

Report to	<b>Planning Committee</b>
Date	<b>9 February 2017</b>
By	<b>Director of Planning</b>
Title of Report	<b>Review of Validation Requirements for planning applications and related consents</b>
Purpose of Report	<b>To approve the revised local list of requirements for planning applications and related consents for adoption</b>

**Recommendation: The Committee is recommended to approve the revised local list of requirements for validating planning applications and related consents for adoption**

**I. Background**

- I.1 Planning applications and applications for related consents (i.e. listed building and conservation consent) require different levels of information and supporting documentation depending on the scale and type of development proposed. There is a national core list of requirements but each local planning authority may also set out a list of additional information and documentation required to reflect national and local policies. This is known as the 'local validation check-list' or 'local list'. Provided this list has been consulted on and is published on the local authority web site, an application is not valid if it does not have all the information and documentation required.
- I.2 Details of the national requirements and the suite of documents a local planning authority may additionally require are published on the planning portal web site at the following link: <http://www.planningportal.gov.uk/planning/applications/howtoapply/whattosubmit/nationaldocuments>
- I.3 Following consultation and discussion with all host Authorities the South Downs National Park Authority (SDNPA) adopted a local list of validation requirements for all applications submitted for development within the South Downs National Park (SDNP) from April 2014. At the time of introducing this, in line with government guidance, the Park Authority needed to carry out a consultation process and review within 2 years of the local list having been adopted.
- I.4 Officers undertook a review and 6 week consultation process late in 2016 with the consultation period closing at the end of December. The proposed amended Local List which was sent out for consultation is attached at **Appendix I**. It must be noted that the Authority did have 2 local lists with one being specifically for Minerals and Waste Applications and the other list for all other applications. As part of this consultation process it was considered prudent by officers to incorporate both lists into one comprehensive list.
- I.5 A significant number of stakeholders were emailed directly as part of the consultation process. The email included a link to the consultation and a survey response on the SDNPA web pages. Respondents could agree/disagree with the proposals and add comments. These stake holders included all the parish councils within the SDNP and local authorities within the SDNP and around it, national consultees including Natural England, the Environment Agency and English Heritage, Utilities companies including Southern Water, individuals and organisations including the Ramblers Association and the NFU, and applicants

and their agents. In addition there was a link to the consultation on the SDNPA web pages with a link from the web page with the current Local Validation List requirements which would have been accessed by most applicants and their agents making an application over the consultation period.

## 2. The Outcome of the Consultation

2.1 In total 183 parishes were consulted along with 18 local authorities, 1147 consultees and 436 planning agents. Comments were received from 26 correspondents which are fully set out in **Appendix 3**

2.2 A number of the consultation responses merely suggested additional guidance that should be highlighted in the list to assist applicants and developers when preparing their documentation and required reports/plans. In the main, these suggestions have been taken on board and been incorporated into the amended Local List which is presented with a recommendation for adoption.

The most correspondence received was in relation to the requirements in relation to the need for Heritage Statements. Having had regard to the comments raised, in liaison with the Conservation Officer, the clarification of applications requiring such a statement has been amended accordingly. In addition, comments were received in relation to CIL requirements, general plans, Biodiversity, lighting, Tree Surveys, Landscaping, Noise, air quality, Affordable housing, Transport, Minerals and Waste and Telecommunication applications. The subsequent recommended Local List for adoption having taken these comments into consideration is attached at **Appendix 2**. The summary of the responses received and the commentary in response to the suggestions for the list is attached at **Appendix 3**.

## 3. Recommendation

3.1 In view of the general agreement with the proposed revisions to the existing Local Validation List it is recommended that the list as amended at **Appendix 2** is adopted for validating planning application. These are as proposed in the list which was subject to the consultation process but with the addition of:

- Clarification of requirements in relation to Community Infrastructure Levy Forms
- Clarification of applications requiring heritage statements
- Amended clarification of applications requiring Biodiversity statements
- Amended requirement for applications requiring affordable housing statements
- New requirement for Surface Water Drainage Strategy for major applications
- Clarification in relation to Lighting Details
- Amended wording for Air Quality Assessment requirements
- Amended wording for Land Contamination Assessment requirements
- Amended wording for Noise Assessment requirements
- New requirement for Playing Field/Sports provision assessment
- Additional link to guidance in the third column of the list to assist applicants in providing the necessary information

## 4. Other Implications

Implication	Yes*/No
Will further decisions be required by another committee/full authority?	No
Does the proposal raise any Resource implications?	No
Has due regard been taken of the South Downs National Park Authority's equality duty as	Due regard has been taken and no issues have arisen from this report

contained within the Equality Act 2010?	
Are there any Human Rights implications arising from the proposal?	None
Are there any Crime & Disorder implications arising from the proposal?	None
Are there any Health & Safety implications arising from the proposal?	None
Are there any Sustainability implications based on the 5 principles set out in the SDNPA Sustainability Strategy: 1. Living within environmental limits 2. Ensuring a strong healthy and just society 3. Achieving a sustainable economy 4. Promoting good governance 5. Using sound science responsibly	4. Promoting Good Governance

## 5. Risks Associated with the Proposed Decision

- 5.1 Risk - the local list which has operating since April 2014 is overdue for review and adoption and the absence of an up to date list could result in the Authority not being able to demand the necessary plans or documentation to be able to fully consider applications.

Mitigation – The adoption of the list will provide the necessary authority to withhold validation should the requirements of the list not be met in the submission of the application.

- 5.2 Risk – Despite changes the list is considered to still be too onerous.

Mitigation – The list responds to feedback, and will be subject to further review in 18 months' time

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#### Appendices

1. Local Validation List which was subject to consultation in 2016.
2. Recommended Local Validation List for Adoption
3. Commentary in relation to comments received and rationale for inclusion or exclusion from list to be adopted.

SDNPA Consultees Legal Services

External Consultees None

Background Documents [Government response to consultation: Streamlining Information requirements for planning applications](#)  
[Guidance on Information requirements and validation CLG March 2010](#)

**Local Validation List subject to consultation October-December 2016**

Information	Requirement since April 2011	Proposed change	Reason for proposed change (for Member information only and not part of the consultation documents)	Guidance
Air quality assessment	All applications for major development where traffic generation is increased	No change	Proportionate and necessary	[link]
Affordable housing statement	All applications for housing development including exception sites	No change	Proportionate and necessary	Include details of how it is to be provided; no. of bedrooms; tenure; RSL; contact details of applicant's solicitors; land registry titles.
Biodiversity Survey and report	All applications for development within or adjacent to a local or national nature reserves or SSSIs and where there is a reasonable likelihood of protected species	All applications for development within or adjacent to a local or national nature reserves or SSSIs and where there is a reasonable likelihood of protected species an/or their habitats	Proportionate and necessary to protect habitats as well	Natural England standing advice [link]
Flood risk assessment	All applications where site area > 1 Ha in Flood Zone 1; all proposals where application site is in Flood Zones 2 and 3; all applications where site is in a designated critical drainage area.	No change	Proportionate and necessary	Environment Agency web site [link]
Foul sewerage and utilities assessment	All applications for major development	No change	Proportionate and necessary	Building Regulations Part H
Heritage statement	All applications for development affecting a heritage asset	All applications for development affecting a designated heritage asset and any non designated heritage asset recognised as such by the LPA unless SDNPA checklist is submitted showing no adverse impact on historic environment	More proportionate	SDNPA integrated guidance for homeowners; EH guidance [link]

