

# **PROPOSED LOCAL AREA PLAN FOR THE HS2 INTERCHANGE & ADJOINING AREA INITIAL (REGULATION 18) CONSULTATION**

## **November 2014**

### **Consultation Questions**

#### **Question 1**

*Do you agree with the approach to the Local Area Plan, focussing on the HS2 Interchange site and adjoining area? If not, what alternative approach should be adopted?*

No. It is not appropriate to look at this site in isolation.

What alternatives were looked at?

Why is only 1 option included in the consultation? Any consultation should offer the public alternative options, these should include:

- Do- nothing/do-minimum
- Less land take e.g. keep to 1 side of the proposed Interchange station
- Limit use of the Interchange site for industrial/commercial only
- Put housing on brownfield sites available elsewhere within the Borough.

What happens if HS2 does not proceed? Is this area of Green Belt now blighted allowing developers to pick it off in the future?

It should not be looked at in isolation. As well as the site itself the ripple effect of the proposed HS2 development, Resort World and Garden City on surrounding communities need to be considered and negative impacts on them mitigated. Otherwise the surrounding communities are having the pain but no gain.

What is the evidence of need for the level of proposed housing? How much is for Solihull, how much for Birmingham and how much would be for generated movements of people from London for them to commute back to London?

What is the evidence of need for the level of business need? Has the existing sites at Blthe Valley.Birmingham Business Park been fully developed and occupied? If not when is this forecast to happen?

#### **Question 2**

*Do you support the Vision proposed for the Local Area Plan? If not, how might the vision be improved?*

The vision is limited and very much focused on economic benefits. Much more needs to be done to make the vision sustainable and future proof for future generations e.g. not just Garden City as a concept but drive it as a green city – focus on sustainable/community energy systems, only green cars, public transport etc.

Is the metro extension due to come to it?

It should at the very least be an ultra low emission zone to nudge behaviour to more sustainable forms of transport and benefit the community by using the income to fund necessary community and other infrastructure projects.

As there is to be a significant enhancement of accessibility from the M42 then the proposed MSA at Catherine de Barnes should be located here to minimise the Green Belt land take. This would avoid having too many junctions on this stretch of the M42.

Again use best practice developed by Merton Council in having demanding sustainability standards for sustainable e.g. Merton Rule required “new developments to generate at least 10% of their energy needs from on-site renewable energy equipment in order to help reduce annual carbon dioxide (CO2) emissions in the built environment. [Considering raising this to 20%]”. Not just suggesting a link to the NEC energy network.

### **Question 3**

*Do you support the proposed strategic priorities of the Local Area Plan? What alternatives should be included?*

Again these are limited and the proposers should have offered realistic alternatives to what is being proposed. See points above.

How will the priorities be applied across the Borough as a whole or at least in the surrounding communities?

Generated traffic and its impact on the surrounding communities needs to be assessed and modelled and mitigation provided to the affected surrounding communities.

### **Question 4**

*Does the evidence highlighted provide justification for the Local Area Plan? What additional evidence needs to be gathered?*

Need to collect the evidence to carry out a full cost benefit appraisal to provide evidence that what is being proposed provides value for money to the community as a whole. This appraisal should include assessing the costs and benefits of permanently losing this area of GreenBelt and reducing the size of the Meriden Gap.

### **Question 5**

*Do you agree with the scope for the Local Area Plan sustainability appraisal?*

No again to is too limited.

Why wasn't a Strategic Environmental Appraisal carried out as part of the LAP?

See comments above wrt to Green City. Shows a lack of imagination?

Look at the lack of mention of community facilities - not mention until 7.2.1. Even then it is a throwaway in 7.2.1 - no mention of schools, GP surgeries, pharmacies, shops, churches community centres, sports fields etc all necessary to sustain any community and so often overlooked by planners.

### **Question 6**

*Do you have any other comments about the proposed content of the Local Area Plan?*

It is schematic and needs much more work before there is anything worthwhile to consider.

How do you justify claiming to protect, enhance or secure protection of the Green Belt and Meriden Gap when you are proposing to build on it (4.5)