

## Appendix 2 Planning application validation requirements for Cambridge City Council -representations and responses

	Validation requirement	Representations Received	Officer Response
	General	<p>List fails to distinguish between requirements for different types of applications eg outline and full etc A summary schedule could be provided as the list is very long.</p> <p>Validation requirements should be proportionate - requirements of this list appear to be excessive and many matters could be covered by condition.</p> <p>Emphasis on pre-application advice is unrealistic given quality of service currently provided.</p>	<p>A summary checklist per category of application will be provided with the website information eg major; minor etc.</p> <p>The requirements are all cross-referenced to Local Plan policy and guidance . The aim is to ensure that applications are submitted in as complete a form as possible so as to reduce the need for planning conditions to be imposed. No changes proposed.</p> <p>Some improvements have been made to the pre-application service and further improvements will be progressed as part of the planning service review</p>
A	Application Form		
B	Fee		
C	Location and site plans	Questioned whether requirements for red line plans and adjacent land to be outlined in blue are clearly enough defined	<p>These comments are made in respect of national validation requirements.</p> <p>Noted and no changes proposed. Technical support officers will take a reasonable and proportionate approach to the amount of information that is required.</p>
D	Other relevant plans	<p>The requirement for both proposed and existing Block Plans seems unnecessary provided the new work is clearly defined – i.e. drawn in red. Two plans should only be required in complex cases.</p> <p>Site Sections should only be required where the site is sloping and the proposal warrants it – most sites in the district are level.</p> <p>Roof Plans should only be required in unusual and complex cases. Generally the elevation drawings should be sufficient.</p>	<p>These comments are made in respect of national validation requirements for householder applications which are not subject to this consultation.</p> <p>The respondent has been advised accordingly, but also advised that technical support officers will take a reasonable and proportionate approach to the amount of information that is required.</p>

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		<p>Reasonable flexibility should be shown in the validation process with the general principle being to reduce bureaucracy, expedite applications and reduce delays.</p> <p>More before and after images for medium and large developments and those affecting conservation areas should be provided.</p> <p>More definition should be provided about the individual types of applications and context where further plans will be required.</p>	<p>These requirements can either be provided as part of the design and access statements, landscape and visual impact assessments. However, each application has to be assessed on its own individual merits rather than this being a general validation requirement.</p> <p>It would be difficult to define every circumstance and every plan that will be required. A summary by category of application will be provided on the website.</p>
E	Plans for advertisement consent applications	No need to repeat general requirements for planning applications as well as additional advertisement application requirements	Information requirements are set out in full for clarity. No changes proposed.
F	Plans for Listed Building Consent applications	Plans at a scale of 1:20 of details are onerous and should be subject to conditions rather than being requested for validation purposes.	The aim is to make applications as complete as possible upon submission and to avoid the need to impose planning conditions where possible. No changes proposed.
G	Design and Access Statement	<p>Amend wording to refer to sites of 0.5 ha <b>or more</b></p> <p>Under requirements -reference consultation undertaken more generally</p> <p>Under requirements for listed buildings note that Heritage Statements can include some of this information</p>	<p>Wording amended</p> <p>Wording amended</p> <p>Wording amended</p>
H	Environmental Impact Assessment		General cross-reference to be retained to EIA requirements
I	Environmental Impact Assessment screening options	Not a validation list requirement and should be removed. Subject to separate EIA Regulations and associated procedures.	This list also sets out the validation requirements for EIA screening requests and it is therefore proposed to retain this.
J	Environmental Impact Assessment scoping options	Not a validation list requirement and should be removed. Subject to separate EIA Regulations and associated procedures.	This list also sets out the validation requirements for EIA screening requests and it is therefore proposed to retain this.

