

Consultee / interested party	Comments	Proposed change(s)	Reason(s)
<p>Luke Gledhill MKCC Development Plans</p>	<p>Further to past chats about the EV parking standards. Central Beds are currently consulting on a Parking standards SPD and we've been checking their guidance on EV charging for comparison. We've noted it includes validation requirements from an EV perspective. As previously discussed, the MKCC approach is that we don't have validation requirements within SPDs. However it would be beneficial to include something similar in the PAVR. Would this be something you can include alongside the PAVR guidance on Transport Assessments/Parking Plans please, or?</p> <p>Here's a list of the information we would require from a MKCC perspective. James' email below has a link to the Central Beds SPD for info.</p> <ul style="list-style-type: none"> <li>• Total number of parking spaces on site.</li> <li>• Number and type of active charge points (e.g., 2 x 7kW wall mounted charge sockets, 1 x 43kW freestanding charge post, 1 x 150kW freestanding charge post).</li> <li>• Number and type of passive charge points.</li> <li>• Carriageway and footway/margin widths where EV charging is proposed.</li> <li>• A layout plan showing the location of the spaces and charging equipment, including layout of underground cable routes/ducting for active and passive charge points.</li> <li>• If applicable, the number of shared/communal charging points.</li> <li>• If proposed by the applicant, the number and location of larger designated parking points for the charging of large vehicles.</li> <li>• Details of how the parking spaces with charging points will be signed and marked out.</li> <li>• Evidence to demonstrate capacity to supply the proposed charge points.</li> <li>• Details of a maintenance contract to be put in place to ensure the ongoing availability of shared/communal charge points for use.</li> </ul> <p><i>[Email below]</i></p> <p>the C Beds draft EV standards are here: <a href="#">link</a></p> <p>Page 7 is their EV standard, and page 10 in section 6.2 includes the info they require at planning app stage. Some useful info in the annexes too including a planning app checklist in appendix 3 on page 20.</p>	<p>Description of 'Parking assessment' updated in Annex B, Section 2 so to link the words 'Parking plan' to relevant entry in Annex B, Section 1.</p> <p>Description of 'Parking plan' then updated to:</p> <p>A plan at 1:500 scale (metric) showing ... parking spaces to each existing and proposed unit should be made clear. <u>The following should also be included:</u></p> <ul style="list-style-type: none"> <li>▪ <u>For major developments, a table listing the total number of spaces for cars, HGVs, powered two-wheelers, any other motor vehicles, cycles, and electric vehicle (EV) charging;</u></li> <li>▪ <u>Number, type and location of active and passive EV charging spaces, and whether these are allocated or communal;</u></li> <li>▪ <u>The layout of underground cable routes/ducting for active and passive EV charging points;</u></li> <li>▪ <u>Typical details for marking and signage of EV charging spaces; and</u></li> <li>▪ <u>Maintenance arrangements to ensure continued operation of EV charging infrastructure.</u></li> </ul> <p>The dimensions of parking spaces and access routes should comply <u>with adopted guidance</u>, whilst consideration should be given to whether spaces provided within the highway would cause difficulties <u>with adoption of the highway. Regard should also be had to Approved Document S of the Building Regulations when designing EV charging spaces and points.</u></p>	<p>The detail requested is necessary to enable an in-principle assessment against adopted planning policy, and could also help to avoid the need to attach conditions to any permission granted.</p> <p>Some of the detail suggested is considered to be beyond that which is 'necessary' to enable assessment of the application and thus the word 'should' is used.</p> <p>Measurement of footway/margin widths can be undertaken using on-screen measuring tools.</p> <p>Matters concerning capacity of electricity supplies are catered for under Building Regulations and do not relate to the design and/or long term use of land and property.</p> <p>Reference to Building Regulations added given the publication of Document S since the PAVR was drafted.</p>
<p>Helen Pinder MKCC Development Management</p>	<p>Just recently I have come across a developer who keeps putting badger setts on location plans.</p> <p>These are being missed and published, mainly because the plans cover a large area and this detail is unexpected and difficult to see.</p> <p>I am going to go back and redact these plans but please could this be added to the new validation list. The location of Badger setts has no place other than in an ecology report marked confidential.</p> <hr/> <p>DM started asking for scale bars when info@work was upgraded (previously you could type in the scale as you would in pdf) but when it became web based this was no longer an option so the only way to measure was to calibrate using a scale bar or an annotated plan showing the measurement (sorry I suspect you know this). I know you circulated some instructions in pdf but don't think these are necessarily passed on to new starters.</p> <p>I advise planning officers that we shouldn't be making applications invalid due to a lack of scale bar as it is neither a national or local requirement however if we are asking for plans to be amended we can ask for a scale bar to be added.</p> <p>As I am a DSO I will always follow the direction of a planning officer and in this instance a case note was added and the checklist updated to show all these plans as unsatisfactory. I amended the standard wording to make it clearer why the application had been invalidated (this was not the only reason for invalidation – no block plan had been provided).</p> <p>I was also having difficulty redacting the plans (increased the scanned file size to 36MB) as they appeared to have been signed (although Mr X has since informed me that the plans are not signed so they are now indexed without redaction) – please see case note.</p>	<p>Description of 'Landscape plan' and 'Site location plan' updated in Annex B, Section 1:</p> <p>A plan at 1:200 or 1:500 scale ... planting intervals, ecological enhancement measures <u>(but not sensitive locations of existing, protected habitats, such as badger setts)</u>, and climate change adaptation measures.</p> <p>A plan based on up-to-date Ordnance Survey data ... and open areas around buildings). <u>Do not include sensitive locations of existing, protected habitats, such as badger setts.</u></p> <hr/> <p>Description of 'Site location plan' and 'Layout Plan' updated in Annex B, Section 1 to include the following text:</p> <p><u>Whilst not mandatory, the inclusion of a linear scale bar is also useful, particularly so interested parties can establish the scale of the proposal and distance between features.</u></p> <p>None.</p>	<p>Matters concerning protected habitat/species are of merit and suitable warnings have been included, although it is recognised that it is still for the LPA to identify and redact sensitive/personal data before publishing.</p> <hr/> <p>Scale bars are <u>not identified as a mandatory requirement as part of the PPG</u>: "...Although not a requirement of legislation, the inclusion of a linear scale bar is also useful, particularly in the case of electronic submissions." However, text has been added in an advisory capacity only, encouraging a proactive approach by applicants.</p> <p>Concerns re. signing of plans are already covered under general provisions relating to inclusion of personal information at para 1.24</p>

