



## Solihull MBC Local Plan Publication Stage Representation Form

Ref:

(For  
official  
use only)

**Name of the Local Plan to which this representation relates:**

Solihull Local Plan (Draft Submission) 2020

**Please return to [psp@solihull.gov.uk](mailto:psp@solihull.gov.uk) or Policy and Engagement, Solihull MBC, Solihull, B91 3QB BY Monday 14<sup>th</sup> December 23:59**

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This form has two parts –

Part A – Personal Details: need only be completed once.

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

### Part A

#### 1. Personal Details\*

*\*If an agent is appointed, please complete only the Title, Name and Organisation (if applicable) boxes below but complete the full contact details of the agent in 2.*

#### 2. Agent's Details (if applicable)

Title	<input type="text" value="Mr"/>	<input type="text"/>
First Name	<input type="text" value="Enriko"/>	<input type="text"/>
Last Name	<input type="text" value="Iskhakov"/>	<input type="text"/>
Job Title (where relevant)	<input type="text"/>	<input type="text"/>
Organisation (where relevant)	<input type="text"/>	<input type="text"/>
Address Line 1	<input type="text" value="REDACTED"/>	<input type="text"/>
Line 2	<input type="text" value="REDACTED"/>	<input type="text"/>
Line 3	<input type="text"/>	<input type="text"/>
Line 4	<input type="text"/>	<input type="text"/>
Post Code	<input type="text" value="REDACTED"/>	<input type="text"/>
Telephone Number	<input type="text" value="REDACTED"/>	<input type="text"/>
E-mail Address (where relevant)	<input type="text" value="REDACTED"/>	<input type="text"/>

## Part B – Please use a separate sheet for each representation

Name or Organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph  Policy  Policies Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	<input type="text" value="V"/>	No	<input type="text"/>
4.(2) Sound	Yes	<input type="text"/>	No	<input type="text" value="V"/>
4 (3) Complies with the Duty to co-operate	Yes	<input type="text"/>	No	<input type="text" value="V"/>

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

The Local Plan is not Sound because it ignores considering other potential locations for a relocated Household Waste and Recycling Centre (HWRC). It also does not take into account a wider implication of HS2 development on Bickenhill Ward.

It also does not comply with the Duty to co-operate because it does not comply with the Key Route Network Policy of the West Midlands Combined Authority (WMCA). It also does not comply with Residents' Charter of HS2 (Paragraph 6).

Relocating HWRC to site UK2 would imply bringing it closer to a larger residential area and add more congestion to a Key Route road (A45) which is already experiencing air pollution level increase due to Jaguar Land Rover's current and future activities, Birmingham International Airport, and other expected development activities of UK2.

There is a more suitable alternative location for a relocated Household Waste and Recycling Centre.

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

A more suitable alternative location for a relocated Household Waste and Recycling Centre (HWRC) must be put in the Local Plan.

HWRC is on the route of HS2, specifically in PC-01-049 area of the plan. Residents' Charter of HS2 Paragraph 6 states "Respect the wellbeing of the communities, minimising disruption to their lives with local mitigation plans and activities, ensuring we meet the standards set out in the Code of Construction Practice."

HWRC relocation can be done within the local area PC-01-049 of HS2 development. The best suitable place is a plot to the east of HS2 route, restricted by HS2 line, A45, and A452.

Relocating HWRC to this alternative location would comply with Residents' Charter of HS2 Paragraph 6 on minimising disruption and respecting the wellbeing of the communities.

A section of A452 to the south of Stonebridge Junction is NOT a Key Route as described in Network Policy of the West Midlands Combined Authority (WMCA). If the entrance to a relocated HWRC would be from A452 that would create less congestion on the Key Route network and would have less negative impact on health and wellbeing of local residents according to the WMCA.

The alternative proposed location is NOT designated for residential development as per the Local Plan. This area will likely to see construction disruption due to HS2 development anyway, so it cannot be considered protected due to HS2 construction.

If the entrance to a relocated HWRC would be from A452 then the site has potential to extend as far westwards as the HS2 line providing suitable area for waste management utilising plots not suitable for residential development.

Given high train speed of HS2, the negative impact on passengers and staff would be minimal.

(Continue on a separate sheet /expand box if necessary)

**Please note** *In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.*

**After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.**

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

☐

**No**, I do not wish to participate in hearing session(s)

☒

**Yes**, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

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The Cabinet and Conservative majority of the Solihull Metropolitan Borough Council tend to hide critical information from local residents and their elected representatives from other political parties as highlighted by this example of the planned relocation of HWRC. However when such hiding of critical information is revealed, the entire conversation diverts along party politics route, while the best interests of local residents may be overlooked by some members of the Cabinet and the Council. Therefore an additional participant with no political party affiliation will be absolutely beneficial.

Also, given the draft of the Local Plan was created with clear signs of ignoring policies and practices of other organisations and/or central and regional government bodies (i.e. HS2, WMCA), the entire process significantly undermines confidence in the Cabinet ability to deal with details of the Local Plan while finding best alternatives for critical changes to infrastructure. Therefore, my participation in the hearing would greatly benefit local residents' interests by providing experience in design of engineering and logistical solutions with multi factor analysis and optimisation.

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

9. Signature:



Date:

2020-  
12-13