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1	Air Quality Assessment	The stated thresholds are consistent with the NPPF and NPPG and appear to be reasonable and proportionate.	Noted.
2	Biodiversity – Ecological Impact Assessment	The stated thresholds are consistent with the NPPF and NPPG and appear to be reasonable and proportionate.  Should not be abbreviated to EIA as confusing	Noted.  Agreed -abbreviation removed.
C1	BREEAM Pre-Assessment	Requirements are too onerous to be applied to all new non residential developments and exceptions need to be considered for listed buildings	Starting point should be that requirement applies unless detailed justification is provided otherwise  No changes proposed.
3	Community / Sports / Leisure Facilities Assessment	None	
4	Demolition and Construction Management Plan (DCMP)	The stated criterion contradicts itself in that it states that a CEMP would be applied in the stated instances, yet it also states that “where a Construction Management Plan is not submitted with the application, it is likely that details will be required by planning condition”. This implies that a CEMP is not always necessary to validate /determine an application. We are of the view that a CEMP can easily be applied as a condition, unless there are site-specific circumstances which merit submission of a document at the validation stage  Requirement is too onerous and would apply to too many types of applications and could be conditioned.	Between them, adopted Local Plan policies 28 and 35 cover sustainable methods of construction and protection of human health and quality of life from noise and vibration.  Submission of a DCMP at application stage helps reduce the burden of a condition and possible delay which the validation process aims to prevent. Neither policy, however, specifically requires a DCMP to be submitted with an application.  The Technical support officers will take a reasonable and proportionate approach to this requirement having regard to the potential for the specific details and mitigation measures to be required by a planning condition.
5	Contamination Land Assessment	The stated thresholds are consistent with the NPPF and NPPG and appear to be reasonable and proportionate.	While the representations received are noted, officers consider that the totality of what is required is excessive and potentially unduly onerous for applicants.  A Preliminary risk assessment (Phase I Investigation) to determine historical land-uses, current land-uses and environmental settings is essentially a desk-

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		Requirement for Conceptual Site Model is onerous for Phase 1 investigation as is the requirement that a Phase 2 should be submitted if Phase 1 recommends it.	<p>based exercise. This represents a minimum level of information and assists in identifying potentially contaminated sites.</p> <p>Requiring the additional information at validation stage is potentially expensive for applicants, especially if there is no certainty that planning permission will be granted. There will also be instances where the applicant does not own the land and therefore an investigation of ground conditions may not be possible.</p> <p>The Contaminated land Officer has suggested that front loading the validation stage in this way will not necessarily result in fewer conditions and may actually complicate the whole process. If the Phase 1 investigation is carried out correctly, this will generally provide the information required to assess whether further intrusive work is necessary, or not, which can then be conditioned.</p> <p>It is therefore recommended that the first bullet point requirement is retained, but that the two following bullet point requirements are deleted as necessary at validation stage.</p>
6	Daylight / Sunlight Assessment, Shadow Study	<p>The stated thresholds are consistent with the NPPF and NPPG and appear to be reasonable and proportionate.</p> <p>Wording should be changed to reference “unacceptably overshadow” instead of “overshadow”</p>	<p>Noted.</p> <p>Wording amended.</p>
7	Design – Masterplans / Design codes	This criterion needs to specify what is meant by a “Large Major” application	<p>For dwellings, a largescale major development has been traditionally defined as one where the number of residential units to be constructed is 200 or more. Where the number of residential units to be constructed is not given in the application a site area of 4 hectares or more should be used. For all other uses a largescale major development is one where the floor space to be built is 10,000 square metres or more, or where the site area is 2 hectares or more.</p> <p>It is recommended that these thresholds are adopted and set out for clarification.</p>
8	Energy/Carbon Reduction Statement	In response to the SCDC validation list, the threshold of a “major development” (i.e. 10 dwellings or more) is too low for this requirement. It may be appropriate to apply this to a Full planning application, but at Outline stage, there is little concept of how the relevant criteria can be met. We would consider that for outline	Adopted Local Plan policy 28 requires that all new development will be required to meet a number of minimum standards, unless it can be demonstrated that such provision is not technically feasible or economically viable.

