

APPENDIX 3 – Commentary in relation to Comments Received and Rationale for inclusion or exclusion from list to be adopted

| Query ID | Originator | Category | Query | Response |
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| 1 | SYR Consultants (Planning Agent) | Water Neutrality | Queries necessity for a statement for Water Neutrality which calculations are required (more than a statement). Addition of a couple of baths/showers/toilets does not warrant fees for the client which can and have been quoted in the thousands to produce the necessary information. If a simple statement of "this is a small development and does not warrant calculations" would suffice, that would be suitable but from recent experience it is not. Can fully understand a housing development needing to produce such a document with 5+ units, but for a single unit is extreme. Maybe material change could be given a figure, or the LPA could use their discretion. | NOT AGREED - The Authority considers that the requirement is necessary given that any new residential development with an increase in households will invariably have an impact on water provision and would not comply with the Habitat Regulations without the necessary information on water provision. |
| 2 | West Sussex Fire and Rescue Service | General | <i>Addition of a requirement for the LPA to consult with the Fire Service as part of the planning process for battery energy storage sites within the National Park.</i> | Comments: The Local Validation List is about requirements for information to enable an application to be validated, therefore this request could not be encapsulated within the local list. Notwithstanding, officers will liaise with the Fire Service to ensure they are consulted on such applications in the future. |
| 3 | British Horse Society | General | <i>Would like to see a question on the forms which asks whether there are any PROWs within the development boundary and, if yes, a note for the LPA that the planning officer must consult the PROW team at the Highways Authority as well as the Highways Department.</i> | Comments: The Technical support manager will pass on these comments to the Planning Portal who manage the form and advise the British Horse Society that this is a matter that the Validation Team already check at validation stage for the purposes of proper consultation. |
| 4 | Ms H Browne - Planning Agent? | General/Dark Skies Assessment | <i>Concern about onerous requirements generally for householder applications. Requirements for Dark Skies Assessment will add to long list of requirements. Pointless requirement for Central Lewes where there is already significant light pollution. Planning Officers should be given role of assessing requirements on a case by case basis.</i> | Comments: The Authority has always adopted an approach of offering the applicant/agent the opportunity to explain their justification for not submitting the required information and naturally there will be cases where officers will be minded to accept the justification. However, there needs to be a benchmark as a starting point and the list |

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| | | | | as proposed is considered to be acceptable in this respect. |
| 5 | Ben Jones Architects | General | <i>Concern about onerous requirements for householder applications. Concern about Additional Dark Skies assessment for householders applications in towns where roof lights are going to have minimal effect. Lack of clarity with list means requirements are interpreted differently for each application. This means results in already poor reputation of planners in eyes of the public being worsened still further.</i> | Comments: The Authority has always adopted an approach of offering the applicant/agent the opportunity to explain their justification for not submitting the required information and naturally there will be cases where officers will be minded to accept the justification. However, there needs to be a benchmark as a starting point and the list as proposed is considered to be acceptable in this respect. |
| 6 | Environmental Protection - Adur & Worthing Councils | Odour/Noise/Air Quality | <p><i>Air Quality:</i></p> <p><i>Types of application - Please add particulate matter to the list of pollutants; add B8 storage and distribution use class with a floorspace of 500m2.</i></p> <p><i>Noise:</i></p> <p><i>BS4142:2014 is now BS2014+A1:2019 Sussex Planning & Noise Guidance is now 2021.</i></p> <p><i>May also be worth including reference to the IoA notes on heat pumps</i> https://www.ioa.org.uk/news/heat-pumps-guidance-noise</p> <p><i>Odour: The EMAQ Kitchen Guidance has been revised see</i> https://emaq.ricardo.com/course/view.php?id=231</p> | AGREED (and relevant documents will be added to the Local Validation List) |
| 7 | Forestry Commission | Trees/Landscape | <i>Ask that standing advice regarding Ancient Woodland be incorporated into the local list</i> | AGREED (and relevant document will be added to the Local Validation List) |
| 8 | Midhurst Town Council | General | <i>Welcomes the Review.</i> | NOTED |
| 9 | CIL Planning Officer (SDNPA) | CIL | <p><i>Section on CIL is incorrect.</i></p> <p><i>It should read as follows:-</i> <i>Information Required:</i></p> | AGREED with regard to the Correct CIL Forms and the List will be amended accordingly. |