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	<p>Unfortunately we often do not have time (or feel we have authority) to question reasons for invalidation but DSOs do know (as far as I am aware) that this is not a valid reason for invalidity.</p> <p>I have just spent over an hour converting a Biodiversity Metric Calculation Tool into pdf from excel so it can be published. Please can this document be provided in both excel and pdf versions.</p>	<p>Description of 'Biodiversity Impact Assessment Metric (BIAM)' updated in Annex B, Section 2:</p> <p>An assessment to demonstrate the impact on existing biodiversity and demonstrate whether there will be a net gain or loss in biodiversity as a result of the proposal. The assessment should be provided on <a href="#">the latest Defra calculation tool, in both an .xlsx file format as well as a 'fit to page' publishable .pdf export.</a></p>	<p>of the PAVR.</p> <p>Para 1.21 of the PAVR outlines, by reference to footnote 6, that exceptions to the 'pdf only' rule are outlined in Annex B. However, the entry for a BIAM is not specific as to the file format needed, which is required to enable consultees' interrogation of the information.</p>
<p>Jennifer Pfeifer</p> <p>MKCC Development Management</p>	<p>Further note regarding the validation requirements document:</p> <p>Applications for Certificates of Lawfulness – the site location plan requirement seems to be for TPO</p> <p><b>16. Applications for Lawful Development Certificates</b></p> <p>16.1 There are 2 types of Lawful Development Certificate. The local planning authority can grant an Certificate confirming that:</p> <p>(a) an existing use of land, operational development or activity being carried out in breach of a planning condition is lawful for planning purposes under section 191 of the 1990 Act; or</p> <p>(b) a proposed use of buildings or land, or operations proposed to be carried out in, on, over or under land, would be lawful for planning purposes under section 192 of the 1990 Act.</p> <p>16.2 Provision has recently been made under the Planning (Listed Buildings and Conservation Areas) Act 1990 establish whether proposed works to a listed building, where those works would not affect the character of the listed building, would be lawful under section 26 of that Act.</p> <p>16.3 In all cases, the <a href="#">onus is on the applicant</a> to provide the evidence to substantiate their claim for an LDC.</p> <p><b>National requirements</b></p> <p>16.4 The following is required:</p> <ul style="list-style-type: none"> <li>▪ the completed <a href="#">application form</a>;</li> <li>▪ a <a href="#">site location plan</a> which identifies the tree or trees to which the application relates;</li> <li>▪ the <a href="#">appropriate fee</a>, unless an exemption applies;</li> <li>▪ substantiated evidence verifying or supporting the proposed or existing use, operation or activity.</li> </ul> <p>Also, our invalidity letters request block plans at 1:200 or 1:500, and your form says 1:500 or 1:1000.</p>	<p>Highlighted text after 'a site location plan' deleted.</p> <p>Corrected scale text from "1:500 or 1:1000" to "1:200 or 1:500".</p>	<p>Superfluous text included in error.</p> <p>Incorrect scales included in error.</p>
<p>Paul Kitchener</p> <p>MKCC Development Management</p>	<p>Just a thought on the validation requirements, I've noticed on the new validation requirements that we'll be requesting site photos as part of submissions.</p> <p>Occasionally, applications submitted with photos tend to get stuck in the Portal requiring manual download and registration to Uniform by the team, especially where they submit large numbers of photos (I see we're requesting x4 high resolution photos). If this occurs with a large number of Householders, for example, it could create extra work which would otherwise be automated.</p> <p>I'm not sure if this has been considered but thought it worth mentioning prior to its adoption. As an option, photos, submitted in pdf format does avoid this issue, but would likely result in some definition/ resolution loss during the conversion.</p>	<p>Description of 'Site photos' updated in Annex B, Section 1:</p> <p>An up-to-date collection of site photos to provide the potential for site visits to be carried out remotely. The photos must be submitted electronically and show the location of the proposed development in the context of its surroundings. All photos must be provided in high-resolution and labelled, <a href="#">all within a single pdf document</a>. A site location or block plan must be provided to show the location of the photo and the angle of view (as per the example below, for a rear extension).</p>	<p>Description amended given there is a need for the photos to be clearly labelled but also provided in a manner which reduces any administrative demands.</p>
<p>David Lawson</p> <p>MKCC Highways</p> <p>(as part of response to consultation on Parking Standards SPD)</p>	<p>At present we provide advice on the number of EV spaces to accord with the numerical requirement in the standards. We do not provide advice on the location of such spaces (outside of our normal advice on location of parking spaces in general) and we do not provide advice on any of the associated infrastructure such as cabling, type of charger etc.</p> <p>My point in the parking standards response was that we do not have the knowledge to give any meaningful advice on the provision of EV charging infrastructure and will not expect to comment on cabling, charger types, positions etc. If this is a requirement going forward then Luciana will need to consider whether it is appropriate for us to do it, how that is resourced and when/how training is provided.</p>	<p>None.</p>	<p>The detail requested is already accommodated in the changes to the description of 'Parking plan', set out above. A further, more detailed schedule is not considered proportionate at this time, particularly when Building Regulations will now have a commanding influence on the</p>

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	<p>The Building Regs Part S Part S under Building Regulations go another level beyond this and require a view on whether spaces are 'associated' with a building. There are also differing requirements for spaces that are in addition to the 1 per dwelling threshold. For changes of use to residential, other requirements kick in and are affected by things like Listing, Conservation Areas, SAM status... Clearly this adds even more complexity to the calculation of parking, which on residential developments already takes up a disproportionate amount of our time.</p> <p>I suggest that the Council considers changing the document requirements (local list) for validation to include a mandatory parking and housing accommodation schedule, as working out which plot is which dwelling size and how many spaces each plot has is very, very time consuming. Then adding in EV provision to this information would make sense and reduce the burden on officers – given that cost per EV space is also a factor, perhaps some sort of EV statement is also required for residential developments?</p>		<p>number and type of EV charging points which must be provided with developments.</p>
<p>Sue Brown MKCC Landscape Architect</p>	<p>I just wanted to pick up on the point regarding building heights. Scaling on a vertical scale drawn at 1:500 is unlikely to bring any kind of accurate figure. Having a maximum building height referenced on the plans and 'approved' helps everyone, particularly enforcement and so whilst I can see why you feel this is a tenuous link to landscape, it is absolutely something which should be requested on all applications in my view. The proposed building height is key in assessing LVIA's and the likely visual intrusion resulting from a new building and so this is why [Person] would be asking for it to be clarified. Developers often get approval at outline for X number of storeys, but given the build height of each storey from one development to another can fluctuate significantly asking for the maximum height gives a worst case marker for everyone to work to, underpinning the maximum scale of the development. Perhaps it should be on the validation list?</p>	<p>None.</p>	<p>The description of 'Elevation drawing' at Annex B, Section 1 requires a scale of 1:100 or 1:200. For tall buildings, the margin of error when scaling on screen is nominal for the context of assessing landscape and visual impact, and therefore it is not necessary to have dimensions specified on the drawing.</p>
<p>Elizabeth Verdegem MKCC Development Management</p>	<p>1.18 – can we legally hold up validation for the payment of an additional administrative fee? Or are we saying it is ok because it's a requirement within or LVL?</p> <p>1.19 - have we checked this is what the parishes would want? We wouldn't normally provide the parishes with any type of hard copy. When you say PC affected is that sufficient or do you mean within the boundary, or adjacent to the boundary (something with ES might have cross boundary effects?)</p> <p>1.21 – could you be even more explicit and say correct document number, revision number and title as per the drawing.</p> <p>1.24 – could you include reference to signatures here as might not think of that as personal data but we do react from documents/report</p> <p>2.2 – wondering if we should specify labelling of room (i.e. bedrooms) – to do a parking calculation for example? We usually have rooms labelled – not sure if could justify</p> <p>2.3 - as well as bedroom, proposals affecting the driveway or parking space need to show dimensioned parking plan</p> <p>4.3 – street scene – I think there's a wider scope for when streetscene is required. Thinking about development along a road which might not be infilling between two buildings, but we'd still want a street scene ("and/or developments facing an existing highway")</p>	<p>Final part of sentence omitted.</p> <p>None.</p> <p>Text amended: "...each document should be <u>accurately</u>, logically and clearly labelled...".</p> <p>Text amended: "Inclusion of personal data, <u>including signatures</u>, should be avoided...".</p> <p>None.</p> <p>Text amended: "...for proposals involving the creation of additional bedrooms <u>or affecting parking spaces and driveways</u>...".</p> <p>6<sup>th</sup> bullet amended: "for developments <u>facing public realm and/or</u> filling a gap between existing buildings...". 'Public realm' already defined in Glossary.</p>	<p>This may have implications for prior approvals and other applications where validation requirements are set nationally and without influence at the local level.</p> <p>It is a legal requirement (under EIA Regulations) for a copy to be provided to parishes. However, the manner in which it is provided is not specified, and this is promoted as an environmentally sustainable method.</p> <p>For clarity.</p> <p>For clarity.</p> <p>The description of 'Floor plan' in Annex B, Section 1 already requires the use of the spaces in buildings to be labelled.</p> <p>Inclusion justified as extensions not involving creation of bedrooms can reduce available space around the dwelling.</p> <p>Inclusion justified given the importance of properly conveying the visual appearance of the development facing public areas.</p>