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		<p>applications and those below, say 50 dwellings, an Energy Statement is better applied as a planning condition.</p> <p>Requirement is too onerous</p>	<p>The recently adopted 'Greater Cambridge Sustainable Design and Construction Supplementary Planning Document (SPD) details submission requirements but does not state what level of development triggers the need for an Energy/Carbon Reduction Statement at validation stage.</p> <p>A number of new standard conditions are proposed in consultation with the Sustainability Officer to ensure the policy requirement is met. This includes where details have not been submitted with the application.</p> <p>Nonetheless the stated threshold would appear to be both proportionate and reasonable having regard to the policy wording and the climate change agenda.</p> <p>Officers recommend no change to the proposed validation requirements.</p>
9	Flood Risk Assessment	The thresholds should ensure that they are consistent with the threshold for a Flood Risk Assessment, as set out in the NPPF and NPPG	The thresholds are consistent with standing advice for a Flood Risk Assessment.
10	Foul Sewage and Utilities /Infrastructure Statement	<p>It is considered that the stated requirements (Statements for foul sewage, utilities and infrastructure) are three different requirements and accordingly, should be listed separately.</p> <p>It is not considered that the stated threshold for the statements are reasonable or proportionate. It is not reasonable to assume that such statements are required for all development. We consider a more suitable threshold would be for major development, or where there is an acknowledged existing problem with the stated infrastructure requirements. For minor development, it would be reasonable to assume that any pre-existing issue could be dealt with by planning condition – requiring the submission of such detail prior to commencement of development. This could reasonably be secured by off-site "Grampian" conditions. This is the approach currently taken by many Councils (including SCDC) and is an effective way of granting planning applications promptly and adding delivery. This accords with paragraph 68 of the NPPF. (Paragraph 68 emphasises the importance of delivery of small and medium sized sites which can make an important contribution to meeting the</p>	<p>There is no reason why the stated requirements should not be separately listed as Foul Sewage and Utilities Assessment.</p> <p><u>Foul Sewage</u></p> <p>Adopted Local Plan policy 85 states that permission will only be granted if it can be demonstrated that there is, or will be, sufficient infrastructure capacity to support and meet all the requirements arising from the new development.</p> <p>It may be onerous to expect details to be provided on drawings for all smaller (i.e. householder developments), some of which will not require any new connection to a drainage system. The planning application form also requires details of surface and foul water connections to be provided.</p> <p>Minor development may include up to 9 dwellings or floor space up to 1,000 square metres. It is not unreasonable or disproportionate to expect some level of detail and or a statement (however brief) to be provided at application stage.</p>

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		housing requirement of an area, and are often built-out relatively quickly).	<p>It is therefore recommended that the “What is required” section is amended to read “If an application proposes to connect a development to the existing drainage system, then details of the existing system should be provided as part of a Foul Drainage Statement and shown on the application drawing(s) where appropriate to do so”.</p> <p>The “What is required” details include “Where the development involves the disposal of trade waste or the disposal of foul sewage effluent other than to the public sewer, then a Foul Drainage Assessment will be required.” This sentence should be added to the “When required” section.</p> <p><u>Utilities Assessment</u></p> <p>As with the above drainage requirements, it may be onerous to expect details to be provided for smaller (i.e. householder) developments with evidence to show there has been prior consultation with the relevant service provider.</p> <p>Minor development may include up to 9 dwellings or floor space up to 1,000 square metres. It is not unreasonable or disproportionate to expect some level of detail and or a statement (however brief) to be provided at application stage.</p> <p>It is therefore recommended that the “What is required” section is amended to read “Where an application proposes to connect to existing utility infrastructure systems, details should be provided as part of a Utilities Assessment Statement and details shown on the application drawing(s) where appropriate to do so”.</p>
11	Health Impact Assessment (HIA)		
12	Heritage Statement (including historical, archaeological features and Scheduled Ancient Monuments)	<p>The stated thresholds are consistent with the NPPF and NPPG and appear to be reasonable and proportionate.</p> <p>More definition required in relation to what is a Heritage Asset and in relation to archaeological requirements /Designated Heritage Assets and non designated Heritage Assets</p>	<p>Noted.</p> <p>More definition provided.</p>

