

## Appendix B: Draft version of the “East Suffolk Council Local Validation List 2024”

### Key

**Blue highlight** = hyperlink to be inserted to link to relevant page/section in the Local Validation List (Appendix B)

**Yellow highlight** = hyperlink to be inserted to link to the relevant page in another chapter/section of the Local Validation Guidance (Appendices C to R)

**Pink highlight** = hyperlink to be inserted to the webpage on which the List and Guidance documents will be published

**Green highlight** = hyperlink to be inserted to link to the Index document which is to be published alongside the List and Guidance Documents (Appendix S)



# **East Suffolk Local Validation List**

March 2024

Final draft with amendments based upon a review of the consultation responses received

## Contents

<b>1.</b>	<b>Section 1 - Introduction.....</b>	<b>1</b>
1.2.	<i>Common reasons why applications are invalid .....</i>	<i>4</i>
1.3.	<i>What if further information or a fee is required?.....</i>	<i>4</i>
1.4.	<i>Online and electronic submissions.....</i>	<i>5</i>
1.5.	<i>Application Descriptions.....</i>	<i>5</i>
<b>2.</b>	<b>Section 2 – Local Validation Requirements .....</b>	<b>6</b>
2.1.	<b>Introduction .....</b>	<b>6</b>
2.2.	<b><i>Agricultural Diversification Statement .....</i></b>	<b><i>7</i></b>
2.3.	<b><i>Air Quality Assessment .....</i></b>	<b><i>8</i></b>
2.4.	<b><i>Amendments/Changes Statement .....</i></b>	<b><i>9</i></b>
2.5.	<b><i>Application Forms and Ownership Certifications .....</i></b>	<b><i>10</i></b>

<b>2.6.</b>	<b><i>Arboricultural Assessment and Tree Survey</i></b> .....	13
<b>2.7.</b>	<b><i>Archaeological Assessment</i></b> .....	16
<b>2.8.</b>	<b><i>Biodiversity Net Gain Strategy/Information</i></b> .....	18
<b>2.9.</b>	<b><i>Biodiversity and Ecological Assessments</i></b> .....	20
<b>2.10.</b>	<b><i>Biomass Boiler Form</i></b> .....	24
<b>2.11.</b>	<b><i>Block Plan/Site Layout Plan</i></b> .....	25
<b>2.12.</b>	<b><i>Building Heights / Number of Storeys Plan</i></b> .....	29
<b>2.13.</b>	<b><i>Coastal Erosion Vulnerability Assessment</i></b> .....	31
<b>2.14.</b>	<b><i>Community Consultation Statement / Statement of Community Involvement</i></b> .....	34
<b>2.15.</b>	<b><i>Community Facilities Justification Statement</i></b> .....	36
<b>2.16.</b>	<b><i>Community Infrastructure Levy (CIL)</i></b> .....	39
<b>2.17.</b>	<b><i>Construction Management Plan /Method Statement</i></b> .....	41

<b>2.18.</b>	<b><i>Contaminated Land Assessment / Land Contamination Questionnaire</i></b> .....	44
<b>2.19.</b>	<b><i>Conversion Specification</i></b> .....	48
<b>2.20.</b>	<b><i>Crime Prevention Statement</i></b> .....	52
<b>2.21.</b>	<b><i>Cross Sections</i></b> .....	53
<b>2.22.</b>	<b><i>Custom and Self Build Delivery Statement</i></b> .....	55
<b>2.23.</b>	<b><i>Daylight / Sunlight Assessment</i></b> .....	56
<b>2.24.</b>	<b><i>Design and Access Statement</i></b> .....	57
<b>2.25.</b>	<b><i>Draft Heads of Terms</i></b> .....	59
<b>2.26.</b>	<b><i>Dust Assessment</i></b> .....	61
<b>2.27.</b>	<b><i>Dwelling Sizes and Tenure Plan/schedule</i></b> .....	62
<b>2.28.</b>	<b><i>Elevational Plans</i></b> .....	65
<b>2.29.</b>	<b><i>Energy Statement</i></b> .....	67

<b>2.30. Environmental Impact Assessment</b> .....	70
<b>2.31. Fees</b> .....	71
<b>2.32. Flood Risk Assessment</b> .....	72
<b>2.33. Flood Risk Sequential and Exception Tests</b> .....	76
<b>2.34. Floor Plans</b> .....	78
<b>2.35. Foul Drainage Assessment</b> .....	80
<b>2.36. Geodiversity Survey and Assessment Report</b> .....	82
<b>2.37. Glint and Glare Assessment</b> .....	84
<b>2.38. Habitats Regulation Assessment (HRA) and Recreational disturbance Avoidance Mitigation Strategy (RAMS) tariff form/payment</b> .....	85
<b>2.39. Health Impact Assessments</b> .....	86
<b>2.40. Heritage Statement or Impact Assessment</b> .....	89

<b>2.41. Housing Statement</b> .....	95
<b>2.42. Hydrographical /Bathymetric Survey</b> .....	97
<b>2.43. Isometric Drawings / Virtual 3-Dimensional Modelling</b> .....	99
<b>2.44. Joinery and Window Details</b> .....	102
<b>2.45. Landscape and Visual Impact Assessment</b> .....	107
<b>2.46. Landscape Masterplan, Landscape Strategy and/or full landscaping details.</b> .....	110
<b>2.47. Lighting Assessment / Details of Lighting Scheme</b> .....	113
<b>2.48. Marketing Assessment</b> .....	115
<b>2.49. Models</b> .....	116
<b>2.50. Noise Impact Assessment and/or acoustic report</b> .....	117
<b>2.51. Odour Assessment</b> .....	119
<b>2.52. Open Space Assessment</b> .....	120

<b>2.53. Parking layout plans</b> .....	122
<b>2.54. Phasing Plan/Schedule</b> .....	124
<b>2.55. Planning Statement</b> .....	126
<b>2.56. Public Rights of Way</b> .....	128
<b>2.57. Refuse storage/presentation plan</b> .....	130
<b>2.58. Retail / Leisure Impact Assessments</b> .....	132
<b>2.59. Roof Plans</b> .....	134
<b>2.60. Rural Workers Dwelling Statement</b> .....	136
<b>2.61. Site Location Plan</b> .....	138
<b>2.62. Streetscene</b> .....	145
<b>2.63. Structural Survey</b> .....	147
<b>2.64. Sustainable Drainage Strategy</b> .....	149



<b>2.65. Sustainable Construction Statement /Plan</b> .....	152
<b>2.66. Telecommunications report</b> .....	155
<b>2.67. Topographical Survey</b> .....	156
<b>2.68. Transport Statement or Assessment</b> .....	158
<b>2.69. Travel Plan</b> .....	163
<b>2.70. Variation of Condition Statement/Specification</b> .....	165
<b>2.71. Ventilation/Extraction Equipment Details and Assessment</b> .....	167
<b>2.72. Viability Assessment</b> .....	169

## 1. Section 1 - Introduction

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- 1.1.1. This Local Validation List explains what information will normally be required to accompany an application to enable it to be validated by the Local Planning Authority. We will only require information that will be a material consideration in the determination of the application. **Be aware that certain information is essential before an application can be validated.**
- 1.1.2. The Town & Country Planning (Development Management Procedure) Order 2015 (as amended) sets out the national information requirements for planning applications: the national list. All planning applications must be accompanied by the information set out in the national list. Without this information, your planning application cannot be validated and the process for deciding the application will not commence.
- 1.1.3. In addition to the national list the Council has adopted a local list (this document). The local list clarifies what information is usually required for applications of a particular type, scale or location. Section 2 of this document sets out the local list.
- 1.1.4. The [East Suffolk ArcGIS mapping system](#) can be used to check whether a proposed application site is within any of the zones and designations referred to within the checklist and application types guidance.
- 1.1.5. When we receive planning applications, we check to see that we have all the information we need to determine an application, and that the plans, certificates and fee are correct. This process is referred to as the validation of the application. It is in your interests to get this correct as the application is not passed to a planning officer and processed further until it is valid (see [common reasons why applications are invalid](#)).
- 1.1.6. We will use the 'Local Validation List' (this document) to check that all the necessary information has been submitted. However, it will remain at the discretion of officers as to whether to validate an application, on the basis of the submitted documents/drawings and their content. If an application is lacking in information that in the view of officers is necessary for the understanding and determination of the application, the application will not be validated until that information/those documents are received.

- 1.1.7. If a scheme is acceptable and permission is granted, then 'conditions' can be imposed requiring the submission of further information. Further applications to **discharge these conditions**, for which a fee is payable, then need to be submitted. You may wish to consider submitting additional information at the initial planning application stage, in order to avoid the submission of further details later which may hold up your development.
- 1.1.8. Common areas where information can be provided beforehand, to prevent pre-commencement conditions having to be applied, include:
- Materials – i.e. Supplier and make / colour of bricks/tiles
  - Boundary treatments
  - Hard landscaping – particularly showing permeable surfaces
  - Parking and turning layouts to satisfy highway requirements
  - Tree protection details
  - Soft landscaping
  - Drainage schemes
  - External lighting details
  - Contamination surveys / assessments
- 1.1.9. As part of our pre-application process we will identify what information will need to accompany an application and you are therefore recommended to seek this advice. Further details can be found at [Pre-application advice service » East Suffolk Council](#)
- 1.1.10. The fact that an application has been validated does not mean that the quality of the plans/documents has been fully assessed. The Local Planning Authority reserves the right to:

- Seek further information with regard to the submitted plans/documents
  - Seek information on material planning issues that have not been addressed in the application where they are relevant to the nature of the application.
- 1.1.11. This includes situations where a plan/statement/document has been submitted to meet a validation requirement, but fails to include sufficient detail and/or meet the criteria set out in section 2 of this document.
- 1.1.12. These aspects will need to be satisfied before any potentially positive decision is made on the application.
- 1.1.13. If during the course of the consideration of the application, it becomes apparent that further information is required, you may be given an agreed period of time to submit this information. We aim to make this request as early in the process as possible, to avoid any unnecessary delays in the determination of the application.
- 1.1.14. However, please note, due to the time frames set nationally for the determination of applications, and the potential need for further consultation processes/time periods on any additional information, it is not always possible to allow for the submission of additional documentation during the application process.
- 1.1.15. If additional information is deemed necessary by the Local Planning Authority and sought from you, but not submitted within the defined timescale, or there is insufficient time within the course of an application for the submission of, and consultation on, the required additional documentation, the application may be refused on the basis of lack of information. Alternatively, you could withdraw the application and submit a fresh application accompanied by the requested additional information.
- 1.1.16. We therefore ask you to carefully consider the constraints of a site before submitting your application; particularly as some of the additional information can take time to put together, and survey work may need to be carried out at a particular time of year.

## **1.2. Common reasons why applications are invalid**

1.2.1. Even though the checklist is supplied to try and ensure applications include all necessary documentation, omissions still occur, adding delay to the application validation process. The most common of these are:

- No or incorrect location plan submitted (with the direction of North not identified or missing licence and copyright information, or no red line marking the extent of the application site)
- No block plan submitted
- No existing elevation/floor plans submitted
- Certificate A/B/C/ D & merged Agricultural Holdings within the application form not signed
- Incorrect fee/no fee submitted
- Design and Access Statement missing
- Heritage Statement missing,
- Lack of tree survey
- Lack of ecological survey
- Lack of contamination survey/assessment

## **1.3. What if further information or a fee is required?**

1.3.1. We will endeavour to notify you within five working days, detailing the reasons for invalidity. We will specify what needs to be provided and give a timescale for the submission of the missing information or fee. If this is not submitted within the given timescale, the application will be returned to you and no further action will be taken on it.

#### *1.4. Online and electronic submissions*

- 1.4.1. East Suffolk Council is able to receive the majority applications electronically via the Planning Portal ([www.planningportal.co.uk](http://www.planningportal.co.uk)). This is the preferred method of receipt.
- 1.4.2. If applications are submitted by hand this may delay the registration of the application as all the documents will need to be scanned and uploaded onto the Council's website.
- 1.4.3. All information contained in this document is correct at the date of publication. It is likely that some requirements may change over time. Changes will be incorporated when the document is revised.

#### *1.5. Application Descriptions*

- 1.5.1. There are no national regulations specifying precisely how an application description should be structured and/or what it should include. However, it is recommended that the description placed on your application is clear, precise and accurately covers what consent is sought for, without being very long winded. The same advice applies no matter what the application is for. Guidance on how to word application descriptions for specific types of application is set out within the application guidance that has been produced to support this Local Validation List (can be accessed via the [Validation Webpage](#)).
- 1.5.2. Please note that the exact wording you place on your application form will usually be used as the description on the formal application including on the public access area of our website, on all correspondence that is sent out by ourselves as part of the consultation process, on the site notice and in the advertisement in the newspaper (if one is required) and on the final decision notice. The only exceptions would be if we agree a revised description with you either at registration stage or during the course of the application. Therefore, make sure that this is the description you are wanting on your decision forever more. It is recommended that you avoid including personal details and do not say anything that you would not want your neighbours or the wider public to know.

## 2. Section 2 – Local Validation Requirements

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### 2.1. Introduction

- 2.1.1. Please note, in addition to the specific policy references included within the sections below, some policies (within the district level Local Plan Documents and the Neighbourhood Plans), include their own specific requirements.
- 2.1.2. Therefore, it is recommended that in addition to the requirements set out below, the requirements of the relevant policies are submitted with applications, to ensure that those can be validated upon submission, and appropriate levels of information are submitted to demonstrate compliance with policy and/or why an exception to policy should be considered.

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## 2.2. *Agricultural Diversification Statement*

- 2.2.1. Although not a formal requirement for the validation of an application. If a scheme is proposed as a farm or rural diversification scheme, it is recommended that an Agricultural Diversification Statement is submitted as part of the planning application, as it provides an opportunity for applicants/agents to explain how they consider their proposals comply with the [National Planning Policy Framework \(NPPF\)](#) and relevant Local Planning Policies within the district level [Local Plans](#) Policies and where applicable [Neighbourhood Plan](#) Policies.
- 2.2.2. This statement should:
- Provide justification on how the diversification proposals will assist in retaining viability of the farm and how the proposal links with any other short term or long-term business plans for the farm.
  - Explain how the use and scale relates well to the setting of the existing farm and how it relates to the farming activities remaining predominant on the site.
  - Provide detailed information and justification that demonstrates that the proposal will contribute to the viability of the farm as a whole and its continued operation,
  - How the diversification would retain or provide additional employment for the local community and jobs more generally,
  - The means by which the conversion of existing buildings will be undertaken sympathetically to the traditional character of the farm.
  - For farm shops as part of a farm diversification scheme, the proposal must identify the products produced on site or locally.
  - For proposals within the former Suffolk Coastal Area, this statement should also explain how the scheme accords with Local Plan Policy SCLP4.4 (Farm Diversification) in all other respects
- 2.2.3. This statement could form part of a [Planning Statement](#)



### 2.3. *Air Quality Assessment*

#### 2.3.1. **When required to validate an application:**

- **When a proposal, whether residential, commercial or of another type, has the potential to cause significant levels of air pollution or exposes future occupants to existing poor air quality.**

2.3.2. **This is required where development proposals could impact upon local air quality, are located within or close to or accessed through [Air Quality Management Areas \(AQMA's\)](#), or where there are proposed potential harmful emissions to air quality arising either directly (i.e. from onsite activities) or indirectly (i.e. from traffic movements even if some distance away) from the proposed development.**

2.3.3. In most circumstances an air quality assessment will only be required for 'Major' applications, but those generating a considerable number of traffic movements to/from the site and/or generating potential air pollution from the nature/type of activity on site will always require such an assessment along with a [Transport Statement or Assessment](#).

2.3.4. The assessment should indicate the potential change in air quality resulting from the development and outline mitigation measures as necessary. Reference should be made to the latest edition of EPUK and IAQM document '[Land-Use Planning and Development Control: Planning for Air Quality](#)' for initial guidance on when an Air Quality Assessment will be required, and where it is considered necessary.

2.3.5. Reference should also be made to [Planning Practice Guidance: Air Quality Assessments](#)

2.3.6. Depending upon the nature of the use, the application may also need to be accompanied by an [Odour Assessment](#).