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	<p>4.3 Parking plan – I think should be in here (and associated out/rem sections) including ref to cycle parking (see note in annexe B below)</p> <p>4.4 – ecology - isn't a PEA required on a major regardless of site designation, at a minimum?</p> <p>Micro-climate – why 7 storeys? CMK plan is 8 or above – not objecting to it, but is it justified?</p> <p>No economic development statement - I think most of this is covered as you've separate listed the retail impact assessment but Economic Development usually wan information fo FTE employees and the types of jobs created so that they can say whether they're going to support a proposal or not – they literally never object so we might say we don't actually think it's necessary?</p> <p>5.6 housing accommodation schedule/statement – we need something from developer on housing on a major when layout is reserved but they're telling us the overall number of units and approximate mix - to feed into the s106?</p> <p>6.3 – reference to para 6.7?</p> <p>6.5 - should you be saying something similar to the thing you've said at 5.7 – for example, I can't see a micro climate assessment listed in RM – but that might be more appropriate at RM than outline – in terms of detailed assessment of balconies etc which is dependent on appearance etc, not just principle of whether the height of the building is accpetable? Or would you be relying on an "indictive" micro climate at outline for the principle of the height of the building, with a condition require a detailed assessment at RM?</p> <p>6.6 – reference to eaves and verge details here is weirdly specific? I would maybe just say specification of materials?</p> <p>8.3 – "the relevant documents listed at 4.3 are likely..."</p> <p>9.6 – these are stated differently to in 4.3 – don't we want to specify existing and proposed still?</p> <p>11.4 – level of illuminance in cdm2</p> <p>12.4/13.5/14.4 I think we should ask for photos of the tree as standard – would help identify and help with assessment – recent photo (from past month)</p>	<p>5<sup>th</sup> bullet amended: "existing and proposed layout plans, accurately showing the position of adjoining properties and their windows, as well as any provision or alteration of a vehicular access, <u>parking spaces</u> and hard surfaces..."</p> <p>None.</p> <p>None.</p> <p>16<sup>th</sup> bullet amended: "for development leading to the loss of designated employment land or any building used for employment purposes; <u>an economic statement and</u> marketing report". New bullet added after: "<u>for development creating employment premises; an economic statement</u>".</p> <p>12<sup>th</sup> bullet amended: "for major residential developments <del>outside of settlement boundaries or providing more than 31% affordable housing</del>, a housing statement".</p> <p>Corrected to 6.6.</p> <p>None.</p> <p>None.</p> <p>Corrected to 4.3 and 4.4.</p> <p>Added "existing and proposed" to first three bullets.</p> <p>None.</p> <p>Para 12.4: None.</p> <p>Para 13.5: 2<sup>nd</sup> bullet changed to "a specification of the work for</p>	<p>For clarity.</p> <p>6<sup>th</sup> bullet provides general catch-all for sites with suitable habitat for protected or priority species, which is highly likely to be engaged as a threshold on all major sites.</p> <p>No definition of 'tall building' in policy, except for CMK Neighbourhood Plan. Proposed wording states 'more than 7'.</p> <p>For clarity and to ensure proper consideration of policies ER1 and ER2.</p> <p>Valid point made. Threshold broadened to require housing statement with all majors, given schedule cannot be completed when layout not known.</p> <p>Cross referencing error from earlier draft.</p> <p>Unlikely that LPA would accept an application for a tall building made in outline without matters of scale and layout to be considered.</p> <p>Example included to illustrate that patterns, reveals, etc. deployed in the appearance of buildings is a consideration alongside the materials used.</p> <p>Cross referencing error from earlier draft.</p> <p>Existing and proposed plans required to properly assess heritage impacts.</p> <p>Even if specified, conditional control would have to relate to a limit which is necessary to ensure acceptable effects on amenity, and Institute of Lighting Engineers standards are presently used.</p> <p>This is already included as part of impact assessments under para 12.4, which usually contain photos</p>

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	<p>15.5 – update section reference</p> <p>15.35 – should this be existing and proposed? Or do you think it’s unjustified to see what it was before given it’s under a prior?</p> <p>16.1 - typo on an</p> <p>16.5 – is a statutory declaration sufficient to validate or should we be asking for further evidence here – or is that too non-specific/the applicant’s obligation to provide? Thinking of 10 years of contracts for HMOs for example.</p> <p>17.1 /17.3– minor material amendments to material minor-amendment – we usually go with the former?</p> <p>17.2 -where would a Screening Opinion dictate that an addendum would be acceptable – wouldn’t that be scoping in theory?</p> <p>17.3 – wouldn’t it just be easier to say anything covered by 4.4, 5.6 or 6.4 as required relative to the amendment being sought – to avoid duplication?</p> <p>17.3 – updated document schedule with a clear list of originally approved drawing and the drawings which supersede them as part of this application. For majors, a statement/schedule of conditions setting out where the details required to be approved have been approved – what you’ve put in 19.4. For changes to design - plans should be clearly annotate to show what amendments have been made since the originally approved version</p> <p>18.4 - plans should be clearly annotate to show what amendments have been made since the originally approved version</p> <p>20.2 – “to the LPA...”</p>	<p>which consent is sought, which <del>may-should</del> include <u>recent</u> photos <del>or diagrams</del> marked with pruning points, crown lifting height and/or extent of crown reduction for works involving the pruning of trees”.</p> <p>Para 14.4: None</p> <p>Corrected from 0 to 3.</p> <p>The words ‘existing and proposed’ added to the front of the second bullet.</p> <p>Changed to ‘a’</p> <p>None.</p> <p>The word ‘minor’ moved throughout section. Footnote added in para 17.1.</p> <p>Changes made to section 18 to remove the word ‘minor’.</p> <p>Changed to ‘Scoping’</p> <p>12<sup>th</sup> bullet changed to reference these paragraphs.</p> <p>None.</p> <p>None.</p> <p>None. Abbreviations in Annex A corrected to full text.</p>	<p>or survey plans and schedules. Para 13.5 benefits from clarity in works being relative to the actual tree and not a diagram.</p> <p>Hedgerow can only be retained if important in terms of the regulations, which is based on age and species make-up, and not appearance.</p> <p>Cross-referencing link in document broken.</p> <p>Prior approvals can involve the assessment of amenity and design, and it may be relevant to consider the existing situation of the building/site.</p> <p>Grammar.</p> <p>The onus is on the applicant to provide sufficient evidence. 4<sup>th</sup> bullet under para 16.4 reflects this under the national requirements.</p> <p>Movement of ‘minor’ to align with use in PPG (para 17a-017). Footnote refers to case law confirming scope of s73 (<i>Finney, 2019</i>).</p> <p>So to reflect approach in PPG.</p> <p>Observation is correct.</p> <p>For clarity. Remaining bullets also remain for clarity and less cross-referencing by the reader.</p> <p>Not proportionate. The proposal must be assessed on its merits. Any permission can be implemented alongside the previous and is not superseded.</p> <p>Not proportionate. The proposal must be assessed on its merits. Any approved plans/drawings sit alongside others and do not supersede them.</p> <p>Term ‘LPA’ not used elsewhere in main text. Abbreviations in Annex A corrected to match.</p>

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	<p>Annexe B</p> <p>App form – incomplete or knowingly inaccurate? – should we accept as valid an app form that clearly has the wrong site area, or sys trees aren't affected when they're removing trees?</p> <p>Conditions tracker – to amend when required if you make my change above. Also add to include our application reference for the DISCON it was approved under (though I can see that's in annex D).</p> <p>Drawing Schedule – I would like to add in submission date as I think it helps us keep trac of things, but I know you're not as bothered about those, so could we add in "revision number/letter and/or submission date" as a compromise?</p> <p>Illustrative masterplan – you've used indicative and illustrative above, just need to pick which term to use</p> <p>Parking Plan – this is only listed in the requirements for a HH, but starts talking here about non-resi. If you add it in anywhere it needs to include cycle parking marked on plan for non-resi and new dwellings.</p> <p>Phasing masterplan – just called Phasing Plan elsewhere</p> <p>BIAM – latest defra or locally approved version – per Policy NE3 C</p> <p>Economic statement – this isn't listed as required in any part of the document (see note above at 4.4)</p> <p>Foul drainage statement – this isn't listed as required in any part of the document</p> <p>Land stability report - this isn't listed as required in any part of the document</p> <p>Parking assessment - this isn't listed as required in any part of the document – did you mean to tie it in with anywhere it was listed for a TS/TA? (and perhaps add a note to Annexe C for when a parking assessment is sufficient rather than a transport statement?)</p> <p>Planning obligations – I recall when doing this last time there is something in the PPG that says that planning obligations statements should not be included in local lists, presumably so as not to hold up validation until a HoT is agreed. (not that it seems to have stopped anyone) We got round that by saying if you were making a viability argument you needed to submit that for validation and do a pre-app to get our full HoT before you submit.</p>	<p>Definition changed to "As a general rule, an application form will not be accepted if it is incomplete <u>or evidently inaccurate</u> in any way...".</p> <p>Text "<u>This must be capable of revision throughout the course of the application</u>" added to end of definition.</p> <p>None.</p> <p>Corrected references at 5.5 and 21.3</p> <p>None.</p> <p>'master' deleted.</p> <p>None.</p> <p>None.</p> <p>New bullet added to 4.4: "<u>for developments not connecting foul drainage to an adopted sewer, a foul drainage statement</u>".</p> <p>Definition deleted.</p> <p>10<sup>th</sup> bullet of Transport Statement definition changed: "<u>an assessment of parking facilities</u> in the area and the parking strategy of the development".</p> <p>Annex C supplemented: "<u>Transport statements and assessment also link with the need to provide a parking assessment (and parking plan) where relevant</u>".</p> <p>None.</p>	<p>In the interests of enabling publicity and consultation without causing confusion.</p> <p>To align with definition of conditions pro-forma.</p> <p>Not necessary. Also logistically difficult for applicants where the actual issue date may not match the exact date it is submitted to the Council. Further, drawing schedules are to be referenced in approved plans conditions in lieu of the plans being listed individually, so the date can be easily added to the condition text.</p> <p>For consistency.</p> <p>Definition of Parking Assessment refers to Parking Plan. Other changes made earlier in this schedule also explain.</p> <p>For consistency.</p> <p>The word 'should' allows for some discretion for locally approved alternatives. However, local expectations are now to use Defra standard.</p> <p>Other changes made earlier in this schedule explain.</p> <p>Necessary in order to provide a trigger for provision of this document, and enable assessment against policy FR1 of Plan:MK.</p> <p>Not necessary to inform planning assessment.</p> <p>To link both Transport Statement and Transport Assessment to the need to assess parking impacts arising from the development.</p> <p>PPG allows for this to be included: "Local planning authorities may wish to consider adding planning obligations or heads of terms for section 106 agreements to their local list" – para 23b-014.</p>

