

Appendix A

From	Comment	Draft amended to take onboard comment?
WBC Highways	<p>1. Road Safety Audit has been included in the list of documents however this should be 'Stage 1 Road Safety Audit' - for all applications proposing any significant change to the highway.</p> <p>2. Please include a Framework Construction Method Statement.</p> <p>3. For development thresholds for provision of Transport Statements, Travel Plans and Transport Assessments please refer to Department for Transport's Guidance on Transport Assessment, March 2007.</p> <p>4. There is no mention of a Transport Assessment Scoping Note - this would need to be included for pre-application for major schemes.</p> <p>5. For householder applications, can we ask for existing and proposed parking layout (spaces 5.0m x 2.5m) for every application? Or at least when there is an increase in habitable rooms. At the moment it just says when there is a 'loss of parking'.</p> <p>6. For major developments can we ask for a draft electric vehicle charging strategy?</p>	<p>Yes included</p> <p>No (normally a condition)</p> <p>Yes included</p> <p>No because this is a requirement for pre-app advice not planning applications</p> <p>No because this would not be proportionate for every householder application</p> <p>Yes</p>
Local Agent (Emily Temple)	<p>1. The portal now accepts files up to 10MB, so the limit of 5MB on page 4 can be updated</p> <p>2. Please confirm if the LPA accepts smaller applications by email in order to encourage electronic submissions wherever possible. E.g. for prior approvals, conditions, NMA, s73.</p> <p>3. Plan numbers. Please ensure plans are labelled correctly on the website. There is little point in applicants labelling plans as requested when the</p>	<p>Yes</p> <p>Yes</p> <p>The Council has adopted a the same labelling protocol</p>

	<p>council does not label documents similarly online. It is easier to find the correct documents online if they are more specifically labelled.</p> <p>4. Fees. National fees change. So unless the LPA plans to update the validation list with each fee change, it may be better to just include a link to the portal for fee information.</p> <p>5. Full application requirements. Suggest more distinction is made between major and minor schemes. Items 6-13 below are very onerous for minor developments.</p> <p>6. Full application biodiversity. More clarification is needed. The validation list requires a bat survey for roof changes in a roosting area, but there is no similar test for full applications. The same criteria should be used for consistency, otherwise it seems more onerous for householder proposals than it does for say a replacement dwelling.</p> <p>7. Employment skills plan. This says for all major development. Does this include major residential proposals or just commercial? Please clarify.</p> <p>8. Floorspace calculation. This is already covered in the full application forms and the CIL AIR form. Please clarify if gross external or internal.</p> <p>9. Internal floorspace calculation. This is already covered in the CIL AIR form.</p> <p>10. Landscape assessment. Please say for major developments to match the text at the end of the document</p> <p>11. Land contamination. This is onerous, especially for small developments. Why do greenfield sites with no known or suspected contamination require an assessment up-front? What is the justification? Suggest this is linked to the contamination zones on the council's mapping system.</p> <p>12. Lifetime homes. This is onerous, especially for small developments. I suggest that if the LPA wants the option of setting additional technical requirements that exceed the minimum standards required by Building Regulations in respect of access to new dwellings then it must be by reference to enhanced Building Regulations in national guidance. For example, what % of the dwellings need to be to</p>	<p>The Council will update the document when the fees increase</p> <p>Yes includes definition of major and minor</p> <p>Yes added</p> <p>Both</p> <p>Yes added</p> <p>Yes added</p> <p>Yes added</p> <p>Clarification added</p> <p>Requirement deleted</p>
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	<p>lifetime standard? Is this just for new dwellings, or conversion proposals too? What size of dwellings does it relate to? I am not aware the LPA has a local plan policy that relates to this issue, and as such a validation requirement is unreasonable. Please note the advice from Government below, regarding viability implications for smaller developers: https://www.gov.uk/government/speeches/planning-update-march-2015 I recommend that if included it is for major developments only.</p> <p>13. Lighting assessment. Most applications include small residential porch lights. Is it possible to exclude these?</p> <p>14. Outline applications. This is not specific enough. Many applicants will interpret this as reports not being required, which will lead to argument with validation staff if validation is then denied. Suggest a distinction is made between major and minor schemes, e.g. major to comply with the same requirements as full.</p> <p>15. All Prior notifications. Suggest each should include a planning statement outlining how the development accords with the GPDO.</p> <p>16. S106 obligations. Please can a draft form be made available online, inclusive of template s106 legal agreements. This will save a lot of time.</p> <p>17. Retail/Office Impact Assessment (Change of Use within Town / Village Centres): Marketing is not required by policy CP13 or TB16 so a request for 2 years marketing is wholly unreasonable. It could also lead to a lot of vacant space in town centre locations that are unable to be redeveloped due to the 2 year marketing requirement. This could both affect the long term quality of the building left vacant for so long, and the vitality of the local centre itself. Withholding redevelopment for so long goes against the presumption in favour of sustainable development; inconsistent with the NPPF. 6 months is a far more reasonable period, if still retained as a requirement.</p>	<p>Requirement does not relate to householder applications</p> <p>Clarification added</p> <p>Not proportionate and there is nothing preventing an agent from submitting a statement</p> <p>Now online</p> <p>Yes added</p>
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