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| | | | <p><i>Community Infrastructure Levy Form 1 - Additional Information Form</i></p> <p><i>Form 2 - Assumption of Liability Form Or</i></p> <p><i>Form 5 - Notice of Chargeable Development Form (prior approvals or Certificates of Lawful Use (existing and proposed))</i></p> <p><i>Types of application/development for which the information is required All householder, minor and major applications, including S73 applications, Outline and Reserved Matters applications.</i></p> <p><i>Prior approvals/notifications, e.g. Agricultural buildings or changes of use to residential, existing lawful use development applications and proposed lawful use development applications (Form 5).</i></p> <p><i>Submission South Downs Local Plan Policy Reference & links to national policy / guidance</i></p> <p><i>Policy SD42: Infrastructure (& Explanatory text 7.217-7.227)</i></p> <p><i>SDNPA Community Infrastructure Levy (Web Link)</i></p> <p><i>Download the forms - Community Infrastructure Levy - Planning Portal</i></p> | |
| 10 | Sussex Wildlife Trust, and Hampshire & Isle of Wight Wildlife Trust | Biodiversity | <p>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.</p> <p>Even a building extension could impact on nesting birds or roosting bats for example. However as a</p> | <p>AGREED - 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.</p> |

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| | | | <p>minimum, we suggest the following changes to the wording in the proposed list:</p> <p>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:...</p> <p>Point one: Sites of Importance for Nature Conservation should be replaced as follows – Local Wildlife Sites (SINCs & SNCIs).</p> <p>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.</p> | |
| 11 | Aerodrome Safeguarding Officer - Gatwick | Aerodrome Safeguarding Statement | <p>Please could the following text be added to the Aerodrome Safeguarding Statement Box:-</p> <p>Information Required:</p> <p>Aerodrome Safeguarding Statement Types of application/development for which information is required: All applications for wind turbines All applications that include buildings/structure over 45m AGL (above ground level)</p> <p>Submission South Downs Local Plan Policy Reference & Links to National Policy Guidance:</p> <p>Policy SD51 Renewable Energy (& explanatory text 7.302 - 7.305)</p> | AGREED |

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| | | | <p>Circular 01/2003 "safeguarding of aerodromes, technical sites & military explosives storage areas Direction' 2002. Available at www.gov.uk</p> <p>Airport Operators Association (AOA) Advice Note 5 "Renewable Energy & Impacts on Aviation". Available at Operations & Safety/ AOA</p> <p>Aerodrome Safeguarding Coloured Squares Consultation Map CAP738 "Safeguarding of Aerodromes" paras 1.10 -1.13 available at www.caa.co.uk</p> <p>Advice can be sought from gal.safeguarding@gatwickairport.com</p> | |
| 12 | Planning Policy Manager - EHDC | HRA | <p>Under the information Required heading relating to HRA it says "assessment to show the impact of the development on the relevant <i>internal</i> Site and mitigation Strategy if required, to allow the Authority to carry out Habitat Regulations" –</p> <p>Consider that the wording should "international" and not "internal".</p> | AGREED |
| 13 | Southern Water | Foul Sewerage & Utilities Assessment/ Water Neutrality Requirements/Odour Assessment | <p>Foul Sewerage & Utilities Statement</p> <p>The reference to Sewers for Adoption Version 7 should be updated. The new process is outlined in Water UK's newer Sewer Sector Guidance (SSG). https://www.water.org.uk/sewerage-sector-guidance-approved-documents/.</p> <p>Water Neutrality Statement - It may be useful to be aware of additional content on the SW website on this topic: Water Neutrality (southernwater.co.uk) Odour Assessment Requirement:</p> <p>Would wish to see additional requirement for an odour assessment "where residential or other odour sensitive uses are proposed next to an existing</p> | <p>Comments: Agreed with regard to majority of Comments: Not agreed with regard to additional requirement " where residential or other odour sensitive uses are proposed next to an existing odour source. Validation Teams will not have the required information to check whether there are existing odour sources next door or in the immediate vicinity.</p> |