<b>Information</b>	<b>Requirement since April 2011</b>	<b>Proposed change</b>	<b>Reason for proposed change (for Member information only and not part of the consultation documents)</b>	<b>Guidance</b>
Land contamination Assessment	All applications for major and minor development and changes of use if contamination is known/ suspected to exist; when site is within 250m of a current licensed or historic landfill site.	No change	Proportionate and necessary	Environment Agency web site [link]
Landscape and visual Impact assessment (including landscaping proposals and photomontages)	All applications for development	All applications for development outside settlement boundaries other than householder and changes of use unless SDNPA checklist is submitted showing no adverse impact on landscape	More proportionate	SDNPA integrated guidance for homeowners; Landscape Institute guidance [link]
Lighting assessment	All applications for development other than householder	All applications for development outside settlement boundaries other than householder	More proportionate	[link to institute of lighting engineers]
Mineral safeguarding	All applications for development within Mineral Safeguarded Areas	DELETED	Further information needed on extent of MSAs and types of development which would require an assessment.	[const[constraint map required]
Noise assessment	All applications for development other than householder	No change	Proportionate and necessary to maintain tranquillity and protect amenity	[JP of WCC to give link]
Open space Assessment	All applications for development where public open space is to be lost	No change	Proportionate and necessary	Local plan SPD and policies
Parking provision	All applications for development	DELETED	Not necessary for validation	
Planning Obligation	All applications for development generating need for off-site contributions	DELETED	Requirement for contributions not easily identifiable at validation stage	

Information	Requirement since April 2011	Proposed change	Reason for proposed change (for Member information only and not part of the consultation documents)	Guidance
Renewable Energy statement	All major development applications	DELETED	Not always relevant	
Statement of how Community has been Involved	All major development applications	DELETED	Not always relevant	
Telecommunications report [change to 'Statement']	All telecommunications equipment applications and notifications	All telecommunications equipment applications	To conform with GPDO 2 Part 24 Annex F Code of Practice on Mobile Network Development (2002)tbc	GPDO 2 Part 24 Annex F Code of Practice on Mobile Network Development (2002)
Transport assessment	All applications for major development	No change	Proportionate and necessary	DfT Guidance (March 2007)
Travel Plan	All applications for major development	No change	Proportionate and necessary	Using Planning Process to Secure Travel Plans: Best Practice Guide 2002; Making residential travel plans work: Good practice guidelines for new development; A guide to development related travel plans.
Tree Survey/ arboricultural assessment	All applications for development affecting trees	All applications for development affecting trees unless SDNPA checklist is submitted showing no adverse impact	More proportionate	SDNPA integrated guidance for homeowners [link]
Ventilation /Extraction equipment report	All applications for A3, A4, A5 and B1/B2 uses	All applications for A3, A4, A5 and B2 uses	More proportionate as B1 uses do not produce fumes	Not required as the content of the report will depend on the type of equipment proposed

**Local Validation List for Adoption**

The following list should be used for all applications.

The South Downs National Park Authority ‘[Advice to Homeholders and their agents](#)’ (August 2012) contains a ‘[baseline assessment checklist](#)’ that, **should only be used for householder applications**. The baseline assessment checklist should be completed accurately as the veracity and accuracy of submitted checklists will be checked and if further information is required it may delay determination of your application.

To assist with consultations and avoid delays 3 hard copies of all application documents and plans are required.

Local policy drivers are based upon the adopted development plans in the SDNP. These policy drivers may change as emerging joint plans reach adoption.

For the purposes of the Local Validation List the definition and criteria for major development is as set out in The Town and Country Planning (Development Management Procedure) (England) Order 2015 (<http://www.legislation.gov.uk/uksi/2015/595/contents/made>)

Information	Requirement from 1 April 2014	Guidance
Additional Plans	<p>The national requirements note the need for a location plan and “others as necessary” with the reliance on the local requirements to detail what those are. For the avoidance of doubt the local requirements should confirm what we need:</p> <ul style="list-style-type: none"> <li>• Block plan including site access details, scale bar, key dimensions (distance of the development from the boundaries of the site and size of the building), original paper size and a north point.</li> <li>• Existing and proposed elevations and floor plans <b>in full</b></li> <li>• Existing and proposed site sections and finished floor and site levels and datum point (1:50 or 1:100) (In all cases where proposals involve a change in ground levels or is on a sloping site).</li> <li>• Roof plans (Required for all applications involving extensions to roof forms and new buildings).</li> </ul>	
Aerodrome Safeguarding	All applications for wind turbines	<p>Annex 1, para 5, page 4 &amp; annex 2, para 15, page 11 of the ODPM/DfT Circular 01/2003 ‘Safeguarding of Aerodromes, Technical Sites &amp; Military Explosives</p> <p><a href="#">Storage Areas : The Town &amp; Country Planning (Safeguarded Aerodromes, Technical Sites &amp; Military Explosives Storage Areas) Direction 2002</a>’, available at <a href="http://www.gov.uk">www.gov.uk</a></p> <p>Airport Operators Association (AOA) Advice Note 7 ‘Wind Turbines &amp; Aviation’ available at <a href="http://www.aoa.org.uk/operations-safety">http://www.aoa.org.uk/operations-safety</a></p> <p>Advice can also be sought from <a href="mailto:gal.safeguarding@gatwickairport.co.uk">gal.safeguarding@gatwickairport.co.uk</a></p>

Information	Requirement from 1 April 2014	Guidance
Air Quality Assessment	All applications for major development where traffic generation, bioaerosols, or odour is increased and/or the development is likely to affect or cause the declaration of an Air Quality Management Area.	<a href="#">NPPF</a> paragraph 124. <a href="#">PPS10: Annex E (g)</a> <a href="#">Defra Air Quality Management Area Maps</a> <a href="#">Air Quality and Emissions Mitigation Guidance for Sussex</a> <a href="http://www.sussex.air.net">http://www.sussex.air.net</a>
Affordable Housing Statement	All applications for housing development which require on-site affordable housing provision including exception sites	Include details of how it is to be provided; no. of bedrooms; tenure; RSL; Contact details of applicant's solicitors; land registry titles.
Biodiversity Survey and Report	All applications for development within or adjacent to, or would have an impact on priority species as detailed on Section 41 of the Natural Environment and Rural Communities Act 2006, or within, adjacent to, or would have an impact upon one or a combination of the following sites: Local Wildlife sites (SINCS & SNCIs), Local Nature Reserves, National Nature Reserves, SSSIs and/or where there is a reasonable likelihood of protected species and/or their habitats/notable habitats.	<a href="#">Useful links for biodiversity at www.gov.uk</a> <a href="#">Sussex Biological Records Centre</a> <a href="#">Hampshire Biodiversity Centre</a> <a href="#">Biodiversity – Code of Practice for Planning and Development BS42020</a>
Community Infrastructure Levy <ul style="list-style-type: none"> <li>• Additional information form</li> <li>• Form 1 -Assumption of Liability</li> <li>• Form 2 – Claiming Exemption or relief</li> </ul>	All development where there is a <ul style="list-style-type: none"> <li>• Net increase of 1 or more dwellings.</li> </ul> Retail development over 100sq m.	<a href="#">Community Infrastructure Levy</a>
Flood Risk Assessment	All applications where site area > 1 Ha in Flood Zone 1; all proposals where application site is in Flood Zones 2 and 3; all applications where site is in a designated critical drainage area.	<a href="#">NPPF</a> <a href="#">NPPF Technical guidance</a> <a href="#">Environment Agency Flood Risk Assessment guidance</a> <a href="#">BS 8533-2011 Assessing and managing flood risk in development code of practice.</a>
Surface Water Drainage Strategy	All major applications	<a href="#">NPPF</a> <a href="#">NPPG:</a> <a href="#">Sustainable drainage systems: non-statutory technical standards</a> <a href="#">Guide to Sustainable Drainage Systems in East Sussex</a> <a href="#">BS8582: Code of practice for surface water management for development sites</a> <a href="#">Environment Agency Report SC030219: Rainfall runoff management for developments</a> <a href="#">The SuDS Manual: Ciria C753</a>



