

APPENDIX 3

South Downs National Park Authority IAPP Review: Draft Local List of Requirements for Planning Applications for consultation – list of responses

Query ID	Originator		Query	Additional comments/links	Response
I	Andy Player SDNPA	Trees	<p>Following on from Dan Wynn's comments- I too would suggest aligning the validations requirements more to the BS5837 format- so it is clearer what we require and when.</p> <p>I would also suggest a review of the homemaker checklist- not least to update the recovered area authorities, but also to ensure that it does do what we want from it, in terms of applicants filling it out to avoid the need for full arb surveys and reports- I'm sure the tree officer group would be willing and able to feed in on this if that were possible? It would be interesting to know how many applicants use the checklist currently in respect to trees on their site?</p>		Comments: The issue of tree information is considered in more detail below. It is acknowledged that the homemaker checklist is due for review and amendment and this will follow the adoption of the Local List.

			<p>It would be useful if we could require further details of hard and soft landscaping in more detail with applications- to include details of how they will establish the plantings and maintain them- this is mentioned in the BS5837 list.</p> <p>I am working on a Technical Advice Note for trees and development, and would suggest that this compliments the validation checklist and visa versa- working on having this for april</p>		
2	Friends of Lewes Society	Householder	<p>The Friends of Lewes welcomes the opportunity to comment on the review of the Local Validation List. The Society supports the validation requirements as they ensure that consistent information is provided in support of planning applications. Although it does not believe any changes are necessary it suggests an additional simple summary to guide applicants proposing small scale household development would be helpful.</p>		<p>Comments: This is a fair point made and officers are programming in a workstream on a simple guide/checklist can be developed to further help applicants work their way through the submission process.</p>
3	Tom Day - Chichester Environmental Co-ordinator	Ecology	<p>I have extracted the parts of the local list that are relevant to our team's work and made some comments. In our experience many applicants and agents tend to assume that protected species will be absent from a site when actually the range of situations when they could be present is very wide, especially in the Downs. We then end up in a situation where surveys are required for an</p>		<p>Comment: The representation makes suggestions with regard to a local checklist in relation to biodiversity surveys and this is something that officers will give consideration to in due course. In addition, the representation suggests that explanation about the different zones in relation to Habitat Regulations Assessment would be helpful. Whilst explanation of this within the types of applications where an HRA would be needed would be onerous</p>

			<p>application which is validated and the clock is ticking. I have also attached a flowchart and check list that we use to help guide our planners (including the SDNP team here) on which applications are likely to need some form of ecological report / survey.</p> <p>Link to files I:\Planning\Dev_mgt\LVL Consultation\LVL 2018\Chichester ecology</p>		and over complicated, officers will give consideration to links to further advice in due course.
4	Steve Blythe HCC Flood team	SWDS	<p>Our only comment on the document is that for the information required for the Surface Water Drainage Strategy and the links to national policy /guidance, that there is a link provided to Hampshire County Council's 'Reducing flood risk in planning' webpage that discusses SUDs and includes our Surface Water and Sustainable Drainage Guidance for Developers, Designers and Planners.</p> <p>The link to the HCC webpage is: Hampshire County Council and Sustainable Drainage Systems</p>		Comment: The suggested link is considered to be beneficial for applicants preparing documentation and it is proposed to include this in the proposed list for adoption.
5	Claire Warwick ESCC Highways	Transport	As Highway Authority we too require the submission of specific information some of which is covered in your list, (access plans, Travel Plans, Transport Assessments) however there are a few additional items required for development proposals in East Sussex.		Comments; there is a difficulty in starting to introduce a sliding scale with regard to types of applications, especially given that a 3 dwelling scheme may present more complex issues than an 8 or 15 dwelling scheme. A pragmatic approach has been taken with setting the requirement at major applications. The requirement for a Stage 1 Road