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| | | | <p>odour source". This would be in a similar vein to the requirement for a noise assessment, and would be in line with paragraph 187 of the NPPF</p> | |
| <p>14</p> | <p>Selborne Parish Council</p> | <p>Various</p> | <p>Affordable Housing Statement: Under types of Application/development for which the information is required" we recommend that after the wording "This should include information on the tenure of each unit" the words "Applications should include a detailed financial study demonstrating the viability of the project at the outset". should be added.</p> <p>Air Quality Assessment: Under "types of application/development for which the information is required" we recommend deletion of the word 'major', because it is down to the decision maker to decide whether or not an application is major; and it will always depend upon the context and siting of the applications; the topography of the landscape can directly affect and influence the air quality of the area and its environment. Even a smaller development has the potential to have a significant impact on air quality and therefore the requirement should not be restricted only to major development.</p> <p>Equestrian Management Plan: Under "types of application/development for which information is required" we recommend that all applications that involve significant water usage, regardless of whether or not it is a major development should be required to have regard to Policy SD17.</p> <p>Assessment screening and appropriate assessment, if required: under types of application/development for which the information is required': Why does this requirement only apply to the Central area? We recommend that all areas should be included because water is becoming an increasingly scarce commodity. Other areas, apart</p> | <p>Comments: Affordable Housing: Suggest amending wording to "All Applications for housing development which require on-site affordable housing provision and/or a financial contribution in lieu, in accordance with Policy SD28, including rural exception sites (Policy SD29). This should include information on the housing mix and tenure of each unit.</p> <p>Air Quality Assessment: Not Agreed. The reference to Major Development is not regarding the definition set out in the NPPF. It is considered that major development is a suitable bar for requiring such information and for lesser developments this would be an overly onerous requirement.</p> <p>Equestrian Plan: Not Agreed: The bar for requiring such information is considered to be proportionate.</p> <p>Assessment screening and appropriate assessment, if required: Not Agreed. This is directly related to designated sites for which HRA's are required and due to Natural England requirements for AA's to be carried out in these areas.</p> |

from the Central area, within the South Downs National Park are also close to RAMSAR sites, to SPAs to SACs and these are materially affected by water usage, as indeed are SSSI's also.

Landscape Appraisal/Study/Relative Tranquillity and Visual Impact Assessment. Relative Tranquillity/Safeguarding Views/ Landscape Character:

Under 'types of application/development for which the information is required':, we observe that the sentence " all applications for development (including change of use) with the exception of householder applications" as written is ambiguous and confusing. We recommend the removal of the words "with the exception of householder applications" because such applications can have a significant impact on the landscape. It would be better if the requirement applies to all applications without exception.

Lighting Assessment/Dark Night Skies: Under ' Types of application/development for which the information is required': There is an intrinsic conflict between the 1st and 2nd paragraphs. We recommend deletion of the word "other than householder" in the 2nd paragraph because householder development can, and often does , cause light pollution in the countryside. We note also that Velux windows and large glazed windows are not covered here, although both can lead to light pollution and to dilution of the darkness of night sky.

Playing Field/Sports provision assessment: Under 'Submission South Downs Local Plan Policy Reference & Links to National Policy/Guidance': we suggest that Policy SD47 should be added to the list here.

Landscape Assessments: Not Agreed: The current requirements are considered to be proportionate.

Lighting Assessment/ Dark Night Skies: Not Agreed. It is not considered proportionate to request such a report for householder applications.

Playing Field/Sports Provision Assessment: Agreed to making reference to Policy SD47 in the 3rd column.