Information	Requirement from 1 April 2014	Guidance
Foul sewerage and utilities assessment	All applications for major development	<a href="#">Building Regulations Part H</a> <a href="#">BS EN752:2008 Drain and sewer systems outside buildings</a> <a href="#">Sewers for Adoption, currently Version 7</a>
Heritage statement	All applications for development affecting a designated heritage asset or any undesignated heritage asset recognised as such by the SDNPA, or its setting. Heritage assets include listed buildings, scheduled monuments and other archaeological sites, Conservation Areas, Historic Parks and Gardens and other historic landscapes, and historic battlefields.	SDNPA integrated guidance: <a href="#">Advice to Homeholders and their agents'</a> <a href="#">NPPF: 12. Conserving and enhancing the historic environment</a> <a href="#">Government guidance on Heritage Statements</a> <a href="https://www.historicengland.org.uk/services-skills/our-planning-services/charter/">https://www.historicengland.org.uk/services-skills/our-planning-services/charter/</a> <a href="https://www.hants.gov.uk/landplanningandenvironment/environment/landscape">https://www.hants.gov.uk/landplanningandenvironment/environment/landscape</a> SDNPA Guidance on Heritage Statements
Land contamination Assessment	All applications for major and minor development and for prior approval and changes of use if contamination is known/suspected to exist; when site is within 250m of a current licensed or historic landfill site.	<a href="#">NPPF Paragraph 121</a> <a href="#">National Planning Policy Framework</a> <a href="#">NPPG</a> <a href="#">Government Guidance on land affected by contamination</a>
Landscape Appraisal/Study (Landscape and Visual Impact assessment only required as part of an EIA)	All applications for development (including change of use) with the exception of householder applications	NPPF  NPPG
Lighting assessment	All applications for development outside settlement boundaries other than householder All applications in the vicinity of a listed building or within a conservation area All applications at a location where bats and their roosts or other protected species are present	<a href="#">Guidance for the Reduction of Obtrusive Light</a> <a href="#">Dark Night Skies information</a> <a href="#">Bat Conservation Trust – Artificial lighting guidance</a> This requirement refers to details of artificial external lighting.
Noise assessment	All applications for development other than householder likely to generate noise that may raise issues of disturbance by noise and/or reduce tranquillity, including where residential or other noise sensitive uses are proposed adjacent to existing noise sources..	<a href="#">NPPF Paragraph 109</a> <a href="#">National Planning Policy Framework</a> <a href="#">Government Guidance - Noise</a> <a href="#">Planning Noise Advice Document: Sussex (www.adur-worthing.gov.uk/media/media_121802_en.pdf)</a>
Open space Assessment	All applications for development where public open space is to be lost	<a href="#">NPPG</a> <a href="#">Open space, sports and recreation facilities, public rights of way and local green space</a>
Soils Management Plan	All applications for development where the movement of top and/or subsoils is proposed	<a href="#">NPPF Paragraph 109</a> <a href="#">NPPG</a>

<b>Information</b>	<b>Requirement from 1 April 2014</b>	<b>Guidance</b>
Playing Field/Sports provision Assessment	All development which would result in a loss of playing fields or impact on existing sports facilities	<a href="#">NPPF</a> <a href="#">Sport England Website &amp; checklist</a>
Telecommunications report [change to 'Statement']	All telecommuni-cations equipment applications	GPDO 2 Part 24 Annex F <a href="#">Code of Practice on Mobile Network Development (2013)</a>
Transport assessment	All applications for major development and minerals and waste developments	<a href="#">NPPG</a> <a href="#">Travel plans, transport assessments and statements in decision-taking</a>
Travel Plan	All applications for major development and minerals and waste developments	<a href="#">NPPG</a> <a href="#">Travel plans, transport assessments and statements in decision-taking</a>
Tree Survey/ arboricultural assessment	All applications for development affecting trees unless accurate completion of the SDNPA checklist demonstrates no adverse impact on trees	<a href="#">Advice to Homeholders and their agents'</a> <a href="#">Bat Conservation Trust – Bats and Trees Guidance</a> <a href="#">Wild birds: protection and licences</a>
Ventilation /Extraction equipment report	All applications for A3, A4, A5 and B2 uses	Content of the report will depend on the type of equipment proposed

Commentary in relation to comments received and rationale for inclusion or exclusion from list to be adopted.

Query ID	Originator	Category	Query	Response
1	Development Management Officer (CIL) SDNPA	CIL	1) <b>A completed CIL Liability form</b> (available on the planning portal) –in order for the Authority to be able to determine if the development is CIL liable, and how much floorspace is chargeable. As well as the ‘CIL additional information Form’ being a requirement for Validation, there is a need to add the ‘ <b>Form 1 – Assumption of Liability</b> ’, and the ‘ <b>Form 2 – Claiming Exemption or Relief</b> ’ as forms that are required as part of Validation. This is because the Authority are unable to begin the first stage of issuing a Liability Notice to the applicant without first receiving this information, and the Authority must issue the Liability Notice as soon as practicable after the day on which planning permission is granted.	<b>AGREED</b> - These amendments are considered appropriate in order for the Authority to properly discharge its duty under the CIL Regulations.
2	Development Management Officer (CIL) SDNPA	Plans	2) Existing plans – this is so the Authority can measure existing floorspace compared to increased/new floorspace, and can determine any discount to be applied for demolished floorspace. It will also help where there is a discrepancy on the floorspace on the CIL form.	<b>AGREED</b> - This amendment considered appropriate in order for the Authority to properly discharge its duty under the CIL Regulations.
3	Winchester City Council	Heritage	(a) <i>Heritage statements will need to cover as relevant all aspects of the historic environment (archaeology, listed buildings, historic landscapes, battlefields etc.) as well as the setting of said heritage assets.</i>	<b>Comments:</b> The wording for requirement for heritage statements has been amended to embrace all the various types of applications which would affect the setting of the assets.
4	Winchester City Council	Archaeology	(b) <i>WCC does not currently have a detailed, comprehensive archaeological notification map, which can be used to trigger the requirement for a Heritage Statement (we have a very broad brush layer –previously provided to the SDNPA and the WCC planning dept. which was compiled as part of the I-APP process a number of years ago - I assume this is what is referred to as the Red, Amber, Green notification areas?). However this will require substantial revision and updating to form a comprehensive and more accurate trigger map layer. This would require resourcing.</i>	<b>Comments:</b> The wording for requirement for heritage statements has been amended to embrace all the various types of applications which would affect the setting of the assets.
5	Winchester City Council	Heritage	(c) <i>The inclusion of a requirement for a HER search as part of a Heritage Statement raises concerns due to the impact to the workload of the respective HER (this is a known issue in East Sussex, where there is a pre-existing requirement for HER searches for householder applications).</i>	<b>Comments:</b> The wording for requirement for heritage statements has been amended to embrace all the various types of applications which would affect the setting of the assets. The requirement for HER search has been removed from the list.