			<p>I note that you expect a Transport Assessment to be submitted but seemingly for major development only. ESCC's Transport Assessment guidance splits the need for assessment into three levels. Along with the submission of a TA with major development, we expect smaller and medium scale development to be supported by a Transport Report or Transport Statement respectively.</p> <p>Similarly a Travel Plan Statement is appropriate for medium scale development .</p>		<p>Safety Audit is noted, although it appears that this requirement is not standard across all authorities and it is questionable whether this is necessary in all schemes in excess of 10 dwellings. on balance it is recommended that a Stage I Road Safety Audit is not required.</p>
			<p>Parking provision and assessment is often covered within the Transport Assessment but we do have specific parking guidance. This guidance covers both cycle and vehicle parking and suggests appropriate layouts. The number of cycle spaces should meet ESCC standards and the number of vehicle parking spaces should comply with our parking calculator.</p>		
			<p>Also for any application in excess of 10 dwellings or equivalent, that proposes alteration to the adopted highway (for the creation of an access, new or altered highway infrastructure- altered junctions, road widening, new /altered footways) we also expect a Stage One Road Safety Audit to accompany a planning application.</p>		

			<p>A copy of our guidance on Transport Assessments, Travel Plans, Road Safety Audits and Parking (including our Parking Calculator) can be found at:</p> <p>https://www.eastsussex.gov.uk/environment/planning/applications/developmentcontrol/tdc-planning-apps/</p> <p>I hope you can consider these suggested additions/amendments when finalising your list. If you need any clarification please let me know.</p>		
6	Nick Claxton ESCC FRMT	Flood Risk Magagement	<p>This response is that of the Flood Risk Management Team at East Sussex County Council (the Lead Local Flood Authority) which is charged with managing local flood risk and is a statutory consultee on major development proposals.</p> <p>Whilst the local list accurately reflects the requirements of National Planning Policy, the requirements of NPPF with regard to non-tidal and non-fluvial flooding are somewhat muddled.</p> <p>There is an assumption that minor development will not require any form of drainage/surface water strategy. This is of concern as our experience demonstrates that the size of development is no indication of the risk it may pose to itself or elsewhere. This approach also overlooks the potential for minor development to disrupt or interfere with watercourses which could lead to</p>		<p>Comments: Whilst it is considered helpful to provide links to guidance and tools that are used in other areas, there is naturally a difficulty in starting to introduce requirements specific to different areas of the Park, making the Local List unnecessarily overly complex and onerous. It is therefore considered that the requirements as originally proposed in the consultation list are acceptable.</p>

			<p>flooding and would be a contravention of the Land Drainage Act. Furthermore a development could be proposed in a major surface water flow path which would lead to flooding issues during construction as well as occupation.</p> <p>East Sussex County Council has developed a Web tool with which to assess SuDS requirements for minor development proposals in the county – the report that the tool generates has been adopted as a validation requirement in Hastings Borough and parts of Rother District and we would commend this to the SDNPA as it will assist not only with basic flood risk policy requirements but will support water quality management objectives.</p> <p><u>The Tool can be accessed here http://eastsussex.suds-tool.co.uk/</u></p> <p>The County Council has developed advice on the drainage strategies which can be found here:</p> <p><u>https://www.eastsussex.gov.uk/media/1995/guide-to-sustainable-drainage-systems-in-east-sussex2.pdf</u></p> <p><u>https://www.eastsussex.gov.uk/media/1994/se7-suds-masterplanning_low_res_reduced.pdf</u></p> <p><u>https://www.eastsussex.gov.uk/media/1996/surface-water-drainage-checklists.pdf</u></p>		
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7	Kate Simons Chichester Env Health	Air Quality Assessment	- Development likely to generate air quality impact in an area where air quality is known to be poor (eg introduce receptors to an area within or close to an AQMA),	Policy SD54 Pollution and Air Quality (& explanatory text 7.324 – 7.328)	Comment: Whilst the aspirations of the representee are acknowledged, the criteria proposed appears to serve to make the Local List more technically challenging and complex for the applicant and overly onerous (also arguably expecting or needing the applicant to have knowledge of complex legislation). The requirements as set out in the list for consultation are considered to be a pragmatic and workable compromise.
			<ul style="list-style-type: none"> - Development likely to adversely impact upon the implementation of air quality strategies and action plans and/or lead to a breach of EU legislation (including that applicable to wildlife) – generally major developments that significantly increase traffic volumes in the vicinity of the site and/or affect the AQMAs, - Development where plant (boiler plant including solid fuel and district heating systems) is proposed which has potential to impact on air quality through emissions to atmosphere. - Development likely to generate bio-aerosols which can be transported in air via dust events (sources of bio-aerosols include soil water and sewage). <p>Note: Candidate AQMA exists at Rumbold's Hill, Midhurst</p>	<p>Further info available in: Institute of Air Quality Management (IAQM) and Environmental Protection UK (EP UK) document Land-Use Planning & Development Control: Planning for Air Quality January 2017.</p> <p>Links provided in consultation document agreed with but first link does not work (Planning Practice Guidance web link) and last link does not work (Air Quality Emissions Mitigation Guidance for Sussex) –</p>	

