

**Aston, Newtown and Lozells
Area Action Plan**

**Regulation 30 (1) (e)
Consultation Statement**

**Birmingham City Council
Local Development Framework**

August 2011

1.0 Publication Stage Consultation (Regulation 28)

- 1.1 The Proposed Submission Document was endorsed by the Council's Cabinet in December 2010 for subsequent Full Council approval on the 13th January 2011. It was placed on deposit for 6 weeks from 21st February to 1st April 2011 for representations to be made based on the soundness and legal compliance of the Plan.
- 1.2 Twenty one representations were received - three of which supported the soundness and legal compliance of the AAP while the remaining were detailed comments covering a number of focussed topics.
- 1.3 A summary of the main issues raised are as follows:
- The Environment Agency - further modelling for flood risk required of the Hockley Brook, and AAP mixed use sites.
 - Walsall Council - expansion of Perry Barr/Birchfield Centre inconsistent with RSS, lack of evidence for proposed level of comparison retail development which would adversely impact on Walsall and West Bromwich Town Centres.
 - The Highways Agency - concern about impact of RIS on Strategic Road Network. Further baseline modelling required and a Travel Framework Plan for the RIS.
 - Sport England - lack of indoor and outdoor sports facilities not addressed in the AAP.
 - Goodman - RIS site should be re-designated as good quality industrial/warehouse accommodation B2/B8, not as a RIS office/employment park.
 - Centro - support for the AAP overall strategy and approach. Require reference to Vision for Movement, the West Midlands LTP3 and the Integrated Public Transport Prospectus, support in principle for 4 tracking of Aston Station, the implementation of the A34 Rapid Transit Corridor and developer contributions for public transport improvements.
 - Aston Heritage Network/Aston Parish Church – Plan requires review of Conservation Areas, consideration of further buildings within Aston Transport Museum proposal.
- 1.4 The following table provides a more detailed summary of the representations and the Council's response.

Name of Organisation/ Individual	Summary of Representation	Response/ Comments	Suggested Amendments to AAP
Turleys on behalf of Birmingham City University	Support for the AAP Minor amendment required to Plan 3 Open Space Strategy.	Agreed. Correct drafting error on Plan 3 Open Space Strategy.	Amend Plan 3.
British Waterways	Support for the AAP Minor amendments required to emphasise importance of canals.	Agreed.	Focussed changes to reflect comments.
Severn Trent Water	Support for the AAP.	Noted.	No change.

Dr Khalade	Support for the AAP.	Noted.	No change.
Aston Arena Sports, Leisure Health and Education Ltd (cic)	Object to Regional Investment Site - wish to continue operating the Aston Events Centre and seek renewal of licence with the future new owners of the Serpentine site.	The Regional Investment Site will include a leisure/sports element, most likely on the current Serpentine site when it is redeveloped. Whether the current operators will be given a renewal of their licence is essentially an estates matter and is likely to be by means of open competition.	No change.
Mr Ahmed	Support for the AAP.	Noted.	No change.
Aston Heritage Network (and Aston Transport Museum)	Request that Aston Hall and Church Conservation Area be subject to a Character Appraisal and Management Plan, and that a new Conservation Area is merited for Central Aston (around the Fire Station) and that Aston Tram Shed policy should include adjoining historic buildings	<p>Aston Tram Sheds have been reassessed to include adjoining additional buildings on the Council's Historic Environment Record and the AAP policy amended.</p> <p>Conservation Area designation is not reliant on the number of listed buildings in any area, but the over riding character created by the buildings, spaces and landscape and the relationship between them. Limited financial and staff resources influence the number of CAAMP completed and their priority. As part of the bid for HLF funding for Aston Hall and Park, significant survey work and analysis was completed for an area which in affect covers approximately 80% of the conservation area. A conservation area character appraisal for Aston Hall and Church Conservation Area is therefore not of high priority.</p>	<p>The AAP amended to be consistent with the revision to the Council's Historic Environment Record – including the additional historic buildings.</p> <p>No change - an additional conservation area designation is not justified.</p>
Walsall Council	The floor space figures in Policy LC1 for Perry Barr/Birchfield are inconsistent with the	A Retail Impact Assessment has been carried out to support both the Core Strategy	The AAP and Core Strategy retail figures for Perry Barr/Birchfield will be reduced by

