

Table 1: Summary of all Comments Received on the Draft Local Validation Criteria document during consultation in August/September 2019, Councils Response and Proposed Change to Document

Comment Number & response method	Organisation	Policy Requirement/ Paragraph Number	Summary of comment	Councils response	Proposed change to document
1 (Email)	Personal	Requirement 6; 7; 8; 9; 10; 15; 20	<p>6. Block/site plan: - Reference to any building or structure increase from 10m to 20m. This would be helpful, but not critical.</p> <p>7. Design and access Statement. For the Local Planning Authority to be stricter in accepting the quality of DAS submissions thereby better aligning requirements of such documents as set out through statutory guidance.</p> <p>8. Existing and Proposed Elevations (NEW). (i) All drawings should have physical dimensions of rooms, halls, exterior wall to exterior wall dimensions, garages inside and outside, eave and ridge heights, plot dimensions. (ii) Plot dimensions (iii) Building to building dimensions (iv) Isometric views to show inter house relationships on request (v) cross section drawing including slopes The above will streamline the whole planning assessment process.</p> <p>9. Existing and proposed floorplans (see 8).</p> <p>10. Existing and proposed site level drawings (see 8).</p>	<p>Requirement 6. Block/site plan A block plan provides crucial information in the assessment of a planning application because it provides the detailed context of how a proposal sits alongside adjacent land and buildings and therefore helps inform its proposed relationship to existing built form and characteristics.</p> <p>The Guidance section of requirement 6 within the draft LVC document has some inconsistency and will therefore be amended.</p> <p>7. Design and Access Statement. Noted</p> <p>8. Existing and Proposed Elevations (i) internal dimensions of buildings only come into play where a development is CIL Liable, i.e. the Community Infrastructure Levy applies. A pragmatic approach should be taken to Local requirements for validation of planning and allied applications. This is therefore considered onerous.</p> <p>(ii) Noted, but would be better placed on the Site/Block plan at requirement 6 (iii) Noted, as above. (iv) Isometric views – ‘on request’ does not provide an applicant with the certainty needed, and intended by a LVC. (v) noted, and is relevant to requirement 10</p>	<p>Amend requirement 6 to ensure intentions of the document are clear.</p> <p>7. No amendments necessary.</p> <p>Amendments accepted to key dimensions added to 8 for exterior dimensions</p> <p>Plot dimensions accepted only, but to be added to requirement 6 ‘Block/Site Plan’</p> <p>Isometric views rejected.</p> <p>Cross section drawings relevant to requirement 10 only.</p>

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			<p>15. Character assessment. These submissions are provided by the applicant. It should not be up to the applicant to decide the criteria.</p> <p>20. Flood Risk Assessment The threshold for submission should be reduced from 1ha to 0.3ha.</p>	<p>15. Character Assessment https://www.gov.uk/guidance/landscape-and-seascape-character-assessments Guidance within the NPPG states that an applicant may conduct their own assessment and offers details of how to go about doing this.</p> <p>20. Flood Risk Assessment This section will be updated to reflect latest national policy and shall reference Policy P11 of the SLP only.</p>	<p>15. Character assessment A web link will be added to this section of the document and provides government guidance on how such assessment should be carried out.</p> <p>20. Flood Risk Assessment Update to reflect latest national policy and shall reference Policy P11 of the SLP only.</p>
2 (Email)	Personal	All	Please do not make the existing process any more complicated than it already is. The Committee and the planning officer will surely concur.	Comments noted.	No amendments required.
3 (Email)	Personal		<p>10. Existing and Proposed site level drawings (NEW). This is welcomed. It should also include cross sections across sites to include adjoining land, not just buildings should be clearly set out in the criteria.</p> <p>34. Travel Plan. The requirement should be reduced so they apply to residential developments of more than 20 houses rather than 50 houses. This would be consistent with the recently made KDBH neighbourhood plan, which defines larger residential developments as more than 20 houses. The proposal to deal with Travel Plans for smaller developments by condition or within the transport statement is not acceptable. It is noted that this is not consistent with the KDBH Neighbourhood Plan.</p>	<p>10. Existing and Proposed site level drawings Cross Section Noted</p> <p>34. Travel Plan It is accepted that some Neighbourhood Plans identify travel plans as necessary items in supporting information for planning submissions for developments of 20 or more dwellings; rather than 50 dwellings as stated in the draft LVC. This amendment is accepted as amongst other reasons aligns itself to Policy P7 and P8 of the SLP.</p>	<p>Amend requirement 10 to include cross sections.</p> <p>34. Travel Plans Amend to reduce threshold for travel plan submission at application stage from 50 dwellings to 20 dwellings.</p>
4 (Email)	Personal	All	The LVC ignores Neighbourhood Development Plans which may have different policies within their own areas. Every planning application must be validated against every criterion in each of these categories (national, Borough, Parish/Designated area criteria).	Noted	The Validation Criteria introduction page shall be updated to make reference to Neighbourhood Plans.