				guidance being updated	

8		Odour Assessment	Development likely to generate odours (eg sewage works, intensive animal rearing, processing of animal remains, solid waste management, composting and some industrial processes) should have an Odour Assessment undertaken.	IAQM Guidance on the assessment of odour for planning Version 1.1 July 2018	Comment: This is a new request for an assessment. It is considered that the representee makes a valid point and it is proposed to add this requirement to the local list for adoption.
				The Control of Odour and Noise from Commercial Kitchen Exhaust Systems (EMAQ, September 2018)	
9		Land Contamination Assessment	Applications where one or more of the following applies: - Development includes ground works and a previous use of the site or a nearby site may have introduced land contamination to the soil and/or water environment, - A sensitive land use is proposed ie. housing, private gardens, allotments, schools or nurseries, - A potentially polluting land use is proposed should be accompanied by a desk study report (including a site walkover and conceptual site model) which concludes with a preliminary risk assessment. This information will enable the LPA to determine if more detailed investigation is required.	Policy SD55: Contaminated Land (& explanatory text 7.329 – 7.332) Suggested links agreed with – same link repeated twice (planning practice guidance and Government Guidance are the same)	Comment: This expands the criteria for which applications should require an assessment. It is considered that the requirements are valid and helpful in terms of providing the relevant information for officers to assess such proposals. It is recommended that this further criteria is added to the Local List.
10			Add the following:		

		Lighting Assessment	Proposals for lasers, search lights, beams of light and illuminated advertisements	Suggested links agreed with.	Comments: Whilst the suggestion is noted, it must also be acknowledged that the list already requires an assessment for all applications which include outdoor lighting. It is therefore considered that no further expansion on types of applications is required. Likewise, Advertisement consent application forms require details of luminance of signs to enable officers and consultees to assess the impact of the proposal. it is therefore considered that the suggestion made is unwarranted.
II		Noise and Vibration Assessment	All applications for development other than householder likely to generate noise that may raise issues of disturbance by noise and/or reduce tranquillity,	Policy SD7	Comment: The proposed additional links for guidance are considered to be helpful and it is recommended that they should be added. The further requirements and criteria suggested are however considered to be overly cumbersome, complex and move away from being a list which will be easy to understand for applicants and it is recommended that the requirements as set out in the consultation list (and not the representation) are accepted.
			Applications for residential or other noise sensitive uses located adjacent to existing noise sources,	Policy SD54	
			Where there are alterations to a site with existing industrial or commercial uses. Alteration can take many forms eg introduction of a new noise source such as fixed plant, a change to the layout or change to working hours. Consideration should be given to the acoustic performance of separating structures where there is a potentially disturbing noise source, for example gyms next to residential dwellings or offices. Acoustic Consultancy advice should be gained in these instances to provide an acoustic performance that is above minimum		

			Approved Document E Building Regulations which is commensurate to the mixed activities.		
			For prolonged or sensitive construction and demolition activities a Management Plan shall be submitted or else a Noise and Vibration assessment drawing from BS 5228-1:2009+A1 (2014) Code of Practice for Noise and Vibration Control on Construction and Open Sites – Part 1: Noise and Part 2: Vibration.	Suggested links agreed with plus:	
			The impact of the sound levels needs to be considered in relation to both the internal and external spaces.		

			<p>For developments where vibration may be potentially disturbing, for example in close proximity to a railway line then a vibration assessment shall be required. Consideration shall be given to recommended threshold Vibration Dose Values (VDV's) as presented in BS6472-1:2008 "Guide to Evaluation of Human Exposure to Vibration in Buildings". It may be that adequate buffer zones or other appropriate mitigation measures are required so that appropriate threshold values can be met, to provide a "low probability of adverse comment". If it is evident that there is the potential for disturbance from short lived episodes of vibration then consideration shall be given to the predicted impact of Peak Particle Velocity (PPV).</p>	ProPG: Planning and Noise	
				BS 5228-1:2009 + AI (2014) Code of Practice for Noise and Vibration Control on Construction and Open Sites – Part 1: Noise and Part 2: Vibration.	

