

CHAPTER 2: VISION

Section 2.0: Solihull – Future Environment

Objections to First Deposit

1080/195 – WMFOE; 1275/121 – CPRE; 1359/713 – Taylor Woodrow Devts Ltd; 1362/743 – Cala Homes Ltd; 1365/840 – Chase Midland plc; 1375/863 – Harper Estates; 1398/782 – Persimmon Homes Ltd.

Objections to Revised Deposit

1494/340/R – DSM.

Key issues

- *Does Section 2.0 overstate Solihull's importance in the West Midlands region;*
- *Should paragraph 2.0.2 recognise the unsustainable growth rate of Solihull's economy, particularly in terms of environmental impact;*
- *Does the Plan make sufficient provision for housing, including sufficient safeguarded land, to avoid future changes to the Green Belt boundary;*
- *Is the designation of long-term housing sites (a) & (b) consistent with the principle of protecting Green Belt (Rev 2/1).*

Inspector's reasoning and conclusions

- 2.1 Section 2.0 outlines the role of Solihull in the West Midlands region during the past decade. It recognises the important role of the Borough in absorbing a significant amount of new housing and providing sites for businesses, as part of the regeneration of the West Midlands. As a factual account of past events, summarising the main aims and impact of the adopted UDP, I am satisfied that this section does not overplay Solihull's importance in the West Midlands, particularly since this role is recognised in the latest RPG11 [CD51G].
- 2.2 Section 2.0 reflects what has happened in the past in Solihull, rather than what will happen in the future. Although recent growth may have had an impact on the environment, particularly since the early 1960s, Solihull will continue to have an important role in the regeneration of the wider West Midlands economy, as confirmed in the latest RPG11. Much of this past growth is the result of planned development and there is little firm evidence to suggest that this has been unsustainable. Paras 2.0.1-2.0.2 recognise that development has resulted in pressure on the Green Belt, and para 4.0.3 recognises concerns about the environmental impact of rapid growth. However, in order to avoid any confusion and reflect the fact that this section is essentially historical, I consider its title should be amended to "*Solihull - Context for the Future Environment*", as suggested at the inquiry.
- 2.3 Objections about housing land provision, both within the current plan period and in the longer term, are addressed in the Housing chapter of my report. I understand that a review of Green Belt boundaries was undertaken as part of the current adopted UDP, including the identification of longer-term housing sites as Safeguarded Land removed from the Green Belt. The release of additional housing sites from the Green Belt without exceptional circumstances would be contrary to national policy in PPG2 and regional policy in RPG11. No amendments to Section 2.0 of the Review are therefore needed in response to these objections. Long-term housing sites (a) & (b) were removed from the Green Belt in the adopted UDP, so their continued designation as Safeguarded Land does not affect the principle of protecting and maintaining the remaining Green Belt.

Recommendation

2.4 I RECOMMEND that the Plan is **modified** by amending the title of Section 2.0 to read "**Solihull – Context for the Future Environment**".

Section 2.1: Impact on the Borough

Objections to First Deposit 1080/193 – West Midlands Friends of the Earth;
1275/120 – CPRE.

Objections to Revised Deposit There were no objections to the Revised Deposit draft.

Key issues

- *Does Section 2.1 of the Plan correctly portray the past erosion of the Green Belt, and should the text be amended to recognise the impact that economic and other development has had, giving stronger commitment to preventing future development in the Green Belt.*

Inspector's reasoning and conclusions

2.5 Although housing and business proposals in the adopted UDP, along with other previous developments such as at BIA, BBP, BVP, NEC and Dickens Heath, have had an impact on the Green Belt, SMBC has successfully resisted most unplanned development in the Green Belt in the past decade. The Green Belt policies in the Countryside chapter reflect the strong policy of development restraint in the Green Belt set out in PPG2 & RPG11. These policies give strong protection against inappropriate development in the Green Belt, whilst allowing proposals that can be justified by very special circumstances. Paragraph 7.0.6 confirms the loss of 166ha of Green Belt land in the past, but the proposals in this Review (notably BVP2) are likely to have much less impact on Solihull's Green Belt. Consequently, I am satisfied that Section 2.1 of the Review correctly reflects the situation in the past decade and sets an appropriate context for future development, particularly when read with other sections of the Review, including the Countryside/Green Belt chapter.