5	Personal		Requirement 8, 9, 10 Requirement for a Scale Bar.		

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(Email)			<p>A. This should be bolstered to include actual dimensions on all plans, therefore to negate the need to electronically measure drawings.</p> <p>B. Suggest a comprehensive validation checklist is produced for officers</p> <p>C. Viability assessments should be submitted at validation stage and not during an application lifetime.</p>	<p>A. Noted as above</p> <p>B. Comprehensive validation checklist produced for Officers – this is already in place as found at Table 1, Summary of Local Validation Criteria</p> <p>C. The applicant nor planning officer will know upfront whether a scheme is viable unless the scheme is submitted as ‘enabling development’ or the applicant knows outright that the scheme will not be policy compliant, for example, in terms of affordable housing. Therefore there will be occasions when a viability assessment has to be submitted during the lifetime of the planning application.</p>	<p>A. Noted and to be amended as above.</p> <p>B. No amendments required.</p> <p>C. No amendments required.</p>
6 (Email)	Personal	ALL	<p>Comments supplement those of the Public Open Space Society, as below. But in addition:-</p> <p>5. Location Plan. Should be referenced by a named road junction or a point mark with the correct OS grid reference. The plan should be orientated to OS Grid North. The preferred scale should be specified as 1:2000; 1:5000 or 1:10,000</p> <p>6. Block Site Plan. Preferred scale should be specified as 1:100; 1:200 1:500 or 1:1000 The explanation to the 45 degree rule could be clearer and taken from the House Extensions Guidelines SPD.</p> <p>7. Design and Access Statement Policies from the SLP and NPPF should be quoted within the DAS as no policy drivers are cited.</p> <p>Requirements 8, 9, 10 Existing and Proposed Elevations; Floor Plans and Site Levels. Preferred scales should be specified as 1:50 1:100 or 1:200 with details at 1:1 1:5 1:10 or 1:20 Requirement 8 &9 could be combined into a single section. Elevations must be shown in orthographic projection. Additional perspective drawings may be provided to assist interpretation of general appearance and streetscene. Important dimensions should be marked and stated on the drawings. Essential dimensions would include: overall lengths, depth of an extension from the original wall; ridge height; height to eaves; distance to boundary or adjacent structure. Existing and Proposed</p>	<p>Requirement 5. Location Plan. Noted and agreed, but to include scales of 1:250 and 1:2500 as per the National Validation Criteria as set out in the NPPG https://www.gov.uk/guidance/making-an-application#Plans-and-drawings</p> <p>Requirement 6. Noted regarding scale as well as making clearer what the 45 degree rule is and how it’s applied.</p> <p>Requirement 7. Design and Access Statement Accept Policy drivers should be added from the SLP.</p> <p>Requirement 8, 9, 10 Noted re scale. Details at 1:1; 1:10 and 1:20 are onerous and would place an undue burden on development and their submissions and would not be proportionate to the scale and nature of applications submitted. Where such details are required, these can be secured through planning condition. All other points noted, with the exception of orthographic projections which are not proportionate every</p>	<p>5. Location Plan Amend to include reference to a North Arrow with the plan orientated to OS Grid North. Preferred scales shall be made explicit.</p> <p>6. Preferred scale shall be included. Reference to the 45 degree line shall be made clearer taking from the House Extensions Guidelines SPD.</p> <p>7. DAS Add policy drivers from SLP.</p> <p>8, 9, 10 Amendments to be made in line with comments above.</p>

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		<p>plans should be placed adjacent to each other on the same sheet or if shown on separate sheets the layout should be the same so that corresponding views are shown in the same position.</p> <p>Requirement 11. Aerodrome Safeguarding Assessment This section is ambiguous as to when the information is required. Perhaps it should specify the requirement applies when the development has large areas of surface that could reflect radio waves or sunlight or expanses of water that could attract aquatic birds.</p> <p>Requirement 12. Agricultural Workers' Dwelling Assessment Title is not consistent to the NPPF which refers to a 'Rural Worker'. Ambiguous description as to when this assessment is required. In line with NPPF 79a amend description to 'Essential Rural Workers Dwelling Assessment'.</p> <p>Requirement 17. Crime Assessment. Suggest this requirement is extended to include other commercial premises, for example banks, jewellers, premises selling alcohol, bookmakers.</p> <p>Requirement 18. Ecological/Geological Assessment (Biodiversity/Geodiversity) Geodiversity is not indicated in the list of relevant development types. There should be an appropriate reference to sites of geological interest or resource value. In relation to habitats, relevant developments should include anything that could harm wildlife migration - on or below the surface, through water, or in the air (e.g. bats). (Wildlife corridors are stated as essential in 10.4.6 of the Local Plan.) The Assessment should include a description of mitigation measures to improve the permeability for wildlife of extensive fencing, continuous lines of buildings, or new roadways. Provisions such as gaps or tunnels for wildlife, or green pathways, should be detailed in the Assessment.</p> <p>Requirement 20 Flood Risk Assessment The reference to "development sites larger than 1 ha" is misleading. The local experience is that heavy rainfall can cause flooding issues irrespective of the Flood Zone. Policy P11 has no size limit and states "All new development shall incorporate sustainable drainage systems, unless it is shown to be</p>	<p>application submission and therefore cannot be considered at validation stage. Orientation of layout drawings to provide consistent templates accepted.