient to DEFRA's 2010 definition of "Sustainability", which puts *Living Within Environmental Limits and Ensuring a Strong, Healthy and Just Society* **above** *Achieving a Sustainable Economy, Using Sound Science Responsibly, and Promoting Good Governance*. DEFRA in turn is obedient to more than one EU and UN law, and in any case the UK as a nation has since the 1960s been a leader, not a follower, in environmental matters since we are typically a nation of wildlife and nature lovers.

As Natural England point out in their Response to IC7, the addition of the Biodiversity Enhancement Map and the Green Infrastructure Network Map provide impetus to their perception (which many share) that such documents "should be seen as more than just an evidence base for the core strategy". The documents pinpoint opportunities to prevent further fragmentation of wildlife habitats – and "wildlife" is not just the species on the Red List, it is the thousands of species native to Britain, and Norfolk in particular, all of which apart from a few tenacious species are threatened by overdevelopment.

It is the built environment which needs to occur in small patches, not the Natural Green Space and its peacefully coexisting network of non-intensive farms. I note that Natural England remark in their Response that certain "vulnerable designated sites and species [are] already under pressure from excessive visitor disturbance" – this will not be alleviated by provision or restoration of further Natural

Green Space unless at the same time the population of humans is allowed to decrease naturally, by simply not providing any more built environment for humans to fill.

2) The World Charter for Nature 1982 urged at Article 24: “Each person has a duty to act in accordance with the provisions of the present Charter; acting individually, in association with others or through participation in the political process, each person shall strive to ensure that the objectives and requirements of the present Charter are met.”

The Planning Inspector has fulfilled this Article within his narrow remit to the best of his ability – it is now up to the thousands of others who have a say in Local Development matters to play their part. The fact is that the Local Biodiversity Action Plans which the UK formed as part of its duties as a signatory to the Convention on Biodiversity 1999 (CBD) are there, but are not centre stage in every single development activity as they ought to be.

I had never heard of this law prior to doing research for this Inquiry, and I am surprised that all participants at every stage of Norfolk County Council’s planning activities do not routinely have the Local Biodiversity Action officers “poking their noses in” as it were. No doubt the latter are shy because there is such a cold reception everywhere for anything that appears to hamper Growth. So bolder people must provide an introduction to this law which – above all other human laws on the planet – has the ability to save us from ourselves.

3) Convention on Biodiversity 1992 <http://www.cbd.int/2010/biodiversity/?tab=1> : here is an example of writing on the CBD website, chosen because it centres around the current focus on Ecosystems - nations having realised that it is essential to preserve whole ecosystems not just little pockets of biodiversity separated from human activity as if they were Native Reservations of some kind such as are or were found within some nations.

“The loss of biodiversity often reduces the productivity of ecosystems, thereby shrinking nature's basket of goods and services, from which we constantly draw. It destabilizes ecosystems, and weakens their ability to deal with natural disasters such as floods, droughts, and hurricanes, and with human-caused stresses, such as pollution and climate change. Already, we are spending huge sums in response to flood and storm damage exacerbated by deforestation; such damage is expected to increase due to global warming.

The reduction in biodiversity also hurts us in other ways. Our cultural identity is deeply rooted in our biological environment. Plants and animals are symbols of our world, preserved in flags, sculptures, and other images that define us and our societies. We draw inspiration just from looking at nature's beauty and power.

While loss of species has always occurred as a natural phenomenon, the pace of extinction has accelerated dramatically as a result of human activity. Ecosystems are being fragmented or eliminated, and innumerable species are in decline or already extinct. We are creating the greatest extinction crisis since the natural disaster that wiped out the dinosaurs 65 million years ago. These extinctions are irreversible and, given our dependence on food crops, medicines and other biological resources, pose a threat to our own well-being. It is reckless if not downright dangerous to keep chipping away at our life support system. It is unethical to drive other forms of life to extinction, and thereby deprive present and future generations of options for their survival and development.”

3)a Local Biodiversity Action Plans (BAPs): Article 8(j) of the CBD, titled “In-Situ Conservation” states: “Each contracting party shall, as far as possible and as appropriate: Subject to national legislation, respect preserve and maintain knowledge, innovations and practices of indigenous and local communities embodying tradition lifestyles relevant for the conservation and sustainable use of biological diversity and promote their wider application

with the approval and involvement of the holders of such knowledge, innovations and practices and encourage the equitable sharing of the benefits arising from the utilization of such knowledge, innovations and practices.”