Query ID	Originator	Category	Query	Response
6	Winchester City Council	Heritage	<i>(d) The provision of data alone is considered insufficient – the key is actually the provision of advice to applicants, to aid the design of schemes which minimise impacts to the historic environment (thus requiring the interpretation of and consideration of potential for currently unrecorded archaeology). This would form a pre-application service –WCC Historic Environment Team is in the process of introducing a specific charged for pre-application advice service as an adjunct to the SDNPA pre-app system.</i>	<b>NOTED</b>
7	Winchester City Council	Heritage	<i>(e) Pre-application advice is key to the quality of heritage statements. Many applicants (particularly, but not confined to householders) are uncertain as to what information should be included in a heritage statement. There is some sector guidance (e.g. Historic England guidance note); however this is quite broad brush.</i>	<b>NOTED</b>
8	Winchester City Council	Archaeology	<i>(f) Development proposal size is often used to define whether a scheme is a major proposal or not, however scheme size should not be used as the sole criteria to define archaeological sensitivity and thus trigger a consultation (although I know that some local authorities do consult on the basis of both a trigger map and scheme size).</i>	<b>NOTED:</b> and requirement amended to encapsulate this.
9	Winchester City Council	Heritage	<i>(g) It is not only householder applications which will require a heritage statement, this is particularly significant for villages, towns etc., where there are commercial premises etc.</i>	<b>NOTED</b>
10	Winchester City Council	Heritage and Archaeology	<i>(h) The proposed restriction on the requirement for a heritage statement to proposals involving below ground activity adjacent to a LB or Scheduled Monument is not appropriate. The vast majority of archaeological remains are non-designated (and include sites equivalent in their significance to scheduled sites, but which for one reason or another remains un-designated), and such a restriction would mean that archaeological issues are not considered for the vast majority of planning applications.</i>	<b>NOTED</b>
11	Sussex Wildlife Trust, and Hampshire & Isle of Wight Wildlife Trust	Biodiversity	Given that nature conservation is a material planning consideration, could occur outside of designated sites and that there is a statutory basis for planning to seek to minimise impacts of biodiversity and provide net gains where possible we suggest that all applications for development should consider biodiversity. Even a building extension could impact on nesting birds or roosting bats for example. However as a minimum, we suggest the following changes to the wording in the proposed list: All applications for development that would have an impact on priority species and habitats as detailed on Section 41 of the Natural Environment and Rural Communities Act 2006, or within, adjacent to, or would have an impact upon one or a combination of the following sites:... Point one: Sites of Importance for Nature Conservation should be replaced as follows – Local Wildlife Sites (SINCs & SNCIs). Under the Guidance section there should be reference to Sussex Biological Records Centre, Hampshire Biodiversity Information Centre, and the Biodiversity – Code of Practice for Planning and Development BS42020.	<b>AGREED</b> - This amendment is considered a proportionate and appropriate requirement and will ensure that impact on habitats can be assessed with the required level of detail.

Query ID	Originator	Category	Query	Response
12	Jess Price, Sussex Wildlife Trust, and Hampshire & Isle of Wight Wildlife Trust	Lighting	Under the guidance section we recommend inclusion of the Bat Conservation Trust's Artificial Lighting Guidance.	<b>AGREED</b> - This link to additional guidance will assist applicants in giving consideration to appropriate lighting in their proposals
13	Sussex Wildlife Trust, and Hampshire & Isle of Wight Wildlife Trust	Tree Survey	Under the guidance section we recommend inclusion of the <i>Bat Conservation Trust's Bats and Trees Guidance and Protection of Wild Birds whilst nesting Guidance</i> .	<b>AGREED</b> - This link to additional guidance will assist applicants in giving consideration to habitats and species in their proposals
14	Savills	LVIA	Our experience is that this is not consistently requested by all local authorities across the SDNPA. Some will not validate an application without it, others will. There is also not a consistent approach as to when a baseline assessment is required if a full LVIA is required. For example, if a full LVIA is being submitted then does this supersede the need for a checklist? This should be made clear and applied consistently across the SDNPA. We would recommend that the LVIA baseline checklist is removed as a validation requirement. However, if this is not the case, then there should be a specific consultation exercise on the checklist. This is because many of the questions are too high-level so as not to yield any meaningful response. They simply introduce a layer of unnecessary bureaucracy.	<b>NOTED:</b> Clarification of terminology included in amended report and requirement for appraisal clarified.
15	Savills	Noise	It is not proportionate to request a noise assessment for 'All applications for development other than householder'. We have submitted a number of applications that have been for uses that do not generate significant noise (e.g. allotments, housing, holiday accommodation, etc.) and should therefore not require a noise assessment. The guidance on when a noise assessment is required should be amended, and applied consistently across the SDNPA.	<b>NOT AGREED</b> - There is a difficulty of providing a long and overly cumbersome list of the types of development that will require a noise assessment, but there will always be exceptions to the rule. The process allows the applicant the opportunity to provide justification as to why a noise assessment is not being submitted and officers will consider this accordingly.

Query ID	Originator	Category	Query	Response
16	Savills	Lighting	It is not proportionate to request a lighting assessment for 'All applications for development outside settlement boundaries other than householder'. Again, there may be time when no external lighting is proposed or lighting is not a significant issue. To provide a lighting report, as is suggested, is costly to applicants.	<b>NOT AGREED</b> - There is a difficulty of providing a long and overly cumbersome list of the types of development that will require a lighting assessment, but there will always be exceptions to the rule. The process allows the applicant the opportunity to provide justification as to why an assessment is not being submitted and officers will consider this accordingly. It is even more relevant that the issue of lighting is marked up at the validation stage given the recent Dark Skies Reserve status being given to the South Downs National Park.
17	Savills	Noise and Lighting	the large majority of National Park planning applications require a report to be submitted via the Planning Portal in order to submit a planning application. This often involves submitting a page stating that a noise / lighting report is not relevant, which is onerous and bureaucratic.	<b>NOTED</b> - The Applicant can however provide detail within their Planning Statement of justification why certain documents have not been provided.
18	Savills	Air Quality	this requirement is onerous because, by virtue of being a major application, then traffic generation is likely to increase. This will mean that the vast majority of major planning applications will require an air quality assessment. This is onerous, expensive and disproportionate. Clarification should also be provided on what constitutes a 'major' application is in the National Park, if is to be used as a trigger for various reports to be submitted.	<b>NOT AGREED</b> - The requirement for such an assessment is not considered to be disproportionate given the sensitive nature of the National Park. It is however agreed that reference within the Local List should be made to what constitutes a 'major development'.