2.3.7. For Annual Air Quality Reports for the East Suffolk District see [Air Quality Reports » East Suffolk Council](#)

## 2.4. *Amendments/Changes Statement*

2.4.1. An Amendments/Changes Statement or a [Variation of Condition Statement](#) is required for all applications seeking:

- **Variations of Conditions;** or
- **Non-material Amendments;** or
- **A planning application seeking consent for a fresh planning permission (outline or full) or reserved matters approval, to previously consented scheme(s) that remains live.**

2.4.2. This includes applications seeking variations/amendments/revised proposals on previous Variation of Condition Consents.

2.4.3. This statement may be in the form of a written statement, and/or schedule and/or a table listing the changes. Plans annotated with the changes must also be included so it is clear to all those involved in the process, precisely what the changes are.

2.4.4. The statement and plans must detail/list **all** of the proposed changes, amendments or other variations from that previously consented, in a clear and accurate manner.

2.4.5. If such a statement is included as part of a [Planning Statement](#), this should be made clear either in a covering letter/email or in the title of the Planning Statement document.

## 2.5. *Application Forms and Ownership Certifications*

- 2.5.1. You will need to complete and submit the application form that is relevant to the type of application you are seeking. The forms for most applications can be submitted online or be downloaded as 'paper forms' (pdf format) from the [Planning Portal website](#).
- 2.5.2. The form must be fully completed with all sections of the application form completed accurately including but not limited to the following sections on planning application forms (where the question is included on that application form):
- Description of the proposed works. This must cover all proposed works and/or changes of use whilst being as concise as possible. Guidance on how to word application descriptions for different proposals can be found in the introduction sections of the guidance for each application type (the guidance can be accessed via the [Validation Webpage](#)).
  - Existing and proposed floorspace for each use. This is vital to ensuring you pay the appropriate [application fee](#), can have significant implications for schemes that are [Community Infrastructure Levy \(CIL\) liable](#) and in proposals for retail floorspace can trigger the need for a [Retail Impact Assessment](#).
  - The site area. In some applications this is vital to ensuring you pay the appropriate [application fee](#).
  - Trees and Hedgerows – This is vital to ensuring that the potential need for an [arboricultural assessment and tree survey](#) is identified prior to the submission and validation of any planning application, including those for extensions or outbuildings at existing homes. If this section of the application form is falsely completed to declare there are no trees or hedgerows within the relevant locations, when there are such features, then the applicant would be making a misleading claim, which would likely result in significant delays in the determination of the application if/when an arboricultural assessment and tree survey is requested and has to be produced and submitted on behalf of the applicant. If it is not supplied, the application may be refused on the grounds of lack of necessary information.
  - Hours of use. This section should be completed, particularly for commercial and community uses, so that officers are aware of how and when the use is intended to operate. Conditions limiting hours are often included on such consents, and therefore having this information upfront as part of the application form can potentially reduce the likelihood for hours conditions to be imposed that are in conflict with the way a site is intended to be used.

### *Ownership Certificates*

- 2.5.3. You must complete an ownership certificate for the land within the red line on the [Site Location Plan](#) , on **all applications** except:
- an application for Reserved Matters,
  - works to trees protected by Tree Preservation Orders,
  - Hedgerow Removal Notice,
  - any Prior Notification application,
  - notification of works to trees in Conservation Areas,
  - applications for Express Consent to display an Advertisement,
  - Certificate of Lawfulness applications,
  - Any post decision application (Discharge of condition, Non-material amendment).
- 2.5.4. These certificates are embedded within the application form itself.
- 2.5.5. For these purposes an ‘owner’ is anyone with a freehold interest, or leasehold interest, the unexpired term of which is not less than 7 years.
- 2.5.6. The responsibility for completing the appropriate Certificate rests entirely with the applicant. The Planning Authority has no records of the details of ownership or lease of land or buildings. The Planning Authority will therefore rely solely on the information submitted with the application and therefore to avoid any delay or challenge, it is important that the certificates are accurately completed.
- 2.5.7. Fill in **Certificate A** if the applicant is the only person who owns the application site and none of the land is part of an agricultural holding. This is what the completed certificate A confirms.

- 2.5.8. Fill in **Certificate B** if the applicant does not own the application site or if the applicant owns the site but there are other people who also own it or have an interest in it (for example shared freeholders, leaseholders, agricultural tenants). You will need to list the names and addresses of any other people and confirm the date when you “served notice” (that is, formally told them) that you were making the application by giving them the Part 1 Notice (see below). This is what the completed Certificate B confirms, which is required at least 21 days before the submission of the application.
- 2.5.9. You should use **Certificate C** if you know some owners or agricultural tenants but not all of them. In this case you must also explain what reasonable steps you have taken to identify other owners and/or agricultural tenants. You will need to list the names and addresses of any other people and confirm the date when you “served notice” (that is formally told them) that you were making the application. You will also have to place a public notice in a newspaper circulating in the area where the land lies, which is required at least 21 days before the submission of the application.
- 2.5.10. You should use **Certificate D** if you do not know any of the owners and/or agricultural tenants. In this case you must also explain what reasonable steps you have taken to identify the owners. You will also have to place a public notice in a newspaper circulating in the area where the land lies.

### ***Part 1 Notice***

- 2.5.11. A notice to the owners of the application site must be used if Certificate B has been completed, and may be required if Certificate C has been completed, and some owners other than the applicant are known. A copy should be served on each of the individuals identified in the relevant Certificate. It will be helpful if a copy of each Notice served, accompanies the application. This notice can be found on the [Planning Portal](#).

## 2.6. *Arboricultural Assessment and Tree Survey*

- 2.6.1. **An Arboricultural Assessment and Tree Survey are required when proposals could have an impact on significant trees on or adjoining the site, whether or not the trees are protected by a [Tree Preservation Order](#) or are in a [conservation area](#) (and are therefore protected).**
- 2.6.2. **A Tree Survey and associate Arboricultural Assessment are required, where trees are:**
- **on or adjacent to the proposed development (even if not protected),**
  - **protected by a Tree Preservation Order, or**
  - **protected by their location within a Conservation Area,**
- 2.6.3. The following information is expected for all development applications where there any trees or hedges on the property or on adjoining properties which are within influencing distance of the proposed development. This includes any trees situated within highway maintainable at public expense that are anticipated to be impacted by development.
- 2.6.4. Development proposals involving minor works (such as replacement windows/re-cladding) or development which does not involve any excavation of the ground or pruning of trees (such as alterations/extensions to a roof) will not normally require an Arboricultural Assessment and/or Tree Survey.
- 2.6.5. As well as trees, the survey must indicate key landscape features such as ponds, hedges and wildlife corridors that may be affected by the proposed development. Trees to be felled and trees to be retained should be clearly identified.
- 2.6.6. An Arboricultural Method Statement should also be provided that sets out the information regarding the measures to be taken to protect the trees shown to be retained on the submitted drawings, schedules of any necessary tree work, and proposals for long-term maintenance.
- 2.6.7. Tree surveys and reports are typically valid for up to two years and should be undertaken by a suitably qualified arboricultural specialist in accordance with British Standard SB 5837: Tree Survey and Arboricultural Impact Assessment.

- 2.6.8. The need and level of information will be dependent on the type and scale of development as well as the quality and value of any affected trees/hedges. A BS 5837:2012 tree survey, undertaken by a suitably qualified arboriculturalist, shall be submitted where:
- Trees on or immediately adjacent to (within 15m of) the application site are subject to a Tree Preservation Order;
  - Trees on or immediately adjacent to (within 15m of) the application site are within a Conservation Area;
  - Or any trees/hedges on or immediately adjacent to (within 15m of) the application site have any other special merit or importance to the local landscape and the application includes:
    - The removal of trees or hedges;
    - Development within the RPAs and/or crown spreads of retained trees;
    - Development that may have an impact on trees/hedges within the development site or on adjacent land and/or when trees/hedges may adversely affect a proposed development.
- 2.6.9. **Note** - If it is considered that the risk to the trees/hedges on or adjacent to the site is low, or if the affected trees/hedges are not of sufficient quality or value to merit a full BS 5837:2012 report, then it shall be for the applicant/agent to demonstrate this, or provide details of a simple tree protection scheme accordingly. It may also be prudent to limit the extent of surveying and tree protection required, for example when dealing with isolated areas of large sites.
- 2.6.10. When considering the potential impacts upon trees as part of the designing of proposals, consideration should be given to the following (as appropriate):
- [Trees on development sites » East Suffolk Council](#)
  - [National Planning Policy Framework - GOV.UK \(www.gov.uk\)](#) – Section 15 (Conserving and enhancing the natural environment)
  - [Planning practice guidance - GOV.UK \(www.gov.uk\)](#) – Section on Natural Environment

- [National Planning Policy Guidance – Tree Preservation Orders and trees in Conservation Areas](#)
- [Arboricultural Association](#)

2.6.11. The [East Suffolk ArcGIS Mapping system](#) can be used to check whether a proposed application contains or is adjacent to a [Tree Preservation Order \(TPO\)](#) or [Conservation Area](#), but this does not override the need to undertake an appropriate survey of the site and identify all trees on or overhanging the site, whether they are protected or not.

2.6.12. Please note:

- **such plans must be drawn to scale, and a photograph of a plan is not acceptable, as the process results in the photograph showing an image which is not at the same scale as that stated in the image. All plans must therefore be either drawn to scale electronically or drawn by hand and if being submitted electronically then scanned to scale, not photographed. Therefore, if photographs are submitted of plans (e.g. \*.jpg \*.png \*.gif) they will not be accepted as valid plans, and the application will be invalid until ‘to scale’ drawings are submitted.**
- **It is the applicant's responsibility to ensure that all submitted plans/drawings are drawn accurately, including in terms of how any surrounding buildings and trees are presented in relation to the application site and the proposals. They must be sure that development could proceed fully in accordance with the drawings/plans that are submitted. Inaccurate representation of the size or position of neighbouring buildings and/or buildings within the application site and/or the proposals could invalidate any consent. It is therefore recommended that all plans are drawn based upon measured surveys or in the event that an Ordnance Survey plan is used, that they are checked on the ground by the applicant/their agent for accuracy prior to submission.**



## 2.7. *Archaeological Assessment*

- 2.7.1. In accordance the [National Planning Policy Framework](#) an Archaeological Assessment may be required for certain applications.
- 2.7.2. **When required to validate an application:**
- **On sites with known archaeological potential or that have potential to contain heritage assets with archaeological interest, an archaeological assessment must be included with the planning application for development proposals which include works at or below ground level to ensure that provision is made for the preservation of important archaeological remains.**
  - **Areas of known or suspected archaeological importance include sites which meet one or more than one of the following criteria:**
    - **Those which contain or are the vicinity of sites of archaeological significance as identified on the on the [Suffolk Historic Environment Record](#)**
    - **Are in areas of known high archaeological potential, such as (but not limited to) river valleys, historic settlement cores, and in the vicinity of Scheduled Monuments.**
  - **Any larger sites which by their very nature have greater potential to impact on sites.**
- 2.7.3. You are advised to check with the [Suffolk Archaeological Service - Suffolk County Council](#), whether the application site is an area of known or suspected archaeological importance. They can also advise on the scope of assessment, which may include a combination of desk-based assessment, geophysical survey and/or field evaluation, using appropriate expertise.
- 2.7.4. Assessments may form part of an Environmental Statement, where a proposal would fall within the guidelines of an [Environmental Impact Assessment \(EIA\)](#) development.

- 2.7.5. Historic England should be consulted on applications affecting Scheduled Monuments.
- 2.7.6.** It is also recommended that an Archaeological Assessment is submitted for any sites which are covered by a policy within the Local Plans or a Neighbourhood Plans that allocates the site for development and specifically highlights a requirement for scheme of archaeological investigation, evaluation and/or assessment.
- 2.7.7. The [Suffolk Historic Environment Record](#)(HER) is a useful source of archaeological information. However, please note an absence of reported archaeology might still mean that there is archaeology on a site, and it is not fully suitable for planning purposes because some sensitive information is withheld.
- 2.7.8. The findings of this assessment should be used to inform and shape the proposed scheme, particularly if it identifies a need to retain archaeological deposits in situ.
- 2.7.9. The [East Suffolk ArcGIS Mapping system](#) also contains some information that can be of use to identifying sites that may be of archaeological interest, as it includes layers identifying Listed Buildings and Conservation Areas, which often relate to the historic core of settlements.

## 2.8. *Biodiversity Net Gain Strategy/Information*

**2.8.1. A Biodiversity Net Gain Strategy is required for the following types of development, unless the development is exempt from the mandatory Biodiversity Gain Objective as it meets a statutory exemption:**

- All ‘Major’ Developments seeking Planning Permission after 12 February 2024,
- All ‘small sites’ (as defined below) seeking planning permission from 2 April 2024,
- Nationally Significant Infrastructure Projects from late November 2025,

2.8.2. A ‘small site’ is defined in the national guidance “[Biodiversity net gain: exempt developments - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/biodiversity-net-gain-exempt-developments) as:

- “residential development where the number of dwellings is between 1 and 9, or if this is unknown, the site area is less than 0.5 hectares
- commercial development where floor space created is less than 1,000 square metres or total site area is less than 1 hectare
- development that is not the winning and working of minerals or the use of land for mineral-working deposits
- development that is not waste development”

2.8.3. In accordance with National Guidance - [Understanding biodiversity net gain, the Biodiversity Net Gain Strategy](#), relevant applications should provide information on how the applicant/ developer intends to meet the Biodiversity Net Gain requirement (the Biodiversity Gain Objective), including details of proposed significant on-site enhancements. The Strategy should include a draft Biodiversity Gain Plan; completed Statutory Biodiversity Metric for both baseline and post-intervention habitats and condition assessment sheets for the pre-development habitats. A draft Habitat Monitoring and Management Plan (HMMP) should also be provided if significant onsite Biodiversity Gain is proposed.

- 2.8.4. If planning permission is subsequently granted it may be subject to conditions and/or legal agreement requiring the submission, approval and implementation of a Biodiversity Net Gain Plan.
- 2.8.5. The draft Biodiversity Net Gain Plan is required to show how the developer will achieve Biodiversity Net Gain, and include evidence for the decisions made in how this intended to be achieved.
- 2.8.6. The Biodiversity Gain Plan and metric calculation must be carried out by a suitably qualified person (an ecologist) and in accordance with the national requirements the [Statutory biodiversity metric tools and guides - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/statutory-biodiversity-metric-tools-and-guides) must be used.
- 2.8.7. All relevant applications will be approved with a general biodiversity net gain pre-commencement condition which will require the submission of a final Biodiversity Net Gain Plan for approval prior to the commencement of development on site. The application to discharge this condition must include the final Biodiversity Gain Plan; completed Statutory Biodiversity Metric; completed Habitat Condition Assessments and a completed Habitat Monitoring and Management Plan (HMMP). If the applicant/developer fails to meet their Biodiversity Net Gain requirements, they may be in breach of planning conditions, planning obligations or legal agreements and therefore the Local Planning Authority could take enforcement action against them.
- 2.8.8. Further Guidance on Biodiversity Net Gain can be found via:
- [Understanding biodiversity net gain - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/understanding-biodiversity-net-gain)
  - [Calculate biodiversity value with the statutory biodiversity metric - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/calculate-biodiversity-value-with-the-statutory-biodiversity-metric)
  - [Statutory biodiversity metric tools and guides - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/statutory-biodiversity-metric-tools-and-guides)
  - [Biodiversity net gain: exempt developments - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/biodiversity-net-gain-exempt-developments)
  - [Biodiversity Net Gain » East Suffolk Council](#)

## 2.9. *Biodiversity and Ecological Assessments*

2.9.1. **When required to validate an application:**

2.9.2. **Ecological Impact Assessment (EclA) will be required for any application which is within or may have an effect on:**

- **Sites designated or proposed for their biodiversity or geodiversity importance, i.e. Sites of Special Scientific Interest (SSSI), Ramsar sites, National Nature Reserves (NNR), Special Areas of Conservation (SAC), Special Protection Areas (SPA), County Wildlife Sites (CWS), and UK and Suffolk Priority (BAP) Habitats, Regionally Important Geological/geomorphologic Sites (RIGS) designations, National and Local Nature Reserves, Roadside Nature Reserves and County Wildlife Sites**
- **Areas including or close to recorded locations of Protected species, and UK and Suffolk Priority habitats or species, or areas likely to support such habitats or species.**
- **Other areas identified in pre-application discussions as potentially containing Protected and Priority species.**

2.9.3. **If the Phase 1 Ecological Assessments identifies a need for species survey's and/or Phase 2 assessment, these will need to be undertaken and submitted as part of the application. Applications received where these are clearly required but have not been undertaken/submitted will generally not be validated.**

2.9.4. The Suffolk Biodiversity Information Service be used to check whether a proposed application site is within many of the zones and international, national and local designations referred to above. However, protected Species are not shared as it is considered best practice, to limit access to information relating to the location of certain species in order to safeguard those species and their habitat from direct intentional harm by parties who may or may not be involved directly with a development proposal. Details of locally designated nature conservation sites and records of protected and Priority species are available from Suffolk Biodiversity Information Service (<https://www.suffolkbis.org.uk/>).