Recommendation

2.6 I RECOMMEND NO MODIFICATIONS to the Plan to meet these objections.

Section 2.3: Principal Changes

Objections to First Deposit 1080/196 – West Midlands Friends of the Earth;
1275/122 – CPRE.

Objections to Revised Deposit 1126/503/R – Hampton-in-Arden Society;
1494/371/R - DSM.

Key issues

- *Does Section 2.3 of the Plan provide a consistent approach, by promoting sustainable development, but also promoting a cluster in the Coventry/Solihull/Warwickshire area, and giving sufficient priority to pedestrians;*
- *Should Section 2.3 be amended to remove the link between unemployment problems in the north of the area and the Coventry-Solihull-Warwickshire sub-region, and ensure that development strategies prioritise access by means other than by car;*
- *Should the first bullet point of paragraph 2.3.1 refer to Solihull rather than the West Midlands;*
- *Rev 2/2 - Is the designation of long-term housing sites (a) & (b) consistent with the principle of protecting the Green Belt and PPG3.*

Inspector's reasoning and conclusions

2.7 Section 2.3 (¶ 2.3.1) has a commitment to supporting and promoting the principles of sustainable development as one of its fundamental principles. Paragraph 2.3.4 refers to the importance of the Coventry/Solihull/Warwickshire sub-region to the West Midlands economy, with the evolution of a cluster of innovative and knowledge-based businesses. This directly reflects Policy PA3 in the latest RPG11 [CD51G], which promotes cluster developments

within the CSW-HTC. Rev 2/3 (¶ 2.3.6) also gives priority to pedestrians and cyclists over the motor car, addressing WMFOE's other point. Overall, I am satisfied that Section 2.3 provides a consistent approach to the principle of sustainable development.

- 2.8 Paragraph 2.3.2 sets out some key themes arising from the commitment to sustainable development principles, integrating economic growth and environmental protection. Para 2.3.3 highlights improved public transport links to employment elsewhere in the region, including the Coventry-Solihull-Warwickshire sub-region. Linking areas of higher unemployment in the north of the Borough, such as the EB/NSRZ, to areas of employment opportunities, such as the CSW-HTC (including BVP), accords with RPG11 (¶ 7.7). It also highlights the need to offer more sustainable options for accessing jobs, in the context of sustainable transport and improving communications. This approach reflects the policies in the UDP's Transport chapter, which promote the improvement of access, including by means other than by car. In my view, Section 2.3 does not overplay the role of Solihull in the sub-region, reflecting the clear purpose of the Review and providing the right balance between economic development and environmental protection.
- 2.9 The commitment to the regeneration of the West Midlands is a fundamental principle of the adopted UDP and has been carried forward in this Review. Although the Plan can only directly influence development proposals within Solihull, the Borough can clearly contribute to the wider regeneration of the West Midlands, whose importance within the Coventry-Solihull-Warwickshire sub-region is recognised in RPG11 (Policy PA3). As a fundamental principle, this approach remains sound.
- 2.10 Long-term housing sites (a) & (b) were removed from the Green Belt in the adopted UDP, so their continued designation as Safeguarded Land does not affect the principle of protecting and maintaining the remaining Green Belt or necessarily conflict with national guidance in PPG3.

Recommendation

2.11 I RECOMMEND NO MODIFICATIONS to the Plan to meet these objections.

Section 2.4: Solihull's Community Strategy

Objections to First Deposit

1126/342 – Hampton-in-Arden Society; 1132/373 – Mr T J Grant; 1275/119 – CPRE.

Objections to Revised Deposit

There were no objections to the Revised Deposit draft.