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<p>Martin Ellison MKCC Conservation</p>	<p>I noted that the requirements for householder applications make no specific reference to appraise the potential impact of development of unlisted property on the setting of listed buildings. The way I read section 2.3 Local Requirements I took it to mean only the householder planning application accompanying an application for LBC rather than any householder application with the potential to impact setting of a listed building. Paragraph 194 of the NPPF states ‘<i>In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting</i>’. Based on the wording in the guidance I wondered if an assessment of the impact of development on the setting of any nearby listed buildings should be a requirement.</p> <p>The type and amount of information required to assist you in the assessment of proposals which affect heritage assets (in accordance with the NPPF, particularly paragraphs 197 and 199) will vary in each case. The information provided should be proportionate according to circumstances, and should facilitate understanding of the significance of the heritage asset, and of the potential impact of the proposal on that significance.</p> <p>We refer you to our Charter for Historic England Advisory Services (particularly sections 11 and 12) as a clear statement of the information needed in order to provide informed advice. The charter can be downloaded from our website via: <a href="https://historicengland.org.uk/services-skills/our-planning-services/charter/">https://historicengland.org.uk/services-skills/our-planning-services/charter/</a></p> <p>In addition to these general comments, I append a few specific comments on your draft document. I hope that this feedback is helpful. If you have any queries about this matter or would like to discuss this further, please do not hesitate to contact me.</p> <p>APPENDIX: Validation Guide – further comments</p> <ol style="list-style-type: none"> <li>Paragraph 9.6: reference is made to a “Heritage Impact Statement”. And in paragraphs 15.21 and 15.34 to a “Heritage Statement”. For consistency with the terminology used elsewhere in this document, one assumes this should read “Heritage Impact Assessment” in all three cases.</li> <li>Paragraph 15.36 refers to the “sustainability” of a Conservation Area. For clarity and to align with the Planning (Listed Buildings and Conservation Areas) Act 1990, we suggest a reference to “an assessment of impact on the character or appearance of the Conservation Area”.</li> <li>In section 2, reference is made to “Archaeological desk-based assessment (including field evaluation where appropriate)” and then to “Heritage Impact Assessment”. In these respective entries, the Council may wish to offer a link to its local historic environment services as a source of further advice.</li> </ol>	<p>5<sup>th</sup> bullet amended: “for proposals affecting a listed building (including its curtilage <u>or the setting of</u>), a heritage impact assessment”.</p> <p>None.</p> <p>Paras 9.6, 15.21 and 15.34 corrected.</p> <p>None.</p> <p>None.</p>	<p>Whilst it is unlikely that setting is affected in any event in an urban environment given other constraints limit the scope/extent of extensions, etc. adjacent; included for clarity.</p> <p>Definition of ‘heritage impact assessment’ already provides sufficient guidance.</p> <p>For consistency.</p> <p>This is the wording of the legislation and remains open to interpretation presently.</p> <p>Weblinks already provided in definitions.</p>
<p>Elizabeth Woodhouse MKCC Landscape Architect</p>	<p>Paragraph 1.21 - Digital File sizes: Even working across the Council server, it is difficult to work with files larger than 5MB, please consider reducing the file size down from 10MB. Working with large digital documents which are slow to open and use, is time consuming.</p> <p>Paragraph 4.4 Add to the list:</p> <ul style="list-style-type: none"> <li>For housing development positioned very close to existing trees to be retained and potentially within the shading arc such that the amenity of future residents (within the dwelling and the garden) would be compromised with the likelihood that retained trees would later be felled; a <u><i>Tree shading Plan as part of an Arboricultural Impact Assessment</i></u>;</li> </ul>	<p>None.</p> <p>None.</p>	<p>Planning Portal file sizes allow 10MB so the Council must operate systems to support receipt and handling of these.</p> <p>Not required as this as arboricultural impact assessment definition requires consideration of “<i>how a proposed development and existing and proposed trees will co-exist and interact throughout the lifetime of the development</i>”... and “<i>Future issues, such as the need to prune or remove trees because they cast excessive shade or encroach upon property, should also be addressed</i>”.</p>

Consultee / interested party	Comments	Proposed change(s)	Reason(s)
	<ul style="list-style-type: none"> <li>For development affecting trees or hedges on the proposed development site and/or on land adjacent to the proposed development site that could influence the development or might be important as part of the local amenity or landscape character; an <u>Arboricultural (tree) survey and Arboricultural impact assessment</u>;</li> </ul> <p>Please note, a preliminary ecological appraisal is typically a precursor to the BIAM (biodiversity impact assessment metric) so should be listed in paragraph 4.3 for developments of 5 or more dwellings or 1,000 square metres or more of floorspace.</p> <p>Section 5 Outline applications – local requirements Paragraph 5.6 Add to the list:</p> <ul style="list-style-type: none"> <li>for major residential developments; an Open Space Provision Plan (with link to the text below inserted under Annex B)</li> </ul> <p><u>Open Space Provision Plan</u></p> <p>A plan at an appropriate scale (metric) showing details of the locations and area calculations for all areas of public open space provision. To include the types of open space required by Plan:MK Policy L4 Public Open Space Provision and Appendix C Open Space and Recreation Facility Provision, such as local play areas, neighbourhood play areas, playing fields, local parks, district parks, allotments etc.; also the required quantity and the provided quantity in hectares or square metres as appropriate. In addition, the plan should show any tree-belt and woodland buffer planting, drainage attenuation features, and depending on the site, the location of flood plains, scheduled ancient monument or registered park and garden and other relevant features. If provision is to be met through a financial contribution to enhance existing facilities it should be stated clearly.</p> <p>Section 6 Applications for Approval of Reserved Matters – local requirements Paragraph 6.4 Add to the list:</p> <ul style="list-style-type: none"> <li>where landscaping is a Reserved Matter, plans should include: <ul style="list-style-type: none"> <li>hard surfacing and planting proposals</li> <li>laying out of public open spaces, gardens, squares, courts, allotments, play areas, public art, habitat creation or other amenity features</li> <li>boundary treatments,</li> <li>formation of levels including ground levels, banks, retaining features / structures or other earthworks</li> <li>site sections and elevations as relevant</li> <li>landscape masterplan, showing all landscaping which is defined as: ‘the treatment of land (other than buildings) for the purpose of enhancing or protecting the amenities of the site and the area and the surrounding area’</li> </ul> </li> </ul> <p>Annex B Section 1: Forms, schedules and plans Please add: ‘All plans drawn to scale are to include an accurate scale bar’.</p> <p>There is no mention of this in the document. By only requiring the scale to be stated isn’t useful when we are working from home with no access to printers. A scale bar is a must on all plans drawn to scale. Plans missing a scale bar is often cited as a reason for not validating applications.</p>	<p>Definition of arboricultural impact assessment updated: “...of the should also be addressed. An <u>arboricultural survey</u>, tree constraints plan and a tree protection plan...”.</p> <p>None.</p> <p>Added new bullet to para 5.6: “<u>for major residential developments, a play and open space statement</u>”</p> <p>Definition of ‘play and open space statement’ given: “<u>A statement which identifies the types of play and open space required, such as local play areas, neighbourhood play areas, playing fields, local parks, district parks, allotments, etc., as well as the required and proposed quantity of and facilities within each, given in hectares or square metres as appropriate. If provision is to be met through a financial contribution to enhance existing facilities nearby, justification for off-site provision must be provided along with relative walking distances, times and routes to such facilities</u>”. Policy reasons also given.</p> <p>Definition of ‘landscaping plan’ amended: “...soft landscaping specifications including species, standard, number and planting intervals, <u>location and amount of play, sports and open space facilities</u>, ecological enhancement measures...”.</p> <p>Added new bullet in para 4.3: “<u>a landscaping plan to show the approach to hard surfacing, boundary treatments, earthworks and planting proposals across the site, along with relevant sections and elevations as relevant</u>”.</p> <p>None.</p>	<p>This is how to carry out an impact assessment, and the definition requires a qualified person to carry out this assessment. Does not require specifics in para 4.4.</p> <p>No change needed. Preliminary ecological appraisal needed as default to create BIAM, but no requirement for it to be supplied under validation requirements.</p> <p>Inclusion warranted to enable assessment against policy L4 and Appendix C of Plan:MK</p> <p>However, detail cannot always be provided on plan, given landscaping and layout may be reserved matters. Level of detail expected beyond pure landscaping matters also not proportionate and available through other sources.</p> <p>Landscaping plan definition updated to capture level of detail required for assessment of reserved matters/full application proposals. Level of detail suggested for para 6.4 either already covered by definition or not proportionate/can be conditioned if not supplied.</p> <p>See earlier reasons for rejecting this suggestion. Digital measurements of plans possible.</p>



