

Full Name	Email address	Organisation Details	Full Comment	Summary of comment	City Council Response
Dr Mike Hodder	mike.hodder@blueyonder.co.uk	Council for British Archaeology, West Midlands	<p>1. We welcome the inclusion of Plan 5 which shows archaeological sites in the Historic Environment Record. To be consistent with Plan 5, the first bullet point in the Archaeology section on p10 needs to mention other archaeological sites shown on the plan, including Westbrook House and Electric Avenue. The wording relating to Electric Avenue medieval moated site is incomplete- it needs to say ""development proposals on or in proximity to the Electric Avenue medieval moated site and other archaeological sites"" and state that following the evaluation further archaeological excavation may be required, followed by analysis and publication of the results. "</p>	Suggested change of wording	Noted, however these issues are dealt with in far more detail in policy TP12 and this guidance does not need repeating
John Dingley	john.dingley@environment-agency.gov.uk	The Environment Agency	<p>1. Flood Risk- we support the design principle of a 15m wide landscape buffer along the River Tame corridor; however it is unclear whether any new planting is proposed in the floodplain.</p>	Supportive of landscape buffer, subject to it not being within the floodplain.	The floodplain does not impact on the development site, which is where the landscaped buffer will be delivered.
			<p>2. The Draft Development Framework should make clear that should high density planting be proposed in the River Tame floodplain then a Flood Risk Assessment (FRA) should be undertaken to demonstrate that it will not obstruct flood flow routes, increase the flood risk elsewhere or restrict access to the watercourse for maintenance. Any plants/shrubs planted should be appropriate native species and should be planted as individuals or in small groups, in rides which run parallel with the direction of flow.</p>	Request guidance on planting within floodplain	Noted, reference made on page 10 to consulting the Environment Agency on all proposals within the Flood Zones 2 and 3. All of the land in the AMH that is in the River Tame floodplain is within these zones.
			<p>3. Some parts of the plan area (namely Areas A, B and F3) are shown on our indicative Flood Map to be located within Flood Zone 2. Flood Zone 2 is defined as an area of land with a 'medium' probability of flooding. The existing LDO for the Aston AMH has a number of policies relating to flood risk/drainage. To supplement these policies we recommend that the following design principles are added to the DDF.</p> <ul style="list-style-type: none"> - All buildings located in Flood Zone 2 should have finished floor levels set at a minimum of 600mm above the 1 in 100 year plus climate change flood level and at least 300mm above average surrounding ground level. Where floor levels cannot be raised sufficiently above the design flood level than flood resistance and resilience measures should be implemented. - A flood warning and evacuation plan should be prepared for any development located within Flood Zone 2 - There should be no buildings, structures or raised ground levels within 8m of the River Tame. 	Request detailed guidance on development within flood zones 2 and 3	Noted, however reference made to consulting the EA on development within Flood Zones 2 and 3 which allows for any potential change in standards.
			<p>4. Under the terms of the Water Resources Act 1991, and the Midlands Land Drainage Byelaws, prior written consent of the Environment Agency is required for any proposed works or structures, in, under, over or within 8 metres of the top of the bank of the River Tame, designated a 'main river'.</p> <p>Birmingham City Council's drainage team as the LLFA should be consulted in regard to any on site surface water drainage arrangements/requirements. We would recommend that sufficient space is allowed within the development layout to accommodate above ground SuDS features such as wetlands, swales etc. The River Tame as this point suffers from diffuse pollution issues so SuDS should look to improve the water quality of any discharge.</p>	Note that BCC drainage team should be consulted as the LLFA	Noted, Birmingham City Council's drainage team are consulted on new developments and advise accordingly.