Key issues

- *Should Section 2.4 of the Plan acknowledge and reflect the broad aims of the Council's Community Strategy;*
- *Does Section 2.4 set out a strategy for achieving an inclusive partnership approach to the development of a Community Strategy which should inform the UDP;*
- *Does the Plan achieve an appropriate balance between economic, social and environmental aspirations, ensuring that the quality of life of future generations is protected.*

Inspector's reasoning and conclusions

- 2.12 I understand that Solihull's Community Strategy [CD106] was approved by SMBC and adopted by the SLSPF in 2003. Paragraph 2.4.3 sets out its broad aims, and the suggested revised text [CD175] updates the situation. However, I believe that the text in Section 2.4 may reflect an earlier draft of the Community Strategy, so it would be helpful if Para 2.4.3 were to reflect the

latest version. Although the Community Strategy is produced under legislation in the Local Government Act 2000, supporting guidance and PPG12/PPS12 emphasise the need for development plans to take account of other strategies. There is clearly an important link between the Community Strategy and the UDP, and it is undoubtedly a material planning consideration. Apart from updating paragraph 2.4.3 and checking the text to reflect the latest version of the Community Strategy, no further amendments to this section are needed to address HIAS' objection.

- 2.13 It is not the role of this UDP to set out a mechanism for achieving an inclusive partnership approach to the development of a Community Strategy, which is subject to a separate process. Section 2.4 of the Review merely highlights some aims of the now adopted Community Strategy and helps to inform the strategy of the SUDPR. The UDP Review will also help to make a positive contribution to the aims of the Community Strategy. This approach is in line with the latest national guidance in PPS12 and supporting documents, and so no further amendments are needed to meet CPRE's objection.
- 2.14 Section 2.4 relates to Solihull's Community Strategy, balancing economic, social and environmental considerations. Other parts of this chapter (eg. ¶ 2.5.4 & 2.6.2) confirm that due regard will be paid to environmental sustainability and the quality of life, and set out specific objectives on sustainable development and the environment.

Recommendation

2.15 *I RECOMMEND that the Plan is **modified** by updating paragraph 2.4.3 in terms of the status of the Community Strategy [CD175], and checking whether the text accurately reflects the contents of the latest adopted version of the Community Strategy [CD106].*

Section 2.5: Solihull's Environment Strategy

Objections to First Deposit 1275/118 - CPRE

Objections to Revised Deposit There were no objections to the Revised Deposit draft.

Key issues

- *Should Section 2.5 of the Plan provide for a stronger protection of the environment, including an approach resulting in no net loss of environmental assets, with a specific objective aiming towards a high quality and sustainable built and natural environment.*

Inspector's reasoning and conclusions

- 2.16 Section 2.5 refers to the broad aims of Solihull's Environment Strategy [CD89], adopted in 1998, with its vision for a high quality sustainable future environment for the Borough. The text (¶ 2.5.6) is thus factually correct. An approach resulting in no net loss of environmental assets is not supported in national policy guidance. A similar approach in the draft WMRPG [CD51F] was deleted by the Secretary of State [CD51C] as being contrary to the principles of sustainable development. Including such an approach in this UDP would therefore be contrary to national and regional policy. The Plan already refers to the aim of providing a high quality and sustainable environment, as set out in the Environment Strategy. The environment strategy of the SUDPR is outlined in the Environment chapter of the Review, so a further objective is unnecessary.

- 2.17 The adoption of a stronger environmental strategy is not justified in the context of Solihull, since it could unbalance the Plan and conflict with national and regional planning policy. In this instance, I am satisfied that Section 2.5 of the SUDPR adequately sets out Solihull's environment strategy, providing the right balance, and does not need to be strengthened or amended, particularly when read together with other policies and the Environment chapter of the Plan.

Recommendation

2.18 I RECOMMEND NO MODIFICATIONS to the Plan to meet this objection.

Section 2.6: UDP Review – Principal Objectives

Objections to First Deposit

1080/197 – WMFOE; 1126/337-339, 341 – Hampton-in-Arden Society; 1359/715 - Taylor Woodrow Devts Ltd; 1362/746 - Cala Homes Ltd; 1375/864 – Harper Estate; 1398/785 – Persimmon Homes Ltd; 1427/823 – Wimpey Homes Ltd; see also Hockley Heath Schedule (Annex D).