			An assessment should normally be carried out by a qualified acoustician who is registered with the Institute of Acoustics (IOA) and/or the Association of Noise Consultants.		
12	Bramshott and Liphook PC	Heritage	The Council has considered the proposed Local List and would like to see more emphasis placed on heritage assets and buildings within the Park.		Comments: This is noted and hopefully the comments made elsewhere on specific heritage requirements should give the Parish Council comfort.
13	Daniel Wynn LDC Trees	Trees	1/ Tree Survey/ Arboricultural Assessment/Arboricultural Method Statement and Tree Protection Plan in accordance with the latest version of BS:5837 Trees in Relation to Demolition, Design and Construction	Annex B of BS:5837 2012	Comment: It is considered that it makes sense to confirm in the requirements that the Tree Survey/AIA/AMS should be in accordance with BS:5837 and it is recommended that this is mentioned in the criteria for requirements, It is however considered that the criteria is clear enough without the need to add that it is mandatory for development where trees subject to TPO's are affected and it is not recommended that this element is added to the list.
			Mandatory for sites	Policy SD11: Trees, Woodlands and Hedgerows (& Explanatory text 5.96-5.102)	
			where trees subject to an existing and/or proposed Tree Preservation Orders are likely to be affected	SDNPA Advice To Homeholders and Their Agents' (Opens PDF)	
			by the development for pre-application advice and applications for development	Bat Conservation Trust – Bats and Trees Guidance (Opens PDF)	
				Wild birds: protection and	

				licences (Web Link)	
14			2/ Tree survey showing trunk centre of all trees with stem diameter exceeding 100mm (or grouped together if impracticable to plot individually) together with crown spreads.		Comment: This element suggests amendments to the honeholders checklist. This will be taken into consideration when the checklist is reviewed, which will follow the adoption of the Local List.
			All applications for development affecting trees unless accurate completion of the SDNPA checklist demonstrates no trees within falling distance of the outermost limit of the development area.		
15			3/ Indicate trunk centres of trees located within falling distance of development on the plan.		Comment: It is considered that this requirement begins to go into too much detail about the content of what should be in the Tree Survey. It is not recommended that this be added to the list as it will being to make the list overly complex.
			Householder applications which may affect trees within the garden or trees on land immediately adjacent to the application site		

16	Member of public	Noise	1. The Noise Policy Statement for England issued by DEFRA in March 2010 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/69533/pb13750-noise-policy.pdf		Comment: This suggestion appears to infer that legislation should be considered as part of the planning application, as opposed to being a requirement for submission by the applicant at the validation stage of the application and is therefore considered not relevant for the purposes of Local Validation Requirements. For sake of completeness, where there are any applications which are considered to have impacts in terms of noise, the Authority consults with the relevant Environmental Health Team who have regard to necessary legislation when formulating any response.
			2. The Noise Act 1996 https://www.legislation.gov.uk/ukpga/1996/37/contents		
17	Member of public		I would like to see the Noise Act 1996 as amended added to the list of factors to be taken into account.		Comment: This suggestion appears to infer that legislation should be considered as part of the planning application, as opposed to being a requirement for submission by the applicant at the validation stage of the application and is therefore considered not relevant for the purposes of Local Validation Requirements. For sake of completeness,
			Excessive, late noise and noise from events can cause problems and prevent residents in some areas getting a decent nights sleep.		

					where there are any applications which are considered to have impacts in terms of noise, the Authority consults with the relevant Environmental Health Team who have regard to necessary legislation when formulating any response.
18	Selboourne Parish Council	Ecology	<p>Under the heading 'Information to support Habitat Regulations Assessment screening and appropriate assessments, if required.</p> <p>Sub section</p> <p>All applications with 6.5km or 12km of Mens, Ebernoe Common for Singleton and Cocking Tunnels SAC's, please include:</p> <p>Shortheath Common SAC and East Hampshire Hangers SAC</p>		Comment: This suggestion for the inclusion of the SAC's highlighted is sensible and it is considered that they should be added to the list.
19	Member of public	Noise/tranquility/dark skies	<p>The Local Plan would benefit from the inclusion of a new section specifically devoted to Festivals and Events.</p>		Comment: This suggestion appears to infer that legislation should be considered as part of the planning application, as opposed to being a requirement for submission by the applicant at the