Query ID	Originator	Category	Query	Response
19	Savills	Affordable Housing Statement	An affordable housing statement should be required for all housing development applications. It is much more proportionate to require it on schemes that require onsite affordable only.	<b>AGREED</b> - This is considered to be a sensible and proportionate approach.
20	East Sussex County Council	Surface Water Drainage	All applications for major development should be accompanied by a surface water drainage strategy, which can be incorporated in a Flood Risk Assessment. Although the requirements for a Flood Risk Assessment are flagged up in the Local List, we consider that it should be made explicitly clear that a Surface Water Drainage Strategy will need to accompany major planning applications. The surface water drainage strategy should include the following: Existing surface water flows on and off site; Existing surface water runoff rates; Identify an outfall for the surface water runoff from the development and understand the sensitivity of the receiving water body; The measures that will be used to store and convey surface water runoff from the development – above ground sustainable drainage systems to be given priority; A plan clearly showing the proposed surface water management measures, including the route to the outfall; How the surface water drainage arrangements will be protected from external sources of flood risk – offsite flows, groundwater and overflowing offsite drainage (including watercourses); How surface water flows exceeding the capacity of the proposed drainage system will be managed safely; How the management of the entire drainage system will be secured for the lifetime of the development. In terms of identifying a reason for why this required, reference can be made to national planning policy and guidance (see: <a href="http://planningguidance.communities.gov.uk/blog/guidance/flood-risk-and-coastal-change/reducing-the-causes-and-impacts-of-flooding/why-are-sustainable-drainage-systems-important/">http://planningguidance.communities.gov.uk/blog/guidance/flood-risk-and-coastal-change/reducing-the-causes-and-impacts-of-flooding/why-are-sustainable-drainage-systems-important/</a> ). Guidance that can be referred to includes <a href="http://planningguidance.communities.gov.uk/blog/guidance/flood-risk-and-coastal-change/reducing-the-causes-and-impacts-of-flooding/why-are-sustainable-drainage-systems-important/">http://planningguidance.communities.gov.uk/blog/guidance/flood-risk-and-coastal-change/reducing-the-causes-and-impacts-of-flooding/why-are-sustainable-drainage-systems-important/</a> ; Sustainable drainage systems: non-statutory technical standards: <a href="https://www.gov.uk/government/publications/sustainable-drainage-systems-non-statutory-technical-standards">https://www.gov.uk/government/publications/sustainable-drainage-systems-non-statutory-technical-standards</a> ; Guide to Sustainable Drainage Systems in East Sussex: <a href="https://www.eastsussex.gov.uk/environment/flooding/sustainable-drainage-systems">https://www.eastsussex.gov.uk/environment/flooding/sustainable-drainage-systems</a> ; BS8582: Code of practice for surface water management for development sites Environment Agency Report SC030219: Rainfall runoff management for developments; The SuDS Manual: Ciria C753	<b>AGREED</b> - This is considered to be a sensible and proportionate approach in relation to requirements as far as Surface Water Drainage is concerned..
21	East Sussex County Council	Transport	The Local List proposes that a Transport Assessment and Travel Plan will be required for all applications for major development. Whilst it is likely to be the case that ESCC, as Highways Authority, will seek a Transport Assessment/Report/Statement for major developments, it is important to note that there will be instances where we require such supporting information for non-major applications. Similarly, in the case of Travel Plans, there will be many instances where we do not consider this to be necessary for major development proposals, particularly those that are unlikely to generate significant volumes of traffic movements. This is recognised in the Planning Practice Guidance, which states “Local planning authorities must make a judgement as to whether a development proposal would generate significant amounts of movement on a case by case basis”. In order to guide the level of supporting information that we require, we would strongly encourage proponents of schemes and the SDNPA to engage with ESCC’s Transport Development Control	<b>NOT AGREED</b> - The requirement that the need for such documentation will be considered on a case-by-case basis inevitably results in uncertainty for the applicant. The existing requirement gives a clear steer but also provides the applicant with the opportunity to demonstrate why they think that an

Query ID	Originator	Category	Query	Response
			team at the pre-application stage. This should save all parties time and effort in the preparation, consideration and determination of the planning applications. In addition, ESCC has guidance on when we will generally seek a Transport Assessment, Transport Report or Transport Statement (see: <a href="https://www.eastsussex.gov.uk/environment/planning/applications/developmentcontrol/tdc-planning-apps/">https://www.eastsussex.gov.uk/environment/planning/applications/developmentcontrol/tdc-planning-apps/</a> ). Although this guidance was prepared in 2009, and we are shortly to review it, its content is still considered useful as a general guide to the level of supporting transport evidence we require for different proposals. In light of the above, we would suggest that the Local List makes reference to the need for a Transport Assessment/Statement/Report and/or Travel Plan will be considered on a case-by-case basis and that pre-application engagement with the relevant Highway Authority will help establish the requirements.	assessment may not be required. The comments about the importance of pre-application advice are agreed and it is hoped that, irrespective of the Local List, developers will be encouraged to submit documentation that will assist all concerned in assessing the scheme.
22	James Isles, Pro-Vision	Air Quality Assessment	It is proposed to continue to require air quality assessments for “All applications for major development where traffic generation is increased”. We do not agree that this is an accurate interpretation of either the NPPF (paragraph 124) or the NPPG. Greater discretion should be used to decide when assessment of air quality will be a material planning consideration. The NPPG states that “Whether or not air quality is relevant to a planning decision will depend on the proposed development and its location” (Paragraph 005 Reference ID: 32-005-20140306). It is clear from the Guidance that the LPA should have consideration of the context of the proposed development, including whether or not any Air Quality Management Areas (AQMAs) are likely to be affected, rather than automatically require an assessment of all major developments where there is an expected increase in traffic (no matter what the baseline traffic situation may be or the scale of traffic increase).	<b>NOT AGREED</b> - The requirement within the proposed list is considered a proportionate approach and in accord with the National Planning Policy Framework and the NPPG. Consideration is given to the nature of the proposed development and its location (within the National Park). The requirement should not just be restricted to AQMAs, but should include development which, by their cumulative approval might increase the possibility of new AQMAs.
23	James Isles, Pro-Vision	Lighting	It would be appropriate to clarify that this requirement refers to details of artificial external lighting, and clarify when assessment of impact on daylight will be a material planning consideration.	<b>AGREED</b> - Clarification will be provided in updated list.
24	Pro-Vision	Noise	This requirement should be reviewed for consistency with paragraph 109 of the NPPF and the NPPG (Reference ID: 30-001-20140306), noting the distinction between developments generating noise impacts and developments sensitive to the acoustic environment, either of which may require assessment depending on the context.	<b>NOTED</b> - The requirement is considered to be in accord with the National Planning Policy Framework and National Planning Policy Guidance.
25	Pro-Vision	Transport	This requirement should be reviewed for consistency with the paragraph 32 of the NPPF and the NPPG (Reference ID: 42-013-20140306). The requirement should be for a transport statement or transport assessment, noting that latter is likely to involve significantly more information which may not be necessary in some cases.	<b>COMMENTS:</b> The current requirement is considered to be in accordance with the NPPF and NPPG.



Query ID	Originator	Category	Query	Response
26	Pro-Vision	Travel Plan	The requirement for a travel plan for all major development is not consistent with paragraph 36 of the NPPF, which states that travel plans are required only where developments are expected to generate a significant amount of movement. Not all major development will create a significant amount of movement, or additional movements, therefore it is not appropriate to require a travel plan in all cases.	<b>NOT AGREED</b> - The local list is required to provide certainty for applicants as to when a travel plan is required. The bar at major development is considered appropriate. It is appreciated that there may be occasions where the scheme may not result in a significant generation of vehicular movement, but on these occasions the applicant has the opportunity to demonstrate the justification for not submitting the plan, which the Authority will give consideration to.
27	Findon Parish Council	Tree Survey	FPC feel that there is scope to expand this section to include 'before and after' photographs/images referring to the level and impact of TPO work to be undertaken as a result of a TPO planning application. There have been several instances in Findon over the last 12 months where the FPC Planning Committee commented to SDNPA that there was a lack of clarity and consistency in such applications. Section 5.6 Policy ES3 (protection of trees and hedgerows) from the made Findon Neighbourhood Development Plan 2016-2035 refers.	<b>NOT AGREED</b> - The issue of accurate information with tree work applications is noted. The submitted location plan and layout plan should show sufficient detail to pinpoint the tree(s) the subject of the application together with the detailed description of the proposed works. Photographs can sometimes be helpful but are not always clear as to which tree is the subject. There is also little opportunity for the validation to ratify the accuracy of the photograph.