2.9.5. The [Suffolk Biodiversity Validation Checklist | Suffolk Biodiversity Information Service \(suffolkbis.org.uk\)](#) identify where habitats and species are most likely to be affected by different types of development. It should be used where a Biodiversity or Geodiversity Assessment is required.

- 2.9.6. The Checklist includes the relevant extract from the British Standard on Biodiversity (BS42020). BS42020 is a Code of Practice for biodiversity in planning. Section 8 refers to the requirement to provide adequate information to enable determination of planning applications.
- 2.9.7. Ecological Impact Assessments (EclAs) consider the impacts on species and habitats from a development proposal. They should identify how harm to habitats and species can be avoided and if necessary mitigated and/or compensated. Ecological enhancements to be delivered as part of the development should also be identified. The Ecological Assessment must be conducted at an appropriate time of year by a suitably qualified individual. Assessments should be proportionate to the nature and scale of development proposed and the likely impact on biodiversity. Where a Preliminary Ecological Assessment (PEA) has identified the need for species specific surveys in order to fully assess ecological impacts these surveys must be included as part of the planning application submission.
- 2.9.8. For proposals which may have an impact on SPAs (including cSPA), SACs (including cSAC) or Ramsar sites, and which are not wholly directly connected with or necessary to the conservation management of the site's qualifying features, sufficient information should be included to enable the Council to undertake a Habitats Regulations Assessment (HRA) under the requirements of the Conservation of Habitats and Species Regulations (2017) (as amended).
- 2.9.9. Although, not a specific Local Validation Requirement, it is recommended that applications for all new dwellings within 13km of SPAs, SACs or Ramsar sites, particularly those for 'Planning in Principle' are accompanied by details necessary to enable the Council to undertake a Habitat Regulations Assessment (HRA).
- 2.9.10. The Suffolk Coast Recreation Disturbance Avoidance and Mitigation Strategy (RAMS) is a partnership between East Suffolk Council, Ipswich Borough Council and Babergh and Mid Suffolk District Councils, supported by Natural England. Its aim is to reduce the impact of increased levels of recreational use on Habitat Sites (also often called European Sites), due to new residential development in the Suffolk Coast area, and to provide a simple, coordinated way for developers to deliver mitigation for their developments.
- 2.9.11. The Zone of Influence (ZOI) is the area where increased residential development will result in likely significant effects. As set out in the strategy, evidence shows that there is a 13 km ZOI around the relevant Habitat Sites in the Suffolk Coast area.

- 2.9.12. Any new residential development (including conversions/sub-division to create additional units/dwellings/homes) within the Zone of Influence will be required to mitigate the effects of the development and show how this will be achieved prior to approval of planning permission. In smaller development this is most efficiently achieved through payment of the RAMS contribution only. For sites comprising of more than 50 dwellings and in more sensitive locations, a bespoke approach including payment of RAMS and demonstration of on-site/off-site mitigation measures may be required. Details on this should be provided with your application as information to inform a Habitats Regulations Assessment (HRA).
- 2.9.13. Further details on RAMS and financial contributions are included within the [Draft Heads](#) of Terms section of this document.
- 2.9.14. Developments should also demonstrate how they provide ecological enhancements through the inclusion of ecological enhancement plans and strategies, commensurate to the type and scale of the development proposed.
- 2.9.15. Details on Geodiversity can be found within the Geodiversity Survey and Assessment [Report](#) Section of this document.
- 2.9.16. National, district level and neighbourhood plan policies seek to ensure proposals are appropriately assessed in terms of the natural environment. The specific policies relating to biodiversity and ecology, are too numerous to list here, but it is recommended that the relevant biodiversity/ecology related policies are referred to and considered, in the design of any proposals. Links to national, district level and neighbourhood plan documents can be found in the further information section below.
- 2.9.17. Further information on the consideration, protection and mitigation of development impacts upon protected species and designated habitats can be found via
- [Protected species and development: advice for local planning authorities - GOV.UK \(www.gov.uk\)](#)
  - [Ecology » East Suffolk Council](#)
  - [Habitat mitigation \(RAMS\) » East Suffolk Council East Suffolk Supplementary Planning Documents \(including RAMS\)](#)
  - [Natural environment - GOV.UK \(www.gov.uk\)](#)

- [National Planning Policy Framework - GOV.UK \(www.gov.uk\)](https://www.gov.uk)
- [Association of Local Government Ecologists \(alge.org.uk\)](https://alge.org.uk)
- [Chartered Institute of Ecology and Environmental Management \(CIEEM\)](https://www.cieem.org)
- [Natural England - GOV.UK \(www.gov.uk\)](https://www.gov.uk)
- [Suffolk Biodiversity Information Service \(SBIS\)](https://www.suffolkbis.org.uk)
- [Suffolk Biodiversity Validation Checklist | Suffolk Biodiversity Information Service \(suffolkbis.org.uk\)](https://www.suffolkbis.org.uk)
- [Suffolk Wildlife Trust](https://www.suffolkwildlifetrust.org)

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## *2.10. Biomass Boiler Form*

- 2.10.1. Applications for any new or replacement biomass boilers must include the completed [Biomass Boiler request form](#) .
- 2.10.2. Full details of the location of the boiler, any associate flues/vents and the storage area for the fuel should also be included on the submitted [floor plans](#), [elevational drawings](#) and [roof plans](#) as appropriate.

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## 2.11. *Block Plan/Site Layout Plan*

**2.11.1. Such Plans should be at a scale of 1:500 or 1:200, and should be on, or based on, an up to date licensed Ordnance Survey map or equivalent with licence no/details included), or a [topographical survey](#) and both the existing and proposed Block Plan/Site Layout Plans must accurately/include:**

- Indicate the direction of North
- Include a scale bar
- Title to identify the development and subject of the drawing
- A unique drawing number which also indicates any revisions (e.g.1234Revision B)
- All revisions should be described to identify any changes (e.g. Revision A – Layout changed)
- The date the plan was prepared or amended
- Show the proposed development in relation to the site boundaries, and other existing buildings on the site and neighbouring land.
- The species, position, and spread of, all trees within or overhanging the application site, including those on adjoining land with a canopy overhanging the application site (including trees situated within highway maintainable at public expense that are anticipated to be impacted by development), where those trees have a stem diameter of 75mm or more (measured at 1.5m above ground level). In terms of trees on adjoining land, those within a distance of up to 12 times their estimated stem diameter, shall be included. These details should be shown on the Block Plan/Site Layout Plan(s) in addition to any plans within an [Arboricultural Assessment.](#))
- The crown spreads and Root Protection Areas (RPA)s for any individual trees, and/or the overall extent of the canopy and average RPAs for woodlands or substantial tree groups, on the Block Plan/Site Layout Plan(s) in addition to any plans within an [Arboricultural Assessment.](#))

- All trees that are to be removed and/or retained clearly marked (on the Block Plan/Site Layout Plan(s) in addition to any plans within an [Arboricultural Assessment](#).)
- The extent and type of any hard surfacing, and the location and type of any associated drainage works (e.g. gullies and soakaways)
- The location, shape and scaled size of any [water management/SuD features](#), (where appropriate/applicable).
- The proposed Block Plan must include details of the visibility splays for any new or amended vehicle accesses to the highway. control of the Local Highway Authority, and in the majority of cases will need to meet the requirements of the [Suffolk County Council Standard drawings for access layouts](#).
- The location, number and form of any vehicle or bicycle parking
- The location and shape of any vehicle turning area.
- The location of any Electric Vehicle Charging Points.
- The plan should highlight what type of vehicles the parking spaces are to be provided for (e.g. cars, two-wheeled motor vehicles, bicycles etc) which spaces are to be equipped with electric charging points and how those spaces meet the [Suffolk County Council Parking Guidance](#) in terms of size etc
- Boundary treatments including walls or fencing where this is proposed.
- The location and [definitive route of any Public Rights of Way](#) that cross or adjoin the application site must be shown on the existing and proposed Block Plans/Site Layout Plans. If the route that appears to be followed on the ground does not match the definitive route, that should also be shown on the drawings.
- On applications for new dwellings or new commercial units details of the position of refuse/recycling storage and presentation areas should also be shown on the proposed block plan and/or on a separate [Refuse Storage Plan](#).
- On sites for multiple new dwellings, new commercial units, or other uses from which recycling/waste collection will need to take place, the routes for waste collection vehicles including tracked path diagrams for turning and

manoeuvring must be shown on the block plan / site layout plan and/or [Refuse Storage Plan](#) and or another similar plan.

- On sites with existing significant variations in ground level and/or where works are proposed to alter ground levels (e.g. terracing, excavation before siting a building or to create a pond, or creating a plateau) the existing block plan will need to be accompanied by or maybe replaced by a [topographical survey](#), and the proposed block plan should include proposed levels. Existing and Proposed [Cross Sections](#) are also likely to be required.

#### 2.11.2. Please note:

- **such plans must be drawn to scale, and a photograph of a plan is not acceptable, as the process results in the photograph showing an image which is not at the same scale as that stated in the image. All plans must therefore be either drawn to scale electronically or drawn by hand and if being submitted electronically then scanned to scale, not photographed. Therefore, if photographs are submitted of plans (e.g. \*.jpg \*.png \*.gif) they will not be accepted as valid plans, and the application will be invalid until 'to scale' drawings are submitted.**
- **It is the applicant's responsibility to ensure that all submitted plans/drawings are drawn accurately, including in terms of how any surrounding buildings and trees are presented in relation to the application site and the proposals. They must be sure that development could proceed fully in accordance with the drawings/plans that are submitted. Inaccurate representation of the size or position of neighbouring buildings and/or buildings within the application site and/or the proposals could invalidate any consent. It is therefore recommended that all plans are drawn based upon measured surveys or in the event than an Ordnance Survey plan is used, that they are checked on the ground by the applicant/their agent for accuracy prior to submission.**
- **Although not a validation requirement, it is recommended that existing and proposed drawings/plans of the same type are drawn to the same scale as one another, in the interests of clarity and ensuring that it is as easy as possible to understand what the proposed changes are.**
- **Although the Building Regulations is covered by separate legislation from Planning, consideration should be given to the requirements of Part O of Building Regulations from the outset, prior to the submission of the planning application, to avoid the scheme failing at the Building Regulations Stage and/or a significant redesign**

**being required along with additional applications to amend any Planning Consent. This is recommended because Part O now requires thermal modelling and assessment in terms of overheating which can significantly impact design in terms of glazing and orientation of buildings.**

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## 2.12. *Building Heights / Number of Storeys Plan*

### 2.12.1. **A building heights /number of storeys plan is required on:**

- **‘Major’ and ‘Minor’ Schemes proposing multiple buildings that would be of varying heights/ contain a different number of floors. These are particularly useful and a requirement of Major housing schemes containing a combination of different property scales such as some of/or all of the following types; bungalows, one-and-a-half storey dwellings, two-storey dwellings, two-and-a-half-storey, three-storey and/or taller.**

2.12.2. The plan should be a copy of the proposed site layout/block plan(s) annotated clearly to show the number of storeys within each building (or part of building if there is variation within a block/building). It is recommended this is in the form of clear numbering/text annotation and/or colour shading.

2.12.3. The colours used for the shading should be considerate of those who are potentially visually impaired (e.g. colour blindness) and should also be clearly contrasting to ensure that the distribution of each property scale is clear across the proposed site layout plan.

2.12.4. Residential developments for more than two dwellings should also be accompanied by a [‘Dwelling Sizes and Tenure Plan/schedule’](#).

### 2.12.5. **Please note:**

- **such plans must be drawn to scale, and a photograph of a plan is not acceptable, as the process results in the photograph showing an image which is not at the same scale as that stated in the image. All plans must therefore be either drawn to scale electronically or drawn by hand and if being submitted electronically then scanned to scale, not photographed. Therefore, if photographs are submitted of plans (e.g. \*.jpg \*.png \*.gif) they will not be accepted as valid plans, and the application will be invalid until ‘to scale’ drawings are submitted.**
- **It is the applicant's responsibility to ensure that all submitted plans/drawings are drawn accurately, including in terms of how any surrounding buildings and trees are presented in relation to the application site and the proposals. They must be sure that development could proceed fully in accordance with the drawings/plans that**

**are submitted. Inaccurate representation of the size or position of neighbouring buildings and/or buildings within the application site and/or the proposals could invalidate any consent. It is therefore recommended that all plans are drawn based upon measured surveys or in the event that an Ordnance Survey plan is used, that they are checked on the ground by the applicant/their agent for accuracy prior to submission.**

- **Although not a validation requirement, it is recommended that existing and proposed drawings/plans of the same type are drawn to the same scale as one another, in the interests of clarity and ensuring that it is as easy as possible to understand what the proposed changes are.**

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## 2.13. *Coastal Erosion Vulnerability Assessment*

### 2.13.1. **When required to validate an application:**

- **All new development, redevelopment, extensions to existing property and development or intensification of land uses in Coastal Change Management Areas (CCMA) (as identified on the [Policies Map](#) and on the [East Suffolk ArcGIS Mapping system](#)) and planning applications for all development within and 30 metres landward of the Coastal Change Management Area identified on the Proposals Map must be accompanied by a Coastal Erosion Vulnerability Assessment (CEVA).**

### 2.13.2. The scope of a Coastal Erosion Vulnerability Assessment should be appropriate to the degree of risk and the scale, nature and location of the development. The Vulnerability Assessment should demonstrate that the proposed development:

- Would not impair the ability of communities and the natural environment to adapt sustainably to the impacts of a changing climate
- Will be safe through its planned lifetime, without increasing risk to life or property, or requiring new or improved coastal defences;
- Would not affect the natural balance and stability of the coastline or exacerbate the rate of shoreline change to the extent that changes to the coastline are increased nearby or elsewhere.

### 2.13.3. The CEVA process must be applied if the CCMA plus Risk zone lies within any part of the area of land within which the development is proposed to take place and not only if the CCMA plus Risk zone includes the precise site of proposed development.



Local Plan	Location on the coast	Permanent residential development	Non-residential development	Temporary development & uses (e.g. caravans)	Extensions to existing development	Modifications to existing development
East Suffolk Council (Suffolk Coastal Local Plan)	Within CCMA	Not permitted	Level B	Level B	Level A	Level A
	CCMA or Hold The Line areas +30m risk zone <sup>[1]</sup>	Level B	Level A	Level A	Level A	Level A
	30m – 60m risk zone landward of coastal risk management structures in areas of soft cliffs <sup>[2]</sup>	Level B	Level A	Level A	Level A	Level A
East Suffolk Council (Waveney Local Plan)	Within CCMA	Not permitted	Level B	Level B	Level A	Level A
	CCMA (includes Hold The Line areas) +30m risk zone	Level B	Level A	Level A	Level A	Level A

<sup>[1]</sup> The 30m risk zone, or buffer area, should be measured from the CCMA, or in Hold the Line areas from the landward edge of coastal defences.

<sup>[2]</sup> Policy SCLP9.3 (Coastal Change Management Area) of the Suffolk Coastal Local Plan requires consideration be given to the preparation of a CEVA in areas of soft cliff located up to 60 metres landward of coastal defences where known geological information indicates that the capacity of coastal defences are likely to be adversely affected by development.