	<p>RSS and there is a lack of evidence base for the proposed level of comparison retail development which would adversely affect Walsall Town Centre.</p>	<p>and AAP by assessing the impact of the proposed expansion of Perry Barr/Birchfield Local Centre upon Walsall Town Centre and West Bromwich which demonstrates minimal impact of the proposed floor space figure upon these centres.</p>	<p>5,000m2 to 20,000 m2 over the 2008-2026 (10,000m2 to 2021) to bring them in line with the RSS. This will be accompanied by strengthening of the phasing policy to require that any proposals for the period post 2021 should be subject to further assessment in relation to need and impact and should not be granted before 2016.</p>
<p>Aston Parish Council</p>	<p>Several points made in relation to the possible impact of the RIS on the Aston Hall & Church Conservation Area, opposition to any expansion of Aston Villa Football Stadium/activities, and seeking developer contributions for improvement of the Church yard.</p>	<p>Agreed .The document to be amended to state that future expansion plans at Aston Villa Football Stadium will be supported if in compliance with both national and local policy and guidance.</p> <p>Agreed .Paragraph 5.13 relates to open space and play areas. There is no reason why a monetary contribution through a section 106 agreement could not be targeted at Aston Churchyard.</p> <p>Conservation Area designation is not reliant on the number of listed buildings in any area, but the over riding character created by the buildings, spaces and landscape and the relationship between them. Limited financial and staff resources influence the number of CAAMP completed and their priority. As part of the bid for HLF funding for Aston Hall and Park, significant survey work</p>	<p>Amend wording relating to Aston Villa Football Stadium.</p> <p>Amend Policy R3 to include Aston Churchyard.</p> <p>No change.</p>

		and analysis was completed for an area which in affect covers approximately 80% of the conservation area. A conservation area character appraisal for Aston Hall and Church Conservation Area is therefore not of high priority.	
Centro	Observations – requiring support in the AAP for the principle for 4 tracking of Aston Station, the implementation of the A34 Rapid Transit Corridor and developer contributions for public transport improvements	Agreed. Amendments to Plan agreed with Centro	Minor wording changes made to the AAP transport policies.
English Heritage	Support for the AAP.	Noted	No change.
Environment Agency	Update and undertake further baseline work including a comprehensive survey of the Hockley Brook to produce accurate modelling of the potential flood risk. Flood Risk Assessments to be undertaken for some mixed use sites, including Perry Barr, and policies improved to tackle water quality in the plan area.	Baseline to be amended after further work undertaken to assess flood risk in the plan area in particular the Hockley Brook. Meeting with EA has agreed the additional baseline work and the proposed amendments to policies.	Policies amended to include water quality improvement aspirations and climate change adaptation measures, and to take account of additional flood risk baseline analysis.
Coal Authority	No specific comments made.	N/A	No change.
Goodman	The proposal for a RIS is unsound as the East Aston site is fragmented, its accessibility at the local level is not good, and will require site assembly, clearance and new infrastructure to create the RIS .It will be not have a sufficiently high quality environment to attract high quality office or B2 occupiers of national or international standing. It is better suited to good quality	Argument not accepted. The Council is preparing a Development Framework for the proposed RIS which will address issues of accessibility, land assembly, phasing of development and urban design principles in creating a high end-use business park primarily for B1 uses and high quality B2 uses as well as leisure/hotel supporting uses. This will	No change.