<p><u>Boundary treatment plan</u></p> <p>Many applications require a Boundary Treatment Plan, so a separate row should be added to the Annex B table to cover the details expected, which are:</p> <p>A plan at 1:500 scale (metric) showing details of the position of all proposed boundary treatment including retained enclosures, a schedule specifying the type, height, composition, construction detail and representative example photo of proposed boundary treatment, provision of hedgehog passes as standard and the site outlined in red.</p> <p><u>Elevation drawing</u></p> <p>For warehousing the elevation plans should include maximum heights shown on dimensioned elevation plans i.e. maximum unit roof height (highest point) and maximum unit haunch height.</p> <p><u>Floor plan</u></p> <p>For warehousing the floorspace (gross external area GEA and gross internal area GIA) figures should be accurately shown on floor plans.</p> <p><u>Landscaping plan</u></p> <p>Replace the current text with the below text. This is what we require and it will save time for applicant to have this listed in the validation document.</p> <p>A plan(s) at 1:200 scale (metric) showing the layout of the proposed development, details to include:</p> <ul style="list-style-type: none"> <li>• existing trees and hedgerows to be retained accurately shown with root protection areas</li> <li>• water bodies, sustainable drainage features (above and below ground)</li> <li>• position of street lighting and junction/forward visibility splays</li> <li>• schedules of plants noting number, species, supply sizes and proposed densities</li> <li>• tree pit planting details including soil volume for trees in hard landscape</li> <li>• finished ground levels and contours in relation to existing ground levels</li> <li>• existing and proposed utility easements</li> <li>• the timing of works, planting aftercare and defects liability period</li> <li>• hard landscape proposals should be provided on separate plans with actual hard landscape products specified and representative example product photos</li> <li>• reference to the layout plan it is based on</li> <li>• the site outlined in red</li> </ul> <p>In addition, a soft landscape specification should be submitted as a separate text document.</p> <p><u>Layout plan</u></p> <p>Text to include: ‘existing trees and hedgerows to be retained accurately shown with root protection areas’</p> <p><u>Levels Plan</u></p> <p>Many applications require a Levels Plan, so a separate row should be added to the Annex B table to cover the details expected, which are:</p> <p>A plan(s) at 1:200 scale (metric) showing the layout of the proposed development, details to include:</p> <ul style="list-style-type: none"> <li>• foundation floor levels of buildings</li> <li>• finished ground levels (spot heights and contours) in relation to existing ground levels on site and in relation to adjacent land/property</li> <li>• existing trees and hedgerows to be retained accurately shown with root protection areas</li> <li>• levels in and adjacent to root protection areas of retained existing trees and hedgerows</li> <li>• levels and height of retaining structures</li> <li>• levels and gradients of slopes and embankments</li> <li>• levels and number of proposed steps</li> </ul> <p><u>Open Space Provision Plan</u></p> <p>(see text under <b>Paragraph 5.6</b>)</p>	<p>None.</p> <p>None.</p> <p>None.</p> <p>None.</p> <p>None.</p> <p>None.</p> <p>None.</p> <p>None.</p>	<p>Not proportionate to enable assessment of application. Can be conditioned.</p> <p>See earlier reasons for rejecting this suggestion. Digital measurements of plans possible.</p> <p>Application form and plans provides ability to establish this.</p> <p>Not proportionate to enable assessment of application. Existing definition adequate. This detail can be conditioned if meeting the necessary and reasonable tests. It is not about whether it saves time/avoids the need for condition, as that is the applicant’s choice and they can still provide over and above that needed by the PAVR.</p> <p>Covered by other requirement (arboricultural impact assessment and associated survey and plans)</p> <p>Existing levels covered by topographical survey, already listed as a requirement. Proposed levels may not be known at time of application and can be conditioned.</p>
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Consultee / interested party	Comments	Proposed change(s)	Reason(s)
	<p><u>Parking plan</u> Update this text to include electric charging bays as appropriate</p> <p><u>Phasing Plan</u> Amend to include the text ('e.g. phasing will be undertaken in numerical order i.e. Phase 1A then 1B etc.') after the wording 'An indicative plan setting out the intended order of delivery of the site'.</p> <p><u>Refuse/cycle storage strategy plan</u> Include reference to a Refuse/cycle storage strategy plan, to show bin storage for houses e.g. 4 wheelie bins from 2023 and apartment block bin storage, and drag distances. To include cycle storage in sheds or garages, or for apartment blocks either integrated into the building or stand-alone bin blocks.</p> <p><u>Residential External Amenity Space Plan</u> A separate row should be added to the Annex B table to include reference to a Residential External Amenity Space Plan, to show quantities in square metres for residential developments. A plan(s) at 1:500 scale (metric) showing the layout of the proposed development, and the quantity of residential external amenity space per property shown in square metres; details to include: private gardens for houses; communal external amenity space for flats and apartments e.g. communal ground floor garden, podium, roof garden; and private external amenity space for flats and apartments e.g. private terrace, balcony.</p> <p><u>Topographical survey</u> Amend to include: 'level contours as well as spot heights, and existing boundary treatments (e.g. this may be chain link, post and rail, stone wall with a specified height)'</p> <p><u>Arboricultural (tree) survey and Arboricultural impact assessment</u> – we would ask for these to be provided together not separately. The potential effect of development on trees, whether statutorily protected or not, is a material consideration that is taken into account in determining planning applications. The minimum appropriate detail on trees required to enable proper consideration of the amenity / arboricultural implications and effects of the development proposals is as follows:</p> <ul style="list-style-type: none"> <li>• Tree survey (to accompany and inform a planning application)</li> <li>• Tree retention/removal plan</li> <li>• Retained trees and RPAs shown on proposed layout</li> <li>• Strategic hard and soft landscape design, including species and location of new / replacement tree planting</li> <li>• Arboricultural impact assessment</li> </ul> <p>All details to be in accordance with BS 5837 2012 Trees in relation to design, demolition and construction – Recommendations.</p> <p><b>Annex B</b> <b>Section 2: Statements, assessments and reports</b></p> <p><u>Biodiversity Impact Assessment Metric (BIAM)</u> Incorrectly refers to NE5 of Plan:MK. This should be replaced with reference to Policy NE4 (Green Infrastructure) and NE6 (Environmental Pollution).</p> <p><u>Landscape and visual impact assessment</u> Incorrectly refers to NE4 of Plan:MK. The correct policy is Policy NE5 (Conserving And Enhancing Landscape Character) and NE6 (Environmental Pollution).</p>	<p>None.</p> <p>None.</p> <p>None.</p> <p>None.</p> <p>Definition amended: "A plan at 1:200 or 1:500 scale (metric) prepared by a chartered surveyor setting out <b>level contours and spot heights</b> across the site..."</p> <p>None.</p> <p>Removal of NE5 from policy drivers.</p> <p>Corrected to NE5.</p>	<p>Updated by other responses above.</p> <p>Not necessary. Existing text is sufficient to outline what is needed.</p> <p>Not necessary to enable assessment against policy. Layout plans to show location of storage/collection points, otherwise can be conditioned.</p> <p>No policy basis for receiving plan detailing amounts required. SPD provides indicative guidance for communal spaces, but layout/floor plans enable assessment.</p> <p>The word 'structures' covers boundary treatments. However, contours assist with understanding the survey.</p> <p>Addressed by earlier discussion around these documents.</p> <p>Policy NE5 not relevant. Existing reference to NE1, 2 and 3 appropriate.</p> <p>Incorrect reference.</p>