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| | | | <p>Strategic Traffic Management Scheme: Under 'Submission South Downs Local Plan Policy Reference & links to national policy/guidance' we suggest Policy SD4 Landscape - should be added here.</p> <p>Ventilation/Extraction equipment report: Under 'Types of application/development for which the information is required', the reference to all applications for A3, A4, A5 Uses is obsolete; these use classes have been revoked. Please use the appropriate new Use Classes instead.</p> | <p>Strategic Traffic Management Scheme: Not agreed to add Policy SD4 - Landscape to the 3rd column. This would only add unnecessary links and this column needs to remain proportionate in terms of relevant information.</p> <p>Ventilation/Extraction equipment report: Agreed that use classes have been revoked and appropriate new use classes need to be mentioned.</p> |
| 15 | Transport DM Team - East Sussex County Council | Transport Assessment/Travel Plan/Strategic Traffic Management Scheme | <p>Transport Assessment: These two requirements are combined as one and it states that they are needed only for major development. While parking assessment often forms part of a TAI recommend they are separated, A parking assessment is required for all development - not just majors. ESCC guidance requires a transport Assessment for 80+ dwellings or equivalent. A transport Statement (35-80 dwelling) or Transport Report (5-35 dwellings) is required for Medium and Minor applications respectively. Could a reference to the different levels of assessment be added? (A transport Report can be combined with a Design and Access Statement.</p> <p>Travel Plan: ESCC guidance requires a travel plan for Major development (80+ dwellings or equivalent) but also a Travel Plan statement for 35+ dwellings or Equivalent, ?Could a reference to the different levels of assessment be added?</p> <p>Strategic Traffic Management Scheme: I would not expect the heading to refer to Parking - more an assessment of strategic highway links and junctions, supported by transport modelling that identifies ways in which to manage flows and demand, likely associated with major development. A strategic Traffic Management Scheme should also cover non-</p> | <p>Comments: These elements of the Local List will be amended in light of comments made and also after discussions with the SDNPA Transport Officer.</p> |

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| | | | car modes - active travel and public transport. The visitor/public parking would be better covered in a separate parking information requirement. | |
| 16 | County Highways Team - West Sussex County Council | Transport Assessment/ Parking Provision Assessment | <p>What classes as 'major development' varies and is based on DfT rescinded guidance on Transport Assessment appendix B thresholds whether a Transport Statement or Assessment is required.</p> <p>Our up to date road safety audit policy that developers use to determine whether an application requires an RSA to accompany the Transport Statement/Assessment: Road Safety Audit Policy (westsussex.gov.uk)</p> <p>Also note that national guidance Manual for Streets 1 & 2 and Design Manual for Roads and Bridges is used in assessing planning applications highway safety/capacity impacts. It is understood that the SDNP Adopted Parking SPD applies for assessing Parking provision.</p> | Comments: These elements of the Local List will be amended in light of comments made and also after discussions with the SDNPA Transport Officer. |
| 17 | Development Manager - Chichester District Council | Various | <p>Additional Plans: Can the requirement for a metric scale bar be included for all plans? Can a required scale be included for Block plans? Doesn't spell it out 1:500 or 1:200 with a red outline outlining the site area and a scaled annotation of the proposal on the plan. And metric, scale bar instructions missing. Elevations, can required scale be included, mention metric scale needed and scale bar needed. These details are included in the applicant/agent 'validation checklists' so would be helpful if they were also included in the Local List Form 1pdf.</p> <p>Air Quality Assessment: In addition to wording suggested by SDNPA please add "All applications next to existing sources of air pollution that could impact future residents/Occupiers (e.g. within AQMAs or close to industrial/agricultural uses or heavily trafficked roads)".</p> | <p>Comments: Agreed: with regard to requirement for a metric bar scale to be included for all plans. Not Agreed: with regard to stating the required scales for Block Plans and Floor Plans/Elevations. The critical point is to ensure the plans are scaleable and the information is at a scale to be able to assess the application. Therefore the Authority need not be specific on the required scale.</p> <p>Not Agreed: Validation Teams will not always have the information before them to assess whether the application site is next to existing sources of air pollution.</p> |

