

6.42 Solihull MBC have made provision for employment land beyond the plan period but have made no provision for long term housing needs. This is an unrealistic approach. To expect no housing growth beyond 2001 and not to plan for it will lead to this consequence: in Solihull there will be a need for more housing beyond 2001 which cannot be met within the urban area or the defined Green Belt. This will lead to appeals where appellants will argue why there are special circumstances to override Green Belt policy. This will lead to development on an ad hoc, unplanned and even irrational basis. This would be unacceptable.

6.43 The Green Belt boundary must be reconsidered. Provision to meet post 2001 housing needs must be made in the UDP; the same approach adopted for employment land would be a satisfactory way of doing this. In this way strategic housing sites could be selected which could be extended without affecting the permanent Green Belt boundary. The Dickens Heath site is not suited to this approach; the Maypoles site is.

#### **Council response**

6.44 SOL 121 gives the detailed response. The UDP acknowledges the distinction between 'interim' and 'confirmed' Green Belt; but the council considered there were other important factors which should be taken into account in determining new housing locations. This matter has been dealt with in the General Housing Proof SOL 100 in paragraph 5.8 and in dealing with the H2 objections.

6.45 The advice in PPG2 and PPG10 is acknowledged but there are exceptional circumstances to justify why no provision should be made in the UDP for longer term housing need. The prime reason for this is an environmental one. Paragraph 1.6 of the UDP says the Council has decided that the Plan's proposals will exhaust the Borough's ability to absorb further strategic sites without unacceptable loss of character, amenity and environment.

#### **Written objections**

6.46 Warwickshire County Council says the UDP does not appear to identify any land for development, particularly for housing, beyond the end of the plan period. This approach is unreasonable and contrary to the advice in PPG2. It would increase pressures elsewhere in the Green Belt within neighbouring authorities.

6.47 SOL 119 gives the detailed response.

6.48 SOL 503 & 503/1 summarizes 3 objections (J W Pettinger, Hereford and Worcester CC and Stratford-on Avon DC) and then gives the Council's response.

#### **Inspector's conclusions**

6.49 The clear advice in PPG2 and PPG10 is that when Green Belt boundaries are defined local planning authorities should relate their proposals to a time scale which is longer than that normally adopted in plans for new development. PPG10 adds that Green Belts must be permanent and that UDPs must establish secure Green Belts which take proper account of the likely scale and pattern of development needs into the 21st century.

6.50 While I understand Solihull MBC's wish to avoid any further new development after 2001 I do not consider it is right to now use the Green Belt to deliberately block any provision for long term development needs. This seems to me to be a short term tactic which is very likely to lead to unwelcome and very controversial encroachment on the Green Belt within a 10-15 year period. A tightly drawn Green Belt around Solihull which pays no attention at all to development needs in this longer time scale simply stores up serious problems for the local planning authority, for local residents and for the development industry.

6.51 In saying this I have carefully examined Solihull's main arguments. First, there is the assertion that the Borough has reached the environmental limit for accommodating further housing growth. Second, there is the request to wait for the results of the forthcoming Regional Planning Guidance process and let this determine matters such as the need for more housing after 2001 and its location. Within this "Waiting for Guidance" argument there is the suggestion that household projections might indicate lower new housing requirements after 2001.

6.52 The Council's environmental limit argument was supported by reference to past development patterns shown on SOL 23 and the views of members about suitable land for new housing. I can accept a need to resist more development in the areas of confirmed Green Belt, but I am not convinced that the Council's general environmental limit arguments are sufficiently strong to now resist all further development in the areas of interim Green Belt. No specific evidence was presented in the inquiry to show that further development in interim Green Belt areas would seriously damage the environment.

6.53 The 'Waiting for Guidance' argument has 2 main deficiencies. If the Green Belt boundaries are now drawn tightly in the UDP, this effectively prevents any reasonable examination of where future development in Solihull should be located. The Green Belt boundaries should be as permanent as possible; to alter the boundary after 2 or 3 years would be entirely inappropriate. The Regional Planning Guidance consideration of long term development needs would therefore be hamstrung in respect of a major growth area, Solihull, if Green Belt boundaries are fixed now in the way proposed in the UDP. The second deficiency, stressed by objectors, seems to come from a wish to avoid difficult and unpopular decisions. There seems to be a hope that a future plan will deal with the level and location of growth; this "Waiting for Guidance" approach would thereby transfer the responsibility for having to provide for long term development to the Secretary of State for the Environment.

6.54 I consider that the Council should assess the Borough's long term development needs and then carefully examine where land should be safeguarded to meet these needs. This land once identified would be protected up until 2001 by strong development control policies. It would be appropriate to look first at the land in the "interim" Green Belt as set out in PPG10 paragraph 12. This search for new housing land for long term development needs should follow the reassessment of housing provision in the plan period. Earlier in this report I have identified very serious deficiencies in housing provision within the plan period. In my opinion the problems of housing provision up to 2001 should be properly resolved before the long term housing needs are tackled.

Inspector's note: At the Solihull UDP inquiry I was presented with a dilemma on housing provision. I spoke briefly about this dilemma on a few occasions with the Council and some of the main parties during the inquiry. Put simply, Part I of the UDP is a structure plan by another name; Part II is a local plan. This means that 2 parts of the traditional development plan process have been fused together. This fusion would work well if there were no serious disagreements over the Part I contents.

With the Solihull UDP I was faced with an extremely difficult task in dealing with Part II proposals because of the fundamental changes I decided were necessary to Part I housing provision policies.

The fundamental changes required to Part I housing provision policies require significant changes to the Part II proposals. But some of these Part II changes could not be the subject of direct argument at the inquiry as the necessary changes were unknown at that time. Consequently the Council has not had a full opportunity to respond to all the changes I am recommending. In these difficult circumstances I have decided that I can make reasonable recommendations about some changes to both Part I and Part II, but I have also decided that necessary further changes should be made only after careful reassessment of housing strategy by the Council. This applies to some housing provision within the plan period and to most longer term housing needs.

The major changes to the housing numbers and housing proposals are summarized in my **Working note** on pages 124-125.

In my opinion this unsatisfactory and partially unresolved conclusion on housing provision stems directly from the reluctance of Solihull to deal with the testing of the PPG10 housing figures and to make any provision for long term housing needs. In reaching this conclusion I am aware that the Solihull UDP was prepared and put on deposit in a slightly different development plan climate to that prevailing today. I am sure that a more rigorous and careful approach would now be adopted to housing provision given that the status of development plans appears to me to have been recently enhanced by Section 54A of the Planning and Compensation Act 1991 and by PPG12.

### **Recommendation**

6.55 I recommend that the Council give consideration to my comments in the preceding paragraphs and to my Inspector's note above and then to:

- (a) assessing the Borough's long term development needs and deciding where a reasonable amount of land to meet these needs should be safeguarded; and
- (b) ensuring that the aforesaid land is safeguarded by appropriate development control policies.