</p> <p>Requirement 11: Aerodrome Safeguarding Assessment. Noted</p> <p>Requirement 12: Agriculture Worker's Dwelling Assessment Noted.</p> <p>Requirement 17. Crime Assessment Noted</p> <p>Requirement 18. Ecological/Geological Assessment (Biodiversity/Geodiversity) Noted.</p> <p>Requirement 20. Flood Risk Assessment Noted.</p>	<p>Requirement 11: Aerodrome Safeguarding Assessment. Amend LVC to include reference to guidance and explain likely development where such an assessment is needed.</p> <p>Requirement 12: Agriculture Worker's Dwelling Assessment Update report in line with NPPF.</p> <p>Requirement 17. Crime Assessment No action required.</p> <p>Requirement 18. Ecological/Geological Assessment (Biodiversity/Geodiversity) It is proposed to update the LVC with guidance from relevant guidance from Circular 06/2005 Biodiversity and Geological Conservation – Statutory Obligations and their impact within the planning system.</p> <p>Requirement 20. Flood Risk Assessment This section will be updated to reflect latest national policy and shall reference Policy P11 of the SLP.</p>
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		<p>impractical to do so". The planning policy objective is for there to be no increase in immediate run-off from a site due to the proposed development. The added run-off from a conventional house extension or conversion is generally not significant, but information should be provided by applicants at a much lower threshold than a site of 1 hectare. It's suggested that a Flood Risk Assessment be required for any development involving an increase in the area of buildings and hard-surfacing of 500 square metres.</p> <p>Requirement 1 Heritage Statement The definition "Any application affecting heritage assets or their setting" is open to misinterpretation. In terms of "setting", many factors of size, style, and topography are involved, and a Heritage Statement should be required whenever a proposed development (or external lighting therefrom) and a heritage asset are, together, visible from one or more public viewpoints. The definition should be sufficiently prescriptive to identify any risk of an impact on the setting of a heritage building.</p> <p>Requirement 24 Lighting Assessment The word "significant" with regard to external lighting is undefined. Although difficult to define, the test should be whether lighting from the development spills beyond the site boundary. If any external light source projects light beyond the site boundary, then a Lighting Assessment should be required.</p> <p>Requirement 31 Structural Survey When Permitted Development rights are being invoked for the re-use of a building within a Green Belt location, the Structural Survey should demonstrate that the restrictions are being complied with. As an example, the Permitted Development restrictions of Class Q do not permit the installation or replacement of the floor. Applicants should be advised a full planning application would be required.</p> <p>Requirement 38 Waste Audit The phrase "flatted development below the majors' threshold " is unclear</p>	<p>Requirement 21 Heritage Statement Noted. Further guidance will be included to demonstrate what is meant by 'setting'.</p> <p>Requirement 24 Lighting Assessment The comments received make no additional points to that already provided within the LVC.</p> <p>Requirement 31 Structural Survey Noted.</p> <p>Requirement 38 Waste Audit Noted</p>	<p>Requirement 21 Heritage Statement It is proposed to update the LVC making reference to Historic England's good practice advice in Planning Note 3. https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/</p> <p>Requirement 24 Lighting Assessment No action required.</p> <p>Requirement 31 Structural Survey The draft LVC will be updated to make clear Class Q requirements.</p> <p>Requirement 38 Waste Audit No action required.</p>
7 (Email)	Barton Wilmore on behalf of IM Land	<p>Application Form: Given that not all questions of the application form are always relevant, this should be caveated 'where relevant' or similar, to ensure there is sufficient flexibility.</p> <p>Ownership Certificates: Not all application types require ownership certificates to be signed. Article 39 of the Town and Country Planning (Development Management Procedure) (England) Order 2015 does</p>	<p>Application Form Noted</p> <p>Ownership Certificates Noted</p>	

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		<p>not require an Ownership Certificate for a Lawful Development Certificate for example.</p> <p>Location Plan: This requirement does not reflect situations where a site location plan may not be required. This includes Section 73 applications to vary/remove a planning condition.</p> <p>Design and Access Statement: There is an error referring to the 'GPDO' within the document title column. This should be amended. It would also be sensible to list out when a DAS is required (as set out in Paragraph: 030 Reference ID: 14-030-20140306 of the National Planning Practice Guidance (NPPG) to ensure that this is clear to users of the document.</p> <p>Existing/ Proposed Plans: it would appear that some of the requirements for the existing/proposed plans would be slightly excessive to ensure a valid application. This included:</p> <ul style="list-style-type: none"> • The requirement to show any blank elevations to show that nothing is happening. • The requirement to show an entire elevation even if only partial works are being undertaken. • The requirement to name all proposed rooms. • The requirement to show the 45 line on all floorplans. <p>It would also appear sensible to list out the cartographic requirements of drawings (the requirement for a North arrow for example) once in the document to avoid repetition.