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C1	Home Energy Questionnaire	Should be provided as a separate document on website  Listed building exceptions should be considered	Agreed  These would need to be justified individually
13	Housing Statement       Accessible Homes	This criterion should ensure that it is in line with that stated in the NPPF and NPPG.  Housing mix details cannot be provided for outline applications  Requirement for student management plan too onerous   Requirements are excessive -need to take account of exemptions eg for listed buildings	While policy 45 refers to developments of 11 dwellings or more, extant legal advice has confirmed that the threshold for the provision of affordable housing should be 10 dwellings or more in line with NPPF paragraph 63.  No change is required  Noted that detailed housing mix information cannot be provided for outline applications but an indicative housing mix can be.  Not agreed that requirement for student management plans is too onerous.  Accessible homes -no changes required. Starting point should be that requirements apply unless demonstrated otherwise. Applicants should engage in pre-application discussions if uncertain.
14	Landscape and Visual Impact Assessment	The stated thresholds in the first paragraph are consistent with the NPPF and NPPG and appear to be reasonable and proportionate.  No comment has been made in respect of the second paragraph.	Noted.
15	Landscape Details	The minimum threshold of a “major” development is far too low. The requirement for landscape details should not be arbitrary as is proposed – It should be site specific and based on the merits of the site	All new “major” development has the capacity to have an impact on the local and/or wider landscape or townscape as a result of its proposed location or height. As a minimum, the requirement for details of a landscape strategy or indicative planting scheme along with management and maintenance plans relative to the development proposed is not considered to be unreasonable or disproportionate.  To require details for all other development is much more subjective to assess at validation stage. Not all development will have an impact on the local and/or wider landscape or townscape as a result of its proposed location or height.

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			<p>Nonetheless, the height and location of a new development can have an impact on the local and/or wider landscape or townscape</p> <p>It is recommended that the wording for “When required?” is amended to read “Major development and other development where landscape proposals will be necessary because the new development is likely to have an impact on the local and/or wider landscape”.</p> <p>Development likely to have an impact as a result of its proposed location or height”.</p>
16	Lighting (artificial) Assessment	The second paragraph under the “when required?” heading is superfluous as the requirement for a Lighting Assessment should be based on the criteria outlined in the first paragraph and on the merits of the site	<p>While the second paragraph is some to some extent superfluous clarification of the requirement would make more sense.</p> <p>It is recommended the “When required? Is changed to:</p> <p>“Major sites at the edge of Cambridge and adjoining open countryside in South Cambridgeshire.</p> <p>Where other proposals for new external artificial lighting or changes to existing lighting may have an adverse impact on local residential amenity, wildlife or landscape character through light pollution, illuminated adverts, and outdoor sports facilities (including multi-use games areas) where external lighting is proposed”.</p> <p>The “What is required” information should be altered to read:</p> <p>“Details of external lighting including building, security, floodlighting, street/courtyard columns and bollards where appropriate shall be provided”.</p>



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17	Marketing Assessment / Local Needs Assessment/ Viability Appraisal	This criterion needs to specify exactly what is required and in what instances. The current wording is ambiguous and could be misinterpreted /misapplied by the Council	<p>To provide clarification, it is recommended the “When required?” section is changed to read:</p> <p>“Several policies require these types of studies to accompany planning applications to provide additional evidence. In particular:</p> <p>Marketing Assessment and/or Viability Appraisal - Required for applications proposing certain changes of use in the City Centre Primary Shopping Area, district, local and neighbourhood centres; the loss of Class B or sui generis research institutes within protected industrial sites; the loss of a safeguarded public house or the loss of any part of a public house or its curtilage; and loss of existing visitor accommodation</p> <p>Local Needs Assessment - Required for applications proposing new, or the loss of, community, sports and leisure facilities; and the loss of a safeguarded public house.</p>
18	Noise / Vibration Assessment	The stated thresholds are consistent with the NPPF and NPPG and appear to be reasonable and proportionate.	Noted.
19	Open Space Assessment (new provision and protection of existing)	This criterion needs to be more specific about the policy requirements for open space and in what instances provision of public open space is required	<p>Policies 67 and 68 set out in detail what is required and when.</p> <p>Suggest No change.</p>
20	Parking Provision (Car and bicycle)	<p>The stated thresholds are consistent with the NPPF and NPPG and appear to be reasonable and proportionate.</p> <p>Parking provision will not necessarily be required for all developments</p>	<p>Noted.</p> <p>Noted and no changes required as text explains that proposals that do not include parking provision/reduced parking provision can be supported by justification</p>
21	Planning obligations –	<p>The stated thresholds are consistent with the NPPF and NPPG and appear to be reasonable and proportionate.</p> <p>Footnote states that this is best practice rather than a validation requirement so should be included in a best practice list instead.</p>	<p>Noted.</p> <p>Requirement will be applied flexibility rather than a separate best practice list being produced.</p>