- 2.13.4. A [Hydrographical or Bathymetric Survey](#) will also be required where an application site and/or proposed works would either involve works below high tide level in the sea or an estuary, or below potential water levels within a river, stream, pond, reservoir or other water feature.
- 2.13.5. It is in effect a [topographical survey](#) (mapping levels and features) below water level. Where a site is both above and below water level, these surveys can be combined on one drawing.
- 2.13.6. Where Hydrographical or Bathymetric surveys are required and submitted, separate Marine License from the [Marine Management Organisation](#) will also likely need to be obtained.
- 2.13.7. Further relevant information can be found via:
- [National Planning Policy Framework \(NPPF\)](#) – section 14 (Flood Risk and Coastal Change)
  - [Local Planning Policy](#), including
    - Policy WLP8.25 (Coastal Change Management Area) for the former Waveney Area;
    - Policies SCLP9.3 (Coastal Change Management Area) and SCLP 9.4 (Coastal Change Rollback or Relocation) of for the former Suffolk Coastal Area;
- And
- [Proposals maps](#) and East Suffolk ArcGIS mapping system showing the Coastal Management Areas
  - [Development and Coastal Change Supplementary Planning Document](#)

## *2.14. Community Consultation Statement / Statement of Community Involvement*

### **2.14.1. This document is required for all ‘Major’ developments.**

2.14.2. If those seeking consent for smaller proposals wish to undertake pre-application community consultation and provide a statement covering the elements set out below, they can do if they wish, but it is not a requirement to validate the application.

2.14.3. The community consultation statement may be incorporated into the [Planning Statement](#) where appropriate.

2.14.4. As explained in the [National Planning Policy Framework - GOV.UK \(www.gov.uk\)](#)

*“Early engagement has significant potential to improve the efficiency and effectiveness of the planning application system for all parties. Good quality preapplication discussion enables better coordination between public and private resources and improved outcomes for the community.”*

2.14.5. Therefore, a community involvement exercise should be undertaken prior to the submission of an application. A written statement should demonstrate that the views of the local community have been taken into consideration in the formulation of the development proposal.

2.14.6. The statement should include information on:

- The event/s held and who has been invited.
- Information on who attended the event/s and the comments made.
- What information was made available at each event.
- How the scheme has been changed in the light of the comments received

2.14.7. As a minimum, those invited to each event should include:

- Adjoining land owners and tenants,
- Local Residents and Local Business owners,
- Relevant Local Community/business groups e.g. if the site adjoins an area of open space managed by a Householders Association, they should be invited, or if the proposal is proposing the loss or creation of commercial space within or close to a town or district centre, the business group for that centre should be invited.
- The Town or Parish Council for the location of the proposed application site,
- In the case of proposals close to Parish boundaries or likely to significant alter traffic levels through a neighbouring parish(es), that/those Town or Parish Councils should also be invited,
- The relevant East Suffolk Council Ward Member(s),
- And
- The relevant Suffolk County Council Ward Member(s),

## *2.15. Community Facilities Justification Statement*

### **2.15.1. A Community Facilities Justification Statement is required on all proposals that include:**

- **The loss of existing community facilities and key services, whether that is buildings or openspace used for such purposes,**
- **The change of use of existing community facilities and key services, to alternative community services and facilities, whether that is buildings or openspace used for such purposes,**

**And/or**

- **The creation of additional community facilities and key services, whether that is buildings or openspace used for such purposes,**

2.15.2. The following recommendations on the content of such a statement are based upon the requirements of the relevant planning policies within the Local Plans.

2.15.3. For proposals which involve the loss of existing community services and key facilities (buildings and land), or the change of use to alternative community service and facility use, the Community Facilities Justification Statement should include:

- Evidence to demonstrate that there is no community need for the facility and the building and/or site is not required for an alternative community use on site; or
- Evidence to demonstrate that the current, or an alternative community use is not viable and marketing evidence is provided which demonstrates the premises have been marketed for a sustained period of 12 months (in accordance with the requirements set out in Appendix 4 to the Waveney Local Plan); or
- Evidence to demonstrate that the scheme would involve the provision of an equivalent or better replacement community facility either on site or in an alternative location in the vicinity that is well integrated into the community and has equal or better accessibility than the existing facility which meets the needs of the local

population/community.

- 2.15.4. For proposals which involve the loss of open space or community sport and recreational facilities should include a Community Facilities Justification Statement which demonstrates that either:
- The proposal is ancillary to the open nature of the area and will enhance local character, increase local amenity and be of greater community or wildlife benefit;
  - An open space assessment demonstrates the site is surplus to requirements including its ability to be used for alternative open space uses; or
  - The loss resulting from the proposed development will be replaced by equivalent or better provision in terms of quantity, quality and in a location that is equally or more accessible to the community
- 2.15.5. In the case of proposals resulting in the loss of Allotments, within the former Suffolk Coastal Area, the statement should include evidence that:
- shows that there is unlikely to be any future demand for the allotments; and/or
  - Other allotments exist and have the necessary capacity to meet demand; or
  - Alternative provision is made on an alternative site within the settlement which ensures an increase in the overall level and standard of allotments across the plan area.
- 2.15.6. For proposals which involve the creation of additional community facilities and key services, the Community Facilities Justification Statement should include details to demonstrate that the proposal would meet the needs of the local community, is of a proportionate scale, well related to the settlement which it will serve and would not adversely affect existing facilities that are easily accessible and available to the local community
- 2.15.7. Prior to the submission of such a proposal it is recommended that agents/applicants refer to the relevant Policies and any areas identified on the proposal maps of the [Local Plan](#) and [Neighbourhood Plan](#) (where applicable).

2.15.8. The relevant Local Plan Policies include:

- For the former Suffolk Coastal Area:
  - SCLP8.1: Community Facilities and Assets
  - SCLP8.2: Open Space
  - SCLP8.3: Allotments
- For the former Waveney Area:
  - WLP8.22: Protection of Community Services and Facilities
  - WLP8.23: Protection of Open Space

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## 2.16. *Community Infrastructure Levy (CIL)*

2.16.1. The [Community Infrastructure Levy \(CIL\) Additional Information Form](#) and **CIL Form 2** are required:

**For all proposals seeking the creation of new or additional floorspace for, or a change of use, to a use that is CIL liable and above the floorspace limits set out below:**

2.16.2. [Download the forms - Community Infrastructure Levy - Planning Portal](#)

2.16.3. A new CIL Charging Schedule for the entire East Suffolk district was adopted in 2023. The following developments are now CIL Liable:

- The creation of new dwellings (whether conversion or new build) (use class C3),
  - The creation of new HMOs (houses in multiple occupation) /use class C4 units (excluding specialist accommodation as defined in the schedule),
  - Holiday accommodation, including Holiday Lodges not complying with the Caravan Act – in defined coastal areas
  - Many, but not all, of the Strategic Sites
  - Extensions, outbuildings and/or other additions with a gross internal floorspace of 100sqm or more, to existing residential properties (e.g. home extensions, annexes, large garages etc)
- and
- The creation of new or extensions to Convenience Retail units with a gross internal floorspace of 100sqm or more (e.g. supermarkets and other shops selling daily goods such as food and drink)

2.16.4. The rates within the new schedule are based both on the nature of the development and its geographical location, including different rates for some strategic sites allocated within the local plans.



- 2.16.5. All applications for CIL Liabile development, will only be valid where both of the following are submitted:
- [Form 1: Additional Information](#) ( please note the floorspace figures on this form must match those on the submitted [floor plans](#), and a revised form must be submitted if the floorspace is altered as part of revised plans during the planning application process)
  - [Form 2: Assumption of liability](#) - this must include a contact address, contact phone number and the individuals email address. It is not appropriate to record agent contact details on behalf of clients within the Assumption of Liability details.
- 2.16.6. Where the proposed floorspace of a domestic extension or retail unit is close to the minimum figure that triggers the need for CIL, it is expected and recommended that the CIL additional Information form is completed and submitted with the application, in order to demonstrate how/why the floorspace trigger is not met.
- 2.16.7. If relief or exemption is to be sought, it is recommended that the relevant [relief or exemption claim forms](#) are supplied as early in the process as possible following the acceptance of liability, potentially during the planning application process or immediately after planning permission has been granted.
- 2.16.8. **Please note** – relief or exemption cannot be sought retrospectively once works have started on site, so if the relevant forms are not completed and submitted prior to the commencement the development will be fully CIL liable.

## 2.17. *Construction Management Plan /Method Statement*

- 2.17.1. This is not formally required in order to validate an application, but supplying a Construction Management or Method Statement upfront is strongly encouraged on planning applications for full planning permission or reserved matters approval, in order to reduce the potential need for pre-commencement conditions on the consent (if granted) which would subsequently need to be discharged via a **discharge of condition** application, which can add additional time delays and costs to the developer during the pre-construction process.
- 2.17.2. Construction Management Plans/Method Statements should address:
- Public safety and site security.
  - Site operating hours.
  - Construction methodology and programme.
  - Controls to be put in place to limit noise, vibration and dust.
  - Proper management of air, dust, stormwater and site drainage/sediment.
  - Site waste management and materials re-use
  - Traffic management including access routes to and from the site (including a swept path analysis).
  - Site specific details which require detailed assessment e.g interface with adjacent owners.
  - Lighting, including location, luminance levels, angle, height, hours of use, and impacts upon light pollution and any matters of ecological importance.
- 2.17.3. They are required in order to provide safeguards during the construction phase of a development, on many aspects of potential impacts including protecting residential amenity from the adverse affects of noise, dust and vibration, ensure highway safety is maintained and avoid unnecessary pollution during the construction phase.

- 2.17.4. In order to address the above, Construction Management Plans / Method Statements should include the following as a minimum:
- parking and turning for vehicles of site personnel, operatives and visitors, loading and unloading of plant and materials (details of areas, layout and location to be shown on a plan along with details of hours of each activity)
  - piling techniques (if applicable).
  - storage of plant and materials (area and location to be shown on a plan)
  - provision and use of wheel washing facilities (details of area, facilities and location to be shown on a plan).
  - details of measures to prevent mud from vehicles leaving the site during construction (details to be shown on a plan and/or detailed in a statement).
  - monitoring and review mechanisms (to be detailed in a statement).
  - details of deliveries times to the site during construction phase
  - and details of mechanisms to control noise vibration and dust.
- 2.17.5. Therefore, Construction Management or Method Statement may need to include and/or be based upon other surveys or assessments, which depending upon the specific nature of the proposal and application site can include:
- [Air Quality Assessment](#)
  - [Arboricultural Assessment and Tree Survey](#)
  - [Biodiversity and ecological assessments](#)
  - [Contaminated Land Assessment/Land Contamination Questionnaire](#)

- [Conversion Specification](#)
- [Lighting Assessment/Details of Lighting Schemes](#)
- [Noise impact assessment or acoustic report](#)
- [Sustainable Construction Statement/Plan](#)

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## *2.18. Contaminated Land Assessment / Land Contamination Questionnaire*

- 2.18.1. The National Planning Policy Framework states that; responsibility for securing a safe development rests with the developer and/or the landowner. However, the Local Planning Authority needs to be able to assess the potential long term safety of a development and ensure appropriate mitigation from potential sources of contamination is secured in order that the site is suitable for the proposed end use.
- 2.18.2. There are various definitions of land contamination assessments. The NPPF provides some guidance. The Environment Agency's (EA) [Land Contamination Risk Management \(LCRM\)](#) provides definitive guidance on risk assessment, describes the various Tiers within Stage 1 risk assessment and sets out what a Tier 1 report should contain. BS10107 also provides some useful guidance and definitions. It should be noted that in isolation an Envirosearch or similar environmental search document would not be considered as a satisfactory Stage 1, Tier 1 report.
- 2.18.3. **When land contamination information is required to validate an application:**
- **If there is reason to believe contamination could be an issue on the proposed application/development site, because it has been previously identified, either through a previous planning application or via other means such as land/property searches, and/or due to its existing or former use e.g:**
    - **Commercial/Industrial uses involving the production, use and/or storage of machinery and/or chemicals, and the proposal is for an alternative use,**
    - **Agricultural buildings or external areas that could have included the storage of fertilizers or other chemicals, or fuel tanks, or that were used for the housing of livestock, and the proposal is for a non-agricultural use which is more vulnerable to contamination.**
    - **MOD land /Military bases (including but not limited to those shown on the [East Suffolk ArcGIS Mapping system](#) schemes for an alternative use of a Minor or Major nature, i.e. not householder development),**
    - **Refuse waste recycling and/or landfill sites on or adjacent to the application site**
    - **Former/existing petrol/diesel filling stations**

**And/or**

- **the application is for a development that has a sensitive use (such as residential (including the creation of an annexe and/or new dwellings), holiday lets, schools, nurseries),**

- 2.18.4. Developers should provide proportionate but sufficient site investigation information to determine the risks it may pose to whom/what structures, so that the risks can be satisfactorily reduced to an acceptable level.
- 2.18.5. As a minimum, a Phase 1, Tier 1 assessment/study will be required. A Stage 1, Tier 1 study consists of a desktop study (such as a full environmental search document which has been reviewed prior to submission), site walkover and initial risk assessment. Each step of this study is described in more detail within the LCRM guidance. As required by the NPPF, the study must be carried out by a competent and suitably qualified person (see NPPG Annex 2 for definition, and further guidance within [Land contamination risk management \(LCRM\) - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/land-contamination-risk-management-lcrm) The National Quality Mark Scheme (NQMS) accredits competent persons with regard to assessing and reporting land contamination issues. It should be noted that his preliminary risk assessment stage may include some intrusive site investigation in order to update the initial conceptual site model.
- 2.18.6. Where the Stage 1, Tier 1 Assessment concludes and identifies a potential risk of contamination, a more detailed Tier 2 (General Quantitative Risk Assessment or Tier 3 (Details Quantitative Risk Assessment) will be required. This involves more in-depth investigation than including intrusive on site investigation, soil sampling and analysis. The purpose being to determine if there are any unacceptable risks to people and the environment.
- 2.18.7. Applicants should note that where significant contamination is known or is likely to be present, it may be necessary to carry out some site investigations before the submission of an application, as significant contamination may limit the suitable end users of that land.
- 2.18.8. If contamination is not suspected, and the development is only for 1-2 dwellings on existing residential land or a Greenfield site then a [Land Contamination Questionnaire](#) and an environmental search should be completed and submitted for review. Environmental searches may be obtained from various companies who keep large databases of environmental information which detail various previous land uses that may indicate the existence of potential

contamination. The Environmental search must be dated within 12 months of the date of the application and have a minimum search radius of 250m.

2.18.9. The only exception to the above requirements for a new Stage 1, Tier 1 Land Contamination Assessment, (and associated Tier 2 or 3 where required) would be if either:

- there is an extant consent on the site, for similar development to that proposed on the current application, and there has been no material change in circumstances since that consent was granted.

Or

- The site has already been redeveloped from one of the uses identified above, to a vulnerable use and appropriate decontamination was undertaken at that time.

2.18.10. If an application is seeking an exemption from providing a Stage 1, Tier 1 land contamination assessment, a short justification statement/letter should be submitted to explain how the application meets one/or both of the above exceptions.

Note on asbestos/asbestos containing materials.

2.18.11. It is important on development sites where buildings may contain asbestos containing materials (ACM), that they are surveyed/assessed and that competent and licensed contractors are involved in any removal and disposal from site. ACM can commonly be found in older agricultural, commercial and industrial buildings, schools, hospitals and some older residential buildings. The ACM can be present in building elements such as roof sheets, guttering, downpipes, other site pipes, tanks and general building insulation panels. In many cases the presence of ACM per se is not a risk unless the condition of the element has deteriorated and become friable.

2.18.12. All/any works that might involve ACM should first begin with a survey, and all/any contractors involved in handling ACM at any stage of a project should follow appropriate Health and Safety law and guidance. In particular, reference should be had to the HSE Guidance document [HSG264 \(Asbestos: The survey guide\)](#). All ACM must be handled carefully by a competent contractor, and any ACM transported from site, and disposed of off-site must be done so by licensed waste carriers, to a site suitably licensed for its disposal. It is vital works are conducted on site in such a manner as to not

contaminant previously 'clean' site areas with friable ACM.