</p> <p>Air Quality Assessment: The trigger to provide an Air Quality Assessment is ambiguous and difficult to understand. This may create confusion as to when an assessment is required. The text showing what is required is also not clear and could create confusion and delays in the validation process.</p> <p>Crime Assessment: The requirement to provide a crime assessment for all major applications would appear to be onerous and excessive and would not specifically be required within all applications. There is also no specific trigger within Policy P15 of the Local Plan. The Council may wish to consider moving this to a separate section offering guidance on what could be included to ensure all issues are covered if required.</p> <p>Environment Statement (EIA): the regulations relating to EIA are out of date and should be updated. The suggested trigger for a screening opinion also does not appear to reflect the different triggers within the regulations.</p> <p>Flood Risk Assessment: The trigger requiring a FRA does not reflect</p>	<p>Location Plan: Noted</p> <p>Design and Access Statement Noted</p> <p>Existing/ Proposed Plans The purpose of including such requirements within the LVC is to ensure greater clarity and certainty to the Council and interested parties when considering and commenting on proposed development.</p> <p>Air Quality Assessment: Noted</p> <p>Crime Assessment: Noted. Amend wording to caveat that only major development where a significant risk of crime arises, should such an assessment be undertaken. Major development will explore how proposed layouts have been developed through their DAS, thus taking account of Secure by Design principles.</p> <p>Environment Statement (EIA) Noted.</p> <p>Flood Risk Assessment:</p>	<p>Design and Access Statement Amend requirement 7 to update policy driver to the NPPG. 030 Reference ID: 14-030-20140306</p> <p>Existing/ Proposed Plans The LVC will be caveated to exclude all new major housing development from showing the 45 degree line on houses within the scheme, but must still demonstrate this criteria where proposed new development sits adjacent or is juxtaposed to existing built form.</p> <p>Air Quality Assessment Update LVC to include contact details where advice can be received.</p> <p>Crime Assessment: Noted. Amend wording to caveat that only major development where a significant risk of crime arises, should such an assessment be undertaken.</p> <p>Environment Statement (EIA) LVC to be updated to reflect latest national regulations.</p> <p>Flood Risk Assessment:</p>
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		<p>the National Guidance (i.e. a site can be a major application but below 1ha in size and therefore would not require a FRA if it was within Flood Risk 1). This should be updated to ensure there is no inconsistency within National Policy.</p> <p>Landscape and Public Realm Strategy: This information could potentially be secured during the application or by a suitably worded planning conditions and, as such, requiring information at validation stage is overly onerous.</p> <p>Lighting Assessment: This information could be secured by a suitably worded planning condition, or if necessary during the application stage and as such requiring information at validation stage is overly onerous.</p> <p>Meeting Housing Needs Assessment: Should be updated to reflect latest Government policy.</p> <p>Noise Assessment: No policy basis for requiring a noise and vibration impact assessment for all major development. Therefore overly onerous.</p> <p>Parking and Access Plan: There is no need to provide this as a standalone document, and would cause delay in the validation process.</p> <p>Open Space Statement: The requirements for this document appear to bring matters of planning policy into a Local Validation list and impact upon what can be applied for.</p> <p>Structural Survey: There would appear to be no reason why a structural survey should be required to supplement all applications which involve the re-use of a building within a Green Belt location. There is no National requirement for this or policy requirement within National or Local Policy as set out within the table. The requirement should be explicit in e.g. 'what an expert is'.</p>	<p>Noted.</p> <p>Landscape and Public Realm Strategy Acknowledged. However, landscape and public realm strategies are highly important in demonstrating how the development assimilates into its environment and further aids consideration of biodiversity offsetting.</p> <p>Lighting Assessment. Disagree. This requirement only applies to <u>significant</u> new or amended external lighting.</p> <p>Meeting Housing Needs Assessment Noted</p> <p>Noise Assessment Noted. Policy P14 of the SLP provides the policy provision for this requirement and may only be applicable in certain cases.</p> <p>Parking and Access Plan This requirement will be met where parking and access is clearly defined within layout plans.</p> <p>Open Space Statement This document provides the evidence needed to address Policy P20 of the SLP and is therefore relevant to the LVC document.</p> <p>Structural Survey: The NPPF at paragraph 146 (d) states that appropriate development in the green belt includes the re-use of buildings, provided that the buildings are of permanent and substantial construction. A Structural Survey will provide evidence of whether this</p>	<p>This section will be updated to reflect latest national policy and shall reference Policy P11 of the SLP.</p> <p>Landscape and Public Realm Strategy No amendments needed.</p> <p>Lighting Assessment No amendments needed.</p> <p>Meeting Housing Needs Assessment Update to reflect latest national policy.</p> <p>Noise Assessment No action required.</p> <p>Parking and Access Plan No amendments needed.</p> <p>Open Space Statement No amendments needed.</p> <p>Structural Survey No amendments needed.</p>