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			<p>5. Groundwater and Contamination- Much of the plan area has an industrial past so it is likely that contamination is present. The site is located on a Principal Aquifer which may support water supply and/or river base flow on a strategic scale. The groundwater underlying the site and the nearby River Tame are considered to be the most likely 'Controlled Water' receptors at risk from contamination.</p> <p>There is a well established risk based procedure for dealing with contamination in England and Wales. Contamination present within the plan area should be dealt with in accordance with this established framework. We recommend that developers are made aware of these requirements and that the Development Framework makes reference to the following documents:</p> <p>-The National Planning Policy Framework sets out government's planning policies for England and how these are expected to be applied. This includes the high level minimum standards and responsibilities for dealing with land contamination. https://www.gov.uk/government/publications/national-planning-policy-framework-2</p> <p>- Model procedures for the management of land contamination (CLR11) is a joint Defra and Environment Agency Publication that has been developed to provide the technical framework for applying a risk management process when dealing with land affected by contamination. https://www.gov.uk/government/publications/managing-land-contamination</p> <p>- Guiding Principles for Land Contamination (Parts 1 to 3). Offering guidance for those that cause contamination, affected land owners and developers. https://www.gov.uk/government/publications/managing-and-reducing-land-contamination</p>	<p>Note that it is likely there is contamination present and that the groundwater underlying the site is at risk from contamination.</p>	<p>Agreed, new section added on Groundwater and Contamination in response.</p>
Lynn Purchase	lynn.sauc@hotmail.co.uk	Aston Heritage Network	<p>1. We support the provision of a buffer zone between the Serpentine Ground and the Aston Park and Church Conservation area. However, we would much prefer the views opened up between the Serpentine Ground, railway and the conservation area. The churchyard adjacent to the buffer zone is overgrown and would benefit from pruning back in parallel with reduced planting in the buffer zone. We note that plan 7 mentions a new security fence between the Serpentine Ground and the conservation area. The Network supports the removal of the present security fence between the church yard and buffer zone and replacing it with a fence that you can look through. We see no value in installing a new security fence between the buffer zone and the Serpentine Ground'.</p>	<p>Support buffer, but suggestions made about detailed design principles.</p>	<p>Two plots of land have been incorporated into the original buffer boundary to take account of comments received, in order to create a more effective scheme. The overgrown area referred to has been included in the buffer boundary and will be cleared to open up views into the churchyard .</p> <p>With regards to the Security fence, given that the buffer is adjacent to a private industrial development, the occupier is erecting a security fence (powder coated paladin fence) to minimise impact of the buffer. This should not detract from the effectiveness of the buffer. The fence is needed as it is part of the site security. In terms of the new boundary treatment to the churchyard, decorative railings are proposed as part of the buffer proposal. - more in keeping with the setting of the church</p>
Nigel Cripps		Parish of Aston and Nechells	<p>1. In regards to Section 8 (Layout)- Agree that the existing views are retained of the Aston Hall and Church Conservation Area but we should do better than that. We should however do better than that because views are currently obstructed by overgrown saplings especially in the West Brook House site that is City Council owned. Significant tree removal is needed and this will open up new views. The areas that have been allowed to go to nature should be brought under management.</p>	<p>1. Tree removal is needed to open up new views, particularly in the West Brook House site. There needs to be some sort of management in place for the sites left to nature.</p>	<p>1. The landscaped buffer for the Serpentine site has been developed in consultation with Aston Parish Church, specifically Nigel Cripps as projects officer. Two plots of land have been incorporated into the original buffer boundary to take account of comments received, in order to create a more effective scheme. The overgrown area referred to has been included in the buffer boundary and will be cleared to open up views into the churchyard. The Council is committed to delivering the buffer, which is a requirement of the adopted LDO.</p>

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			2. In regards to Section 8 (Landscape)- The buffer between the Serpentine Ground and the Conservation area is different to the others. The conservation area boundary is overgrown (it has not been maintained) and this needs to be addressed as part of the buffer zone planting scheme. The removal of numerous saplings may be all that is needed certainly not the scale of planting between the footpath and road way shown in the sketch on page 14.	2. The conservation area boundary needs to be maintained as it is overgrown, thus clearance is needed.	2. A degree of tree clearance is taking place as part of the buffer proposal. However, the project cannot fund clearance/maintenance across the churchyard as a whole.
			3. Plan 4- The Parish fully supports the provision of a footpath through the church yard but has no funds to undertake the works.	3. Wishes to see a footpath through the church yard	3. The buffer proposal does not include plans to create a pedestrian link through the churchyard. It is acknowledged that the church wish to create this link, but it would need to feature as part of a later phase, and a funding stream would need to be identified for this.
			4. Section 12 Area B- A landmark building is required on the corner of Aston Hall Road and Lichfield Road. (The stunning and listed King Edwards Pub was demolished on this corner and a suitable landmark building is needed to replace it). The illustration on page 12 is not attractive enough.	4. The proposed building is not attractive enough as a landmark/gateway to the RIS.	4. It is recognised that this is a prominent location/gateway into the RIS and a high quality scheme is needed at this location. This is stated in the Development Framework.
			5. Section 12 Area C- See comments on plan 7	See below	See below
			6. Section 12 Area D- The Aston Tavern and the Parish Church have a capacity that far exceeds the car parking space available. The Serpentine Ground used to meet this need but will not in future. The Framework explains how the new businesses are going to provide for their car park needs but it does not consider the needs of the existing high footfall buildings. Case study – 26 November there was a large funeral at Aston Parish Church, with the wake following at Aston Tavern. One hour before the funeral service all the car parking space was taken. At the start of the service the grass in front of the church was full and cars were parked in Trinity Road, the entrance to the Serpentine Ground, at Aston Hall etc. The situation did not change from 11 30am until after 5pm. Aston Villa is usually asked for access to the Holt End car park this is frequently refused it was on the 26th associated with security concerns. The boundary between the conservation area and Area D is inappropriate. The obvious solution is missing from this framework. The area under the Aston Expressway should be converted into a public car park and a tree lined more suitable boundary treatment provides to the west of the A38(M) viaduct. An alternative is to use the space partly below the Expressway between Aston Tavern and the Aston Social club There are problems with vibration and acid generated by the Expressway that could also be reduced by providing a more appropriate boundary treatment.	6. The church are not convinced enough parking spaces will be provided for the Parish church and future businesses. Car parking provision is suggested for under Aston Expressway/ alternative location suggested between Aston Tavern and the Aston Social club.	6. The Tavern has a car park adjacent which has car parking provision. The sites brought forward as part of the RIS will need to include a sufficient number of parking spaces to support new development. Unfortunately, there is no scope to use land within the RIS for public car parking purposes. It may be worthwhile contacting Aston Villa to determine whether an arrangement could be put in place to address on-going car parking problems. The Council will explore potential options for additional car parking facilities. Area D, opposite the C/A, is a well established industrial use. The Council will contact the occupier to discuss potential boundary treatment improvements.