			<p>We submit that such a policy should have clear limits for acceptable noise and light levels based on WHO Guidelines for Community Noise 1995, and UK Noise Council Code of Practice. These are standard rules based on UK and Internationally accepted best practice figures which can be readily applied to such events. They address noise levels (dB), duration of events and the locality and conditions surrounding these events ie the harmful and detrimental effects on local communities and the environment. They are not subjective but prescriptive.</p> <p>These figures should be quoted on Planning Applications for the avoidance of doubt. In its most basic form there could be a limit of inaudibility of say 1km beyond which the noise cannot be heard.</p> <p>Basically noise and light levels can only be measured by instruments, not the human ears and eyes. Therefore, there needs to be clearly defined and referenced levels permissible within the National Park, and in keeping with the basic aims of the Park. We repeat that these limits cannot be determined subjectively by a committee.</p>		<p>validation stage of the application and is therefore considered not relevant for the purposes of Local Validation Requirements. For sake of completeness, where there are any applications which are considered to have impacts in terms of noise, the Authority consults with the relevant Environmental Health Team who have regard to necessary legislation when formulating any response. The representation appears to be suggesting that the Local Plan should have a policy relating directly to Festivals and Events. The consultation on the Local List of Requirements is therefore not the forum for this discussion</p>
20	Stephen Shaw WSCC Highways	Road Safety	<p>Thank you for consulting West Sussex County Council in relation to the SDNPA Local List of Planning Validation Requirements. In addition to the existing validation requirements you may also wish to consider including the need to require a Stage I Road Safety Audit policy for relevant planning applications. This</p>		<p>Comments: The matter of whether to require a Stage I Road Safety Audit has been addressed elsewhere in this list and it is not considered necessary to add this requirement to the list.</p>

			<p>would be in line with the West Sussex County Council Road Safety Audit Policy which is attached for information.</p> <p>Link to file : \\southdowns.gov.uk\data\Planning\Dev_mgt\LVL Consultation\LVL 2018\WSCC Road Safety</p>		
21	Greg Chuter ESCC Archaeology	Heritage	<p>I have a number of comments regarding your existing validation criteria and information:</p> <p><input type="checkbox"/> Section 189 of the NPPF requires applicants heritage statements to contain as a minimum information form the Historic Environment Record</p> <p>The current template for small scale applications in relation to heritage http://www.southdowns.gov.uk/wp-content/uploads/2015/03/Advice-to-Homeholders-and-their-Agents.pdf does not work as applicants can simply answer 'no' to all the questions, and as discussed above are not required to check the HER.</p> <p><input type="checkbox"/> Your template points applicants to the heritage gateway, this is not the HER, and does not contain relevant</p>		<p>Comments: The comments of the representee are noted and it is acknowledged that, where possible, the more information that is available to the case officer and specialist advisors is always going to help with the consideration of the application. It must also be acknowledged that whilst the NPPF mentions that the local HER should have been consulted, it does not explicitly require it. Officers need to take a balanced view in relation to the requirements at validation stage and it is considered on balance that not every such application would require consultation with the HER. Notwithstanding, it is considered helpful and practical to provide guidance links to the HER in respective areas. The representees links to templates, whilst helpful does not necessarily translate that such templates will be suitable for each and every such application and it is considered that a link to such templates could appear</p>