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	draft heads of terms <sup>1</sup>		
22	Planning Statement	<p>The stated thresholds are consistent with the NPPF and NPPG and appear to be reasonable and proportionate.</p> <p>Requirements are not clear enough with respect to application to different categories of development</p>	<p>Noted.</p> <p>Not agreed. No changes proposed.</p>
C2	Public Art Strategy		
23	Retail Statement	The Council should ensure that this is consistent with the criteria set out in the NPPF and NPPG	The requirement is consistent with policy 6
24	Statement of Community Engagement	<p>A minimum threshold of 10 dwellings is far too low for such a requirement. This is disproportionate and unreasonable, particularly when the Council should be focussing on delivering housing. We suggest a minimum threshold of 50 houses, or where local circumstances warrant it</p> <p>This should be a best practice requirement rather than a validation requirement</p>	<p>Other than development for more than 2 turbines or where the hub height of any turbine exceeds 15 metres, neither the NPPF or NPPG are specific about the thresholds for pre-application engagement.</p> <p>The adopted GCSP SCI 2019 encourages community engagement “particularly where development is likely to have significant impacts on local communities or where the site is particularly sensitive”.</p> <p>The suggestion that a minimum threshold of 50 houses, or where local circumstances warrant it be adopted is considered somewhat arbitrary as a validation requirement.</p> <p>Suggest that the stated criterion is retained, especially as it does not specifically require engagement to have been undertaken, but rather a statement of what has been undertaken.</p> <p>Don't agree it should be only a best practice requirement -needs to be retained for major developments.</p>
25	Surface Water Drainage Strategy	It is not reasonable or proportionate that a Surface Water Drainage Strategy is required for all scales of development. It is not considered that ‘minor’ development’ would usually result in a significant adverse impact on surface water drainage. Likewise,	The supporting text for adopted Local Plan policy 31 “seeks to ensure all surface water that is discharged to ground or into rivers, watercourses and sewers has an appropriate level of treatment to reduce the risk of diffuse pollution. The

<sup>1</sup> This is not a requirement for validation but is considered to be best practice and will help to speed up the planning decision process

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		<p>the layout of many outline applications is not fixed which may mean that such a strategy is difficult to produce and, in any case, would be meaningless until the layout of the development had been fixed. We suggest that the threshold is amended to require such a strategy only for 'major' development, development of 1 hectare or more<sup>2</sup>, where there is an acknowledged pre-existing drainage issue or where the orientation or topography of the site warrants such a strategy. For all other minor development, we consider that such a strategy could be suitably dealt with through a planning condition – which is the approach that most Councils (including SCDC) currently apply.</p> <p>Infiltration testing requirements conflict with other guidance that suggest that this can be conditioned</p> <p>Drainage proforma should be provided as a separate document on the website</p>	<p>“strategy” for both householder and other applications is considered to be both proportionate and reasonable.</p> <p>No changes are therefore required.</p> <p>There is a typo in the “What is required” section. “Any flat room” should read Any flat <u>roof</u>”.</p> <p>If a development is being proposed for infiltration testing then details should be provided at application stage to avoid the need for planning conditions to be imposed</p> <p>Agreed</p>
26	Sustainability Statement and Sustainability Checklist	<p>The stated threshold is far too low and be at least 50 houses. The Council should focus on delivering houses and should not concern itself with such detail at the validation stage for smaller developments or where the application is in outline. It would be appropriate to apply such matters as a planning condition</p> <p>If the information isn't integrated into the Design and Access Statement but still provided, it should be accepted</p> <p>The Sustainability Checklist should be saved separately to the SPD on the website.</p>	<p>Policy 28 states quite clearly that “Promoters of major development ...should prepare a Sustainability Statement as part of the Design and access Statement submitted with their planning application...”</p> <p>Suggest No change.</p> <p>Noted and agreed.</p> <p>Noted and agreed.</p>
C2	Telecommunications development (supplementary information)	The stated thresholds are consistent with the NPPF and NPPG and appear to be reasonable and proportionate.	Noted.
27	Transport Assessment or Statement	This policy needs to state the difference between a Transport Statement and Assessment and specify in what instances one is required. This should correspond with any thresholds that the	The supporting text of Policy 81 states that “A detailed transport assessment or a less detailed transport statement may be required in accordance with the