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| | | <p>Biodiversity Survey and Report/Environmental Impact Assessment/Ecological Impact Assessment/Geodiversity/International Sites: CDC Local List includes following, consequently we receive less biodiversity checklist submissions. Can SDNPA include something similar? <i>'The appraisal should be undertaken by competent persons with suitable protected species licences, qualifications and experience, membership within the Chartered Institute of Ecology and Environmental Management (CIEEM)'</i>. Doesn't clearly say "and further surveys if recommended" i.e. where a bat survey asks for further surveys, can they be asked for upfront please?</p> <p>Community Infrastructure Levy: Is it correct that this is required for prior approvals? The government has re-numbered the forms. They should read Form 1 Additional Information Form Form 2 Assumption of Liability Form 7 Self-Build Exemption Claim Form Part 1 Form 8 Residential Annex Exemption Claim Form Form 9 Residential Extension Claim Form</p> <p>Foul Sewerage and Utilities Assessment: Can we ask for an assessment for other types of applications where there is no connection mains drainage?</p> <p>Heritage Statement in accordance with SDNPA Guidance (to include Archaeological Assessment): Suggested wording:- <i>All applications for development affecting a designated heritage asset or any non-designated heritage asset recognised or likely to be recognised as such by the SDNPA or its setting. Heritage Assets include but are not restricted to listed buildings, scheduled monuments and other archaeological sites, Conservation Areas, Historic Parks and A gardens, and other historic landscapes and historic</i></p> | <p>Agreed: With regard to Biodiversity Survey Reports, Additional word regarding competent persons. Not agreed with regard to Requesting Further Surveys where the submitted surveys request it. This would require detailed scrutiny by the validation team that is considered overly onerous, and could be picked up by the case officer and consultees if necessary.</p> <p>See Comment 9.</p> <p>Agreed</p> <p>Not Agreed: The Validation Team will be unaware at validation stage whether a building is non-designated or 'likely to be recognised as such'.</p> |
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| | | | <p><i>battlefields. Heritage Statements must follow the SDNPA's Heritage Statement Guidance.</i></p> <p>Land Contamination Assessment: First line under type of application - add including previous military uses in case of unexploded ordnance and ordnance clearance. Second bullet, suggest e.g. instead of i.e. as the list does not include all possible sensitive land uses.</p> <p>Odour Assessment: List of odour generating uses should include commercial kitchens (e.g. at hotels/restaurants. Development adjacent to existing source of odour that may result in future occupiers/residents being affected by odour impacts.</p> <p>Telecommunication Statement: Does this need to be clearer in identifying the types of application where we can ask for this information (i.e. not prior approvals).</p> <p>Tree Survey/Arboricultural Assessment/Arboricultural Method Statement and Tree Protection Plan (in accordance with BS;5837): It would be helpful to include specifications detailed I section 3.2 of the guidance document Advice-to-Homeholders-and-their-Agents.pdf (southdowns.gov.uk).</p> <p>Ventilation/Extraction Equipment Report: Land uses have been update to Class E - repeat link to the Control of Odour and Noise from Commercial kitchen Exhaust Systems (EMAQ September 2018)</p> | <p>Agreed:</p> <p>Agreed: (Not agreed: with regard to 'development adjacent to existing source of odours....'. It is not always possible for validation teams to know whether a development is adjacent to an existing source of odour)</p> <p>Agreed:</p> <p>Not Agreed: There is a need for the list to be more simplistic and not overly cross reference to the point that the list becomes flooded with too much information.</p> <p>Agreed:</p> |
| 18 | Historic England | Heritage Statement | <p>You may find it helpful to refer in the guidance section to Historic England's Advice Note 12 <i>Statements of Heritage #significance; Analysing Significance in Heritage Assets in the Validation List.</i> https://historicengland.org.uk/images-books/publications/statements-heritage-significance-</p> | <p>Agreed</p> |

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| | | | <p>potential cumulative impacts of minor applications within their boundaries. It also provides opportunities for LPAs and developers of midscale minor developments (6 – 9 units) to review the opportunity of utilising more sustainable ways of surface water drainage within developments where there may be opportunities to incorporate SuDS.</p> | |
| 20 | Singleton & Charlton Parish Council | Various | <p>Concerns about burdens being placed on builders and developers putting in smaller applications for only a few dwellings.</p> <p>Biodiversity Net Gain: Note the "small sites metric" spreadsheets however this is designed for up to 9 dwellings and almost 2.5 acres: much larger than hypothetical micro site for 1 to 2 dwellings. Habitat improvements envisaged by the process require a 30 year plan to preserve and enhance these habitats. Only true measurable impact of a micro development is in terms of the footprint of the dwelling and its immediate surrounding areas, such as driveway and some provision of 'hard' outside space. In such cases the new requirement could even backfire. We note the new BNGF requirements do not apply to householder developments and extensions, which is an acknowledgement of the impossibility of controlling what goes in people's gardens. In place <i>'development proposals will be expected to demonstrate an overall positive impact on the natural environment....demonstrated through an Ecosystem Services Statement'</i>. This makes a great deal of sense; it also points the way to a more balanced approach to cases that involve micro scale developments: ones that are really just turning gardens into gardens, but do not get exempted as 'householder applications' as they stretch over more than one existing garden. While there is clearly going to be some potential loss of habitat in such cases, a simple charge for Renature credits, based on the area of 'sealed surfaces', such as building footprint</p> | <p>Comment: BNG Exemptions are set nationally through legislation and regulations, and we will not be able to deviate from these. Support for our approach on Eco-system Services for householder scale development to demonstrate an overall positive impact on the natural environment is welcomed. With regard to Nutrient Neutrality, the metric for calculating this is set by Natural England and is not something SDNPA is able to change.</p> |