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			<p>Transport Assessment/ Statement Travel Plan: There is no specific trigger for when a transport assessment or transport statement is required within national or local policy. Within para. 111 of the NPPF it states that all developments that will generate significant amounts of movement should provide a transport assessment or transport statement. The Council should therefore evidence that their triggers are in accordance within this national guidance and is not overly onerous.</p> <p>Waste: Not all major developments will create 'significant volumes of waste' as set out in NPPG para: 049 Reference ID: 20-049-20141016. The Council should therefore evidence why all major planning applications will need to provide this information to ensure that this requirement is not overly onerous.</p>	<p>policy test is met or not.</p> <p>Transport Assessment/ Statement Travel Plan It is intended to reduce the threshold of new dwellings to 20, rather than 50 for reason of sustainability criteria as set out in Policies P7 and P8 of the Solihull Local Plan. A number of Neighbourhood Plans have also been adopted post the SLP where such requirements are also put in place. The LVC therefore aligns policy expectation.</p> <p>Waste: Requirement 38 of the LVC is not intended to apply to all development proposals but caveats that this requirement applies to development that creates 'significant amount of waste' thus in accordance with NPPG para: 049 Reference ID: 20-049-20141016</p>	<p>Transport Assessment/ Statement, Travel Plan Please note amendments to this requirement as stated above.</p> <p>Waste: Add 'Certain' in front of Major planning development' at column 2 'Types of application that require this information'.</p>
8 (Email)	Tyler Parkes on behalf of Chief Constable of West Midlands Police (CCWMP)		<p>Section 17. Crime Assessment- The CCWMP requests the introduction that Major Applications and those with a significant risk of crime, or fear of crime, to submit a Security Considerations Assessment to reflect updated guidance in the PPG</p> <p>The CCWMP further requests that applicants are required to refer to the 'Secured by Design' Standards, 'Park Mark' standards and include consideration of development maintenance in crime assessments to further improve community safety, reduce crime, fear of crime and anti-social behaviour and help create sustainable communities now and into the future.</p>	<p>Requirement 17. Crime Assessment Noted. It is accepted that anti-terrorism measures play an important part in the design of new development. Secured by Design standards are also common place in consideration on new development layouts. Both are supported by national guidance and Policy P15 and its supporting text of the SLP.</p>	<p>Requirement 17. Crime Assessment Amend Section 17 to make reference to counter terrorism measures and Security Considerations Assessment for major development that affect higher risk buildings or crowded spaces or those that attract crowds of people. Reference for advice on this is made to NPPF paragraph 012 Reference ID: 53-012-20190722 with hyper link to 'Protecting Crowded Places – Design and Technical Issues' Revised March 2014</p>
9 (Email)	Open Spaces Society	ALL	<p>References to the NPPF are from the 2012 edition and should be updated to the current 2019 edition.</p> <p>Section 5 & 6 to include the requirement that Public Rights of Way are shown on all Plans. Similarly, reference should be made to PRW within the Design and Access Statement at Section 7.</p>	<p>Noted</p> <p>Noted</p>	<p>Amend NPPF references to reflect 2019 addition in all cases.</p>

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			<p>Section 29 Open Space. Update NPPF policy requirements to paras 96-98. For Major Commercial development, open space can be a resource in which visitors and staff relax. It would be appropriate to ask for a definition of access arrangements from public and staff areas.</p> <p>Major residential development should include factual information on the area of open space to be provided per dwelling or resident, together with typical distances between the open space and dwelling as well as facilities to be provided.</p> <p>In addition, applicants should be asked for a clear statement as to how the open spaces are to be maintained and preserved in perpetuity.</p> <p>Table 1 – suggest it is updated to cross reference previous section numbering.</p>	<p>Noted. Commercial open space is dealt with via Policy 15 and P20 of the SLP.</p> <p>Noted. Policy P20 requires POS provision as a proportion of population generation.</p>	
10 (Email)	Hampton In Arden Society		<p>Section: Mandatory national information requirements Suggested that reference be made to the applicant having considered and taken account of any relevant neighbourhood development Plan and that all reports and assessments are no more than 6 months old</p> <p>Requirements 8, 9, 10 Under guidance column suggest that the existing and proposed plans should be based on the same template and identical elevations to enable clear and easy comparison.</p> <p>Requirement 34 (Travel Plan) Suggest the number of dwellings in any residential development be reduced to 20 as even this could potentially represent up to 60 vehicle movements daily.</p> <p>Requirement 35 (Tree/ Arboriculture Survey) Suggest that all reports should not be more than 6 months old.</p>	<p>Noted.</p> <p>8,9,10 Noted & accepted</p> <p>34. Noted and accepted</p> <p>35. Other consultation comments have been put forward on this topic and merits further consideration, and potentially consultation by the local planning authority.</p>	<p>The Validation Criteria introduction page shall be updated to make reference to Neighbourhood Plans.</p> <p>Amend to make reference to the use of identical templates for presentation of existing and proposed plans and elevations, therefore allowing easy comparison.</p> <p>34. Amendment accepted.</p> <p>35. For further consideration outside of this current consultation.</p>