2.18.13. Further sources of relevant information include:

- [National Planning Policy Framework - GOV.UK \(www.gov.uk\)](https://www.gov.uk)
- [Land contamination risk management \(LCRM\) - GOV.UK \(www.gov.uk\)](https://www.gov.uk) – provides guiding principles on how planning can deal with land affected by contamination
- [Environmental Protection Act 1990: Part 2A - Contaminated Land Statutory Guidance \(publishing.service.gov.uk\)](https://publishing.service.gov.uk) [East Suffolk Council Contaminated Land Strategy and Public register](#)
- [East Suffolk Land Contamination Questionnaire](#)



## 2.19. *Conversion Specification*

### 2.19.1. **When required to validate an application:**

**Where Planning Permission is sought to convert a building to an alternative use and physical alterations are required to the building to facilitate this change in use.**

2.19.2. Common examples include the conversion of agricultural buildings to holiday lets and/or dwellings, but these requirements are applicable no matter what the existing and proposed uses.

2.19.3. It is required to demonstrate that the building is capable of being converted in accordance with the requirements of the NPPF, NPPG, Local Planning Policy and in some cases the requirements of the Listed Buildings and Conservation Areas Act 1990.

#### **Requirements:**

### 2.19.4. **The conversion specification must be based upon a [Structural Survey](#) and consist of the following as a minimum:**

- [Floor Plans](#), [Roof Plans](#), [Elevational Plans](#) and [Cross-sections](#) specifically identifying the elements of the building proposed to be
  - The elements to be Retained in their current form,
  - The elements to be altered,
  - the elements to be removed/replaced,
  - and
  - the new elements proposed.

- A statement, drawings and/or other documents setting out the proposed specification material, colour, finish and size for all new elements. In the case of new fenestration, full details of the framing profiles will also be required in accordance with [Joinery and Window details](#).
- Where the building(s) proposed for conversion are
  - [Listed](#) (including those that are curtilage listed),
  - within a [Conservation Area](#)
  - or potentially identifiable as a [Non-Designated Heritage Asset](#),

a [Heritage Statement/Assessment](#) must also be submitted which should be used alongside the Structural Survey to inform decisions on which elements are to be retained or lost, as identified in the Conversion Specification.

And

- Where the building(s) need to incorporate features or works are required to be undertaken in a certain way in order to safeguard Protected Species or other ecological matters, these must be included as part of the Conversion Specification, and be informed by the [Biodiversity and Ecological Assessment](#).

2.19.5. **The details shown on the plans must include, (but not be limited to):**

- All structural elements e.g. all elements of the frame (including upright posts, cross beams, roof trusses etc),
- All external finishes, including the removal of any cladding, render, brickwork, tiles, slates etc and details of any replacement finishes,
- Any works required to the foundations, including details on whether the building currently has foundations and if they need improvements and/or if there are no foundations, the conversion specification must detail what works are proposed to be undertaken to secure the long-term structure of the building (e.g. underpinning which areas).

- Any works to the building/floor slab, including details of the extent to which the existing floor slab has to be removed, i.e. which areas of the building, and details of the type of works e.g. to lay a damp proof membrane and new slab material laid.
- Any works to the ceilings and/or upper floor finishes,
- Any alterations to existing openings/fenestration, the insertion of any additional openings, and the infilling of any existing openings.

2.19.6. In addition to using an appropriate consultant/historic buildings specialist, the following sources of further information are recommended:

- [National Planning Policy Framework - GOV.UK \(www.gov.uk\)](https://www.gov.uk) – Section 16 is of particular relevance
- [National Planning Policy Guidance \(NPPG\)](#)
- Historic England - [General Advice on Historic Building Maintenance, repair and conservation](#)
- Historic England - [Adapting Traditional Farm Buildings](#)
- [Listed Buildings](#)
- [Conservation Areas](#) across East Suffolk
- [Non-Designated Heritage Assets \(NDHAs\)](#) in East Suffolk
- [Historic Environment - East Suffolk Council Supplementary Planning Document](#)

2.19.7. Please note:

- **plans within/accompanying the Conservation Specification must be drawn to scale, and a photograph of a plan is not acceptable, as the process results in the photograph showing an image which is not at the same scale as that stated in the image. All plans must therefore be either drawn to scale electronically or drawn by hand and if**

being submitted electronically then scanned to scale, not photographed. Therefore, if photographs are submitted of plans (e.g. \*.jpg \*.png \*.gif) they will not be accepted as valid plans, and the application will be invalid until 'to scale' drawings are submitted.

- It is the applicant's responsibility to ensure that all submitted plans/drawings are drawn accurately, including in terms of how any surrounding buildings and trees are presented in relation to the application site and the proposals. They must be sure that development could proceed fully in accordance with the drawings/plans that are submitted. Inaccurate representation of the size or position of neighbouring buildings and/or buildings within the application site and/or the proposals could invalidate any consent. It is therefore recommended that all plans are drawn based upon measured surveys or in the event that an Ordnance Survey plan is used, that they are checked on the ground by the applicant/their agent for accuracy prior to submission.
- Although not a validation requirement, it is recommended that existing and proposed drawings/plans of the same type are drawn to the same scale as one another, in the interests of clarity and ensuring that it is as easy as possible to understand what the proposed changes are.

## 2.20. *Crime Prevention Statement*

### 2.20.1. **When required to validate an application:**

- **required for all ‘Major’ Planning Applications ,**
- **any applications relating to the provision of new or expansion of public or community buildings or facilities,**
- **applications for large Housings in Multiple Occupation (where there are more than six people living together as a single household),**

### 2.20.2. **A Crime Prevention Statement should explain:**

- how crime prevention measures have been incorporated into the design,
- demonstrate how reference has been made to the relevant ‘Secured By Design Guide’.
- How key aspects of the design of the scheme including the layout of the development, orientation of buildings, natural surveillance, boundary treatments, parking arrangements, access control (where appropriate), secure cycle storage and external lighting have been shaped by crime prevention guidance.
- How consideration has been given to relevant Planning Policy relating to public safety and deterring crime and disorder.

2.20.3. Although not a specific validation requirement for the Crime Prevent Statement, it may be useful to include drawings/plans to demonstrate how crime prevention has shaped the proposals.

2.20.4. The Crime Prevention Statement could form part of the [Design and Access Statement](#) or a [Planning Statement](#). However, if it is combined with another statement, it is recommended that its inclusion is made clear in the title of that document, to avoid the potential for it to be overlooked when the application is being validated.

## 2.21. Cross Sections

### 2.21.1. Cross section(s) through the existing and/or proposed building(s) and/or site should be submitted at a scale of 1:100 or 1:50 in the following circumstances:

- **Where a proposal involves a significant change to the existing ground levels** – i drawings should be submitted to show both existing and finished levels. This will need to be based upon accurate on site survey measurements, most likely via a [Topographical Survey](#).
- **On significantly sloping sites**, full information is required concerning alterations to levels, the way in which a proposal sits within the site and, in particular, the relative levels between existing and proposed buildings. The drawings may take the form of contours, spot levels, and/or cross or long sections, as appropriate, but the existing versions of these drawings should be based upon a [Topographical Survey](#).
- **For any significant changes to ground levels such as terracing**, both existing and finished levels will be required. The drawings may take the form of contours, spot levels, and/or cross or long sections, as appropriate, but the existing versions of these drawings should be based upon a [Topographical Survey](#).
- **Where the significantly sloping ground extends across neighbouring land** as well as the application site, the buildings on the adjacent land must be included, and show accurately in terms of position and height.
- **Where the proposal involves the conversion of a building and substantial physical works are proposed**, existing and proposed cross sections should be submitted to illustrate the proposed works and which elements are to be retained and those that are to be replaced/added. These cross sections could form part of the [Conversion Specification](#).

### 2.21.2. Please note:

- **such plans must be drawn to scale, and a photograph of a plan is not acceptable, as the process results in the photograph showing an image which is not at the same scale as that stated in the image. All plans must therefore be either drawn to scale electronically or drawn by hand and if being submitted electronically then scanned to scale, not photographed. Therefore, if photographs are submitted of plans (e.g. \*.jpg \*.png \*.gif)**

**they will not be accepted as valid plans, and the application will be invalid until 'to scale' drawings are submitted.**

- **It is the applicant's responsibility to ensure that all submitted plans/drawings are drawn accurately, including in terms of how any surrounding buildings and trees are presented in relation to the application site and the proposals. They must be sure that development could proceed fully in accordance with the drawings/plans that are submitted. Inaccurate representation of the size or position of neighbouring buildings and/or buildings within the application site and/or the proposals could invalidate any consent. It is therefore recommended that all plans are drawn based upon measured surveys or in the event that an Ordnance Survey plan is used, that they are checked on the ground by the applicant/their agent for accuracy prior to submission.**
- **Although not a validation requirement, it is recommended that existing and proposed drawings/plans of the same type are drawn to the same scale as one another, in the interests of clarity and ensuring that it is as easy as possible to understand what the proposed changes are.**

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## *2.22. Custom and Self Build Delivery Statement*

- 2.22.1. Once the emerging [Custom and Self Build Housing Supplementary Planning Document](#) has been adopted, a Custom and Self Build Delivery Statement will be required for all outline and full planning applications involving custom and self-build housing.**
- 2.22.2. A template for a Custom and Self-build Delivery Statement is included as an appendix to the draft Supplementary Planning Document (SPD), and is intended to be included as an appendix once the SPD is adopted later in 2024.
- 2.22.3. It is expected that this template will be used to produce a Custom and Self Build Housing Delivery statement for submission with relevant applications in order to meet the requirements of this Local Validation List.

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## 2.23. *Daylight / Sunlight Assessment*

- 2.23.1. **A Daylight / Sunlight Assessment is required for all applications where the development is likely to have an adverse impact on the current levels of daylight/sunlight enjoyed by adjacent properties or buildings, including private amenity spaces immediately adjacent to the rear of the properties they are associated with and effects on the efficiency of any already installed solar panels.**
- 2.23.2. An assessment should provide sufficient information to assess the impact on adjacent properties or buildings with regard to sunlight availability to windows and sunlight availability to open spaces and gardens. Shadow paths should be demonstrated on a [block plan\(s\)](#) (to an appropriate scale) showing the adjacent properties in relation to the proposed development.
- 2.23.3. The daylight/sunlight assessment needs to be undertaken in accordance with British Standard “Code of Practice for Daylighting” BS 8206: Part 2, 2008 (as amended).
- 2.23.4. Please note a Daylight / Sunlight Assessment will be requested from the Agent / Applicant, and be expected to be supplied prior to the determination of the application if one has not been supplied from the outset and during the course of the application assessment process, if the case officer has concerns regarding potential for substantial loss of daylight or sunlight to habitable rooms and/or the neighbouring private amenity areas immediately adjacent to the rear of the properties they are associated with.
- 2.23.5. In cases where such an assessment is not supplied, and the officer has undertaken their own assessment that demonstrates substantial loss of daylight and/or sunlight, the planning application is likely to be refused on the basis of the detrimental impact upon the amenity of adjoining residents. Similarly, if the supplied assessment shows the impact to be substantially detrimental to these daylight and sunlight levels, consent is likely to be refused.
- 2.23.6. Therefore, it is recommended that the potential impacts of all proposals upon daylight and sunlight of existing adjoining properties is considered from the outset of the formulation of the design of any scheme.
- 2.23.7. It may also be useful to supply [Isometric Drawings and/or still shots/images from virtual 3-dimensional models](#) to assist with understanding lighting impacts.

## 2.24. *Design and Access Statement*

2.24.1. According to [Making an application - GOV.UK \(www.gov.uk\)](https://www.gov.uk), Design and Access Statements are always required for:

- **major development (that is development of 10 or more dwellings) (or 0.5 hectares for residential development where the number of dwellings is unknown)**
- **for the creation of more than a 1000 square metres of floor space and where the site is greater than 1 hectare),,**
- **For the creation of one or more dwellings within a Conservation Area,**
- **The creation of a building or buildings where the floor area created is 100sqm or more (measured externally within a Conservation Area (including householder developments, such as extensions and outbuildings).**
- **Applications for Listed Building Consent**

2.24.2. Based upon [national guidance](#), a design and access statement should:

- explain the design principles and concepts that have been applied to the development,
- demonstrate the steps that have been taken to appraise the context of the development and how the design of the development takes that context into account in relation to the proposal.
  - explain the policy adopted as to access and how policies relating to access in relevant development plan documents (DPDs) have been taken into account
  - state what, if any, consultation has been undertaken on issues relating to access to the development and what account has been taken of the outcome of any such consultation;

- explain how specific issues which might affect access to the development have been addressed,  
and
  - explain how the Suffolk streets Design Guide has been considered in the formulation of the scheme.
- 2.24.3. On proposals for Major residential developments (i.e. 10 or more dwellings), the design and access statement should also explain how the proposals perform when assessed against the Building for Life Guidelines.
- 2.24.4. Policy WLP8.29 (Design) of the East Suffolk Council – Waveney Local Plan and Policy SCLP11.1 (Design Quality) of the East Suffolk Council – Suffolk Coastal Local Plan both require Major residential developments to perform positively when assessed against Building for Life Guidelines
- 2.24.5. Neighbourhood Plans Policies also set a requirement for demonstrating and/or meeting the Building for Life or other design criteria. The specific policies relating to design and access, are too numerous to list here, but it is recommended that the relevant policies are referred to and considered, in the design of any proposals.
- 2.24.6. It is also recommended that Design and Access Statements explain any consideration given to the [National design guide - GOV.UK \(www.gov.uk\)](#) and local design and character related documents such as [Conservation Area Appraisals](#) and [Supplementary Planning Guidance Documents and other guidance \(including any site specific development brief where applicable\)](#) in the development of their proposed scheme.

## 2.25. *Draft Heads of Terms*

- 2.25.1. Applications will not be made invalid because they lack Draft Heads of Terms, however you are strongly advised to submit them with the following applications as this will speed up the process.
- All applications for more than 10 dwellings
  - Recreational disturbance Avoidance Mitigation Strategy (RAMS)
  - When advised of the need through Pre-application advice
- 2.25.2. A Planning Obligation (Section 106 Agreement) is a separate legal agreement signed by the planning authority and the landowners (that is, persons with a legal interest in the land, which may also include the developer), prior to the grant of a planning permission. The agreement will include commitments given by the landowner towards the provision of various community benefits considered necessary to make the proposals acceptable.
- 2.25.3. A schedule of issues (such as affordable housing provisions, contributions to schools and contributions to the Recreational disturbance Avoidance and Mitigation Scheme (RAMS)) to be addressed (known as the Draft Head(s) of Terms) during the planning application process, and should be submitted with any application where an obligation is required. This may be required for applications involving the creation of at least one dwelling that is not a replacement, unless otherwise advised by the local planning authority.

### Recreational disturbance Avoidance and Mitigation Scheme (RAMS)

- 2.25.4. Applications for residential development within 13km of a European Designated Site (Habitats Site), will be assessed under the Habitats Regulations as part of the application determination process. In some instances where mitigation is identified as being required, that cannot be provided on site, a financial contribution to the Recreational disturbance Avoidance Mitigation Strategy (RAMS) will be required, either in the form of an upfront payment with an associated Section 111 form, or secured as part of a Section 106 agreement or Unilateral Undertaking.

2.25.5. Further details relating to RAMS are included within the [Biodiversity and Ecological Assessments](#) Section of this document, and in:

- [East Suffolk Based information on S106 Agreements and Habitat Mitigation \(including RAMS\)](#)
- [Planning practice guidance - GOV.UK \(www.gov.uk\)](#)

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## 2.26. *Dust Assessment*

- 2.26.1. **An assessment of the potential of dust emissions will be required for any scheme that has the potential to produce significant levels of dust during demolition or construction; or for any scheme that has the potential to produce dust through its operational life**
- 2.26.2. For dust control during demolition and construction a risk assessment and mitigation plan should be included in a [Construction Management Plan](#).
- 2.26.3. For dust control during operation a risk assessment and mitigation plan should be submitted as part of the application.