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| | | | <p>and driveways, could replace the need for the extensive process that results from using the metric.</p> <p>Nutrient Neutrality: Believe it could be made far more simpler for the smallest developments (Payment due = No of dwellings x 3.42 x £ (current cost of Nutrient Credits). Main reason for simplification is that, where gardens is turned into dwelling(s) plus garden(s) much of the input requested by the metric is disregarded in the calculation: annual rainfall, site area, soil types etc are not need. As a minimum we feel the instructions need to be re-written to make this clear and guide such cases away from these stages of the calculation. (Notes submitted by Parish Council on Re:Nature Credits, but considered not relevant to Local Requirement List).</p> | |
| 21 | Itchen Valley Parish Council | General | <p>It would help the consideration of applications in the context of extension and replacements dwellings if there was a requirement to state the relevant GIA of a dwelling at the 18th December 2002. This is relevant to determining whether there would be the loss of a small or medium sized dwelling.</p> | <p>Not Agreed: Whilst the comments of the Parish Council are appreciated, it is considered that this may be difficult to achieve with any certainty given that it can often be difficult to establish when alterations occurred to the property. Officers will in any event, undertake a history search to seek to ascertain historical floor areas of properties.</p> |
| 22 | Cheriton Parish Council | Biodiversity Gain Plan/Biodiversity Survey and Report. Etc/Environmental Impact Assessment. | <p>Biodiversity Gain Plan: The centre column includes as one of the exclusions, planning applications which are "proposals where impacts are temporary and can be remediated within two years". It is not understood how SDNPA would be able to know for certain the impacts would be temporary and could be remediated within two years unless a fully supported BNG Plan is submitted by the applicant and is given full consideration by the Authority. This proposed exclusion may provide an opportunity for applicants, minded to minimise the impacts of their proposals, to circumvent the requirement to provide a fully-supported BNG Plan. Parish Council request that the</p> | <p>Comments: Biodiversity Gain Plan: BNG exemptions are set nationally through legislation and regulations. The temporary impact exemption is now no longer being proposed by government and so this has been removed from the list of exemptions.'</p> |

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| | | | <p>SDNPA adopts a precautionary approach and removes this exclusion.</p> <p>Biodiversity Survey and Reports: An addition should be made to require that all bird surveys, which are provided in support of such information, must be in accordance with the "industry Standards". The methodology includes, for example, a recommendation for 6 bird survey visits to be undertaken as part of a survey for breeding birds.</p> <p>Environmental Impact Assessment: Recent experience brings Parish Council to conclusion that applications should not be validated until the Authority is entirely satisfied with the Environmental Statements. Parish Council believes that proposed amendment to Local Validation List are inadequate for such large applications. A more appropriate approach would be that such applications are not validated until the LPA had undertaken a full review of the contents of an ES and I satisfied that the ES is complete and accords with the EIA Regulations (of which there is no mention in the list) Parish Council recommends the Authority adopts the precautionary approach and fully validates ES's before they are provided for more general consultation.</p> | <p>Not Agreed: The List should become unduly onerous and forensic in relation to each particular element of ecology and it is considered that the matters of bird surveys would be encapsulated within the main surveys/reports.</p> <p>Environmental Impact Assessment: The role of the Validation Team is not to forensically check the adequacy or otherwise of extensively complex documents such as Environmental Statements. This will be the responsibility of the case officer together with any required specialists. This, by its very nature can take some time, but it should not hold up the validation of the application.</p> |
| 23 | Ecologist - Winchester City Council | Biodiversity Gain Plan | <p>Should "other suitable method" be included as it will be a requirement under the Environment Act 2021 to use the statutory metric? Should it state demonstrating a minimum 10% measurable net gain? Completed habitat condition assessments should be included. Maps showing baseline habitat and post-intervention habitat (retained, enhance and created habitat units). Where land within the red line has no habitat (sealed hard surfaces) there should still be a biodiversity gain plan. Are ROMPs exempt?</p> | <p>COMMENT: The allowance for a 'other suitable method' will be retained and a 'minimum 10%' will not be added as the Validation List will be in place ahead of mandatory BNG and this wording supports a policy compliant but pre-mandatory BNG approach. The wording of this section will be updated to show distinct scenarios for pre-mandatory BNG and post-mandatory BNG and their respective requirements.</p> <p>The additional wording about mapping requirements is AGREED.</p> |