11 (Email)	Solihull Tree Wardens Group		<p>Tree valuations should be included in either the Design and Access Statement (DAS) and/or Tree Arboriculture Survey; Tree valuations should be made using the latest addition of CAVAT (Capital Asset Valuation of Amenity Trees) and should be provided for all trees affected by the proposal, or have been removed from the development site in the 5 years prior to the application.</p> <p>Suggested that percentage of tree canopy cover of the site is reported</p>	<p>35. Comments presented are noted. Suggested changes sought by the Solihull Tree Wardens group to the local validation criteria are significant and therefore fall outside the scope of this consultation which sought comments on 4 new topic areas only. Comments made will be reported to</p>	<p>35. Amendments rejected at this point in time.</p>

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			<p>in the DAS or Tree Arboriculture Survey and should relate to the maximum tree canopy cover in the 5 years leading up to the application submission. Statistics should include the overhang of tree canopies (or formerly overhanging) from adjoining plots.</p> <p>Planting schemes should consider quality and longevity rather than simply number and should be assessed using a standardised methodology.</p> <p>Suggested that tree planting schemes in the DAS and the Landscape and Public Realm strategy should be detailed to include locations, sizes, species, growing conditions, maintenance strategies and space limitations on canopy growth.</p> <p>The description of the planting schemes should include projected canopy cover after 30 years estimated using the submitted data and the method approved by the planning authority.</p> <p>Works on a protected tree suggest: Photographs and clear descriptions should be included in the tree works specification.</p> <p>The subject tree should be clearly identified by submission of plans in accordance with the requirements laid down for the location plan and the block/site plan.</p>	<p>the Solihull Policy team and can be addressed through the Solihull Local Plan Review.</p>	
12 (Email)	Balsall Parish Council		<p>5. Location Plan. Should be referenced by a named road junction or a point mark with the correct OS grid reference. The plan should be orientated to OS Grid North. The preferred scale should be specified as 1:2000; 1:5000 or 1:10,000</p> <p>6. Block Site Plan. Preferred scale should be specified as 1:100; 1:200 1:500 or 1:1000 The explanation to the 45 degree rule could be clearer and taken from the House Extensions Guidelines SPD.</p> <p>7. Design and Access Statement Policies from the SLP and NPPF should be quoted within the DAS as no policy drivers are cited. For applications involving extensions there should be a statement of the % increase in size to demonstrate compliance with the House Extension Guidelines SPD and other policies where appropriate.</p> <p>Tree valuations should be included in either the Design and Access Statement (DAS) and/or Tree Arboriculture Survey; Tree valuations should be made using the latest addition of CAVAT (Capital Asset Valuation of Amenity Trees) and should be provided for all trees affected by the proposal, or have been removed from the</p>	<p>5. Location Plan. Noted and agreed, but to include scales of 1:250 and 1:2500 as per the National Validation Criteria as set out in the NPPG https://www.gov.uk/guidance/making-an-application#Plans-and-drawings</p> <p>6. Noted and Agreed.</p> <p>7. Design and Access Statement Accept Policy drivers should be added from the SLP. % increase is a guide only, and is only one aspect considered when assessing extensions with size of curtilage, separation from dwellings and design being other aspects of consideration. Therefore proposal rejected.</p> <p>Comments relating to tree surveys are to be considered outside the scope of this consultation.</p>	<p>5. Location Plan Amend to include reference to a North Arrow with the plan orientated to OS Grid North. Preferred scales shall be made explicit.</p> <p>6. Preferred scale shall be included. Reference to the 45 degree line shall be made clearer taking from the House Extensions Guidelines SPD.</p> <p>7. DAS Add policy drivers from SLP.</p> <p>Tree Arboriculture Survey. No action required.</p>

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		<p>development site in the 5 years prior to the application.</p> <p>Suggested that percentage of tree canopy cover of the site is reported in the DAS or Tree Arboriculture Survey and should relate to the maximum tree canopy cover in the 5 years leading up to the application submission.</p> <p>A replanting scheme for the site showing how the % tree cover of the site will be restored to a value determined for that locality by the planning authority within 30 years of the date of planning approval using standardised methodology that takes account of the proposed species, soil, space, shading etc.</p> <p>8, 9, 10 Existing and Proposed Elevations; Floor Plans and Site Levels. Recognisable scale is not a good definition and should be changed to 'recognised scale' or 'common scale'. Better to state preferred scales explicitly. Preferred scales should be specified as 1:50 1:100 or 1:200 with details at 1:1 1:5 1:10 or 1:20 Sections 8 &9 could be combined into a single section.</p> <p>Elevations must be shown in orthographic projection. Additional perspective drawings may be provided to assist interpretation of general appearance and streetscene. Important dimensions should be marked and stated on the drawings. Essential dimensions would include: overall lengths, depth of an extension from the original wall; ridge height; height to eaves; distance to boundary or adjacent structure. Existing and Proposed plans should be placed adjacent to each other on the same sheet or if shown on separate sheets the layout should be the same so that corresponding views are shown in the same position.