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## *2.27. Dwelling Sizes and Tenure Plan/schedule*

### **2.27.1. A Dwelling Sizes and Tenure Plan/Schedule is required on**

- **all schemes that include proposals for more than two residential units**

### 2.27.2. This sizes and tenure plan/schedule maybe in the form of:

- details on the proposed [block plan](#) with a table/schedule on the same sheet; or
- another plan including a schedule on the same sheet; or
- separate plan(s) and schedules; and/or
- as part of or within an appendix to the [Planning Statement](#).

2.27.3. However, if it is submitted as part of another document/statement, please make this clear at submission stage i.e. by referring to it in the document title and/or referring to in an covering letter.

2.27.4. It is recommended that prior to deciding on the unit size and tenure proposed within the development, applicants/agents refer to the relevant policies relating to housing size and tenure within the [Local Plan](#) documents and any relevant [Neighbourhood Plans](#)

2.27.5. The district wide policies which refer to housing mix and tenure, and are included within the relevant Local Plan are:

- Within the former Suffolk Coastal Area:
  - SCLP5.8: Housing Mix,
  - SLP5.9: Self Building and Custom Build Housing,
  - SCLP5.10: Affordable Housing on Residential Developments, and

- SCLP5.11: Affordable Housing on Exception Sites,
- Within the former Waveney Area:
  - WLP8.1: Housing Mix,
  - WLP8.2: Affordable Housing,
  - WLP8.3: Self Build and Custom Build, and
  - WLP8.6: Affordable housing in the countryside

2.27.6. Please note some allocation policies within the Local Plans and Neighbourhood Plans place specific requirements on housing size and tenures, and where a development is proposed on such a site, the requirements of that policy will generally be taken as the mix sought.

**2.27.7. Please note:**

- **such plans must be drawn to scale, and a photograph of a plan is not acceptable, as the process results in the photograph showing an image which is not at the same scale as that stated in the image. All plans must therefore be either drawn to scale electronically or drawn by hand and if being submitted electronically then scanned to scale, not photographed. Therefore, if photographs are submitted of plans (e.g. \*.jpg \*.png \*.gif) they will not be accepted as valid plans, and the application will be invalid until ‘to scale’ drawings are submitted.**
- **It is the applicant's responsibility to ensure that all submitted plans/drawings are drawn accurately, including in terms of how any surrounding buildings and trees are presented in relation to the application site and the proposals. They must be sure that development could proceed fully in accordance with the drawings/plans that are submitted. Inaccurate representation of the size or position of neighbouring buildings and/or buildings within the application site and/or the proposals could invalidate any consent. It is therefore recommended that all plans are drawn based upon measured surveys or in the event that an Ordnance Survey plan is used, that they are checked on the ground by the applicant/their agent for accuracy prior to submission.**



- **Although not a validation requirement, it is recommended that existing and proposed drawings/plans of the same type are drawn to the same scale as one another, in the interests of clarity and ensuring that it is as easy as possible to understand what the proposed changes are.**

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## 2.28. *Elevational Plans*

- 2.28.1. Elevational plans must be submitted for all new buildings and for all proposals where extensions/alterations are proposed to existing buildings.
- 2.28.2. They must:
- be at a scale of 1:100 or 1:50
  - include a scale bar
  - have a title to identify the development and subject of the drawing
  - have a unique drawing number which also indicates any revisions (e.g.1234Revision B)
  - All revisions should be described to identify any changes (e.g. Revision A – Layout changed)
  - The date the plan was prepared or amended
  - Show all sides of the existing building, as well as the proposed development, including any facing internal courtyards,
  - Indicate, where possible, the proposed building materials and the style, materials and finish of windows and doors.
  - Blank elevations must also be included, if only to show that this is in fact the case. Where an elevation adjoins another building or is in close proximity (either facing or perpendicular to it e.g. on a semi-detached dwelling) the elevational drawings should also clearly show the relationship between the including in terms of position and height . They should also show the position and size of any openings on each property.
- 2.28.3. Although not an essential requirement, it is recommended that such plans include dimensions, to enable ease of understanding for those consulted on and/or viewing the plans.

**2.28.4. Please note:**

- **such plans must be drawn to scale, and a photograph of a plan is not acceptable, as the process results in the photograph showing an image which is not at the same scale as that stated in the image. All plans must therefore be either drawn to scale electronically or drawn by hand and if being submitted electronically then scanned to scale, not photographed. Therefore, if photographs are submitted of plans (e.g. \*.jpg \*.png \*.gif) they will not be accepted as valid plans, and the application will be invalid until 'to scale' drawings are submitted.**
- **It is the applicant's responsibility to ensure that all submitted plans/drawings are drawn accurately, including in terms of how any surrounding buildings and trees are presented in relation to the application site and the proposals. They must be sure that development could proceed fully in accordance with the drawings/plans that are submitted. Inaccurate representation of the size or position of neighbouring buildings and/or buildings within the application site and/or the proposals could invalidate any consent. It is therefore recommended that all plans are drawn based upon measured surveys or in the event that an Ordnance Survey plan is used, that they are checked on the ground by the applicant/their agent for accuracy prior to submission.**
- **Although not a validation requirement, it is recommended that existing and proposed drawings/plans of the same type are drawn to the same scale as one another, in the interests of clarity and ensuring that it is as easy as possible to understand what the proposed changes are.**

2.28.5. It may also be useful to supply [isometric Drawings and/or still shots/images from virtual 3-dimensional models](#) assist with understanding elevational drawings, but they are not a substitute for elevational drawings.

## 2.29. *Energy Statement*

### 2.29.1. **An Energy Statement is required to validate an application for:**

- **Buildings (new build or conversions) with a gross external floorspace of 1,000m<sup>2</sup> or more.**
- **Residential developments providing 10 or more residential units.**
- **Residential sites of 0.5 hectares or more**
- **Any development on a site of 1 hectare or more.**

2.29.2. Proposals for new residential development (including re-use or conversion of buildings) and non-residential development over 1000 square metres must submit an energy statement that details how it is proposed the site will meet the energy standards set out within national building regulations. In particular, any areas in which the proposed energy strategy might conflict with other policies in the local plan should be identified and proposals for resolving this conflict outlined.

2.29.3. The aim of an energy statement is to demonstrate how the proposed development would be sustainably constructed in a manner that ensures energy efficiency of the scheme and also comply with relevant planning policy relating to such matters. Therefore, the statement should explain and evidence the following as a minimum:

- Water efficiency of 100 litres/person/day for residential developments,
- How consideration has been given to and if locally sourced, reused and/or recycled materials are to be utilised.
- How on-site renewable energy generation has been considered and/or is to be incorporated,
- If a non-residential scheme with a gross floorspace of 1,000sqm or higher, how the British Research Establishment Environmental Assessment Method 'Very Good' standard or equivalent is to be achieved.
- How means to improve the efficiency of heating, cooling and lighting of buildings have been incorporated by maximising daylight and passive solar gain through the orientation of buildings.

- How sustainable water management measures such as the use of sustainable drainage systems, green roofs and/or rainwater harvesting systems are to be incorporated.
  - How construction waste will be minimised, including designing out waste during the design stage, selecting sustainable and efficient building materials and reusing materials where possible.
  - How the scheme incorporates accessible and unobtrusive sustainable waste management facilities such as adequate provision of refuse/recycling/composting bin storage
- 2.29.4. The Energy Statement must also include the [M4\(2\) checklist](#). Unless it is included in the [Sustainable Construction Statement](#).
- 2.29.5. The energy statement may be included within the Design and Access Statement and/or [Planning Statement](#) and/or Sustainable Construction Statement where these are also required. However, where submitted as part of another statement, applicants/agents are advised to make it clear where this statement is located e.g either in the title of the documents or in a covering letter, to reduce the potential for it to be assumed missing during the registration process.
- 2.29.6. Prior to the preparation of this statement it is recommended reference is made to policies and guidance relating to measures to minimise water and energy consumption. These include but are not limited to:
- [National Planning Policy Framework \(NPPF\)](#)
  - [National Planning Policy Guidance \(NPPG\)](#)
  - [East Suffolk Local Plans](#):
    - For the former Suffolk Coastal Area
      - SCLP9.2 Sustainable Construction
    - For the former Waveney Area:
      - WLP8.28 Sustainable Construction

- Any applicable [Neighbourhood Plans](#)

2.29.7. Applicants/Agents are also recommended to fully consider the current and any emerging [Building Regulations](#) relating to such matters. Whilst failure to comply with the Building Regulations may not prevent the granting of Planning Permission, the need to incorporate additional water and energy saving features in to the scheme prior to and/or during the construction phase could result in additional costs and time delays, especially if applications for **Variations of Conditions** or **Non-Material Amendments** are required to cover any such changes.

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### *2.30. Environmental Impact Assessment*

- 2.30.1. It is not possible to invalidate an application due to the lack of an Environment Impact Assessment (EIA).
- 2.30.2. This is a process by which information about the likely environmental effects of developments are collected, assessed and taken into account. Usually this will only apply to major projects such as infrastructure development, wind farms and large residential developments. However, this is not always the case and some smaller developments, if located in a sensitive area or cumulatively related to other development proposals, may require an EIA. If you are proposing any large or sensitively located development you should ask the Local Planning Authority about an Environmental Impact Assessment as part of your pre-application discussion and we can explain what needs to be done as part of the process, particularly in relation to seeking screening and scoping opinions.
- [National Planning Policy Guidance \(NPPG\) – Environmental Impact Assessment](#)
  - [The Town and Country Planning Environmental Impact Assessment\) Regulations 2017 \(legislation.gov.uk\)](#)

### 2.31. Fees

- 2.31.1. The fees for Planning and planning related applications are defined at a National level, and so are the same across England. They are set out in Regulations that can be found [online](#).
- 2.31.2. The correct fee for your application may also be found on the [Planning Portal](#) website.
- 2.31.3. There is also fees guidance on the [ESC Website](#)
- 2.31.4. The Planning Portal also provides a [Fee Calculator](#)
- 2.31.5. A planning or planning related application is only valid once the appropriate fee has also been supplied to the Local Planning Authority. Therefore, any delay in payment of the fee will delay the validation of the application and the commencement of the application process. Therefore, it is recommended that application fees are submitted upfront at the same time as the application form, plans and supporting documents.



## 2.32. *Flood Risk Assessment*

### 2.32.1. **When required to validate an application:**

- **For every application in Flood Zones 2 or 3 (of all sizes from a small addition on a house or in its garden, up to and including Major development schemes),**
- For any application elsewhere with a site area greater than 1 Hectare,
- All new buildings, significant extensions and changes of use within the floodplain or adjacent to a Main River,
- Engineering operations that involve raising the level of land or significantly increasing surface water run-off to non-mains sewer systems such as watercourses and soakaways.
- Development in basements and on lowered ground levels
- Development or changes of use to a more vulnerable class that may be subject to land, groundwater, sewer or canal flooding). Such uses include but are not limited to new dwellings/residential, hospitals, residential institutions, educational establishments, health services, holiday or short-let caravans and camping.....etc
- **Sites adjacent to roads with no drainage –(also see [Sustainable Drainage Strategy](#))**
- **Any development proposals within the flood zones identified in the [Strategic Flood Risk Assessment \(SFRA\)](#).**

2.32.2. The Nationally defined Flood Zones can be accessed [online in map form](#).

2.32.3. East Suffolk District Council has prepared a [Strategic Flood Risk Assessment \(SFRA\)](#). The SFRA provides a detailed analysis of flood risk across the main towns of the District. The SFRA identifies flood zones that take into account the impact of climate change over the period to 2107.

2.32.4. Any development proposals within the flood zones identified in the SFRA should be accompanied by a Flood Risk

Assessment. A Flood Risk Assessment should identify and assess the risks of all forms of flooding to and from the development and demonstrate how these flood risks will be managed, taking climate change into account.

2.32.5. For most developments, this assessment should include existing and proposed surface water drainage arrangements, although for larger developments the requirements of a site-specific Sustainable Drainage Strategy should be agreed at pre-application stage.

2.32.6. The April 2018 Strategic Flood Risk Assessment does not include climate change modelling for every watercourse. It is therefore also necessary to consider the flood extents from the 2008 Strategic Flood Risk Assessment for the following watercourses:

- River Waveney
- Wrentham
- Tin River
- Alde – west of A12
- Minsmere – west of Middleton

2.32.7. Further details on surface water drainage requirements can be found in the [Sustainable Drainage Strategy](#) of this document

2.32.8. In order to determine whether you need to submit a site specific flood risk assessment (FRA) as part of your application you need to follow two steps:

1) Establish which flood risk zone your site falls within using the "[Flood Map for Planning](#)":

- Zone 3 is an area that could be affected by flooding either from rivers or the sea, if there were no defences. This area could be flooded from:
  - a river by a flood that has a 1 per cent (1 in 100) or greater chance of happening each year

- the sea by a flood that has a 0.5 per cent (1 in 200) chance of happening each year
  - Zone 2 is the extent of an extreme flood from the rivers or the sea if there were no defences. These areas could be affected by a major flood with up to a 0.1 per cent (1 in 1000) chance of occurring each year
  - Zone 1 is the area not shown as being in Zones 2 or 3 and considered to be at low risk of flooding from rivers or the sea. Please note that other sources of flood risk are not shown on these maps so your site may still be in an area of risk from surface water or groundwater flooding.
- 2) If your site falls within zones 2 or 3 or meets one of the other criteria given above a Flood Risk Assessment (FRA) will be required.
- 2.32.9. If a proposal requires a full FRA you are strongly advised to discuss the scope and content of the flood risk assessment with Suffolk County Council as Lead Local Flood Authority and the Environment Agency before you start work on it.
- 2.32.10. Further information may be found in [National Guidance](#) as to the requirements of a flood risk assessment and whether one is required
- 2.32.11. The preparation of a Flood Risk Assessment may need to be undertaken by a specialist with appropriate expertise, but in all cases consideration should be given to the following:
- [National Flood Map for Planning](#)
  - [National Planning Policy Framework \(NPPF\)](#)
  - [National Planning Policy Guidance \(NPPG\)](#)
  - [National Guidance on “Preparing a flood risk assessment: standing advice”](#)
  - [National Guidance on “Flood risk assessment in flood zone 1 and critical drainage areas](#)
  - [National Guidance on “Flood risk assessment in flood zones 2 and 3](#)

- [National Guidance on “Flood risk assessment: the sequential test for applicants](#)
- [East Suffolk Strategic Flood Risk Assessment](#)
- [East Suffolk Local Plans:](#)
  - Suffolk Coastal Area Planning Policies:
    - SCLP9.5: Flood Risk
    - SCLP9.6: Sustainable Drainage Systems
    - SCLP9.7: Holistic Water Management
  - Waveney Area Planning Policies:
    - WLP8.24: Flood Risk,
- East Suffolk area – [Neighbourhood Plans](#)

2.32.12. In addition to a Flood Risk Assessment, a [sequential test and/or an exceptional test](#) may be required for vulnerable uses (as defined above).

