

# KR PLANNING LTD

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## **PLANNING APPLICATION VALIDATION STATEMENT**

The Planning Statement and the Design and Access Statement embrace the supporting information potentially “required” by the Council. Placing the validation list in context, expectations should not go beyond requirements of legislation and of the good practice guidance. Central to this contention is the DCLG publication “The Validation of Planning Applications – Guidance for Local Planning Authorities” (December 2007), which states:

*The government expects local planning authorities to seek information that is necessary for a decision to be made and should not require a level of detail that is unreasonable or disproportionate to the scale of the application. Local lists should take into account the governments commitment in the Planning White paper “Planning for a Sustainable Future” to reduce the information requirements associated with the submission of planning applications..... Authorities should remember that conditions may be imposed to require the submission of detailed reports as a condition of planning permission. (Para 24).*

This is a very pertinent point as it is not within the remit of the LPA to refuse to register an application on the basis that it considers the quality of submitted information to be of an inappropriate standard.

Paragraph 25 goes on to state:

*The recommended national list of requirements seeks to capture the most common types of information and supporting documentation to be submitted for most types of application. However, the Government recognises that the list will not be able to cater for the wide and varied specific local requirements of each local planning authority. Where information is locally specific or is necessary for a particular type of scheme, the local planning authority should ask applicants to supply this information post-validation. (para 25)*

Three key points arise from this:

- Efforts should be made to minimise the information that is required
- A need to ensure that requests for information are relevant and in scale and kind to the application proposals
- That applications should be validated unless there is sound and clear reason why they cannot be.

In raising this from the outset, this is not to say that areas upon which the Council may seek information, are not regarded as material considerations or are irrelevant to the application proposal but clearly some balance and considered assessment is required in each case and the Council’s code of practise, whilst laudable in clarifying expectations, should be read in the context of national advice and guidance and applications should be validated unless there is good reason to the contrary. Indeed the recommendation from the Killian Pretty Review regarding more “proportionate” requests for information have been accepted by the Government.

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In response to the Camden Local List, I provide the following commentary:

- **Affordable housing statement**

The development does not pass the affordable housing threshold, so this is not a relevant material consideration.

- **Air quality**

The site is not identified in the Local Plan as being in an area of poor air quality i.e. an Air Quality Management Area. The development itself would not give rise to issues of air quality.

- **Biodiversity survey and report**

Given the nature of the site, no implications arise from the development in relation to protected species.

- **Conservation Area appraisal**

The Site does not lie within a designated Conservation Area.

- **Daylight/sunlight assessment**

This was not highlighted as an issue on the previous application, nor was an issue at the appeal.

- **Environmental Impact Assessment**

The development does not trigger the need for an EIA or screening option.

- **Evidence to accompany applications for town centre uses**

The existing building is a mix of C3 and B1 uses.

- **Existing and proposed car parking and access arrangements**

No parking proposed, and the Applicant will maintain the previous S106 prohibition on resident parking permits. .

- **Flood risk assessment**

The site is not located within an area identified to be at risk of flooding.

- **Foul sewerage assessment**

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As noted in the application, it is proposed to use the existing connection.

- **Heritage Statement (including historical, archaeological features and Scheduled Ancient Monuments)**

The development does not lie within a Conservation Area, or near a Listed Building or any of the other designations listed.

- **Impact assessment**

The Design Statement Addendum includes a Section detail providing an analysis of potential impact in relation to intervisibility between the existing and proposed stairwell.

- **Land contamination assessment**

The site is not subject to any contamination

- **Landfill statement**

No known landfill sites near the application site.

- **Lighting assessment**

No external lighting proposed.

- **Noise impact assessment**

The proposal is not a noise generating use.

- **Open space assessment**

No change from the approved scheme.

- **Other plans (3 copies to be supplied unless the application is submitted electronically. All plans and drawings should include: paper size, key dimensions and scale bar indicating a minimum of 0-10 metres)**

Not Applicable

- **Photographs/photomontages**

Please see Design and Access Statement

- **Planning obligations/draft Head(s) of Terms**

As per the previous approval. .

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- **Planning Statement**

Commentary is included within this cover letter.

- **Regeneration statement**

Not applicable.

- **Statement of Community Involvement**

Commentary is included within this cover letter.

- **Structural Survey**

Not applicable.

- **Transport assessment**

No parking proposed.

- **(Draft) travel plan**

Not required as no parking proposed.

- **Tree survey/Arboricultural implications**

No trees on site.

- **Utilities statement**

Existing connections will be used.

- **Ventilation/extraction statement**

Not applicable given the nature of the proposal.

- **Site waste management plan (including relevant refuse disposal details)**

No change to the existing circumstance.