The onus is on the contracting party’s government to promote “traditional lifestyles” and to “respect, preserve and maintain” the knowledge that embodies traditional lifestyle. There is no onus on government, local or national, to fling everybody into a landscape where no traditional pursuits are possible and they will not be preserved but extinguished, along with the web of life which sustains all living things. On the contrary government is bound to “respect, preserve and maintain.... traditional lifestyles relevant for the conservation and sustainable use of biological diversity and *promote their wider application*”. There is no sign of such promotion in the JCS, or of any involvement of the “holders of such knowledge”.

Every contracting party delivers a Progress Report at intervals to the UN. In 2009, the UK delivered its Fourth National Report to the United Nations CBD. <http://www.cbd.int/doc/world/gb/gb-nr-04-en.doc> On the subject of Local BAPs, the Fourth UK Report said:

“The preparation of Local Action Plans has also been extremely useful in reaching out to and involving local communities in delivering country, UK and even global objectives. Despite these successes there is still much to do. It is expected that **applying more of an ecosystem approach** and more obviously dealing with social and economic aspects of biodiversity will help to engage **other sectors and more elements of civil society** to build on the progress made. **Greater engagement across society** on biodiversity issues will be essential to improving the support and capacity available for biodiversity work in the UK.”

Surely this means, in effect, that every Planning Department of every Council needs to paper its walls and preface its documents, with information sheets and diagrams relating to Local Biodiversity, and make everything else subservient to them? And that every sector and offshoot of the construction industry does too?

3)b The Norfolk Biodiversity Partnership soldiers quietly on, collating the information required by the Convention about the state of local ecosystems. But no-one in the grip of construction fever is going to take time to even read through their findings, are they, still less base their plans upon these findings. The Norfolk BAP lists twenty-one types of Habitat, and then for each Habitat lists the “Current Factors Causing Loss or Decline in Norfolk”. It is not for me, but for those with paid jobs related to Planning Applications, to trawl painstakingly through this data.

As an example, the Habitat called “Lowland Mixed Deciduous Woodland” says that “Development, including urban growth, quarrying, recreational development, and trunk road improvements has caused deterioration or destroyed parts of many woods in recent years, and continues to threaten others.” It also mentions climate change and tree disease, and no doubt joined-up action with other ecologists would implicate traffic fumes and other pollution as major suspects behind these – and indeed most - threats to ecosystems.

Another example: the Habitat called “Lowland Wood-Pasture and Parkland” lists “Direct loss of the habitat through change to other land uses, eg arable farming, golf courses, road building, expansion of villages, commercial encroachment, and the colonisation of secondary woodland Lower water tables and pollution”, as causative factors amongst others (most of the others being related to Growth and Development in some way, and consequent overpopulation).

Summary of Response to IC7:

It is for those in paid employment (public or private) to obey international law and plug in to the Local BAP site (as well as local communities with traditional knowledge and skills), and then get expert opinion on how much of a threat to genuine Sustainability and Biodiversity is presented by Overgrowth, Overdevelopment, and Overpopulation. They must then transfer the findings to the practical application of planning law, and if they were to do this they would find that it is the Developers who are Extremists, not the Objectors.

Whilst waiting for this happy event to take place, I repeat my thanks to the Planning Inspector for at least inching open a door of perception that has until now remained firmly shut amongst decision-makers in the public and private sectors. Members of the public can hammer on that door endlessly, but to no avail unless someone with authority steps in and fulfils their public duty to involve “ordinary people” as delineated in the Charter for Nature and the Convention on Biodiversity, to which the UK is a willing and enthusiastic signatory. The Aarhus Convention is better known for general consultation obligations, but environmental laws have made a special effort to enforce the inclusion of individuals in decision making because it is at the individual level that every one of us feels the true impact of attacks upon the natural world whereas in the workplace (small or large, public or private) every one of us finds it easier to pretend there is no impact, or at least that the impact does no harm.

Our surroundings are an extension of our homes, and of course the prefix “eco” does simply mean “home” in Greek. If we defended our environment as we do our homes, we would never even entertain large-scale intrusions such as are proposed in the JCS for the benefit of quarter of a million people who have not even arrived in Norfolk yet whilst thousands who are already here are struggling to find work or to pay for basic needs like food and water and energy if they are on low incomes or pensions.

Edith Crowther
British National Party (PPC Broadland)