			<p>information for East Sussex (we have not uploaded any new information to the heritage gateway for over 10 years), applicants should therefore only visit the County HER.</p> <p><input type="checkbox"/> Section 3.5 Heritage Statement, again does not discuss the minimum requirement of section 189, HER data.</p> <p><input type="checkbox"/> As a planning advisor, the key information I need is what survives on site, and what is the proposed impact to what survives, I cannot see the applicant is guided towards providing this information currently</p> <p></p> <p><u>I am sure the key question an applicant will ask, is how do I know if my site has archaeological interest? A visit to the HER will certainly clarify if the site contains any (so far) recorded archaeological / heritage interest. In East Sussex and Brighton, we have developed alert mapping to try and highlight areas of known archaeological interest called ANAs. These locations can be publically accessed at https://www.eastsussex.gov.uk/environment/archaeology/planning/</u></p> <p><u>We also offer a service where if an applicant identifies their site is within an ANA they can contact us at county.her@eastsussex.gov.uk to glean whether HER information is required for their heritage statement.</u></p>		<p>overly prescriptive and it is recommended that this not be added.</p>
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			<p>For small scale applications where an HER search is required, rather than the applicant commission an archaeological consultant to draw together a full desk based assessment, we offer a cost effective service providing a summary of the HER for that site called an HER Consultation Report (see example attached)</p> <p>For small scale applications, in order to reduce the workloads on validation teams and the amount of consultations sent to us, we have set thresholds on the ANA shapefile stating what we are only interested in being consulted on, scoping out types of applications / development that we do not consider will have a significant impact within each particular ANA. This could also be used by validation to clarify if a Heritage Statement is required in relation to buried archaeological remains.</p> <p>We would expect for all larger schemes, and significant impact on historic buildings, the applicant to submit as a minimum a heritage impact assessment, and as directed in section 189 of the NPPF were necessary field evaluation.</p> <p>We have been heavily involved in similar reviews with the other LPAs we advise, including Brighton who have a very useful website and further information, including a heritage statement template that works well, which you may wish to look at. https://www.brighton-</p>		
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			hove.gov.uk/content/planning/heritage/heritage-statements		
			Link to file: \\southdowns.gov.uk\data\Planning\Dev_mgt\LVL_Consultation\LVL 2018\ESCC_Heritage		
22	Liss Parish Council	General	<p>"Liss Parish Council has a statutory obligation to comment on all planning applications made relating to properties within Liss Parish. Liss Parish Council has noticed a reduction in the quality of the application documents themselves to the point where it can be difficult to fully understand the plans which then makes it difficult to consider the application or make constructive comments. The frequent poor quality of the plans submitted also means that consultees are wasting time trying to understand the applications before then considering them."</p>		<p>The Local List, together with the National List of Requirements, is intended to ensure that all those who inspect the documents have a clear understanding of what is being proposed. Validation Teams seek to ensure that the requirements of the Lists are met before any application is validated. Officers will seek to make contact with Liss Parish Council to understand examples of plans and applications which have been difficult to understand.</p>
23	Member of public	Noise/tranquility	<p>I would request that you align your mission statements and aspirations for a national park far more closely with potentially disruptive applications which affect residents of the park including large scale noisy events, fireworks, lasers,</p>		<p>Comment: This suggestion appears to infer that legislation should be considered as part of the planning application, as opposed to being a requirement for submission by the applicant at the validation stage of the application and is therefore considered not relevant for the purposes of Local</p>

			situations which cause excessive environmental damage.		Validation Requirements. For sake of completeness, where there are any applications which are considered to have impacts in terms of noise, the Authority consults with the relevant Environmental Health Team who have regard to necessary legislation when formulating any response. In other respects the representation is focussing on particular type of development but does not appear to be making any specific suggestion in relation to Validation requirements for such events.
			The preservation of the total environment in all respects is paramount and there should be no exceptions !!		
			There is no point in having aims and aspirations for the park and then accepting and approving events such as Boomtown, which is in contravention of just about all of the items in your mission statement.		
			I would also request that the Noise Act 1996, as amended by the Clean Neighbourhoods and Environment Act 2005, be added to the list of compliance conditions for any application without exception. This would go some way to ensuring the tranquillity of the countryside within the park and be so much appreciated by those who live within the park.		
24	BHS	PROW	The Society welcomes the opportunity to comment on the above document, especially as the Local List as far as we can tell, does not appear to have a 'requirement' for information on 'public rights of way (prow), or recreational routes', lost, gained or affected by an application/development.		Comment: Whilst the comments are welcomed in this respect, it is considered that the requirement for a specific Public Rights of Way Assessment would be another overly onerous requirement. Officers scrutinise applications post validation and if they consider that there is any additional clarification required from the applicant process, our experiences has been that this can be supplied swiftly without