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	<p>Also add in the following text:</p> <p>Visualisations (in accordance with Visual Representation of Development Proposals, Technical Guidance Note 06/19, Landscape Institute, 2019)</p> <p>For townscape visual impact assessment the following guidance is also relevant: Townscape Character Assessment – Technical Information Note 05/2017, Landscape Institute, revised April 2018</p> <p>Viewpoints for baseline photography and visualisations should be agreed in advance with the LPA. Baseline photography should be undertaken in the winter months of December-February.</p> <p><u>Lighting assessment</u></p> <p>Our ecologist colleagues request a certain colour light to minimise impact on nocturnal wildlife a part of a sensitive lighting scheme plan – this should be checked and quoted.</p> <p><u>Soil quality assessment</u></p> <p>Incorrectly refers to NE4 of Plan:MK. The correct policy is Policy NE7 (Protection of the Best and Most Versatile Agricultural Land)</p> <p>Thank you for your consultation. If you have any queries on the above comments please let me know and I will be happy to discuss with you.</p>	<p>None.</p> <p>None.</p> <p>Corrected to NE7.</p>	<p>Requirement to follow GLVIA, and thus be carried out by a professional, links through to these guidance notes. Changes not necessary.</p> <p>This is an assessment consideration, not validation.</p> <p>Incorrect reference.</p>
<p>Rachel Kilgallon Lead Local Flood Authority</p>	<p>The Flood and Water Management Team in their role as LLFA are grateful for the opportunity to review the draft Planning Application Validation Requirements ('PAVR'). We would welcome further opportunities to discuss the comments provided below.</p> <p>Summary Comments</p> <ul style="list-style-type: none"> <li>• Whilst the document is extensive, it would benefit from a summary checklist/table showing where documents may be required. It is not user friendly in its current condition. Many other authorities have made these lists interactive on their webpages, which feels more accessible.</li> <li>• There should be stronger clarification of when a surface water strategy (and SuDS) may be an essential versus potential requirement for an application? In general, there is an overall lack of appreciation for when surface water management should/must be considered on a site, including the use of SuDS. In theory, surface water management should be considered for all levels of application, including the addition of a driveway, it is just whether the LLFA is consulted. There also appears to be an inconsistent approach and wording to how it links with the need for an FRA – this is likely to increase the confusion on flood risk management.</li> <li>• Line '1.23 The' incomplete.</li> <li>• Outline application list does not refer to a surface water management strategy/statement or FRA, but the full application list does. The inclusion of '5.8 The above documents are defined at Annex B where other documents are also defined, which, dependent upon the site and the nature of the proposals, may also be requested' and referring the 4.4 does not feel sufficient to address this. This general wording is repeated throughout the document seems to cover off any missed documents; however, a surface water management strategy is frequently omitted from the lists.</li> <li>• Prior approval under permitted development rights: As per NPPF - applications for some minor development and changes of use should not be subject to the sequential or exception tests but should still meet the requirements for site-specific flood risk assessments. A change in use may involve an increase in flood risk if the vulnerability of the development is changed. Even if a development's vulnerability is not increasing, change of use and redevelopment can often present an opportunity to improve the flood resilience of existing development, the design of which may not have been informed by a site-specific flood risk assessment when it was first constructed.</li> <li>• 15.34, not sure why the drainage strategy is included in the wording for flood zones here. Then only FRA on 15.36.</li> <li>• Pre-applications – more of a comment: The LLFA are consulted on pre-apps, which we currently provide detailed, but free advice/support, via the LPA. Most pre-applications do not include a consideration of flood risk and surface water management, which ultimately leads to objections at submission stage. Some emphasis on the validation list would help</li> </ul>	<p>Summary matrix to be created as 'quick reference guide' to sit alongside the PAVR. Document will also be published as a mini-site.</p> <p>None.</p> <p>Removed.</p> <p>None.</p> <p>None.</p> <p>None.</p> <p>None.</p>	<p>Accessibility and ease is being considered, but main document is the legally adopted list.</p> <p>Adequately covered by inclusion at para 4.4, for instance, and definition given in Annex.</p> <p>Typo.</p> <p>Captured by para 5.7 linking back to para 4.4. This ensures a proportionate approach and safeguards the ability to request such information</p> <p>Requirements are prescribed nationally. No scope to amend/add to at local level.</p> <p>Requirements are prescribed nationally. No scope to amend/add to at local level.</p> <p>Pre-application provides the opportunity for the Council to lead the scope and detail of a</p>

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	<p>as in line with Plan:MK it is expected that space will be specifically set aside for SuDS and fluvial flood risk reduction features and used to inform the overall layout of development sites.</p> <p>Appendices</p> <p>Annex A:</p> <p>It should be noted that ‘minor’ development is defined differently in relation to flood risk than planning. This has led to incorrect advice to be provided by LPAs in the past pertaining to flood risk. Should be noted that wording has been updated as per PPG... [text truncated as it quotes the PPG at <a href="http://www.gov.uk">Flood risk and coastal change - GOV.UK (www.gov.uk)</a>].</p> <p>Annex B: Section 2: Statements, assessments, and reports</p> <p>Flood risk assessment (FRA) For the policy drivers (Policy FR1), it worth noting that Paragraph E is vital for consideration within the validation list as it goes beyond NPPF/PPG. Critical Drainage Catchments differ from ‘Critical Drainage Area’ which has been notified to the local planning authority as such by the Environment Agency in line with the National Planning Policy Framework (NPPF); it also refers to high risk from surface water flooding... [text truncated as it quotes part E of FR1 of Plan:MK].</p> <p>Sustainable Drainage System (SuDS) Strategy</p> <p>1. Requirement: Sustainable Drainage System (SuDS) Strategy: It would be the view of the LLFA that this should be referred to as a surface water management strategy/statement and not purely SuDS Strategy. Not all sites will be able to incorporate SuDS in their complete form but will still be required to manage surface water (quantity and quality). The current title is slightly misleading to the assessments required.</p> <p>2. Policy Drivers: This should also include FR3 as the proposed layout, access and risk to the site requires this element also. It also directly refers to the LLFA in additional to balancing lakes etc. Could it also include wording around and any subsequent revision, updates or guidance produced? Potential for SPD from new Lake Capacity Study by LLFA. SC1 is also relevant here for green roofs and rainwater harvesting.</p> <p>3. For foul water flows: These should not be within the surface water strategy, as it is often incorrectly included in historic conditions. There is already a foul drainage statement included on the list. It is also unclear who you are referring to as the drainage authority in this instance? This would not be the LLFA. Do you mean the relevant water and sewerage company? Please remove this. SuDS are not used for foul water.</p> <p>4. Description: Recommended that the list is amended to a more comprehensive order such as rewording as follows (which is mostly directly taken from new PPG wording):</p> <p>A surface water drainage strategy is required for all scales of development where surface water will be created or affected. Where a site-specific flood risk assessment is required, it may be appropriate to combine the two.</p> <p>Where Sustainable Drainage Systems (SuDS) are required in accordance with paragraphs 167 and 169 of the National Planning Policy Framework, to reduce delays in the planning process, applicants need to submit a strategy containing proportionate information on the proposed sustainable drainage systems as part of their planning application, having regard to the nature and scale of the development proposed.</p> <p>Supporting information will need to describe the existing and proposed surface water management arrangements to ensure there is no increase in flood risk to others off-site.</p> <p>It may need to address:</p> <ul style="list-style-type: none"> <li>• What are the existing surface water drainage arrangements for the site?</li> <li>• If known, what (approximately) are the existing rates and volumes of surface water run-off generated by the site?</li> <li>• What are the proposals for managing and discharging surface water from the site using sustainable drainage systems and accounting for the predicted impacts of climate change? What are the proposals for restricting discharge rates?</li> </ul>	<p>Definition of ‘minor application’ supplemented: “<a href="#">It should be noted that ‘minor development’ is defined differently in relation to flood risk, and should be considered in the appropriate context</a>”.</p> <p>The word ‘any’ in the first bullet of the definition underlined to emphasise the need to consider surface water drainage. Additional text added: “...A FRA should also normally be accompanied by a sustainable drainage system strategy. <a href="#">It should also pay particular attention to part E of policy FR1 of Plan:MK which identifies the need to consider Critical Drainage Catchments...</a>”.</p> <p>References to ‘sustainable drainage strategy’ through document changed to ‘surface water management strategy’. Definition also amended.</p> <p>Reference to FR3 and SC1 added.</p> <p>Text removed.</p> <p>Definition amended: “A strategy for how surface water flows from the development will be handled, <a href="#">which can be provided as part of a flood risk assessment</a>. This should include (as a minimum)...”.</p> <p>Link added to PPG: “Regard should also be had to <a href="#">the latest national guidance</a> on what the strategy should contain”.</p>	<p>development proposal. The LLFA can provide this comment at this stage, even if proposals are scant in detail/information supplied.</p> <p>The point raised is useful in minimising the risk of misunderstanding between parties involved in the planning process.</p> <p>So to emphasise the need to consider surface water drainage and Critical Drainage Catchments.</p> <p>Changes warranted in light of comments made.</p> <p>Review of policies indicates they could be relevant drivers.</p> <p>Separate references to and definition of ‘foul drainage statement’ adequate.</p>

