

3Bs Neighbourhood Plan – Summary of Regulation 16 Representations

Representation:	Comment (summarised or extract):
Birmingham Civic Society	General - no comments to make at this stage.
Environment Agency	<p>Several additions requested to policies including:</p> <p>NPP 2 Sustainable Development: Rewording of 1) a) to read ‘Proposals are required to demonstrate they will; improve biodiversity (by promoting the planting of trees, shrubs, and natural flora)’ Addition of 1) l) to read: ‘l) protect and enhance the natural ecological & geomorphological function of watercourses’</p> <p>NPP 3 Improving the Parks Addition of 2) d) ‘look to facilitate the natural processes of the River Tame’ Addition of 3) e) ‘naturalise the Perry Brook to restore natural functions, improve biodiversity and slow flows’ Addition of 4 f) ‘look for multi-functional solutions to improve, water attenuations, water quality, biodiversity and public amenity value’</p> <p>NPP 5 Improving blue and green connections Addition of 1) g) ‘incorporating a buffer zone free from proposed development & hardstanding next to watercourses which can be naturalised to provide space for water, biodiversity and natural geomorphological processes.’</p> <p>NPP 7 Improving Biodiversity Suggested rewording to avoid using the term ‘meadows’ as this implies a high expectation which can only be achieved through very specific establishment and maintenance requirements. This is fine if the resource is available</p>

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	<p>but can lead to disappointment where not. Biodiversity gains can often be achieved via less onerous inputs, for example reducing grass cutting.</p> <p>NPP 9 Regeneration of Tower Hill Shopping Area Addition of 1) 6) 'Regeneration that looks to enhance and treat the River Tame as a valuable aesthetic asset and improve community connectivity to the river will be supported'</p>
National Grid	National Grid has identified that it has no record of assets within the Neighbourhood Plan area.
Historic England	<p>Historic England has no adverse comments to make upon the draft plan which we feel takes a suitably proportionate approach to the main historic environment issues pertaining to the plan area. We commend the commitment in the Plans Vision, objectives and policies to support well designed development that is sympathetic to the character of the area whilst conserving significant local heritage assets (including through Local Listing). Proposals to consolidate and enhance existing green infrastructure, protect green spaces and to work towards a "garden suburb" character for the area are equally commendable.</p>
Natural England	General - no specific comments to make.
Severn Trent	<p>General comments:</p> <ul style="list-style-type: none"> • Provided information on the company and its role in specific relation to sewage strategy, surface water and sewer flooding, water quality and water efficiency. • States the company look forward to providing more comprehensive comments when more detailed plans and geographical locations of developments become available.
West Midlands Police	<p>General comments:</p> <ul style="list-style-type: none"> • States that community safety issues, crime and the fear of crime are important to consider in plan-making. • Signposted where crime statistics for the area can be found. • Notes the former Walsall Road police station is mentioned in the plan. This building is no longer owned by West Midlands Police, it was sold at auction in 2018. • States a site visit was undertaken (this included Tower Hill area, Thornbridge Avenue area and Turnberry Road area). From this visit, the following observations were made:

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	<ul style="list-style-type: none"> - Previously, gating schemes of vehicle driveways/alleyways have taken place in the area - A34 corridor - subways along its route were historically under used and unsightly – a programme of works over the years has seen these “designed out” and street level pedestrian crossings installed – safer, improved natural surveillance etc - Major works have taken place at A34/A453 junctions and between One Stop Shopping Park and the former BCU site - A34 corridor has seen installations of CCTV & ANPR (Automatic Number Plate Recognition) projects over the years to improve safety, traffic management and crime reduction - Inconsiderate parking on grass verges - Street Lighting – there is currently a programme of works to upgrade street lighting in Beeches Road - Public Open Space forms a sizable part of the plan areas and witnesses considerable community involvement.
The Canal & River Trust	<p>General comments:</p> <p>The Trust welcome the vision of the document, especially the recognition of the central role of connectivity and wayfinding within the area. Improving connectivity and wayfinding within the plan area is a significant objective of the Trust.</p> <p>Comments on specific policies include:</p> <p>NPP1 Pre-Application Community Engagement: The Trust welcomes the inclusion of Policy NPP 1, the Trust is happy to provide pre-application advice to applicants/developers in our role as a statutory consultee. Pre-application advice from the Trust can be pivotal in the early identification of constraints and opportunities at sites in close proximity to our network and/or our assets. As such, there is an opportunity to include recognition of this within the main body of the text in relation to canalside development.</p> <p>Policy NPP 2 Sustainable Development:</p>