			<p>The specific requirement for an “Open space Assessment” (Column 1), is only requested for “All applications for development where ‘public open space’ is to be lost or new open space required as part of the development.” (Column 2). However, the “SD Local Plan Policy Refs & links to national policy/guidance” (Column 3) include links to public rights of way documents.</p> <p>Public open space is very different from path and recreational routes, they are different on the ground, and they serve different purposes. It is therefore not clear that any ‘Open space Assessment’ would provide the information required to prevent non-motorised users (NMUs) from being disadvantaged in this area, something that from experience we are aware has happened in the past.</p> <p>If information on path and recreational routes is meant to be included in an ‘Open space Assessment’, we believe there should be some clarification of the wording in Columns 1 and 2, to make that clear, especially as these are now of such importance for the safety of NMUs, due to the increased traffic levels resulting from development on our roads.</p>		<p>impacting greatly on timescales for achieving resolution of applications. Therefore it is considered that expanding any requirement in this respect is not necessary.</p>
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			<p>We also have concerns that, although a full planning application has a question about the proximity of grow, changes of use do not. So changes of use, for example, agricultural to residential, agricultural to storage or prior notification of agricultural or forestry development, do not ask the question. Therefore, the effect of such changes of use on grow is not monitored in the application process.</p> <p>This is particularly relevant where</p> <p>a) re-developed barns accessed by farm tracks, which are grow (especially bridleways), are upgraded for residential use with tarmac, often not of a suitable specification for horses.</p> <p>b) farm buildings converted to storage facilities increase traffic flows on access tracks (especially bridleways), which is detrimental to the safe use of the right of way by all NMUs.</p>		
25	Member of public	Noise/tranquillity	<p>Please may I suggest that the Noise Act 1996, as amended by the Clean Neighbourhoods and Environment Act 2005, should be added to the list? This Act includes a statutory provision that 'night hours' begin at 11 pm and it is an offence to cause nuisance to a resident in their own home during such hours by excessive noise from other premises.</p>		<p>Comment: This suggestion appears to infer that legislation should be considered as part of the planning application, as opposed to being a requirement for submission by the applicant at the validation stage of the application and is therefore considered not relevant for the purposes of Local Validation Requirements. For sake of completeness, where there are any applications which are considered to have impacts in terms of noise, the</p>

			<p>This, I hope, might have an impact on Boomtown Fair, which is held on land adjacent to my home, and which each year has continued with loud music till midnight on some nights, and till 4 am on others. This is most certainly a nuisance to me in my home, as it makes sleep impossible.</p>		<p>Authority consults with the relevant Environmental Health Team who have regard to necessary legislation when formulating any response.</p>
26	Winchester Heritage	Heritage	<p>In the Draft Local List of information Requirements for Planning Applications the section referring to <i>Heritage Statements in accordance with SDNPA Guidance (to include Archaeological Assessment)</i> indicates that a Heritage Statement is required for all applications affecting an designated heritage asset or any undesignated heritage asset <u>recognised as such by the SNPA</u>, or its setting (my emphasis).</p> <p>Question, how is an applicant to know that an undesignated heritage asset is recognised as such by the SNPA (or even known about)?</p> <p>I understand that some communities in the NP have been asked by the NPA to undertake a village plan, including drafting a proposed local list. This might cover some, but not necessarily all, built heritage assets once such a list has been developed / adopted, but is unlikely to cover archaeology (especially below ground remains), especially as many archaeological remains are currently unknown. Having read the SDNPA</p>		<p>Comment: Where there are undesignated heritage assets recognised by the Authority, the applicant will become aware of this through a neighbourhood plan or during pre-application discussions with officers. Nevertheless, there will always be instances where the asset is only recognised as such during the application process and officers appreciate this to be the case. The comments are noted, but it is not considered that the Local List of requirements would be able to fully address this to allow the information to be readily available for each case prior to the application being validated.</p>

			Guidance on Heritage Statements, I can't see that this issue is covered.		
27	Chichester Economic Dev	Agriculture and forestry workers statement	Development of or loss of agriculture or forestry workers' housing		Comment: The requirement for this statement is driven by Policy SD32 which sets out the criteria to comply with the policy. The applicant will need to include information and evidence to demonstrate compliance. In many cases, applicants have sought the advice and assistance from land agents and agricultural consultants to draw together such a document.
	Link to file \\southdowns.gov.uk\data\Planning\Dev_mgt\LVL_Consultation\LVL_2018\CHICH Econ Dev		- Who would this statement need to be from and what information would it need to include?		
28	Chichester Economic Dev	Lighting assessment/ Dark Night	All applications which include outdoor lighting		Comment: The requirement is clear that all applications which include outdoor lighting require a lighting assessment. It must be noted for the purpose of this representation that not all temporary
		Skies			