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28	Chichester District Council	Archaeology	Heritage statement requirement: 'All applications for development affecting a heritage asset and any non-designated heritage asset recognised as such by the SDNPA unless accurate completion of the SDNPA checklist demonstrates no adverse impact on the historic environment.' I am not aware of any particular process for the recognition of non-designated heritage assets, or any published list of non-designated heritage assets (other than the Historic Environment Record) that can be consulted. I'm not convinced that it is possible to determine whether or not an application is likely to have an adverse impact on the historic environment solely on the basis of an accurately completed checklist. In the circumstances expecting the applicant to, effectively, self-validate this is a pointless exercise. Perhaps the answer is to have a simple, general requirement: 'All applications for development affecting any designated heritage asset and any suspected non-designated heritage asset should provide a heritage statement including, where appropriate, the results of a HER search.' This would have the added virtue of making redundant the next section: 'Historic Environment Record Searches will be required for: All householder applications for extensions involving any below ground activity to a boundary/adjacent a LB or Scheduled Ancient Monument.' which could be deleted. In the next sections reference is made to red and amber archaeological notification areas. However, these do not exist for Chichester District. I'm not clear why the distinction is made between residential and non-residential schemes – either could affect below-ground archaeological interest – or why a heritage statement should be needed for one or more residential units but not for non-residential schemes under 2ha. A development of 2ha would easily encompass most archaeological sites! Perhaps the following would suffice: 'Within Archaeological Notification Area for one or more units or where the site is larger than 25m2 and for any below ground activity within or adjacent to a Scheduled Monument or a historic church or churchyard. Outside of Notification Area for 10 or more units or where the site is over 0.5ha.'	<b>NOTED:</b> Requirements in relation to Heritage Statements amended to encapsulated all elements.
29	Chichester District Council	Air quality assessment	Recommend wording change: bioaerosols, or odour and/or the development is within or likely to affect or cause the declaration of an Air Quality Management Area	<b>AGREED</b> - The proposed amended wording is considered to give greater clarity of the requirement for such an assessment.
30	Chichester District Council	Biodiversity	Recommend additional wording: surveys would be required where the proposal is likely to impact upon protected species eg. bats, great crested newts etc. - Would like 'priority habitats' to be considered under the list	<b>AGREED</b> - Priority habitats to be added to the wording.
31	Chichester District Council	Land Contamination Assessment	Recommend additional wording: Applications for prior approval for change of use under permitted development rights Eg retail to dwelling house, certain sui generis to dwelling houses, offices to dwelling houses, storage or distribution centres to dwellinghouses, agriculture to dwelling houses, etc	<b>AGREED</b> - Given that land contamination is one of the issues considered under prior approval this is a reasonable requirement.

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32	Chichester District Council	Noise Assessment	Recommend additional wording: <i>Applications where residential or other noise sensitive use is proposed adjacent to existing noise sources (eg industrial or commercial uses).</i>	<b>AGREED</b> - This request is considered appropriate and necessary.
33	West Sussex County Council	Heritage	I have looked through the document and the only comment I have is in regard to the Heritage Statement section, in particular the when an Historic Environment Record Search is required for a Householder application. Could the current text be replaced with the following: Householder Application Searches that would be subject to the West Sussex Threshold Guidance for a Householder Application as detailed below: • Any below ground activity adjacent to/boundary of a listed building and/or Scheduled Ancient Monument e.g. for an extension An HER Search is NOT required for internal alterations e.g. replacement windows or loft conversion. Any ground excavations at all or new above ground structure, path or slab of any kind within a Scheduled Ancient Monument requires Scheduled Monument Consent beforehand. This Consent is quite separate from and out-ranks planning permission or Listed Building Consent: English Heritage can advise.	<b>NOTED:</b> The requirement for statements amended to encapsulate all comments made.
34	West Sussex County Council	Archaeology	Also, could you include this link to the West Sussex Archaeological Notification Areas online map so householders and other applicants will be able to assess whether they need to consider the Historic Environment - <a href="https://www.westsussex.gov.uk/land-waste-and-housing/landscape-and-environment/historic-environment-record/#archaeological-notification-areas">https://www.westsussex.gov.uk/land-waste-and-housing/landscape-and-environment/historic-environment-record/#archaeological-notification-areas</a> .	<b>AGREED</b>
35	Binsted Parish Council	Plans	Location plan showing the distance from neighbouring properties and any public rights of way or access Block plan, detailing the existing site levels Details of the access including appropriate proven sightlines Full set of plans for the development showing the existing and the proposed, floor plans, elevations and roof plans.	<b>NOT AGREED</b> - It is important not to stray into what are National Requirements. The information needed within the location plan should be limited to ensuring that the location of the proposed site is clearly identified on a recognised scale and this does not include the need for distances to neighbouring properties, footpaths etc. Likewise, the national requirements set out the needs on a block plan. The requirement for floor plans and elevations will depend on the nature of what is being proposed.

Query ID	Originator	Category	Query	Response
36	Binsted Parish Council	Plans	All plans should show an appropriate scale bar, together with/rather than a note of the plans scale. It is often difficult to work out scale of planned features from an online plan, even using the SDNP scale tool. All plans should also include a north pointer.	<b>NOTED</b> - Ordinarily this would be required under the national requirements.
37	Binsted Parish Council	Min Waste	Good to include Minerals and waste developments into the proposals although when the assessment is required is still ambiguous as it is with other developments currently requiring assessment, the proposal suggests that an assessment is required where traffic generation is increased what does this mean, what is considered an increase. we suggest that the trigger point for these assessments need to be much more prescriptive and less open to interpretation so perhaps where the developments likely to create X number of additional trips an assessment is required. The X needs to be established by those better qualified to judge, but should reflect the importance of special qualities of the South Downs National Park and an assessment should be required at a lower level than in areas where the qualities of the area are deemed lower.	<b>NOT AGREED</b> - The requirement is considered to be prescriptive and easy to understand insofar as where a development is likely to generate additional traffic, the assessment would be required. The suggested requirement dependent on 'number of trips' is considered to be overly complicated especially when it also includes a suggested assessment/weighting about whether the qualities of the area are lower in one area than another. This suggested requirement is considered to result in a more complex and less proportionate approach.
38	Binsted Parish Council	Various	Given the two main purposes of the National Park, I would like to see more consideration given to protecting species pathways (wildlife corridors) through the landscape. Many of our important species are protected within a network of protected sites including SSSIs, Nature reserves etc., however their populations continue to decline as a result of being isolated from each other as a result of these corridors being cut by development activities. It's not possible to protect all wildlife corridors but where identified they should be given more weight in the planning process.	<b>NOT AGREED</b> - It is considered the requirements in terms of biodiversity are sufficient to address this. The introduction of designated wildlife corridors in order to 'catch' such an assessment would be overly onerous.
39	Binsted Parish Council	General	It is not all together clear what is meant by Major development, we would prefer a more precise of what constitutes a major development. The definition of major should also take into consideration the location of the development, what is the infrastructure, is the site located near to populations it is visible or hidden away. A big hole in the ground with good transport networks which is away from populations and can't be seen or heard from publicly accessible locations will have a lower impact than a small hole in the ground located next to a rural school, accessed by large vehicles on narrow roads.	<b>NOTED</b> - Clarification will be included within the Local List as to what the definition is of Major Development for the purposes of the Local List. There is a clear difference between what is major for the purposes of requirements with an application and what the