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	<p>We note a minor typographical error that should be corrected. Point E of Policy NPP 2 should read as ‘enhance connections between, and accessibility to, the parks and <u>waterways</u> for active forms of travel’.</p> <p>Policy NPP 3 Improving the Parks: We strongly support the intention for development proposals in Perry Park to improve biodiversity around the Tame Valley Canal, which is designated as a County Wildlife Site. As such, the Trust is happy to work with the Neighbourhood Forum regarding signage in the plan area.</p> <p>Policy NPP 5 Improving Blue and Green Connections: We suggest that Policy NPP 5 is amended to read as: ‘Proposals that provide visibility to the canal through or over the bridge on Walsall Road are supported subject to the proposals not having an adverse impact on the structural integrity of the canal infrastructure and the biodiversity and amenity values of the canal corridor’.</p> <p>Policy NPP 6 Reducing the Risk of Flooding: We recommend that the following paragraph is included with the AECOM SuDS Guidance Report, which applicants/developers must take consideration of in accordance with Policy NPP 6: ‘Where a proposed development is adjacent to the Tame Valley Canal, then the location of any soakaway or SuDS system should be at least 10 metres away from the top of the canal cutting. This is required in order to protect the structural integrity of the canal infrastructure’.</p> <p>Policy NPP 7 Improving Biodiversity: The Trust welcomes the inclusion of a policy that promotes the need for developments to achieve biodiversity net gain.</p> <p>Policy NPP 12 Protecting and Enhancing Heritage Assets: Though the Trust supports the inclusion of Policy NPP 12, it should be noted that Map 14 is inaccurate as Locks 1 and 2 should be marked as statutorily listed. Moreover, paragraph 162 implies that all locks and bridges within the plan area are listed, which is incorrect (Perry Barr footbridge is listed, as well as Perry Barr Locks 1 and 2).</p>

Representation:	Comment (summarised or extract):
	<p>Comments on Community Actions:</p> <ul style="list-style-type: none"> • Notes the Community Action on page 42 indicates that the Forum will work with ‘the Police and other agencies to address the fly tipping and maintenance issues on Regina Drive and other sites to be identified in due course by the Forum’. This action is supported by the Trust. • Notes it is posed within the Plan the idea of the Neighbourhood Forum adopting a stretch of canal. This is something that the Trust would welcome, and we are keen to work with local organisations and agencies to create opportunities for community adoptions.
Sport England	<p>General comments:</p> <ul style="list-style-type: none"> • States there is an omission of the Birmingham Playing pitch Strategy as the City-wide Studies. • Suggests bullet point one of community vision is amended to read: ‘a safe, healthy, pleasant and accessible place to live’. • Requests there is an emphasis on designing for a healthy community and new buildings following passive design principles. • Requests greater reference to the importance of playing fields and formal and informal activities in the plan. • Supports Policy NPP5 - It is important to ensure good connectivity and accessibility to blue and green connections. • States that improvements to prevent flooding should not be to the detriment of the playing fields at Perry Hall Park and elsewhere. • Supports Policy NPP7 in principle but requests more detail on delivery. • States concern the biodiversity improvements could impact negatively on formal sport. In particular the creation of new wildlife corridors could create planning blight on the ability to install sports lighting to sites. Requests an impact assessment is provided for any biodiversity improvements within 50 m (or some other agreed distance) of playing fields, multi-use games areas, tennis courts skate or BMX facilities. • Support principles in Community Objectives section 6.

