

Our Future City: ‘Draft Central Birmingham Framework 2040’. Response from Birmingham Friends of the Earth

Thank you for the opportunity to respond to the above document. Birmingham Friends of the Earth is writing to highlight the environmental and social imperative to make Climate Change the central concern of Our Future City Plan.

1. Untenable focus on “growth”

- 1.1 We are extremely concerned about the emphasis on economic growth which runs throughout and the structuring of the framework in terms of multiple “Growth Zones” in each geographical area. “Sustainable economic growth” is mentioned only once (p. 13). It is hard to see how the plan would be sustainable, given the amount of demolition and construction implied and the lack of detail on what productive industries would be encouraged that are socially and environmentally viable and would contribute to ‘good’ growth.
- 1.2 The ideas of limitless growth, and growth as always beneficial, are now widely discredited, given the constraints of the real world. BFoE recommends ‘Doughnut Economics’ in which the limits to growth set by our planetary boundaries are recognised, as is the lack of resources currently experienced by some people and the need to ensure that no-one is left without essentials. Doughnut economics has been applied to policy making and planning in Amsterdam and other cities. We would like to see the Council follow a similar ethically sound and realistic approach in Birmingham.
<https://www.kateraworth.com/doughnut>
- 1.3 The future material base of the city is not clear in this draft plan. Space will be required for physical production, reuse, repair and recycling, and this will need lower-priced floorspace for these activities to be sustainable. We think that the plan overestimates the demand for expensive rented apartments and cafes, as highlighted by the current cost-of-living crisis, driven by constraints on energy and food, which is causing ordinary people to struggle with their household budgets. Green jobs are barely mentioned in the document, and neither are local energy production or the local production of consumer goods. Birmingham is represented in the draft plan as a city of consumption, with most people working online at home or sometimes in offices. Furthermore, while we support the development of green technology to a degree, it is important to note that the “high-growth industries of the future [...such as] low carbon tech” (p.15), the “green growth based on

technology, innovation and manufacturing” (p. 27), and even the “green technology [...] growth areas” (p. 31) have environmental costs and physical limits. You need to think not only about carbon footprints but also material footprints, in terms of the materials (metals, plastics, glass, rubber etc) used during production and consumption.

- 1.4 Inward investment is a cause for concern, in the way it is presented in the framework. The “City of Growth for All” theme (p.31) emphasises this inward investment, but we envisage that returns on investment will go straight back out of the city. In particular, the value of construction projects will benefit developers based outside Birmingham. The Council appears to be placing greater emphasis on the city becoming a global player, rather than on the local economy of small shops and business in local communities, which keep money cycling within the city.
- 1.5 We would like to see greater detail about the likely impact of the plan on the existing local economy. Small industries, which provide jobs, and have to keep down their costs, currently exist in Central Birmingham, for example the small factories in currently affordable premises in Ladywood. We would like the Council to specify how many of these will be lost, with their current premises being demolished, in order to make way for development projects that appear to us likely to erode the material base of the city.
- 1.6 The European cities that are quoted as comparisons, have a tourist economy based on their historic townscape, but the Birmingham Plan involves demolition of our historic buildings from the pioneer industrial city, to accommodate glass boxes that could be anywhere in the world.

2. Incompatibility between “greener city” and the scale of new construction

- 2.1 Birmingham Friends of the Earth sees an irreconcilable conflict between the claims made for the development of Birmingham as a “greener city” and the amount of construction implied in the document. In other words, a direct conflict between the “City of Growth” and the “City of Nature” themes that are set side by side on page 31. Birmingham will not become “a climate resilient city in which nature is supported” (p. 12) if the “urban heat island” is expanded, which is likely given the implied increase in tall glass buildings that will be cold and require intense heating in winter, retain heat and require air conditioning in summer, create wind channels between buildings, create unhelpful shade for solar panels and ground-level plants, and present problems in terms of the weight of soil and water for the imagined roof gardens. Some of the artist’s impressions presented in the document, in which stunningly green lawns grow immaculately on the tops of tall buildings, are fantasy. They would not support biodiversity. Roofs will be needed for solar pv generation to offset the electricity consumption of large buildings.
- 2.2 The glass towers will capture and hold tremendous amounts of heat in summer and hence create heavy demand for air conditioning and energy to run it. Shading would be required. The roof gardens imagined are problematic, due to the weight of soil and the energy required to pump up water. The shade from high-rise buildings would cut out light and reduce the use of solar panels. High winds may be channelled between buildings by the wind tunnel effect between buildings and this is already a problem in the city

centre. In winter this effect would rob heat from the huge surface area of the buildings. In summer the “urban heat island” would be intensified, becoming more pronounced as global warming increases. In 30-40C temperatures, such as those experienced in summer 2022, people would find no refuge in such a heavily built-up environment. As the urban heat island intensifies, people are likely to want to move out of Birmingham city centre and not into it.