Query ID	Originator	Category	Query	Response
				definition of 'major' in the context of Paragraph 116 of the National Planning Policy Framework.
40	Binsted Parish Council	Various	Given the special qualities of the SDNP and the requirement to fully comply with the purposes of the National Park, Landscape and visual impact, lighting and noise assessment should be an absolute minimum requirements in the SDNP in order.	<b>NOTED</b> - The requirements within the Local List are considered to address this, however it must be noted that a proportionate approach must be taken depending on the specifics of each particular application.
41	Binsted Parish Council	Transport	Transport and highways is a major issue in the SDNP with many of the transport networks being unsuitable for the numbers and size of vehicles using them particularly at peak times. This situation is only going to get worse. Where sustainable transport options are not available we believe a transport assessment and travel plans should be required as a matter of course. Again the document refers to 'Major Development' as we have already stated it is difficult to understand what it means. We would therefore like to see a more standardized/ structured approach based on size of development and location. The Hampshire/SDNP parking standards operates in this way, it provides an easy to understand, simple to decide approach to whether an easement would be required or not.	<b>NOT AGREED</b> - The requirement on the list for consultation is considered to be proportionate and clear (with the caveat that the definition of major development will be made clearer in the final list). Any more detailed requirement based on the location of the development alongside the size would be considered overly cumbersome. The current requirement does provide the opportunity for the applicant to demonstrate why they consider the requirement unreasonable in their particular case.
42	Binsted Parish Council	Tree Survey	Trees provide a structure to our landscape, an assessment should always be required.	<b>NOT AGREED</b> - The application form asks the applicant to confirm whether such trees would be affected. If they will be, then a tree survey will be required. It would not be proportionate to request a tree survey for trees which will be unaffected by the proposed development.

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43	Binsted Parish Council	General	We would suggest that without the correct assessments, applications should not be accepted for consultation by SDNP. All too often we see situations where applications are not supplied with full local list information, frequently the missing information is then required in the form of condition after permission is granted. We don't believe this is conducive to good planning practice, it does not provide protection for the special features of the National Park or the maintenance to thriving communities within it. Without the correct information in the form of an accurate assessment being provided as and when required, a full and comprehensive decision making process cannot be embarked upon, any decisions reached will by their nature be flawed.	<b>NOTED</b> - Government advice encourages local authorities to be proportionate in their requests as part of the Validation process. It is always helpful to have all the required information for all parties to assess the acceptability or otherwise of a scheme. However at the heart of this consideration must be whether the Authority can come to a recommendation on the basis of what has been provided.
44	Friends of Lewes	Plans	The Society often finds it difficult to interpret the impact of proposed elevations on the surrounding area where the site has a change in ground levels or is on a sloping site. It therefore suggests that development proposals would be clearer if the third bullet point in the information section "Additional Plans" was amended to read: Existing and proposed building, roof and site sections and finished floor and site levels (1:50 or 1:100) (In all cases where proposals involve a change in ground levels or is on a sloping site).	<b>AGREED</b> - The need for existing and proposed levels are considered to be important in the consideration of planning applications.
45	Pulborough Parish Council	Plans	Having considered the draft document, I have been instructed to advise that Members expressed surprise that the SDNPA have not included the submission of CAD drawings as mandatory, as in their view with the advances of modern technology this would be appropriate for developments of 5+ houses. They would therefore like to recommend that this be included as part of the mandatory criteria for the final document.	<b>NOT AGREED</b> - It is not considered proportionate to request solely CAD drawings. The accuracy of plans is critical but this cannot be achieved solely by CAD drawings.
46	Adur & Worthing	Air Quality	Guidance should include the 'Air Quality and Emissions Mitigation Guidance for Sussex' (current version is 2013 and is available to view online). This is a document produced by Sussex Authorities through Sussex-air, which gives guidance on the procedures for air quality assessments and appropriate mitigation which should be incorporated into developments at an early stage. Links to the transport assessment and Travel Plan should also be made clear in the validation list. (available at <a href="http://www.sussex-air.net/">http://www.sussex-air.net/</a> )	<b>AGREED</b> - These links to guidance are considered helpful in assisting applicants.
47	Adur & Worthing	Noise	Guidance should include the 'Planning Noise Advice Document: Sussex' (current version 2015 and is available to view online). This is a document produced by Sussex Authorities which gives guidance on the procedures for noise impact assessments and relevant standards. (available at <a href="http://www.adur-worthing.gov.uk/media/media,121802,en.pdf">http://www.adur-worthing.gov.uk/media/media,121802,en.pdf</a> ).	<b>AGREED</b> - These links to guidance are considered helpful in assisting applicants.

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48	Telscombe Town Council	Drainage	The Committee would like to see validation requirements linked to sustainable design and construction on all application including water conservation/SUDS statement and waste storage/recycling/waste reduction report.	<b>NOTED</b> - It is considered that the requirements adequately cover the issue of Drainage.
49	Telscombe Town Council	General	Major applications should set out lifetime homes standards and provide details of wheelchair accessible housing	<b>NOT AGREED</b> - These matters are addressed at Building Regulations Approval Stage and developers/applicants should be factoring this into their drawings at this stage in any event.
50	Telscombe Town Council	General	On major applications or other applications that increase floorspace by 500m2 or greater, that an energy statement be submitted	<b>NOT AGREED</b> - The set criteria is considered to be proportionate and the rationale for this arbitrary figure is not made clear.
51	Telscombe Town Council	Plans	That all plans should be titled and numbered and that all plans show clearly the proposed works in relation to the existing, highlighting any structures to be demolished (this should be shown in cross-hatch red).	<b>NOT AGREED:</b> This is considered not to be proportionate to be refusing to validate applications purely in the absence of numbered plans.
52	Telscombe Town Council	Air Quality	The wording of the requirements of the Air Quality Assessment is not specific. What is meant by "where traffic generation is increased?" Air Quality Assessments should be sought for all applications above 75 houses or above 50 houses in an Air Quality Management Area (AQMA). For all applications that increase the floorspace by over 1000m2 or 500m2 in an AQMA or involve the creation of 100 parking spaces or greater. Any Air Quality Assessment should set out measures to be adopted to reduce the impacts of the development to acceptable levels.	<b>NOT AGREED</b> - The requirement for such an assessment where traffic generation is to be increased is considered to be specific and proportionate.
53	Telscombe Town Council	Telecoms	A Telecommunications Report should apply to all telecommunications applications including those for infrastructure e.g. base station, cabinets. Also apply to prior notification schemes.	<b>NOT AGREED</b> - The need for a full report is not considered to be proportionate for applications for base stations and cabinets.
54	Telscombe Town Council	Tree Survey	The tree survey/arboricultural assessment should include details of what the report needs to contain, does it need a plan, details of roots, etc.	<b>NOTED:</b> The guidance should include this detail.

Query ID	Originator	Category	Query	Response
55	Telscombe Town Council	Lighting	The lighting assessment is sought on all applications "in the vicinity of a listed building" - how far is the vicinity? Is that the street?	<b>NOTED</b> - The comments of the Parish Council are appreciated but there is a danger of reducing every requirement to specifics in terms of distances etc. In this case the matter of 'vicinity' will need to be a matter of judgement for the validation team on each particular case.
56	Telscombe Town Council	Heritage	The list contains little about demolition of listed buildings or locally listed buildings. Any such applications should contain a structural report and a schedule of works to ensure that the remaining building is not harmed or put at risk.	<b>NOTED:</b> Requirement for Heritage Statements has been amended to provide more clarity.
57	Storrington and Sullington Parish Council	Plans	Additional Plans: 'Block plans ....key dimensions...' seems sensible; is this more detail than required by HDC at present?	<b>NOTED</b> - This is not more detail than is currently required by Horsham District Council
58	Storrington and Sullington Parish Council	Heritage	Heritage statement: '....any non designated asset recognised as such...' members are slightly confused by this, but presume this is covered by the Guidance listed.	<b>COMMENTS:</b> Whilst an asset may not be listed it may have a local listing and be considered to be an asset. Guidance should assist in this respect.
59	West Sussex County Council Highways	Transport	Road Safety Audit - For all 'major' planning applications that include any of the following:* Alteration to an existing highway, Intensification of use of an existing access (intensification is generally defined as 50 or more vehicle movements per day. However it is recommended that clarification is sought from WSCC where a proposal involves the intensification of an existing access as other issues such as collision data, visibility and geometry would need to be considered), Formation of a new access, Off-site highway improvements, New residential estate roads where a through route is created, where a bus route is created or where the road serves access to a school or other major community or retail facility. For all other planning applications that include proposals that do not meet recognised standards. The need for a safety audit will be assessed by West Sussex County Council officers. Of particular interest will be visibility, geometry and junction location. Safety Audits will not normally be required, for minor applications, if guidance set out in Manual for Streets or Design Manual for Roads & Bridges is achieved. *( 'major' applications are defined as residential development of 10 units or more or 0.5 ha or more when the numbers are unknown and commercial	<b>NOT AGREED</b> - The validation process should be clear and simple to understand. The suggested requirements would overly complicate and would not be proportionate.