Representation:	Comment (summarised or extract):
	<ul style="list-style-type: none"> • Supports engaging with the community but need to ensure a vocal minority does not skew engagement. • Requests the inclusion of a positive statement on the improvement of sports facilities/playing pitches in the parks in the 'Improving the Landscape Character' section of the plan. • Requests greater clarity in Policy NPP 14 Protecting and enhancing the provision of community facilities.
Council for British Archaeology, West Midlands	<p>General comments:</p> <ul style="list-style-type: none"> • Supports Policy NPP12 but requests the following amendments: <ul style="list-style-type: none"> - Para 161 - second sentence should read: 'Water mills were a feature of the area and there are millpools and the sites of mills i Perry Park'. Third sentence should be parks not park. - Para 164 - "planning custom and practice" should be "planning legislation and policy" - Para 165 - It would be better to say zig-zag bridge (Perry Bridge) because Perry Bridge is its name in the National Heritage List for England. This paragraph could also point out that the bridge is the only scheduled monument in the 3Bs (it is also a grade II listed building). It is not medieval but dates to the 18th century although it is in a medieval style. We support the comments about its setting. • Para 55- Perry Park also contains heritage assets. • Para 57- Perry Hall Park- the medieval moat and former fishponds are heritage assets. • Para 61- Perry Park contains heritage assets- former mill pools and the sites of watermills. • Support policy NPP 3 2(a) to enhance heritage assets in Perry Hall Park but it should read east of the River Tame, not north. • Appendix B - support the nomination of buildings for local listing. • Appendix F - suggest it should be re-drafted and provided links to information that could be used for the redraft. • Para 195 - as noted above, the zig-zag bridge is not medieval.
Member of the public	<ul style="list-style-type: none"> • General support for the plan including enhancing biodiversity and street greenery and improved access to the parks and river. • Requests that wildflower seeds are planted – referenced example of Shirley Park. • Asked if the West Midlands Cycle Hire scheme will be included and planned for.

Representation:	Comment (summarised or extract):
Member of the public	<p>General comments:</p> <ul style="list-style-type: none"> • Asks why the Athlete’s Village and area around the railway station isn’t included in the plan boundary. Suggests they should be included. • States there is no focus on changing residents' attitudes to public and active transport. Suggests the plan should refer more explicitly to the public transport provision in the area. • Supports plans to improve the environment for pedestrians and cyclists. • Requests the plan goes further to deal with reducing the impact of cars on pedestrians, people living and working in the area and the climate emergency. • Suggests more ambitious plans to restrict traffic should be included in the plan. • States that Perry Barr Locks create a moat-like barrier to accessing the park. Suggests improvements are made to improve accessibility. • States that rain gardens between pavements and the roads will catch surface runoff and minimise flooding, releasing water into the water table more slowly. • Suggests the plan could identify surface level car park for more productive uses, such as residential apartments near local centres to support local businesses and provide a greater variety of housing. • Agrees that Tower Hill is identified as an under-utilised local centre. Suggests work is undertaken to improve the pedestrian environment. • Supports the list of buildings recommended for local listing. Suggests creating several distinct conservation areas to minimise poor alterations to buildings and ensure they meet a standard in keeping with local character.
Member of the public	<p>Requests the plan goes further to improve the environment for pedestrians including pedestrian safety and takes measures to reduce car pollution and mitigate against a car dominated environment.</p>
Member of the public	<p>General support for the plan and its vision including:</p> <ul style="list-style-type: none"> • Improving accessibility to and between parks

Representation:	Comment (summarised or extract):
	<ul style="list-style-type: none"> • Encouraging greater engagement with the local community • The introduction of SuDS drainage schemes • Increasing biodiversity • Protecting heritage • Employment opportunities <p>Supportive of policies to improve shopping hubs and the need to create a community facility at Tower Hill.</p>
Member of the public	General support for the plan especially improving the biodiversity in the plan area natural environment and parks. Suggests the plan goes further to support community venues for all ages but in particular for teenagers.
Member of the public	General support for the plan but concern regarding car parking on streets in the area. Also suggested the Tower Hill area requires improvement.