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| | | | | <p>The addition of ROMPs as an exemption is AGREED.</p> <p>The addition of requiring completed condition assessment is AGREED.</p> |
| 24 | Midhurst Town Council | Various | <p>Midhurst Town Council wish to submit the following comments in response to the above:</p> <p>1) Consider how insulation for listed homes could be installed and include relevant directives within the list.</p> <p>2) Provide a section within the list relating to the desirability of 'work/life' units.</p> <p>3) Ensure an appropriate level of parking facilities for new builds with sufficient charging points, and include relevant directives within the list.</p> <p>4) Consider and include within the list where, and how charging points could be installed.</p> <p>As a general comment, the Council would like to see the application process improved in terms of ease of use, and the period of time to achieve an outcome reduced.</p> | <p>Comments:</p> <p>1) The Authority is unable to provide, through the local list, signposts to information on all technical elements of development. To do such would make the list overly detailed. The List is there to ensure the officers have sufficient information to consider the application.</p> <p>2). The list is not the opportunity to extol the desirability of certain developments. The Local Plan provides the steer for developers/applicants to understand the Authority stance on various forms of development.</p> <p>3) The Authority Parking Standards SPD is the appropriate vehicle to advise applicants on Parking provision.</p> <p>4) As mentioned above, the List can only provide links to assist applicants in ensuring they submit the correct information to assess the application.</p> <p>In relation to the general comments made, these are noted. There is a constant balance between ensuring the Authority has the correct information to assess the application, and not making the validation process overly burdensome.</p> |
| 25 | County Archaeologist - East Sussex County Council | Heritage Statement | <p>The link in Column 2 and similarly named link at the bottom of column 3 do not appear to work.</p> | <p>Comment: Links will be checked prior to list being uploaded and amended if necessary. Not considered necessary to add additional link to Archaeological Notification Areas in East Sussex.</p> |

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| | | | <p>Please could Column 2 specifically name Archaeological Notification Areas as an 'undesigned heritage asset'?</p> <p>It may also be helpful for applicants if the following could be included: <i>A map of the Archaeological Notification Areas in East Sussex and Brighton & Hove can be found here</i> Archaeological Notification Areas for East Sussex, Brighton and Hove (arcgis.com).</p> <p>Please could Column 2 state that all major applications will also require the submission of a Heritage Statement unless advised otherwise by the East Sussex Historic Environment Record (contacted via County.Her@eastsussex.gov.uk. Please advise if it is the intention to also review the guidance set out in Heritage Statement Guidance Note Final pdf (southdowns.gov.uk).</p> | <p>Not agreed to confirm "all major applications will require a Heritage Statement unless advised otherwise by East Sussex County Council. This is not proportionate and would not be the decision of ESCC as to whether an application in the South Downs National Park should be validated or not.</p> |
| 26 | Sussex Wildlife Trust | Biodiversity Gain Plan/Water Neutrality | <p>Ask for clarity on information relating to the Biodiversity Gain Plan.</p> <p>When the 'information required' box states the term ' Ecological Study' does this mean submission of the original survey data? This survey data would be needed to support the understanding and scrutiny of the BNG Metric if needed by the officer assessing the application. Keen to know if a similar approach (TANs) will be taken for new environmental requirements.</p> <p>SWT is keen to know if additional requirements will alter the application form itself, and that officers have access to environmental data to check that the information submitted is correct.</p> | <p>Clarification to question:</p> <p>Yes, this means survey data and analysis of that information.</p> <p>The Local List Review does not include consideration of alterations to the application forms.</p> |
| 27 | Lewes District Council and Eastbourne Borough | General | <p>Consider it would be beneficial to include existing and proposed floor plans onto the list with the reasoning that they need to demonstrate compliance with SD31.</p> | <p>Comments: This is already included in the List under 'Additional Plans'.</p> |