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			development of 1,000 sq.m. or more or 1 ha or more).Safety Audits must be undertaken in compliance with HD 19/15, Road Safety Audit subject to the departures set out in this policy.	
60	Historic England	Heritage	“Guide to the Range of Information to Enable Consultations With Us The type and amount of information will vary in each case; our approach is proportionate according to circumstances. Much of the information we require will be included in your Design and Access and/or Heritage Statement. This is not a checklist of information required by local planning authorities, but when we are consulted on the information requirements for local validation we commend this Charter as a clear statement of the information we will need in order to provide informed advice.” <a href="https://www.historicengland.org.uk/services-skills/our-planning-services/charter/guide-to-the-range/">https://www.historicengland.org.uk/services-skills/our-planning-services/charter/guide-to-the-range/</a>	<b>NOTED:</b> Guidance highlighted will be added to the list to assist applicants.
61	Landscape Officer SDNPA	Advice to homeowners	Please could this be reworded to avoid any duplication and confusion. The advice to homeowners and their agents is aimed at the domestic market and should not be used to inform about baseline studies for other non householder applications. I have had numerous occasions where the checklist has been wrongly used for large schemes on the basis of the advice given above, this has resulted in applications being validated with the wrong documents.	<b>AGREED</b> - Clarification and revision of the terminology in this comment is needed.
62	Landscape Officer SDNPA	Advice to homeowners	Please could we be clear and correct in the terminology used - Landscape and visual impact assessment is the document required as part of an Environmental Impact assessment where the screening process has scoped landscape into the Environmental statement. It is not undertaken outside of the EIA process. Applications which fall outside of the EIA regulations will be required to submit a bespoke landscape appraisal / study in accordance with the relevant professional guidance where landscape impacts are likely due to the sensitive character of the site and/or it's degree of visibility. The baseline checklist should not be referred to in the context of non householder applications.	<b>AGREED</b> - Clarification and revision of the terminology in this comment is needed.
63	Fernhurst Parish Council	Plans	The Council would like to receive smaller scale A3 location plans such as 1:2500 for smaller sites and 1:5000 for larger sites. This is to ensure that the location of the property is clearly and easily understood as well as its wider context.	<b>NOT AGREED</b> - The important requirement is to have a location plan that clearly identifies the application site. The Validation Team is able to judge at which scale the location plan will be able to achieve this.
64	Elsted Parish Council	Plans	It would be useful if page 1 of the appendix required details of the size of the existing and any extension building in square metres gross external. Furthermore, and although there is reference to the need to provide 'finished floor and site levels' in the 'additional plans' section, what is needed is the requirement to provide a datum point.	<b>PARTIALLY AGREED</b> - It is not considered critical to know the external size of the building in square metres for planning purposes. The requirement for a datum point is however considered to be helpful in the process and is agreed.

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65	Hampshire County Council	Archaeology	Thank you for your recent consultation regarding the review of local requirements. I would I not raise any additional issues to those set out. However I have attached the advice information currently on our web site which might be a useful link (although I appreciate that as there are three County Councils the proliferation of advice links with inconsistent messages may be something you choose to avoid – but I add it in case you wish to consider it) <a href="http://www3.hants.gov.uk/landscape-and-heritage/historic-environment/environment-landscape_planning__amp__heritage-newpage.htm">http://www3.hants.gov.uk/landscape-and-heritage/historic-environment/environment-landscape_planning__amp__heritage-newpage.htm</a>	<b>AGREED</b> - The link to this guidance is considered to be helpful in the process
66	Landscape and Biodiversity Lead, SDNPA	Tree Survey/ Biodiversity	Would basically like to ensure that when people apply for planning, and tick the box that they are going to impact on trees, that they are required to provide supplementary info on how they are going to protect their trees.	<b>COMMENTS:</b> Current Tree requirements include the need to provide details of how trees will be protected.
67	Sport England	Various	In addition to the national validation requirements set out within the Government's Planning Practice Guidance, Sport England recommends that planning applications affecting playing field land should provide sport specific information in line with the below checklist. This information will enable Sport England to provide a substantive response to applications on which it is consulted. It will also aid the LPA to assess an application in light of paragraph 74 of the NPPF and relevant Local Plan policies. The checklist presents the recommended requirements for all applications. It also indicates the information that Sport England recommends should be submitted where an applicant feels their development may meet with one of the exceptions to Sport England's Playing Fields Policy. See PDF material	<b>AGREED</b> - This guidance can be introduced into the list to provide guidance to applicants.
68	Midgley Design	CIL	An application recently made to Lewes District Council in respect of a proposed commercial development for B1, B2 and/or B8 use was delayed because no CIL Form had been submitted. Yet CIL does not apply to such buildings. An enquiry of the LPA plans registration department revealed that CIL forms are required for all new-build applications, irrespective of whether or not CIL applies. Such is the stupidity of the Planning Portal application forms that there is no 'tick box' for acknowledging whether or not the application involves a CIL chargeable proposal. If SDNPA are to update the requirements list for applications then the SDNPA 'stance' on the requirement for CIL forms to accompany any application should be clarified. (And perhaps suitable representations should be made to the Planning Portal to seek adaptation of the application form procedure to allow for CIL information to be included where required.	<b>Comments:</b> Proposed CIL requirements are considered to provide clarity on when these will be needed.

Query ID	Originator	Category	Query	Response
69	Winchester City Council	LVIA	<p>Requesting an LVIA for sensitive applications within the SDNP is entirely appropriate. However, I have an issue with the SDNPA checklist for this as it is entitled “Landscape and Visual Impact Assessment – Baseline Assessment Checklist”. This is misleading. An LVIA is a professionally produced document which assesses the impact of a development on landscape and visual amenity, as set out in the Landscape Institute’s Guidelines for Landscape and Visual Impact Assessment, Third Edition (2013). In addition, an LVIA (which is produced as part of the EIA process) is not the same as a Landscape and Visual Appraisal, which uses a similar methodology, but is considered to be an ‘informal LVIA’ for use on non-EIA developments, and is more likely to be appropriate for the majority of applications. The SDNPA checklist should therefore be re-titled “Applicant checklist to decide if a Landscape and Visual Appraisal is required”. Whether an LVIA as part of an EIA is required would be determined by the Screening and Scoping process for EIA. When uploading these checklists to the relevant planning case file it should also be entitled “Applicant Checklist for LVA” so it is easier to quickly find an LVA associated with an application when looking at the list of all documents associated with the application. I would suggest that you ask your Landscape Architects to review this document alongside the proposed changes to Validation Requirements.</p>	<p><b>NOTED:</b> Clarification of terminology included in amended report and requirement for appraisal clarified.</p>