- 2.3 It is vital to retain the existing green spaces. Birmingham lacks a substantial city centre park or a river that could provide green space and blue space to cool the air and the inhabitants in hotter summers. The Birmingham Tornado in 2005 was driven by excess heat and we must expect many more similar events in future. We find the claim that green space will be doubled in the plan to 30% of the area (p.28) to be unfathomable. We would like the Council to provide detail on how this will be achieved.
- 2.4 We are concerned about flooding and the ability of drainage systems to cope with the run-off impact of all the new surfaces, horizontal and vertical, especially given the increasing frequency of sudden downpours due to climate disruption. In addition, some developments are in flood zones. For example, some developments in the Rea Valley are located in Flood Zone 3, which has a high probability of flooding from rivers. Please refer to our previous [response to the Rea Valley Urban Quarter Draft SPD](#).
- 2.5 We understand that the geology of Birmingham is not suited to such tall and heavy structures anyway. There are old mine workings, hence no underground rail system was ever built. The city centre is on The Birmingham Fault, which can move, so independent geologists should be consulted.
- 2.6 The framework appears to wildly underestimate the significance of embodied carbon, meaning all the emissions released in the lifecycle of a building from the original construction process, including in the materials used (especially concrete, steel and glass), to the emissions from deconstruction and disposal. The demolition of existing buildings will create a lot of waste, and the buildings are likely to contain toxic substances such as asbestos. We would like the Council to give proper consideration to the environmental cost of the all the elements of both the demolitions and new construction projects envisaged.
- 2.7 We doubt the relevance and credibility of the comparisons with Vienna (“double our green spaces to a level comparable with Vienna”) and Copenhagen (“same level of active travel routes”). Perhaps the relevance of Vienna for Birmingham would be that it has been rated one of the most liveable cities, partly based on residents’ access to quality, affordable housing – this is an area in which the plan should do more for residents of Birmingham. While there are tall buildings in Vienna and Copenhagen, the historic architecture of the 19th Centuries and other periods is respected, and they are densely populated, but are not high-rise cities as a whole. We doubt whether the number of 30 or 40 or 50-storey buildings being proposed for Birmingham would be approved in those cities (e.g. 35-storey tower on Upper Trinity Street p.78; 32 and 48-storey towers on other streets in Digbeth p.79; a group of buildings ranging up to 38 storeys in Glasswater Locks p.123). Not mentioned in the plan is the recent approval for the 53-storey build-to-rent tower in Curzon Wharf, which is to be joined by other

towers including one of 41 storeys. Such developments are extremely concerning, on environmental and social justice grounds. Also not mentioned is the skyscraper in Snowhill Plaza, which was recently approved despite considerable heritage concerns. We are highly sceptical about the number of people wanting to live in such developments, especially at high prices, and in addition to our environmental concerns we believe it to be over-development anyway. There is a danger of creating huge structures which repeat the mistakes of the modernist high-rise blocks and road systems in the 1960s/70s - they had to be demolished later on.

- 2.8 Our alternative, since BFOE does support "densification" in city centres, and more housing is needed, is terraced housing like in Paris of perhaps 5-6 stories in height consisting of flats. With nearby small shops and amenities such as small green spaces. The best kind of housing for families with children maybe 2-3 stories high terraces with small gardens.

3. Distortion in types of planned housing, given current trends

- 3.1 We believe that the emphasis on residential-led redevelopment at high density, particularly in the City Heart, is misplaced. While the efficient use of space is important and new homes should not be built on greenbelt, and it is important to reduce distances travelled and avoid urban sprawl, we also believe that the plan may be overestimating the future demand to live in central Birmingham, due to the growth in remote and hybrid working. Being able to work from home reinforces the attraction of living in the suburbs with private gardens, local green spaces, playgrounds and schools. The plan's projected tendency of people wanting to move into the city centre may be out of date and in fact be reversing. In terms of commuting to London, High Speed Rail will deliver only a small gain in the journey time and the level of the fares is as yet unknown.
- 3.2 Moreover, high density housing, in the form of very tall apartment buildings, has often been unpopular, particularly for families with children. Disadvantages include the lack of garden space or access to adequate green space - for playing, exercising, dog walking, growing flowers and vegetables etc, which was highlighted during the lockdowns during the Covid pandemic. More pandemics are predicted. In addition, people are wary of living in very tall buildings, due to fears that they would not be able to exit the building in the case of fire or explosions, following the Grenfell Tower tragedy, and fears that children or objects may fall or drop out of windows and off balconies. Lift maintenance is often a problem and lifts stop working during power cuts. Lower buildings, such as four-storey terraces with communal gardens, in appropriate locations, are preferable.
- 3.3 We are also concerned that all the rental income will go out of the city, indeed out of this country. There should be limits on ownership and be a proportion of affordable homes to buy and rent.
- 3.4 Considerable public infrastructure would have to be developed, in what have not been residential areas, but industrial ones, in order to accommodate a larger number of people living in the city centre. This would require remodelling of the drainage, sewerage, rain run off, and electricity supply, as well as new schools and health centres. There should be no agreement to a