	<p>industrial/warehousing accommodation within B2 and B8 use classes.</p>	<p>be founded on a market - led, commercially-aware Deliverability & Viability Assessment by independent consultants. The site is not considered appropriate for another Junction6 type development due to the likely impact of HGV movements on the M6, the lack of opportunity to transform the visual impact of this important gateway, and through the type of jobs associated with distribution/industrial parks.</p>	
<p>Highways Agency</p>	<p>The transport evidence base underpinning the AAP is incomplete and therefore has implications in whether the AAP is sound or deliverable. Additional modelling is required to test the impact of the RIS on the M6 and the HA's proposed M6 Birmingham Phase 3 Managed Motorways Scheme.</p>	<p>Given the site's close location to Junction 6 of the M6, it is acknowledged that any adverse impacts must be effectively mitigated through the development of a balanced package of sustainable transport, demand management and physical improvements. Additional transport modelling has therefore been undertaken to demonstrate the impact of the RIS on the M6. On the basis of the low level of traffic assignment to the SRN, early indications of this modelling show no significant impacts on the operation of the M6 or Junction 6 at Gravelly Hill.</p> <p>In addition, the Council has prepared a Framework Travel Plan for the proposed RIS and added a further policy into the AAP requiring developers/occupiers to formally sign up to and implement this document in consultation with the</p>	<p>Further modelling has been undertaken and a Framework Travel Plan prepared to strengthen the AAP Policies and Proposals, in particular the potential RIS impact.</p>

		<p>Council, Centro and the HA.</p> <p>Other comments provided by the HA have been addressed in either the AAP submission document or the Transport Strategy (previously identified as the Movement Strategy).</p>	
Natural England	<p>Observations – numerous detailed comments made to strengthen the biodiversity and sustainability policies and reference to the City’s emerging Green Infrastructure Strategy to be inserted.</p>	<p>Agree with the majority of the detailed comments made.</p>	<p>Minor focused changes made and reference to new documents.</p>
Sport England	<p>Importance of sport not recognised. Lack of indoor and outdoor sports facilities not addressed.</p>	<p>Agree. Additional baseline evidence to assess level of existing indoor and outdoor sports provision and reference to new and emerging provision.</p>	<p>Changes to the Plan to recognise importance of sport and refer to new and emerging sports facilities to be provided in the area.</p>
Entec UK Limited (on behalf of National Grid)	<p>Land beneath Spaghetti Junction is crossed by a section of underground cable. No permanent structures should be built over or under cables or within the zone specified by agreement.</p>	<p>Agreed.</p>	<p>Clarify in Plan that no permanent structures are to be built over or near the cables and safe unrestricted access must be maintained at all times.</p>
Mrs Field	<p>The AAP needs to include additional buildings (former Steam Tram Shed and offices/residence) in the policy for the safeguarding of the Aston Transport Museum. This complex should be treated holistically as one heritage asset.</p>	<p>Aston Tram Sheds have been reassessed to include adjoining additional buildings on the Council’s Historic Environment Record and the AAP policy amended.</p>	<p>The AAP amended to be consistent with the revision to the Council’s Historic Environment Record – including the additional historic buildings.</p>
Mr Haynes	<p>The Greyhound Stadium at Perry Barr should not be an opportunity site, as it is in a sustainable</p>	<p>Agree that such uses should be located in highly accessible locations in or adjacent</p>	<p>Policy LC1 will be amended to emphasise that “equivalent provision made should</p>

	<p>location for its use (including for speedway as well as greyhounds). Any relocation is not acceptable as it must refer to an equally acceptable location with a requirement to provide equivalent development. Any retail expansion of the centre can be accommodated on the One Stop site.</p>	<p>to centres. The current AAP policy states that “any replacement provision should be at least as accessible to current and potential users as the existing facility.” For clarity this will be amended to read, “equivalent provision made should be at least as accessible to current and potential users as the existing facility.”</p> <p>In regard to the Perry Barr Greyhound Stadium there is an opportunity to enhance the existing leisure offer and develop complementary uses on land surrounding the stadium. If the stadium was redeveloped, equivalent provision should be made at least as accessible to current and potential users as the existing facility.</p> <p>The main reason for the change is in relation to the reduction in proposed retail growth floor space for Perry Barr/Birchfield Centre from 25,000 sq. m. to 20,000 sq. m. to bring the policy in line with the West Midlands Regional Spatial Strategy.</p>	<p>be at least as accessible to current and potential users as the existing facility.”</p>
Mr Miah	<p>Plan is unsound as insufficient public consultation was undertaken.</p>	<p>At each stage of the plan process, full consultation was undertaken through exhibitions, drop-in sessions, telephone help-line, public meetings, and newsletters to each household and business in the plan area.</p>	<p>No change.</p>