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			<p>7. Plan 7- The plan suggests that there will be a perimeter fence to the north of the buffer zone but this is not shown on the sketch on page 14. Such fences have a reputation for being visually intrusive and in this situation would act as a visual barrier between the Serpentine Ground premises and the conservation area. An architect or similar professional is needed to ensure a good design solution.</p> <p>There has always been a concern that the buffer zone could become overgrown or a dumping ground. The open vista shown in the page 14 sketch will help prevent that. The enclosed passage for example Lovers Walk alongside Aston Station is dreadful and repeating that mistake must be avoided.</p> <p>Is this the latest plan? Understand that the eastern part (Aston Tavern end) of the buffer zone will be different with widening the access from Aston Hall Road and there are landownership issues. The road way is not wide enough for juggernaut lorries, a wider entrance is suggested.</p> <p>How will the enclosed land be maintained between the churchyard boundary and the buffer zone boundary? Can this become part of the churchyard maintenance programme? The plan does not identify access arrangements for the maintenance of this enclose space.</p> <p>The Parish supports to principle of removing the present security wall and replacing it with one that is sturdy but can be looked through. A satisfactory design would be similar to but not as grand as the boundary treatment around Birmingham Cathedrals Churchyard</p>	<p>7. The proposed perimeter fence to the north of the buffer zone must be well designed to avoid creating a visual barrier.</p> <p>Need to ensure the buffer zone does not become an overgrown or a dumping ground.</p> <p>A wider entrance is suggested for the Aston Tavern end of the buffer zone.</p> <p>Incorporate the land between the churchyard boundary and the buffer zone boundary into the churchyard maintenance programme</p>	<p>7. A perimeter fence will be constructed between the buffer and access road, which will serve the development plots. Discussions have taken place between LPG and the contractors to ensure the fence isn't visually unappealing/ detract from the buffer scheme.</p> <p>LPG have factored in a 15 year commuted sum for the maintenance of the buffer, which will ensure that it's well kept.</p> <p>The updated plan has been incorporated which includes the additional plots of land (EDD and unregistered plot). This will provide a wider entrance to the buffer.</p> <p>All the land within the buffer boundary will be maintained by Parks/ Leisure using the commuted sum.</p> <p>Reference made to new boundary treatment which will be appropriate to the setting of the conservation area on page 13.</p>
			<p>The Parish is keen to develop access from the Serpentine Ground into the churchyard and provide a higher quality footpath towards Witton Lane and Aston Hall. The church has no money for this and is keen to work with the City to secure funds for the work. Some design and cost estimates will be needed prior to making a funding application. This could be progressed by the team currently developing the buffer zone design.</p>	<p>Wish to work with the Council to provide a higher quality footpath from the Serpentine Ground into the churchyard.</p>	<p>As stated above, this aspiration is noted but these works would need to form a subsequent phase of development. The Council only has funds to deliver the landscaped buffer, which will provide a new boundary treatment to the churchyard, thereby opening up views to the church. It is recognised that feasibility monies are needed to undertake design work to enable a bid to be submitted, but no funding is available for this.</p>
			8. P16 photo - Caption- Not the Serpentine site	Caption incorrect	Agreed, caption amended
			<p>9. Appendix 1- The Parish supports the proposed enhancements to Aston Churchyard but has no money to deliver these improvements. We are keen to work with the City to deliver this scheme- see above.</p> <p>Allocating resources from Section 106 money is mentioned in the Appendix. The church has been told that there is no 106 money. The Aston, Newtown and Lozells Area Action Plan Policy R6 states "Section 106 and/or section 278 agreements will secure enhancement to Aston Church Yard", this funding is missing from the financing section of the 'enhancements to Aston churchyard' section in the appendix. This needs to be changed to meet Policy R6.</p>	<p>No allocation of S106 monies in the Appendix.</p>	<p>See above. S106 monies are being used to deliver the buffer works , which will provide a new boundary treatment to the churchyard: this element is regards as an 'enhancement to Aston Churchyard' (as stated in the adopted AAP). This is significant environmental improvement. Any further works will need to be funded from elsewhere.</p>
Susan Murray	susan.murray@naturalengland.org.uk	Natural England	We are encouraged to see the consideration and inclusion of green corridors in the indicative layout. We advise that green areas are multi-functional where possible and provide for the needs of both people and wildlife.	Supportive of green corridors.	Noted, where possible green areas will be multi functional and will provide for both people and wildlife.