### 2.33. Flood Risk Sequential and Exception Tests

- 2.33.1. A sequential approach is required for the location of development that can be vulnerable to the effects of flooding. It seeks to direct vulnerable uses to areas at the lowest risk of flooding, prior to permitting the development in those areas at greatest risk of flooding.
- 2.33.2. In addition to a [Flood Risk Assessment](#), a Flood Risk Sequential Test will be required for 'vulnerable use' developments (see Flood Risk Assessment, requirements) meeting the following:
- If the application site is within flood zones 2 or 3,  
and
  - If the application is for 'Major' development;  
or
  - Non-Major development
  - **Unless:**
    - The site has been allocated for development and subject to the test at the plan making stage (provided the proposed development is consistent with the use for which the site was allocated and provided there have been no significant changes to the known level of flood risk to the site, now or in the future which would have affected the outcome of the test).
    - The site is in an area at low risk from all sources of flooding, unless the Strategic Flood Risk Assessment, or other information, indicates there may be a risk of flooding in the future.
    - The application is for a development type that is exempt from the test, as specified in footnote 56 of the National Planning Policy Framework (which currently states "*This includes householder development, small non-residential extensions (with a footprint of less than 250m<sup>2</sup>) and changes of use; except for changes of use to a*

*caravan, camping or chalet site, or to a mobile home or park home site, where the sequential and exception tests should be applied as appropriate.”*

- 2.33.3. A Flood Risk Exception Test will be required if the sequential tests shows that it isn't possible to use an alternative site and the development is:
- Highly vulnerable and in flood zone 2,
  - Essential infrastructure in flood zone 3a or 3b,
  - More vulnerable in flood zone 3a
- 2.33.4. Details of what flood zone a site is located in can be found at '[Get Flood Risk information for planning in England](#)'.
- 2.33.5. Further advice on the requirements of a Flood Risk Sequential Test and Exception Test is provided at a National Level within the [Flood Risk and Coastal Change Section of the National Planning Policy Guidance](#) and '[Flood Risk Assessment: the sequential test for applicants](#)'.
- 2.33.6. Further information and guidance can be found via
- [National Planning Policy Framework \(NPPF\)](#)
  - [National Planning Practice Guidance Flood Risk and Coastal Change](#)
  - [National Guidance – Flood risk Assessments if you are applying for Planning Permission](#)
  - [Environment Agency Preparing a Flood Risk Assessment: Standing Advice](#)
  - [East Suffolk Strategic Flood Risk Assessment:](#)
  - [National Flood Map for Planning](#)

### 2.34. *Floor Plans*

#### 2.34.1. Floor Plans are required for all applications seeking to:

- Erect new buildings (except for very modest garden sheds/ summerhouses/ greenhouses within domestic gardens), or
- Increase or remove floor space from existing buildings (including basements, extensions, loft conversions), or
- change the use of part of or the whole of an existing building even if there are no physical alterations proposed (required to be annotated to show the existing and proposed uses and any subdivision between units), or
- Convert existing buildings (for such proposals they may form part of the [Conversion Specification](#))

#### 2.34.2. All Floor plans must

- Be at a scale of 1:100 or 1:50 for all new buildings and for all proposals where extensions/alterations are proposed to existing buildings.
- Include a scale bar
- Include a title to identify the development and subject of the drawing
- Include a unique drawing number which also indicates any revisions (e.g. dwg 1234 - Revision B (additional window))
- All revisions should be described to identify any changes (e.g. Revision A – Layout changed)
- Include the date the plan was prepared or amended
- Show all new buildings and/or extensions to existing building in context with adjacent buildings shown accurately in terms of position and footprint (including property numbers where applicable).

- 2.34.3. Although not an essential requirement, it is recommended that such plans include dimensions, to enable ease of understanding for those consulted on and/or viewing the plans, including the space available within carports and garages for the parking of vehicles, and/or the space for cycle parking.
- 2.34.4. It can also be useful for such plans to be annotated with the figures of floorspace area proposed to be added through extension, removed through demolition or be altered in terms of change of use. Such figures can also be included in a [Planning Statement](#) and/or a [Design and Access Statement](#).
- 2.34.5. **Please note:**
- **such plans must be drawn to scale, and a photograph of a plan is not acceptable, as the process results in the photograph showing an image which is not at the same scale as that stated in the image. All plans must therefore be either drawn to scale electronically or drawn by hand and if being submitted electronically then scanned to scale, not photographed. Therefore, if photographs are submitted of plans (e.g. \*.jpg \*.png \*.gif) they will not be accepted as valid plans, and the application will be invalid until 'to scale' drawings are submitted.**
  - **It is the applicant's responsibility to ensure that all submitted plans/drawings are drawn accurately, including in terms of how any surrounding buildings and trees are presented in relation to the application site and the proposals. They must be sure that development could proceed fully in accordance with the drawings/plans that are submitted. Inaccurate representation of the size or position of neighbouring buildings and/or buildings within the application site and/or the proposals could invalidate any consent. It is therefore recommended that all plans are drawn based upon measured surveys or in the event than an Ordnance Survey plan is used, that they are checked on the ground by the applicant/their agent for accuracy prior to submission.**
  - **Although not a validation requirement, it is recommended that existing and proposed drawings/plans of the same type are drawn to the same scale as one another, in the interests of clarity and ensuring that it is as easy as possible to understand what the proposed changes are.**
  - **the question on the application form relating to floorspace must also be completed accurately, especially on schemes seeking changes of use.**



### *2.35. Foul Drainage Assessment*

- 2.35.1. **A Foul Drainage Assessment is required for all development that proposes/requires the disposal of additional foul sewage effluent. This includes**
- **all schemes proposing additional new build units or uses requiring toilet facilities or other foul water disposal (e.g. new dwellings, offices, community buildings, restaurants, car washes etc),**
  - **conversions of existing buildings that were unlikely to have an existing or previous foul water connection (e.g. barns and other storage buildings) to a use requiring a foul water connection,**
  - **significant extensions to existing buildings and/or uses requiring additional foul water facilities (excluding extensions to existing dwellings).**
- 2.35.2. This is required because all development is expected to ensure that the capacity of local wastewater treatment and sewerage infrastructure is not exceeded.
- 2.35.3. If an application proposes to connect a development to the existing drainage system, then details of the existing system should be shown on the application drawing(s). In the case of extensions to existing dwellings this can simply be in the form of annotation on the block and/or floor plans showing the connection to the existing sewage pipe within the property.
- 2.35.4. On applications creating additional units (e.g. new dwellings, offices, community facilities etc including conversions), the Foul Drainage Assessment should detail how the foul sewage will be connected to the public sewer.
- 2.35.5. Where a development involves the disposal of trade waste or the disposal of foul sewage effluent other than to the public sewer (i.e. if it is to be treated via an onsite unit), then a more detailed Foul Drainage Assessment will be required including details of the method of storage, treatment and disposal. A Foul Drainage Assessment should include a full assessment of the site, its location and suitability for storing, transporting and treating sewage.
- 2.35.6. Where connection to the mains sewer is not practical, then the Foul Drainage Assessment will be required to demonstrate why the development cannot connect to the public mains sewer system and show that the alternative

means of disposal are satisfactory. A private means of foul effluent disposal is only acceptable, and should only be considered, when foul mains drainage is unavailable.

- 2.35.7. Further information can be found in [Planning Practice Guidance: Water Supply, Waste Water and Water Quality](#)

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### *2.36. Geodiversity Survey and Assessment Report*

#### 2.36.1. A Geodiversity Survey and Assessment Report will be required to validate an application:

- When a proposal is likely to impact upon the geodiversity of a site designated for its geodiversity interest.  

Or
- When a site is greater than 5Ha in area and within a [minerals consultation area](#),  

Or
- Within the safeguarding distance of any existing or proposed minerals or waste sites that are safeguarded by the [Suffolk Minerals and Waste Local Plan](#).

2.36.2. The Geodiversity Survey and Assessment Report will need to comprise a Phase 1 Geoenvironmental Assessment and where it identifies the need for further investigation, a Phase 2 Geoenvironmental Assessment will also be required.

2.36.3. Planning Policy requires that proposals conserve and contribute towards the enhancement of the landscape character, biodiversity and geodiversity of the East Suffolk District. Within East Suffolk there are 57 Sites of Special Scientific Interest (SSSI) in total, with 20 of those being designations for geodiversity interest. If a proposed development is likely to impact on the geodiversity of these sites, then a survey and assessment of the impact of the development will be required. These SSSI are shown on our [GIS system](#).

2.36.4. The survey and assessment need to identify the potential impact of the development and measures to avoid, mitigate or compensate those impacts on the designated site.

2.36.5. To check whether a site is affected, applicants are advised to contact the Suffolk Biological Records Centre, which holds geodiversity as well as biological records. Further advice may also be obtained from the [GeoSuffolk](#) website.

2.36.6. The following websites provide links to these resources:

- [Suffolk Geographical Information System](#), showing minerals Consultation area, SSSI etc
- [Suffolk Biological Records Centre](#)
- [GeoSuffolk:](#)
- [Geology in Suffolk & Essex Coast & Heaths National Landscape \(formerly the AONB\).](#)

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### *2.37. Glint and Glare Assessment*

**2.37.1. A Glint and Glare Assessment will be required for all 'Major' Solar applications where the proposed development site is located alongside or within the vicinity of:**

- **any part of the Strategic Road Network (i.e. those highways managed by 'National Highways').**
- **Any part of the local highway network (i.e. those highways managed by Suffolk County Council)**
- **any active airfield, aerodrome or heliport.**
- **And/or**
- **An active railway line.**

2.37.2. In terms of assessment of impacts upon road users, a Glint and Glare Assessment will need to include an assessment of the potential glint and glare from light reflecting off the Solar photovoltaic equipment, at both a regular vehicle drivers eye level and at the for any Heavy Goods Vehicles (HGVs) drivers eye level.

2.37.3. The Assessment will also need to identify and assess the potential impacts upon aviation and train drivers, in situations where the site is located alongside or in close proximity to an active airfield, aerodrome, heliport or railway line.

*2.38. Habitats Regulation Assessment (HRA) and Recreational disturbance Avoidance Mitigation Strategy (RAMS) tariff form/payment*

**2.38.1. A Habitats Regulation Assessment (HRA) will be required for all applications that:**

- Propose 1 or more net new dwellings, or liable development (including holiday lets), within 13km RAMS Zone of Influence of the Suffolk Coast Habitat Sites consisting of:
  - Special Areas of Conservation (SAC)
  - Special Protection Areas (SPA)
  - Ramsar Sites

2.38.2. A Recreational disturbance Avoidance Mitigation Strategy (RAMS) tariff form/payment are not required to validate such applications but would be required to be submitted during the course of the application, for proposals that are RAMS liable within the Zone of Influence.

## 2.39. *Health Impact Assessments*

2.39.1. **Health Impact Assessments are required for any development where there is expected to be significant impact on the health and wellbeing of the local population or particular groups within it, which includes:**

- **A housing development of 50 dwellings or**
- **A development of less than 50 dwellings but which is still deemed to potentially impact on health services significantly**
- **A development that includes care homes, care facility, housing for the elderly, or student accommodation**
- **A development that involves the significant loss of public open space**
- **Any other type of development that could have significant health implications**

2.39.2. A health impact assessment should consider the impact of a development on the health of future users/occupants, and the impacts upon existing health services and facilities, and identify opportunities for addressing health challenges of development sites through the planning and design approach used for the development, particularly in relation to housing, streets, open space, infrastructure and shared facilities

2.39.3. It should also identify:

- ways in which the positive impacts for health can be enhanced,
- ways to avoid or minimise negative impacts,
- and
- Means to mitigate any negative impacts

2.39.4. The level of detail required within the health impact assessment will depend on the scale and nature of the development. The content of a Health Impact Assessment should be agreed with the local NHS and Suffolk County

Council Public Health Team at pre-application stage.

- 2.39.5. East Suffolk Council as Local Planning Authority is currently developing a [Healthy Environments Supplementary Planning Document](#). As that moves towards adoption that should be greater considerations and once adopted that document should be used to inform the Health Impact Assessment process.
- 2.39.6. The [Healthy Environments Supplementary Planning Document](#) includes specific guidance on the proposed structure/use of Health Impact Assessment tools. It includes the recommendation that for now the [Healthy Urban Development Unit \(HUDU\) Rapid Health Impact Assessment](#) tool is used unless something more bespoke is needed (i.e. 'desktop' or full Health Impact Assessment). The HUDU Rapid Health Impact Assessment is expected to be superseded in the future by a Suffolk-wide template Health Impact Assessment tool, and once adopted the use of that tool will be required to meet the Local Validation List requirements.
- 2.39.7. Health Impact Assessments should be carried out alongside other assessments, such as [Environmental Impact Assessments](#) and [Transport Impact Assessments](#).
- 2.39.8. Further information can be found via the following:
- [Government Guidance on promoting health and safe communities](#)
  - [Health Impact Assessment in spatial planning](#)
  - [Suffolk Observatory](#)
  - [East Suffolk Healthy Environments Supplementary Planning Document](#)
  - [East Suffolk Open Spaces Assessment](#)
  - [East Suffolk Play Area Strategy](#)
  - [East Suffolk Cycling and Walking Strategy](#)
  - [East Suffolk Air Quality Reports \(Annual\)](#)



- [Public Health Suffolk's annual Public Health Reports](#)
- [Office for Health Improvement and Disparities \(OHID\) public health profiles dashboard](#)

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## 2.40. *Heritage Statement or Impact Assessment*

2.40.1. When a Heritage Asset(s) are potentially affected by proposed development, those assets, their setting and any potential impacts should be carefully considered from the outset, informing and shaping the scheme. Co-currently with that process a Heritage Statement and Impact Assessment should be drafted.

2.40.2. The NPPF states:

*“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. The level of detail should be proportionate to the assets’ importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.”*

2.40.3. It is recognised that the requirements for the submission of a Heritage Assessment or Impact Assessment, and the content of such an assessment must be proportionate to the nature and type of Heritage Asset, and the potential impact of the proposals, which can be in part linked to scale and type of development proposal.

2.40.4. **Heritage Statement or Impact Assessment is required to validate any application for Planning Permission or Listed Building Consent, affecting a heritage asset (defined below) and or its setting, including the following:**

- **Proposals affecting any [listed building](#), including development within a curtilage and the setting of a listed building,**
- **Proposals affecting Scheduled Ancient Monuments and their setting, (some exceptions apply for householder proposals, and other minor works see below),**
- **Proposals affecting sites identified on the [Historic Environment Record](#) and their setting,**
- **Proposals affecting sites known to or thought to contain archaeological remains e.g. unidentified earthworks that appear on historical mapping,**

- **Proposals within or affecting the character or appearance of [Conservation Areas](#) (at the discretion of the Local Planning Authority, an exception maybe made to this requirement where it is clear that a proposal would not be visible from the public realm),**
- **Proposals involving the demolition or substantial alterations to a building which may be considered as a [non-designated heritage asset](#).**
- **All applications where the development is likely to have an impact on designated or non-designated heritage assets (identified at pre-application stage or during a previous application) will require a heritage statement.**

2.40.5. Whilst there maybe rare occasions where the Local Planning Authority makes exceptions to the above requirements for providing a Heritage Statement or Impact Assessment, applicants/agents may still wish to supply one as it may aid in the determination of the application and/or be an opportunity to present your proposals in a positive light.

2.40.6. There may be some cases where a Heritage Statement or Impact Assessment is not required prior to validation, but such a statement/assessment is then requested during the application process, once the assessment of the proposals is underway. When this happens, it is very likely that the statement/assessment will be required prior to the determination of the application. Therefore to reduce potential time delays in the determination of an application, it can be in an applicant's interest to submit a Heritage Statement or Impact Assessment from the outset if they are submitting an application which could affect a Heritage Asset or its setting.

2.40.7. Annex 2 (Glossary) of the [National Planning Policy Framework \(NPPF\)](#) defines a heritage asset as

*'A building, monument, site, place, area or landscape identified as have a degree of significance meriting consideration in planning decisions, because of its heritage interest. Heritage assets include designated heritage assets and assets identified by the local planning authority (including local listing).'*

2.40.8. A statement should include:

- a description of the significance of any heritage assets affected (whether designated or non-designated), including any contribution made by their setting,

- the relevant Historic Environment Record should be consulted,
- an assessment of the affected heritage asset(s) (using appropriate expertise where necessary to describe the significance of the heritage asset),
- an assessment of the impact of the proposal on the significance of those heritage assets affected (whether designated or non-designated), both overall and with special emphasis on the parts directly affected, including where necessary consideration of impacts which may arise as a result of development within their setting and any reasoned justification for the proposal,
- Demonstrate that opportunities to avoid the identified impacts have been explored, and where this is not possible set out mitigation with any harm weighed against any public benefits.
- where an application site includes new building or ground disturbance on or adjoining an archaeological heritage asset (whether designated or non-designated), or where a site has the potential to include archaeological heritage assets, a desk-based archaeological assessment (and where necessary an appropriate level of field evaluation) should be compiled in accordance with the NPPF (see the [Archaeological Assessment](#) section of this document) .
- Include photographs of the areas of the proposed works/affected by the proposals and their surrounding context (both internal and external images of any buildings/structures involved in the proposals). In instances where previously undertaken works are sought to be undone and/or restoration of historic elements are proposed, it can also be useful to include copies of historic photographs to illustrate how the building appeared previously.

**2.40.9.** Heritage Statements and Impact Assessments should be proportionate to the proposed development, and therefore their length and extent of detailed assessment will be dependent upon the nature of the proposal and the heritage asset(s) potentially affected by the proposals.