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		<p>County Council apply in such instances It is not reasonable to state that the applicant should agree the exact scale of development with the County Council. The only way that this could be done is by a paid-for pre-application enquiry to the County Council. Whilst this may be appropriate for larger-scale developments, the district Council should not defer to a third party on this matter – It is passing the buck</p> <p>Requirements not defined clearly enough</p>	<p>thresholds in Cambridgeshire County Council's current transport assessment guidelines".</p> <p>The guidelines do not set out definitive thresholds for when a transport assessment as opposed to when a transport statement is required. It is therefore reasonable for the County Council as the local highway authority to determine which of the two approaches is appropriate depending on the type and nature of the application.</p> <p>The choice of which type of information is required is initially for the applicant to decide.</p>
28	Travel Plan	<p>A Travel Plan should only be required where there are significant transport impacts.</p> <p>Requirement for travel plan is vague and should be more clearly defined. Some uses could have quantified thresholds.</p>	<p>Policy 81 states "new development will require ... a travel plan to accompany all major development proposals". The supporting text also refers to where proposals "a significant amount of (traffic) movement".</p> <p>The key issue is whether there is sufficient justification for a Travel Plan to be required upfront for non-major development and not imposed simply as a condition. "A significant amount of (traffic) movement" is not defined so requires a subjective validation judgement.</p> <p>Nonetheless, it is important to understand future travel demands early in the planning process so that the full impact of an application can be properly assessed.</p> <p>It is recommended that the requirement remains unchanged.</p>
29	Traffic Management Plan	<p>It is not reasonable to provide this for all non-householder applications. This is highly disproportionate. Such a Plan should be provided at validation for larger-scale development or where it is warranted. It could easily be applied as a condition or informative to a planning permission. The Council needs to focus on delivering dwellings and the best way of doing that, in this instance is to provide a far more pragmatic and less burdensome approach to its validation requirements.</p>	<p>While a condition can and usually is applied to many developments, research has shown that the number of applications to discharge conditions for traffic management plans are considerable and often initially refused causing unnecessary delay for developers (as well as increased workloads for officers). It is more efficient for all concerned if this information is provided with the application.</p> <p>Suggest No Change.</p>

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30	Tree survey / arboricultural implications	The stated thresholds are consistent with the NPPF and NPPG and appear to be reasonable and proportionate.	Noted.
31	Ventilation/extraction Statement (including odour considerations)		
32	Waste Design Guide Toolkit	The stated minimum criterion is disproportionate and could easily be secured by planning condition. Such a requirement would not be relevant for outline planning applications. The Council needs to focus on delivering housing and such matters can easily be dealt with through a planning condition – They are not needed to validate a planning application	No alternative minimum provision has been suggested. So long as the details required are proportionate to the level of development proposed, the requirement is considered reasonable.  Suggest No Change

### Consultation Responses referenced in this Schedule

E-Mail dated 05/02/20 from Hugo Prime and Co

Letter dated 17/02/20 from Turleys

Letter dated 17/02/20 from Savills

Letter dated 17/02/20 from Cambridge Past Present and Future