Objections to Revised Deposit

1275/161/R, 164/R-165/R – CPRE; 1494/374/R – DSM; 1481/342/R – English Heritage; 1362/428/R – Cala Homes Ltd; 1365/422/R – Chase Midland plc; 1375/347/R – Harper Estates; 1359/329/R – Taylor Woodrow Developments Ltd.

Key issues

- *Are these principal objectives in the right Section with the necessary status;*
- *Is there any confusion between the references to fundamental principles in paragraphs 2.6.1, 2.0.4 & 2.3.1 and the principal objectives in para 2.6.2;*
- *Does the Sustainable Development objective adequately reflect the economic, social and environmental aspirations of the community;*
- *Does the Role of the Borough objective provide an appropriate balance between the economic growth of the Borough and protection of the environment, ensuring that its economic potential supports regeneration objectives without any net loss of environmental quality and quantity;*
- *Are long-term housing sites (a) & (b) consistent with the objective on Key Development Principles;*
- *Should the objective on Meeting People's Needs be amended, replacing "In" with "When" and deleting reference to EB/NSRZ;*
- *Should the Environment objective ensure that there is no net loss of environmental assets as a result of development, and refer to the protection of established neighbourhoods and the Borough's historic environment and heritage;*
- *Should the Housing objective clarify that general market housing is needed in addition to affordable housing;*
- *In the Centres objective, should the phrase "where appropriate" be deleted;*
- *Should the Transport objective adopt the principles of the Local Transport Plan and Public Transport Strategy and incorporate a statement of the relevant principles as an annex to the Plan;*
- *Should the Countryside objective include the management of a diverse and prosperous rural economy and refer to the protection of land adjacent to the countryside, and is it covered by other objectives.*
- *Should the Recreation objective "encourage" rather than "promote" opportunities for sport and include a caveat protecting the Green Belt;*

Inspector's reasoning and conclusions

- 2.19 The principal objectives of the Plan flow logically from the identification of the four fundamental principles, earlier in this chapter. I understand that they have been developed specifically for this Review and provide the underlying basis for the policies that follow. Generally, the objectives are clearly

expressed and are given sufficient prominence and priority in this chapter. I am also satisfied that the text in paragraph 2.6.1 does not conflict with other parts of this chapter and adequately sets out the context for the principal objectives which follow. Furthermore, these objectives need to be seen as a consistent set of objectives, and read in the context of the more detailed considerations outlined in later chapters of the Plan.

- 2.20 The Sustainable Development objective refers to the *quality of life of present and future generations*. This reflects the familiar “Brundtland” Report definition, as confirmed in RPG11 (¶ 2.2). The term *generations* is an easily understood term, referred to in other documents. In my view, it would not be improved by its replacement with the term *citizens*, as suggested by HIAS.
- 2.21 In the Role of the Borough objective, it is important that the Plan balances economic growth and environmental protection. As drafted, the objective confirms that the economic potential of the Borough will only be realised if it is consistent with maintaining a high quality local environment. In my view, this is a reasonable and appropriate balance. The approach of no net loss of environmental quality is not in accord with national policy and has been previously rejected by the Secretary of State (see above). Such an approach would therefore conflict with national and regional policy and cannot be justified in the context of Solihull’s role in realising its economic potential in support of the regeneration of the wider West Midlands. Other objectives and specific policies in the SUDPR cover the environmental impact of new development. However, to avoid any doubt about the nature and extent of the environment to be maintained, the last sentence of this objective would be improved by adding the words *built and natural* before *environment*.
- 2.22 Long-term housing sites (a) & (b) are designated in the adopted UDP as potential long-term housing sites in accordance with PPG2 (¶ 2.12-2.13). No decisions to actually develop these sites have yet been made, and the requirements of the Key Development Principles objective would be considered as part of the decision-making process at that time.
- 2.23 In Meeting People’s Needs objective, there is little difference between the words *In* and *When* at the beginning of this objective, but I consider the latter would be more appropriate. As for the reference to residents in the EB/NSRZ, Regeneration Zones are identified by the RDA as areas with particular needs where regeneration should be concentrated. It is important to improve transport links between such areas and employment opportunities, in line with regional policy in RPG11, and so I am satisfied that the reference is relevant.
- 2.24 As for the Environment objective, I have already indicated that the approach of no net loss of environmental quality is not in accord with national policy and has been previously rejected by the Secretary of State (see above). It therefore follows that such an approach cannot be justified in terms of this objective. The Environment objective already aims to protect the special environmental quality and character of the Borough, which includes both the built and historic environment, to ensure that the environmental impact of new development is minimised. In my view, this is sufficient to safeguard the character of existing residential neighbourhoods and residents’ immediate environment and quality of life. SMBC also confirms that historic assets are included in the special environmental quality and character of the Borough.
- 2.25 The Housing objective refers to providing a *“range of new housing appropriate to the changing needs of the Borough’s population”*. This would cover general market housing as well as affordable housing, as confirmed in the Housing chapter of the Plan. In the Centres objective, SMBC explained at the inquiry that the term *where appropriate* was included to reflect the possibility that there might be particular trip-generating activities that could not be located in centres. I consider this is sufficient justification for including this phrase.