future which involves extremely large public investment without more information. Birmingham City Council is currently facing a £650 million hole in its budget.

- 3.5 The waste from the additional 35,000 homes will need to be processed, as will waste from businesses. Burning this waste will be uneconomic, once as the Tyseley incinerator is included in the Carbon Emissions Trading scheme from 2028, so space for recyclable and compostable waste needs to be included in the plan for central Birmingham.
- 3.6 Pressure on space would be increased in the Plan and the allocation for walking and cycling will need to be dramatically improved. There is already overcrowding at certain times in pedestrian spaces in the city centre and pedestrians and cyclists compete for space. If large numbers of additional residents are added, the walking and cycling infrastructure must be improved to ensure safety, by taking space from cars. There must be space for the storage and movement of necessary vehicles. We support the planning of a safe cycle network across the central part of Birmingham. A 15-minute cycle journey can be planned for, and we have been asking for this for several decades. With much less traffic, measures to 'manage' cyclists will be much less needed, so we look for the 'right to roam'. Similarly, there should be better walking routes, including between the main rail stations.
- 3.7 BFOE supports a strong reduction in space for private vehicles in Central Birmingham, especially the City Heart and space for continuous walking and cycling routes, also space for bus and tram routes. This could be as major roads repurposed for Greenways, but cost-effective solutions are needed, which can be implemented quickly and independently of the overdevelopment that we are warning against. Thought will have to be given to deliveries and the rerouting of freight.

4. Ineffective and inadequate involvement of residents

- 4.1 A large number of people already live in the areas covered by the plan. The document should state how these people will be involved and how their input will be included. It is not acceptable to say that there has been agreement on the plan when measures to involve residents have been ineffective and actual resident involvement has been minimal. One of our BFOE members attended a stakeholder event about this plan and was the only person present. Holding events is not the same as engaging people, if the events are not attended by residents. As representative structures are lacking in most areas, except for areas such as the Jewellery Quarter, the Council should provide details of how they are going to reach local communities. Moreover, this must be done on an area-by-area basis, so that there is no situation in which one group of residents have 'agreed' to a plan for people living in a different area. or even in the same area where there are several different local communities. The engagement plan must tie in with the communication plan, and regular and meaningful engagement must be clearly defined.
- 4.2 While we are pleased that neighbourhoods are recognised as assets, we do not understand the need to invent new names like West Central. We feel that it is unlikely that this would be proposed for areas of Paris or London which already have their distinctive historic names. Residents should be asked whether they want to have new names for where they live. Some of the

boundaries cut up actual neighbourhoods, for example Balsall Heath, with its existing Neighbourhood Development Plan, which will actually make planning and participation more difficult.

5. Risk

5.1 A thorough risk analysis should be carried out and proposals for any “Plan B” should be shared. For example, what provision has been made in the case of the withdrawal of development partners? In particular, what action will be taken if demolition is carried out, but construction is not? We would like to see the Council prevent situations such as the current derelict landscape in Digbeth, where planning permission has been given but developers have decided in their own interests not to move forward, until it suits them. Part of the way that such situations can be avoided is with a presumption that it is unwise to demolish serviceable buildings. Finally, we would like to see a plan for how different areas will be prioritised. The current plan gives the impression that large parts of Birmingham are up for sale to developers, leaving control in the hands of the developers rather than the Council.

In summary, we call upon you to revise the plan so that it is in line with:

- the City Council’s declaration of a Climate Emergency in 2020
- The Route to Zero Action Plan

Area Specific Comments:

Heart

Moor Street station – already has a platform that could be opened welcome a service via Moseley and Kings Heath. Snow Hill station – already has space that used to be used by the tram

Smithfield – a large park in the middle would be preferable to lots of little parks

We doubt if a Gun Quarter will actually be an attraction.

South

Balsall Heath - We would welcome reopening of the station

Highgate Park = good idea to make it bigger – already lots of high rise flats and people do not feel safe using park. Extend it downhill into town.

West

Hockley flyover – good – allow the area to come back to life

Ladywood (Monument Road) Proposed railway station – welcome – should re-open