Consultee / interested party	Comments	Proposed change(s)	Reason(s)
	<ul style="list-style-type: none"> <li>• Demonstrate how the hierarchy of drainage options has been followed. Explain and justify why the types of sustainable drainage systems and method of discharge have been selected and why they are considered appropriate. Where sustainable drainage systems are considered to be inappropriate, provide clear evidence to justify this. Where cost is a reason for not including sustainable drainage systems, provide information to enable comparison with the lifetime costs of a conventional public sewer connection.</li> <li>• How have sustainable drainage systems been integrated with other aspects of the development such as open space or green infrastructure, so as to ensure an efficient use of the site?</li> <li>• What multifunctional benefits will the sustainable drainage system provide? For major developments, if multifunctional sustainable drainage systems are not being provided, what evidence is there that such techniques are not possible?</li> <li>• What opportunities to reduce the causes and impacts of flooding have been identified and included as part of the proposed sustainable drainage system?</li> <li>• How will run-off from the completed development be prevented from causing an impact elsewhere?</li> <li>• How has the sustainable drainage system been designed to facilitate maintenance and, where relevant, adoption? What are the plans for ensuring an acceptable standard of operation and maintenance throughout the lifetime of the development?</li> </ul> <p>Non-statutory technical standards are available to guide decisions about the design, maintenance and operation of sustainable drainage systems. Refer to the Environment Agency's approach to groundwater protection. Detailed industry guidance (for example CIRIA's SuDS Manual, ICE's SuDS Route Maps), provide technical details for the suitability of sustainable drainage systems for a wide range of design characteristics.</p> <p>5. The LLFA currently request/condition the Construction Surface Water Management Plan separately but wondered if the LPA would prefer it was covered under a more general Construction Environmental Management Plans (CEMP). How is this currently required under the validation list shown, is it named differently? The LLFA would be happy for this to be included in the suggested list above also.</p> <p>6. Porosity is not an appropriate term here; this should be permeability if the list is not amended.</p>	<p>None.</p> <p>5<sup>th</sup> bullet of definition changed: "evidence of ground conditions/<del>porosity</del><u>permeability</u> to inform the above design calculations".</p>	<p>As noted, the item can be conditioned and it is not required to reach an assessment.</p> <p>5<sup>th</sup> bullet of definition changed: "evidence of ground conditions/<del>porosity</del><u>permeability</u> to inform the above design calculations".</p>

Your name	Jenni Ferrans	Paul Cranfield, Clerk	James Walsh	Phillip Snell	Stephen Narborough	Michael Moore
The company or organisation you are representing (if applicable)	Clr MK Council	CMK Town Council	MKCC Rights of Way	Milton Keynes Council	Milton Keynes City Council	Milton Keynes City Council
Are you...	An MKCC councillor	A Town or Parish councillor	Another consultee (eg. MKCC department)	Another consultee (eg. MKCC department)	A statutory consultee (as prescribed in planning legislation)	Another consultee (eg. MKCC department)
Have you submitted to or engaged with a planning application handled by MKCC in the last two years?	Yes	No	Yes	Yes	Yes	Yes
Did you refer to or were you aware of the Local Validation List, adopted in May 2020?	Yes		No	Yes	Yes	Yes
Did you find the Local Validation List helpful and easy to use? Please give details.	Reasonably easy		It didn't contain mention of any requirement to include existing Public Rights of Way, which is a concern to us. <b>Response: rights of way are protected under other legislation. Developers must</b>	Often appears that the submission has not been checked and therefore applicants are then requested to comply	Aside from ad-hoc discussions regarding validation of specific applications I consider that the validation list is a document for applicants to refer to. It helps me in that it ensures the correct information is included with the application, but only as long as	Reads well, given the amount of material to cover navigation around this document is most important.

			either design to incorporate, thus assessment of layout plans is adequate, or later seek to divert/extinguish routes.		the applicant includes it and the validation team pick up on any omissions.	
Do you agree with the approach of having a single document setting out all national and local validation requirements? Please explain your response and how this may or may not assist you.	Yes	Yes	N/a	Yes, but needs to be short so it is indeed read. If an element is relevant, i.e. Ecology then guides the applicant to further details - use of process diagrams to illustrate what is required both now and potentially through the planning journey to meet local and national policy. Terms such as ecology can also appear to applicants as only referring to "special" features, however they generally apply to all applications, although the level of response should be pertinent in scale and depth to the situation.  <b>Response:</b> this would form general advice which can be provided elsewhere on the MKCC website, or through pre-application advice itself. Process diagrams create risk of error when each proposal and site must be assessed on its own merits.	Yes. The applicant can find all of the information as to the council's requirements and will hopefully submit all the necessary arboricultural information upfront, thus obviating the need for us to chase for the information.	Support a single document bringing all validation requirements into one place.
Do you agree with the approach of setting out all validation requirements by application type, instead of grouping by national and local criteria? Please explain your response and how this may or ...	yes - easier for developers to look up for a specific application	Yes	Yes it would assist as Public Rights of Way are a consideration on larger scale applications as opposed to smaller applications where it is likely not to be a relevant consideration. Details regarding potential Public Rights of Way across a site should be included in Full and Outline applications as part of a layout plan.  <b>Response:</b> definition of 'layout plan' covers "rights of way" so to capture both formal and informal rights of way, as well as those proposed.	The document is not particularly engaging to the non-professional and uses terms etc that may be unfamiliar with some applicants - whilst the written document is the basis I would suggest a web based pathway process is developed which would be more engaging - this would lead applicants to the correct information, this would be helpful to the validations team if information was submitted in a linked way it could be followed all the way through if integrated, would save the resources of scanning and transferring files etc and ensure end to end process  <b>Response:</b> it is intended to create a web-based version of the document, as well as a 'quick reference' matrix.	Yes. The applicant will find this a more user-friendly presentation of information rather than the alternative.	Yes, bringing validation requirements by application type, rather than by grouping by national and local criteria assists in navigation around document.
Do you have any observations on the accuracy of when national validation requirements are triggered (as set out in Chapters 2 to 20)?	no	No	Legislation allows the local planning authority to request information about a matter which it is reasonable to think will be a material consideration in the determination of the application. DEFRA Circular 1/09 states that the effect of development on a public right of way is a material consideration in the determination of applications for planning permission and local planning authorities should ensure that the potential consequences are taken into account whenever such applications are considered. Therefore, Public Rights of Way should be a validation requirement and be shown on any layout plans. This would also have the benefit of bringing to the attention of the MKCC Rights of Way team any potential planned network changes which would allow us to engage in with our legislative processes with the applicant.  <b>Response:</b> See above.	The Environment act is waiting various instrument to enact - changes in local and government policy are ongoing - consideration needs to be given to the need to update All applications should have regard for nature and the environment so an appropriate level of information is required Preliminary Ecological Appraisal Report being minimum - additionally a Biodiversity Enhancement scheme appropriate in scale to the development and a BIA - see comments regarding the Environment act and need to keep document up to date.  <b>Response:</b> the PAVR must represent the current situation and it is made clear at 1.3 that the document will not always be 'current'. Environment Act is unlikely to alter validation requirements, BIAM is already a requirement and usually informed by a BES (so is often supplied by default).	No.	No

