

### **Draft Local Validation Criteria**

#### **Consultation Document July 2019**

Following a Referendum in March 2019, the Knowle Dorridge and Bentley Heath (KDBH) Neighbourhood Forum (NF) successfully completed development of its Neighbourhood Plan (NP), which was 'made' by Solihull Council on 11 April 2019. Our response below reflects the Forum's experience in preparing the NP and specifically highlights relevant content of Policies included in the NP that now forms part of the statutory Development Plan for the Borough.

#### **Criterion 10:**

The NF welcomes the requirement for all applications proposing changes to site levels of more than 0.3 metre to clearly and explicitly show on their plans all such changes in levels and cross sections of buildings. The wording should make clear that this requirement applies to cross sections across sites, including adjoining land (not just to buildings), and especially to large development sites where considerable changes of level are proposed.

Experience from recent development in our Area, at Middlefield Spring in Knowle, illustrates how unacceptable overlooking and bad design arises when topography and site levels are not taken into account. Photographs of the unsatisfactory outcome are included on p79 of the KDBH Neighbourhood Plan. The prospect of further large scale development in Knowle on two sites both of which have significant changes in levels makes it essential that such unacceptable outcomes are not repeated. The need for plans to show existing topography and cross sections of proposals across the sites, including in relation to existing adjoining land, needs to be clearly set out in this criterion.

#### **Criterion 34 Travel Plan:**

The requirement should be reduced to apply to residential developments of more than 20 houses (rather than 50 houses) to be consistent with the recently 'made' KDBH Neighbourhood Plan which defines larger residential developments as more than 20 houses. In addition, the proposal to deal with travel plans for smaller developments via a planning condition or within the transport statement is not acceptable as it is inconsistent with the KDBH Neighbourhood Plan (Section 10.4).

Throughout the 4+ years spent developing the NP, residents and businesses alike have continuously and consistently raised parking problems in and around Knowle, Dorridge and Bentley Heath village centres as one of their foremost concerns. A fundamental aim of the NP is to ensure that new developments do not add to these problems and exacerbate parking issues. This is reflected in Section 6.3 Traffic and Transport Objectives and more specifically in section 10.4 Policy T2 Contributions to Additional Parking and Road Improvements.

## KDBH Neighbourhood Forum

### Response to SMBC Consultation

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Specifically in the context of Transport Assessment and Travel Plans, the supporting text to Policy T2 states: 'All planning applications that include proposals which may generate significant traffic volumes, or are likely to have a material impact on the highway network or on parking demand in the village centres, shall be accompanied by a Transport Assessment and Travel Plan.' (p 47). Hence, downgrading a Travel Plan to a condition or to form part of a Transport Assessment is inconsistent with this, and singularly fails to recognise the huge importance placed on these matters not only in KDBH but also, in our experience, by other communities experiencing similar development pressures.

#### **Community Access Statements:**

The NF notes that the criteria do not require assessment of the impacts on community facilities nor on future access to, and management of, proposed community facilities where these are affected by, or proposed as part of, new development. This is an omission.

In contrast, the NF refers the Council to Policy ECF6: Community Access and Management of the KDBH Neighbourhood Plan. This encourages applicants to submit a Community Access Statement setting out arrangements for providing and maintaining public access and details of future management of any new facilities to be provided as part of residential developments on allocated sites or on residential schemes of 20 houses or more.

The NF strongly believes that, while recognising this is not a national mandatory requirement, this update to the Local Validation Criteria presents an opportunity for the Council to consider including Community Access Statements as a local validation criterion in respect of large scale residential developments that generate the need for community facilities. Again, this gives voice to the concerns raised locally (and very likely shared more widely across the Borough) about the potential impact of large scale new residential development on existing community facilities and services that are often already under severe pressure. It therefore seems reasonable and material to the consideration of developments that such information becomes a local requirement in relevant applications.

The NF values the opportunity to feed into the Council's thinking regarding this important aspect of tuning planning validation to the Borough's local context and looks forward to reading the outcome in due course.