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| | Council - Planning | | | |
| 28 | Rowland Castle Parish Council | Various | <p>Transport Statement and Transport Report: For SDNPA Local Plan SD19, explanatory text states that a Transport Assessment, Transport Statement, Transport Report and/or Travel Plan will be required on development that generates significant amounts of traffic movement. The list of information required does include Transport Assessment and Travel Plan and refers to SD19, so in the interests of consistency and accuracy these two documents should be included. The glossary of terms in the Local Plan does not define either Transport Statements or Transport assessments, but the link https://www.transport-statement.co.uk/ shows the differences. A TS is a light touch of a TA and is used in some cases where issues do not require a full TA. TSs cover the smaller scale developments where the traffic impacted is limited in both volume and area impact.</p> <p>Road Safety Audits (Stage 1): These are conducted in four stages (1, completion of preliminary design, 2 completion of detailed design, completion of construction, 4 poste opening monitoring.). When an application is submitted a Stage 1 RSA could be provided as an appendix to a TA or as a separate Report. RSA (Stage 1) should be included as a separate 'information required' item.</p> <p>Planning Statement/Design and Access Statement: This should be submitted to demonstrate conformity with Local Plan Policies, the NPPF and other relevant legislation.</p> <p>Landscape Management Plan: This should be provided to inform the on-going landscape management, biodiversity, planting and amenity</p> | <p>Comment: It is not considered proportionate to have 8 separate required reports for transport aspects. A good number of the items listed by the Parish Council could be included within other reports (such as refuse and cycling strategy being part of a Design and Access Statement and/or transport assessment. Important to be clear on where particular reports are required and after discussions with the Authority Transport Officer, amendments will be made to these elements of the Local Validation List but will be limited to:- Transport Assessment (including Stage 1 RSA (statement for smaller development), Parking Provision Assessment, Travel Plan, Strategic Traffic Management Plan (for larger attractor developments) and a construction traffic management plan (including Worker Travel Plan) (for larger developments).</p> |

planting, its objectives and post construction aftercare required to safeguard future establishment.

Street Scenes: These are not referred to in the 'Additional Plans' ' Information required' item but should be provided for applications for larger developments.

Proposed Access and Movement Plan: This is a plan submitted for new developments with new streets and would show primary and secondary routes (and the road widths) for vehicles, and also footpaths only for use by pedestrians.

Refuse and cycling Strategy: This is a plan submitted for new developments with new streets and would show the routes that could be taken along the new streets by refuse collection vehicles and cycles.

Walking, Cycling and horse-riding assessment. This document would assess the suitability of the local road network for walking, cycling and horse riding, and the provision for this within the proposed development.

Engineering Layout: This plan would show details including the structure, dimensions and contours of any new proposed roads and boundaries (e.g. fences and retaining walls).

Declaration of Conformity with the International Commission on Non-ionising Radiation Protection (ICNIRP) Public Exposure Guidelines: This relates to Electronic Communications. This certificate is not referred to in the Telecommunications Statement item in the list submitted for consultation.

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| | | | <p>Topographical Survey: A map showing its contours and their heights should be submitted for certain planning applications.</p> <p>Construction and Environmental Management Plan: This should be submitted for large developments in accordance with Best Practice Guidance - The control of Dust and Emissions from Construction and Demolition 2006.</p> <p>Suggested change to one of the information requested items. Additional plans, links should be given to the Adopted Design Guide SPD and the SDLP Extensions and Replacement Dwellings Technical Advice Note.</p> <p>Strategic Traffic Management Scheme: The link to the Guidance on Parking residential and non-residential Development SPD (SDNPA) should be provided.</p> <p>Open Space Assessment: The section states " All applications for development where public open space is to be lost or new open space required as part of the development'. This sentence should be amended to refer to 'Local Green Space' in addition to 'Public Open Space'.</p> | |
| 29 | Flood Risk Management Team - West Sussex County Council | Surface Water Drainage | Please can we add a surface water drainage proforma to the Surface water drainage section. We have a web page on Suds and within this page this a link to the checklist. | AGREED |
| 30 | Ecologist - SDNPA | Biodiversity Net Gain | Variety of wording changes in all 3 columns to incorporate current understanding of Statutory BNG requirements/timings and updated terminology. Additional links added and updates in relation to bats and artificial lighting/trees. | AGREED |