<p>Do you have any observations on the accuracy of what is required under the national validation requirements (described in Sections 1 and 2 of Annex B)?</p>	<p>no</p>	<p>No</p>	<p>Details regarding Public Rights of Way should be requested as outlined in question 7 response.</p> <p><b>Response:</b> See above.</p>	<p>A PEA normally comprises a desk study and a walkover survey</p> <p>The results of a PEA can be presented in a Preliminary Ecological Appraisal Report (PEAR). It identifies the key ecological constraints and opportunities associated with a project, possible mitigation requirements and any detailed further surveys required to inform an Ecological Impact Assessment (EclA).</p> <p>In the majority of cases, additional surveys beyond the PEA will be required. In some scenarios, additional surveys will not be needed to allow an EclA to be undertaken; this is particularly the case for sites where it is unlikely that protected or priority habitats or species</p> <p>Under normal circumstances it is not appropriate to submit a PEAR in support of a planning application because the scope of a PEAR is unlikely to fully meet planning authority requirements in respect of biodiversity policy and implications for protected species.</p> <p>An Ecological Constraints and Opportunities Plans (ECOP) is used to illustrate key constraints and opportunities - this may well effect the Biodiversity Impact Assessment and help to demonstrate the mitigation hierarchy has been followed, this will form part of the EclA are present or will be effected</p> <p>The EclA will identifying, quantifying and evaluate the potential effects of development-related or other proposed actions on habitats, species and ecosystems. Refer to Biodiversity: Code of practice for planning and development published by the British Standards Institute (BS 42020:2013)</p> <p><b>Response:</b> added to the definition of PEA:</p> <p>In order to enable adequate assessment of the proposals, the PEA should move to carry out an Ecological Impact Assessment (EclA) in line with British Standards, and be supported by an Ecological Constraints and Opportunities Plan (ECOP) to illustrate key constraints and opportunities.</p>	<p>No.</p>	<p>No</p>
<p>Do you have any observations on the necessity of the local validation requirements, having regard to the relevant policies of Plan:MK (as described in Sections 1 and 2 of Annex B)?</p>	<p>all necessary as far as I can see</p>	<p>No</p>	<p>n/a</p>		<p>I have responded previously via email suggesting changes / additions to arboriculturally related sections.</p>	<p>1) Section 2 page 74: Energy and Climate statement, please mention sustainable construction policies SC2 and SC3 in description (where relevant) and in policy driver section.</p> <p><b>Response:</b> added to the definition.</p> <p>2) Section 2 ,page 76 Flood Risk Assessment (FRA) "Where SuDS are required in accordance with paragraphs 167 and 169 of the National Planning Policy Framework, to reduce delays in the planning process, applicants need to submit a sustainable drainage strategy containing proportionate information on the proposed sustainable drainage systems</p>

						<p>as part of their planning application (including outline applications), having regard to the nature and scale of the development proposed.”</p> <p>The current PAVR wording is that “A FRA should also normally be accompanied by a sustainable drainage system strategy”. Please amend this text as shown below:</p> <p>A FRA needs to be accompanied by a sustainable drainage system strategy.”</p> <p><b>Response:</b> definition amended, taking into comments from the LLFA too.</p> <p>3) Section 2 page 79: Housing Schedule : Among the benefits that completing a Housing Accommodation schedule would provide to the Council are more accurate and timely data on housing and a huge saving of staff time on monitoring work as relevant colleagues have to currently trawl through plans and other documents to obtain data on topics such as:</p> <ul style="list-style-type: none"> <li>a) Tenure, dwelling types and characteristics</li> <li>b) The number and type of affordable housing</li> <li>c) Number of wheelchair accessible homes</li> <li>d) Self-build and custom build homes</li> </ul> <p>Please check the version of the housing accommodation schedule being used is the latest version (version 5).</p> <p><b>Response:</b> noted. Latest version correct.</p> <p>4) Section 2 page 80: Marketing report, if marketing report produced for compliance with policies ER2 and ER11 mention marketing of the property /site should be for a minimum of 6 months.</p> <p><b>Response:</b> definition amended: “A report of recent marketing activity of the property prepared by a recognised estate or property agent. <u>This should cover a period of no less than 6 months and not be artificially constrained by method of marketing or scope of uses, having regard to permitted development rights and suitable, alternative uses”.</u></p> <p>5) Section 2 page 81: Parking Assessment. Mention new MKCC Parking Standards SPD expected to be adopted at 17 January 2023 Delegated Decision meeting.</p> <p><b>Response:</b> weblink provided provides access to latest standards.</p>
<p>Do you have any observations on the proportionality of triggers associated with local validation requirements, having regard to the relevant policies of Plan:MK (as set out in Chapters 2 to 21, an...</p>	<p>some triggers missing</p>	<p>No</p>	<p>n/a</p>	<p>I have responded previously via email suggesting changes / additions to arboriculturally related sections.</p>	<p>1) Chapter 15 page 39 paragraph 15.8change of use from class E ...to dwelling houses.</p> <p>You may wish to highlight here that the Article 4 Direction (A4D) in the Central Business District of Central Milton Keynes has removed permitted rights to change an office to residential use.</p> <p><b>Response:</b> footnote 23 adjusted.</p>	



Do you have any observations on the accuracy of local validation requirements in relation to the NPPF and PPG (described in Sections 1 and 2 of Annex B)?	no	No	NPPF paragraph 100 (page 29) states "Planning policies and decisions should protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users". The local validation requirements should take account of this and details about Public Rights of Way should be requested as part of application plan requirements in order to be able to reflect this policy.  <b>Response: as above.</b>		I have responded previously via email suggesting changes / additions to arboriculturally related sections.	No
Do you have any comments on the provisions relating to the submission of applications by methods other than the Planning Portal or the Council's own application forms (when available) (as set out ...	no	No	n/a		None.	No
Do you have any comments on the provisions relating to the accessibility requirements for digital files (as set out at paragraph 1.21)?	no	Applicants should be required to clearly delineate vertical and horizontal dimensions on all plans, elevations and sections to assist in the reading of plans on a small computer screen.  <b>Response: digital measurement of plans possible using Adobe Reader (free to obtain). Details must be proportionate and this is a matter for the officer/interested party to address.</b>	n/a		None.	No
Do you have any comments on the provisions relating to the confidentiality of certain information (as set out at paragraphs 1.27 to 1.28)?	no	No	n/a		None	No
Do you have any other comments on the overarching requirements in Chapter 1?	no	It is important that MKCouncil adopts a checklist (if not currently in use) to verify and confirm that the submission conforms in full to the guidance.	n/a		As per previously submitted via email;  3.3 Prior approval Add in the text; .....form Including: <ul style="list-style-type: none"><li>• details of any trees on or adjacent to the site likely to be affected</li></ul> <b>Response: national criteria – cannot be amended/supplemented.</b>  4.4 Full application - Items often required Add in the text  For development influenced by protected, veteran/ancient, significant or a high number of trees and/or priority or important hedgerows; a tree survey and an arboricultural impact assessment would necessarily be required.  <b>Response: text already exists.</b>  5.0 Outline application Add in the text	No

					<p>For development likely to impact upon protected, veteran/ancient, significant or a high number of trees and/or priority or important hedgerows; a tree survey and an arboricultural impact assessment would necessarily be required particularly where layouts are indicated/included.</p> <p><b>Response:</b> covered by para 5.7, linking back to 4.4.</p> <p>6.0 Approval of Reserved Matters</p> <p>Add in the text</p> <p>For development likely to impact upon protected, veteran/ancient, significant or a high number of trees and/or priority or important hedgerows; a tree survey and an arboricultural impact assessment would necessarily be required particularly where layouts are indicated/included.</p> <p><b>Response:</b> covered by para 6.5, with text supplemented with "Regard should be had to relevant thresholds given at paragraph 4.4".</p> <p>12.4 Applications for works to trees subject to a Tree Preservation Order</p> <p>Add in the text</p> <p>.....crown lifting height in metres and/or extent of crown reduction in metres</p> <p><b>Response:</b> para 12.3 amended: "a specification of the work for which consent is sought, ideally using the terminology provided by the Arboricultural Association"</p> <p>13.4 Applications for works to trees in Conservation Areas</p> <p>Delete 'made', add in 'must make'</p> <p>". . . operations are involved, it made must make clear what work is . . ."</p> <p><b>Response:</b> inserted 'with' in front of 'it'. Grammatical correction.</p> <p>15.5 typographical error;</p> <p>Add in the text</p> <p>15.5 Please see section 3.0 for prior..."</p> <p><b>Response:</b> captured in earlier changes.</p> <p>Glossary – Site location plan</p> <p>Site location plans are often very poor showing just the site and lacking any additional features that would aid identification, resulting in wasted time identifying the property. Suggest that a requirement for the three nearest roads to be clearly shown and named, be added.</p> <p><b>Response:</b> the up-to-date base map requirement along with the application form (site address) allows for identification of the site.</p> <p>Glossary – Site photos</p> <p>Site photos for trees should include a general view of the whole tree, the trunk from ground to crown break point from</p>	
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					<p>three evenly spaced aspects and detailed photos of any specific features.</p> <p><b>Response:</b> Text added to definition: "<u>Site photos for trees should include a general view of the whole tree, including the trunk from ground to crown, from three evenly spaced aspects along with detailed photos of any specific features (e.g. breaks, wounds, fungal growth, etc.).</u>"</p> <p>Glossary – Arboricultural (or tree) Survey</p> <p>Add in the text</p> <p>" . . , in accordance with the current British Standard 5837 (or any equivalent . . ."</p> <p><b>Response:</b> definition amended: "Informed by an arboricultural survey and prepared <u>in accordance with the current British Standard</u> by a qualified arboriculturist...".</p>	
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