</p> <p>Section 17. Crime Assessment. Suggest this requirement is extended to include other commercial premises, for example banks, jewellers, premises selling alcohol, bookmakers.</p> <p>Section 18. Ecological/Geological Assessment (Biodiversity/Geodiversity) Geodiversity is not indicated in the list of relevant development types. There should be an appropriate reference to sites of geological interest or resource value. In relation to habitats, relevant developments should include anything that could harm wildlife migration - on or below the surface, through water, or in the air (e.g. bats). (Wildlife corridors are stated as essential in 10.4.6 of the Local Plan.) The Assessment should include a description of mitigation measures to improve the permeability for wildlife of extensive fencing, continuous lines of buildings, or new roadways. Provisions such as gaps or tunnels for wildlife, or green pathways, should be detailed in the Assessment.</p>	<p>8,9,10 Comments accepted as above.</p> <p>Orthographic projection rejected as above.</p> <p>Dimensions accepted as above.</p> <p>17. Crime assessment. The existing LVC only provides take away as one example and is therefore not exclusive or exhaustive.</p> <p>Section 18. Ecological/Geological Assessment (Biodiversity/Geodiversity) Noted.</p>	<p>8, 9, 10 Amendments to be made in line with comments above.</p> <p>17. Crime assessment No action required.</p> <p>Section 18. Ecological/Geological Assessment (Biodiversity/Geodiversity) It is proposed to update the LVC with guidance from relevant guidance from Circular 06/2005 Biodiversity and Geological Conservation – Statutory Obligations and their impact within the planning system.</p>
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		<p>Section 20 Flood Risk Assessment The reference to "development sites larger than 1 ha" is misleading. The local experience is that heavy rainfall can cause flooding issues irrespective of the Flood Zone. Policy P11 has no size limit and states "All new development shall incorporate sustainable drainage systems, unless it is shown to be impractical to do so".</p> <p>Section 21 Heritage Statement The definition "Any application affecting heritage assets or their setting" is open to misinterpretation. In terms of "setting", many factors of size, style, and topography are involved, and a Heritage Statement should be required whenever a proposed development (or external lighting therefrom) and a heritage asset are, together, visible from one or more public viewpoints.</p> <p>Section 24 Lighting Assessment The word "significant" with regard to external lighting is undefined. Although difficult to define, the test should be whether lighting from the development spills beyond the site boundary. If any external light source projects light beyond the site boundary, then a Lighting Assessment should be required.</p> <p>Section 31 Structural Survey When Permitted Development rights are being invoked for the re-use of a building within a Green Belt location, the Structural Survey should demonstrate that the restrictions are being complied with. As an example, the Permitted Development restrictions of Class Q do not permit the installation or replacement of the floor. Applicants should be advised a full planning application would be required.</p> <p>Section 38 Waste Audit The phrase "flatted development below the majors' threshold" is unclear.</p>	<p>20. Flood Risk Assessment Noted.</p> <p>Requirement 21 Heritage Statement Noted. Further guidance will be included to demonstrate what is meant by 'setting'.</p> <p>Requirement 24 Lighting Assessment The comments received make no additional points to that already provided within the LVC.</p> <p>Requirement 31 Structural Survey Noted.</p> <p>Requirement 38 Waste Audit Noted</p>	<p>20. Flood Risk Assessment This section will be updated to reflect latest national policy and shall reference Policy P11 of the SLP.</p> <p>Requirement 21 Heritage Statement It is proposed to update the LVC making reference to Historic England's good practice advice in Planning Note 3. https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/</p> <p>Requirement 24 Lighting Assessment No action required.</p> <p>Requirement 31 Structural Survey The draft LVC will be updated to make clear Class Q requirements.</p> <p>Requirement 38 Waste Audit Flatted amended.</p>
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13 (Email)	Berkswell Parish Council		<p>Support submission of Balsall Parish Council.</p> <p>In addition: -</p> <ul style="list-style-type: none"> • Clear requirements for plans and elevations accompanying planning applications. • More information in the DAS for which reference to relevant policies should assist the applicant. The statement should include specific, numerical information on the change of floor area in a proposal and on trees that are affected or proposed to be planted. There should be corresponding changes to a tree arboriculture survey. • Clarity about the need for assessment relating to aerodrome safeguarding; agricultural workers dwellings and crime. • Applicants should be made more aware about what might impact on biodiversity and geodiversity • Flood Risk assessment – requirements to align with SLP Policy P11. • Situations requiring heritage assessment and or lighting assessments should be defined more tightly. • Clearer indication of the restrictions on the development permitted by Class Q in relation to the requirement to a structural survey for the re-use of the building in the Green Belt. 	Comments noted and dealt with as above.	Comments noted and dealt with as above.
14 (Email)	Hampton in Arden Parish Council		Repeats points made by Hampton in Arden Society, as above.	Comments noted and dealt with as above.	Comments noted and dealt with as above.