- 2.26 The Transport objective is a high-level objective which refers to the Local Transport Plan [CD85] (prepared jointly by the WM Metropolitan Boroughs and the WMPTA). The principles of the LTP are fully set out in the Transport chapter of the Plan (¶ 5.0.4-5.0.5), which also refers to the Public Transport Strategy, under Proposal T1/1 (¶ 5.1.4). I consider these references are sufficient, particularly since these plans and their principles are subject to review. No amendments to this objective are therefore necessary.
- 2.27 The Countryside objective sets out a positive role for the countryside, alongside protection of the Green Belt, in line with PPG2, PPG7 (*now PPS7*), RPG11 and SMBC's Countryside Strategy [CD95]. As such, it does not duplicate or repeat the contents of other objectives. I understand that GO-WM asked for the phrase about managing a diverse and prosperous rural economy to be included, to take account of national policy in the Rural White Paper and PPG7/PPS7. Although Solihull's rural area has to be tempered with the fact that it lies in the Green Belt, I am satisfied with the need for separate Green Belt and Countryside objectives. Furthermore, the management of a diverse and prosperous rural economy is a relevant and appropriate element of the Countryside objective, fully in line with national and regional policy.
- 2.28 As regards the protection of adjoining land, the Countryside objective reflects the national guidance in PPG2 & PPG7/PPS7. Since all of Solihull's countryside lies in the Green Belt, it would also be protected by Green Belt policies. Rev 7/3 to Policy C2 seeks to ensure that any development conspicuous from the Green Belt will not harm the visual amenities of the Green Belt, which would ensure the protection of adjoining land. To widen the policy further would conflict with national and regional policy, and so no amendments are needed to this objective.
- 2.29 In the Recreation objective, PPG17 refers to the *promotion* of open spaces and sports and recreational facilities, and in my view, this is an appropriate term for this objective. SMBC's role is largely one of enabling the provision of such facilities, including those provided by other bodies, such as parish councils. The protection of the Green Belt is specifically covered in the Green Belt objective, and so no amendments are needed to cover these points.
- 2.30 Most of the other detailed points raised by objectors on these objectives have either been taken into account in Rev 2/4-2/9, or would conflict with other objectives and policies in the Plan, or be contrary to national and regional planning policy. Some of the points are also better addressed under other more specific policies and sections of the Plan. Consequently, no further amendments are necessary to this section of the Review.

Recommendation

2.31 I RECOMMEND that the Plan is modified by:

- (i) *amending the objective on the Role of the Borough within the Region, by adding the words "**built and natural**" before the word "environment" in the last sentence of the objective;*
- (ii) *amending the objective on Meeting People's Needs by replacing the first word of the objective "In" with "**When**".*