			Would this include temporary light displays, such as Christmas Lights?		lighting requires permission and historically authorities have not had an issue with temporary Christmas lighting because, by its nature, it is seasonal.
29	Chichester Economic Dev	Noise assessment	<p>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.</p> <p>The responsibility should be with the developer to ensure soundproofing of any residential properties being developed near to industrial sites. Please confirm that this will be the case.</p>		Comment: The requirement means that the applicant will be both assessing and demonstrating how any noise issues concerning either the development or noise generating activity on other sites may be addressed to ensure compatible development.
30	Chichester Economic Dev	Transport assessment/Parking provision statement	<p>All applications for major development</p> <p>Parking provision assessments should be provided in all residential developments. In the past there has been too much reliance on public car parks for occupiers of such properties, however, there is no legal agreement that they must park in public car parks, and the majority of people will use on street car parking for</p>		Comment: The lack of a transport assessment for minor applications does not prevent officers and Highway Authorities from assessing the impact of such development. The applicant needs to be supplying parking provision in accordance with adopted standards and indicating this on their site layout plans, together with details of access provision and visibility splays. It is not considered that a full transport assessment is required for minor applications as this might be considered to be overly onerous.

			free, putting more pressure on already overcrowded streets.		
31	Chichester Economic Dev	Strategic Traffic Management scheme	Applications including new, extended or relocated Visitor Parking		Comment: As with all requirements in the Local Plan, the required documents should be proportionate to the development in question, but it is not logistically possible to provide detailed guidance on a sliding scale for all types of development. It is therefore considered that to expand the requirements to show a sliding scale of information required would result in the list becoming too cumbersome and overly technical.
			A strategic traffic management plan may not be appropriate in all cases, an additional 100 spaces is completely different to 10 additional spaces. Should there be a sliding scale for the level of information required?		
32	Upham Parish Council	General	Councillors agreed that a street scene view should be included with each Planning Application, and the Applicant should be given an explanation of what the street scene should include, as this would give a clearer view of the impact of the Application on the area.		Comments: It is acknowledged that street scene plans can often be helpful in gauging the impact of development proposals on the surrounding character of the area. In fact, on larger schemes applicants tend to submit street scenes as a matter of course. There does however need to be a sense of proportionality and it is considered that it would not be reasonable to seek street scene plans for all planning applications (it has to be noted that there are many applications where street scenes will not be affected by proposals (rear extensions, Change of use, etc). It is therefore considered that the suggestion to require street scene views for all applications is overly onerous and should not be required.
33	Sport England		I attach a copy of the consultation guidance checklist prepared by Sport England.		Comments: The inclusion of these links are considered to be of assistance and informative for

			Link to file: \\southdowns.gov.uk\data\Planning\Dev_mgt\LVL Consultation\LVL 2018\Sport England		potential applicants and it is recommended that the list is amended to include these
			Further information can also be found on our website at: http://www.sportengland.org/playingfields policy		
34	Roy Little	Lighting/dark Skies	<p>Having had a look at the review of the local list, under the 'Lighting assessment/Dark Night Skies, section of the revised list, please note the comments and conclusion of Inspectors for the two attached appeal decisions within the National Park, which focus on lighting within development, as follows:</p> <p>Buriton Barn, Buriton Farm, Buriton Farm Lane, Treyford GU29 0LF</p> <p>Paras 16 -19</p> <p>and</p> <p>Ashton Farm, Ashton Lane, Bishops Waltham, Southampton SO32 1FR</p> <p>Paras 10 - 17</p> <p>In light of these appeals, under the heading of under the 'Lighting assessment/Dark Night Skies, I would like to suggest consideration of the inclusion of:</p> <p>All applications for development proposals within rural and semi-rural</p>		<p>Comments: The Designation of part of the Park as Dark Night Skies is taken very seriously. It is clear from a number of appeal decisions that Inspectors appreciate the sensitivities of light pollution in rural or semi-rural locations. The Authority is however charged with not making local list requirements onerous especially for householder applications. The suggestion for a requirement in rural and semi-rural areas does not provide Admin Teams with any clarity as to what defines a rural or semi-rural location. In addition, it is clear that recent experience has shown that case officers have not needed in all cases to have a lighting assessment to assess the impact or otherwise of internal/external lighting on residential development and have been able to form a recommendation (and potentially impose conditions to mitigate, if minded to approve) without a detailed lighting assessment. It is therefore considered that the suggested additional requirement is not necessary.</p>

			areas, which include indoor lighting and/or roof lights/openings.		
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