15 (Email)	KDBH Neighbourhood Forum		<p>Section 10 Existing and Proposed site level drawings (NEW). This is welcomed. It should also include cross sections across sites to include adjoining land, not just buildings should be clearly set out in the criteria.</p> <p>34. Travel Plan. The requirement should be reduced so they apply to residential developments of more than 20 houses rather than 50 houses. This would be consistent with the recently made KDBH neighbourhood plan, which defines larger residential developments as more than 20 houses.</p> <p>The proposal to deal with Travel Plans for smaller developments by condition or within the transport statement is not acceptable. It is noted that this is not consistent with the KDBH Neighbourhood Plan.</p> <p>The LVC should be updated to include the requirement for a Community Access Statement in connection with large scale residential developments that generate the need for community facilities (as considered within the KDBH NF Plan).</p>	<p>Comments noted and dealt with as above.</p> <p>Comments noted and dealt with as above.</p>	<p>Comments noted and dealt with as above.</p> <p>Comments noted and dealt with as above.</p>
16	Highways		Requirement 33 – Transport Assessment/ Transport Statement	Requirement 33 – Transport	Requirement 33 – Transport

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(Email)	England		Update policy driver to 'DfT Circular 02/2013 Strategic Road Network and the delivery of sustainable development' DfT 2007 'Guidance on Transport Assessments' is now withdrawn and has been superseded by transport evidence bases in plan making.	Assessment/ Transport Statement Noted and to be amended to bring up to date with latest policy.	Assessment/ Transport Statement Noted and to be amended to bring up to date with latest policy.
17 (Email)	Historic England		Requirement 5 & 6 – Site Location and Block Plans Recommend that these sections highlight the need for site location and block plans to be to a metric scale and that suitable scales are suggested for the avoidance of doubt and in the interests of the Historic Environment so that distances between a planning application site and heritage assets and setting are clear. Requirement 7 – Design and Access Statement It is recommended that criteria (c) relating to heritage assets includes reference to “significance” instead of, or as well as, ‘character’ and ‘distinctiveness’ to ensure there is cohesion of terminology between this requirement and that of Section 21 Heritage Statement and the NPPF. Requirement 21 Heritage Statement The references to GPA3: Setting and the Historic Landscape Characterisation information is welcomed.	Requirement 5 & 6 – Site Location and Block Plans Noted. Requirement 7 – Design and Access Statement Noted and amended accordingly. Requirement 21 Heritage Statement Noted.	Requirement 5 & 6 – Site Location and Block Plans Noted. Requirement 7 – Design and Access Statement Noted and amended accordingly. Requirement 21 Heritage Statement No action required.
18 (Email)	HS2 Ltd	All	HS2 Ltd has no comments to make.	Comments noted	No amendments required.
19 (Email)	Conservation, Landscape, Urban Design and Ecology team SMBC	7 (DAS); 10; 15; 18; 21; 23; 29; 31; 35; 36;	Comments made identify areas where policy drivers have changed and must be updated. In some cases, changes of terminology are identified to keep a pace with latest guidance and policy.	Comments noted	Amendments to be made in accordance with comments.

Table 2: Results of the Local Validation Criteria during consultation in August/September 2019, Councils Response and Proposed Change to Document

Question Number	Question	Response (Numbers of responses)						Council's Response	Proposed Change to Document
		Strongly Agree	Agree	Neither Agree nor Disagree	Disagree	Strongly Disagree	Total Number of Responses		
1	8. Do you agree with the proposed amendments to Requirement 8 (Existing and Proposed Elevations) of the Local Validation Criteria (regarding streetscene drawings)? If not what would you change?	1	3	3	0	0	7	The majority of respondents to the survey agreed with the approach to requirement 8 relating to a streetscene drawing being clearly marked as indicative and appearing on a separate plan to all other scale elevation drawings. None of the respondents are in disagreement.	No amendments required.
2	9. Do you agree with the proposed amendments to Requirement 9 (Existing and Proposed Floor Plans) of the Local Validation Criteria (regarding scale bars and the 45 degree line)? If not what would you change?	1	3	3	0	0	7	The majority of respondents agreed with the proposed changes sought which includes the provision of a 45 degree line measured from the nearest habitable room of immediate neighbouring dwellings. None of the respondents are in disagreement.	No amendments required.
3	10. Do you agree with the proposed amendments to Requirement 10 (Existing and Proposed Site level drawing) of the Local Validation Criteria applicable where site levels or where existing levels change by more than 0.3m across the site and neighbouring land. If not why not?	0	4	3	0	0	7	Four respondents agreed and 3 stated no preference to the inclusion of site level plans where there is either an existing or proposed change in level of 0.3m or more across the site or adjacent to neighbouring development. None of the respondents are in disagreement.	No amendments required.
4	11. Do you agree with the proposed amendments to Requirement 31 (Structural Survey) of the Local Validation Criteria (regarding structural surveys being submitted for building conversions in the Green Belt)? If not what would you change?	2	2	3	0	0	7	The majority of respondents agree that a structural survey should be submitted alongside applications for building conversions in the Green Belt. None of the respondents are in disagreement.	No amendments required.