**2.40.10.** However, just submitting a copy of the listing held by Historic England will not be accepted as a heritage statement, even for smaller proposals.

- 2.40.11. Assessments may form part of an [Environmental Statement](#), where a proposal would fall within the guidelines of an Environmental Impact Assessment (EIA) development, however this should be made clear in the title of that document.
- 2.40.12. Similarly, if a Heritage Statement or Impact Assessment is included within either a [Planning Statement](#) or [Design and Access Statement](#), it should be made clear in the title of that statement/Document.
- 2.40.13. National, district level and neighbourhood plan policies seek to ensure proposals are appropriately assessed in terms of the historic environment. The specific policies relating to heritage, are too numerous to list here, but it is recommended that the relevant heritage related policies are referred to and considered, in the design of any proposals.
- 2.40.14. Links to national, district level and neighbourhood plan documents can be found below and within the [Archaeological Assessment](#) section of this document
- [The Town and Country Planning Listed Buildings and Conservation Areas Act 1990](#)
  - [National Planning Policy Framework \(NPPF\)](#)
  - [National Planning Policy Guidance \(NPPG\)](#)
  - [Historic England – The National Heritage List for England \(NHLE\)](#)
  - [Historic England – Advice on Planning](#)
  - [Historic England – Advice on Looking after Historic Buildings](#)
  - [Historic England Advice Notes](#) including:
    - Conservation Areas
    - Making Changes to Heritage Assets
    - Sustainability Appraisal and Strategic Environmental Assessment
    - The Adaptive reuse of Traditional Farm Buildings

- Listed Building and Curtilage
- Statements of Heritage Significance
- Energy Efficiency and Traditional Homes
- Commercial Renewable Energy Development and the Historic Environment
- Listed Building Consent
- [Suffolk Historic Environment Record](#)
- [East Suffolk Council – Conservation Areas](#)
- [East Suffolk Council – Conservation Area Appraisals](#)
- [East Suffolk Council – Listed Buildings](#)
- [East Suffolk Council – Local Plans:](#)
  - Suffolk Coastal Local Plan Policies:
    - SCLP11.3: Historic Environment
    - SCLP11.4: Listed Buildings
    - SCLP11.5: Conservation Areas
    - SCLP11.6: Non Designated Heritage Assets
    - SCLP11.7: Archaeology
  - Waveney Local Plan Policies:

- WLP8.37: Historic Environment
- WLP8.38: Non-Designated Heritage Assets
- WLP8.39: Conservation Areas
- WLP8.40: Archaeology
- [East Suffolk Council - Non-designated Heritage Asset Criteria](#)
- [East Suffolk Council – Supplementary Planning Documents and other guidance including:](#)
  - Historic Environment (2021)
  - North Lowestoft Heritage Action Zone Design Guide
- [Neighbourhood Plans in East Suffolk](#)

## 2.41. *Housing Statement*

### 2.41.1. **When required to validate an application:**

- **Applications which include proposals for 10 or more dwellings or in the case of outline planning applications more than 1000sqm of new floorspace (or meet the Local Plan Thresholds set out below or in relevant Neighbourhood Planning Policies).**
- **For affordable housing exception sites**
- **Applications submitted by Community Land Trusts**

### 2.41.2. **This is required for all proposals that include, or would normally be required to include, affordable housing.**

### 2.41.3. The Housing Statement must include a dwelling sizes and tenure plan, and schedule which must comprise:

- A schedule listing all the plots, the number of bedrooms, the number of persons housed (i.e. 2 bed bungalow for 3 persons), the proposed tenure, and whether they are M4(2) or M4 (3) complaint (details of how they compliant will also be required as part of the [sustainable construction statement/plan](#))

and

- An annotated plan(s) showing the dwellings, clearly labelled and/or shaded to show the number of bedrooms and tenure of each property. In the case of bungalows/houses this should be a block/site layout plan, and in the case of a block(s) of flats plans of each floor/level annotated to show these details would be required.

### 2.41.4. If there is space, the schedule may be added as a table on the annotated plan(s).

### 2.41.5. Where the proposal is located in the countryside, the statement should also include:

- evidence that the proposal would meet a proven need as demonstrated in a local housing needs assessment
- evidence that the affordable housing provided will be made available to people in local housing need at



an affordable cost for the life of the property

- 2.41.6. Within the former Waveney Area, Policy WLP8.2 of the [Waveney Local Plan](#) sets the thresholds for affordable housing requirements on residential sites. It states:

*“All new housing developments on sites with a capacity of 11 dwellings or more must make provision for a proportion of the total dwellings to be affordable housing as follows:*

- *Housing developments in the Lowestoft and Kessingland area (excluding Corton) must provide 20% affordable housing;*
- *Housing developments in the Southwold and Reydon area must provide 40% affordable housing;*

*and*

- *Housing developments in the remainder of the District must provide 30% affordable housing ”*

- 2.41.7. Within the former Suffolk Coastal Area, Policy SCLP5.10 of the [Suffolk Local Plan](#) sets the thresholds for affordable housing on residential sites. It states.

*“Proposals for residential development with capacity for ten units or more or sites of 0.5ha or more will be expected to make provision for 1 in 3 units to be affordable dwellings, and to be made available to meet an identified local need...”*

- 2.41.8. In addition to the above, [Neighbourhood Plans](#) can set alternative thresholds for affordable housing requirements, therefore if the application site lies within a Neighbourhood Plan Area, and the proposed development would meet/trigger an affordable housing requirement, the application must be accompanied by an Affordable Housing Statement.

## 2.42. *Hydrographical /Bathymetric Survey*

2.42.1. **A Hydrographical / Bathymetric Survey will be required where an application site and/or proposed works would either involve:**

- **works below high tide level in the sea or an estuary, or below potential water levels within a river, stream, pond, reservoir or other water feature (e.g. dredging, construction of jetty's and slipways etc)**
- **And/or**
- **Where the development has the potential to affect the flows and/or shape of below water/ offshore movements of material (e.g. coastal defence works, dredging etc that could affect long shore drift)**

2.42.2. It is in effect a [topographical survey](#) (mapping levels and features) below water level. Where a site is both above and below water level, these surveys can be combined on one drawing. These may also be the basis for [cross section](#) drawings to assist in illustrating the existing situation and the proposed changes, and should also be accompanied by a proposed levels and features plan (i.e. a proposed [block plan](#) with this level of detail).

2.42.3. Where Hydrographical or Bathymetric surveys are required and submitted within coastal or estuaries, it is likely that a [Coastal Erosion Vulnerability Assessment](#) would also be required, and separate [Marine License from the Marine Management Organisation](#) will need to be obtained.

2.42.4. **Please note:**

- **such plans must be drawn to scale, and a photograph of a plan is not acceptable, as the process results in the photograph showing an image which is not at the same scale as that stated in the image. All plans must therefore be either drawn to scale electronically or drawn by hand and if being submitted electronically then scanned to scale, not photographed. Therefore, if photographs are submitted of plans (e.g. \*.jpg \*.png \*.gif) they will not be accepted as valid plans, and the application will be invalid until 'to scale' drawings are submitted.**

- **It is the applicant's responsibility to ensure that all submitted plans/drawings are drawn accurately, including in terms of how any surrounding buildings and trees are presented in relation to the application site and the proposals. They must be sure that development could proceed fully in accordance with the drawings/plans that are submitted. Inaccurate representation of the size or position of neighbouring buildings and/or buildings within the application site and/or the proposals could invalidate any consent. It is therefore recommended that all plans are drawn based upon measured surveys or in the event that an Ordnance Survey plan is used, that they are checked on the ground by the applicant/their agent for accuracy prior to submission.**
- **Although not a validation requirement, it is recommended that existing and proposed drawings/plans of the same type are drawn to the same scale as one another, in the interests of clarity and ensuring that it is as easy as possible to understand what the proposed changes are.**

### *2.43. Isometric Drawings / Virtual 3-Dimensional Modelling*

- 2.43.1. Whilst they cannot replace 2-dimensional drawings such as [Block Plans](#) and [Elevational Drawings](#), Isometric Drawings and/or still shots/images from virtual 3-dimensional models can be useful to illustrate the physical relationship of your proposals with the existing building and/or neighbouring properties.
- 2.43.2. In some instances, providing information in these formats can improve the understanding of the proposals by third parties and other consultees and there may be potential to alleviate some of the concerns that such parties may have as a result of misunderstanding 2-dimensional plans.
- 2.43.3. Therefore, whilst Isometric Drawings and/or still shots/images from virtual 3-dimensional models are not required in order to validate any planning related application, they are something that may be advantageous, particularly on schemes proposed:
- on sites with a close relationship to neighbouring properties, or
  - on sites with significant level changes with them or in relation to neighbouring land, or
  - on larger major development schemes, where they could be used at the pre-application stage to enhance public engagement, prior to the submission of the formal application. In such cases updated versions to show any amendments to the scheme following community engagement and any pre-app guidance from the Local Planning Authority (i.e. as the submitted plans on the application) should be submitted.
- 2.43.4. Such drawings/stills from virtual 3-d models should:
- Show the proposals from multiple angles (i.e. not just the best angles), and
  - Be clearly annotated to ensure it is clear the direction of the view, what buildings and other features are shown, the date on which the 'existing' environment has been modelled, and the date(s) on which they have been created and/or updated.
  - Be submitted in a supported file type/format, preferably \*.pdf \*.gif or \*.jpg format

- 2.43.5. The software used to produce virtual 3-dimensional models of proposals is often capable of producing a file type that can be shared online and/or pre-set fly-through style videos. Whilst they can be very interesting, such videos and/or copies of the 3-dimensional model itself often require significant electronic memory, and therefore they are currently not encouraged to be submitted as part of a planning related application. Care also has to be taken with such things in terms of potential GDPR requirements especially if they include actual video or photographs of the existing environment that may have captured members of the public. If you wish to share interactive versions of your 3-dimensional model or fly-through videos it is therefore recommended that you host them on your own website/elsewhere and provide a stable hyperlink to them within your [Planning Statement](#) and/or any other relevant documents.
- 2.43.6. Such drawings/images from modelling can also be used to support [Daylight/ Sunlight assessments](#)
- 2.43.7. Physical Models of a proposed development can be useful at public in person consultation events, but the Local Planning Authority cannot upload the actual model to the website (i.e. the public record) and therefore is not particularly accessible during the application consultation process and long term retention is impractical. Therefore, if they are produced, photographs of that model from multiple angles should be submitted, rather than the actual physical model.
- 2.43.8. Please note:**
- **such plans must be drawn to scale, and a photograph of a plan is not acceptable, as the process results in the photograph showing an image which is not at the same scale as that stated in the image. All plans must therefore be either drawn to scale electronically or drawn by hand and if being submitted electronically then scanned to scale, not photographed. Therefore, if photographs are submitted of plans (e.g. \*.jpg \*.png \*.gif) they will not be accepted as valid plans, and the application will be invalid until 'to scale' drawings are submitted.**
  - **It is the applicant's responsibility to ensure that all submitted plans/drawings are drawn accurately, including in terms of how any surrounding buildings and trees are presented in relation to the application site and the proposals. They must be sure that development could proceed fully in accordance with the drawings/plans that are submitted. Inaccurate representation of the size or position of neighbouring buildings and/or buildings within the application site and/or the proposals could invalidate any consent. It is therefore recommended that all plans are drawn based upon measured surveys or in the event that an Ordnance Survey plan is used, that they are checked on the ground by the applicant/their agent for accuracy prior to submission.**

- **Although not a validation requirement, it is recommended that existing and proposed drawings/plans of the same type are drawn to the same scale as one another, in the interests of clarity and ensuring that it is as easy as possible to understand what the proposed changes are.**

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## 2.44. *Joinery and Window Details*

### 2.44.1. **When required to validate an application:**

- **This is required for all applications for Planning Permission and/or Listed Build Consent, which include the replacement of existing, or the provision of new windows, doors and surrounds, conservatories or shop fronts, within or to heritage assets.**

2.44.2. If an applicant/agent is unsure if they need planning permission and/or Listed Building Consent, and/or if their proposals are likely to be approved, advice can be provided by the Local Planning Authority via its [Pre-application Advice Service](#).

2.44.3. If a proposal is seeking Planning Permission (e.g. on a [listed building](#), or in an [Article \(4\) area of a Conservation Area](#), or if Permitted Development Rights for such works have been removed via condition on a [previous consent](#)) and/or Listed Building Consent to replace windows or doors, the application will need to include full [Joinery and Window details](#) detailing the existing and proposed windows/doors

2.44.4. These details would need to be in the form of:

- a) Close up photographs or drawings showing the existing windows, doors and their surroundings at a scale of 1:10 and horizontal and vertical cross-section drawings at a scale of 1:2 showing the details of the glazing bars, sills, heads, methods of opening and glazing
- b) Drawings showing proposed windows, doors and their surroundings at a scale of 1:10 and horizontal and vertical cross-section drawings at a scale of 1:2 showing the details of the glazing bars, sills, heads, methods of opening and glazing.

And

- c) a supporting elevational drawing#(s) or annotated photograph(s) identifying which windows each of these photographs/drawings relates to.

2.44.5. For conservatories on Listed Buildings, the elevational and cross-sectional drawings (to the scales identified above) must include a continuous horizontal cross-section through windows and doors, and details of the glazing bars, sills, heads,

cornice and methods of glazing and opening.

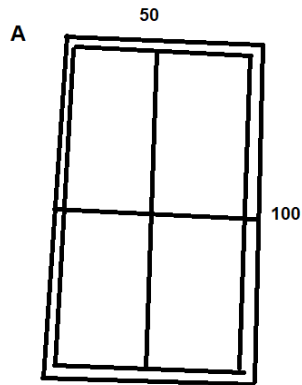
- 2.44.6. For shopfronts, the elevational and cross-sectional drawings (to the scales identified above) must include details of the glazing bars, sills, heads, fascia, pilasters, stallriser, cornice, method of glazing, shopfront lettering and colour scheme.
- 2.44.7. Where the windows/doors proposed to be removed are historic, it is recommended that the application also includes a justification statement supported by evidence that the windows/doors are beyond repair.
- 2.44.8. It may be possible to agree these details by condition in some instances. However, it is recommended such details are supplied upfront wherever possible as it may not be possible to grant consent without such details, and in the event that consent is granted with conditions, a further **discharge of condition** application would then be required which would likely result in additional costs and delay to the process before works can commence on site.

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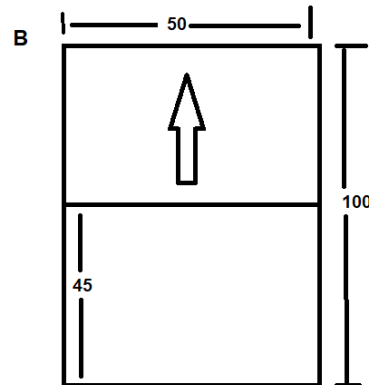


### Examples of drawings that are not sufficient

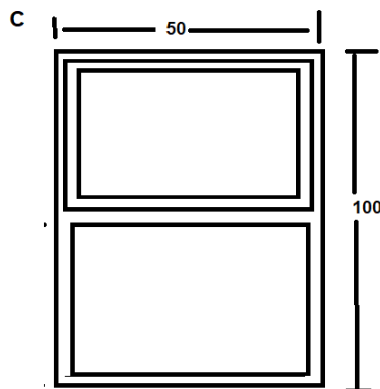
These illustrations are based upon drawings that have been submitted for applications previously but are unacceptable in terms of their lack of accuracy or level of detail. Therefore drawings/sketches of this type will not be acceptable to validate applications where window or joinery details are required upfront e.g. replacement windows in flats.



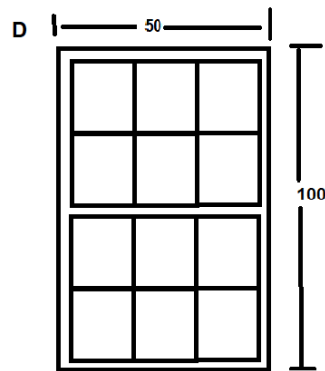
Not to scale  
Note - to match existing "like for like"



Not to scale  
Note - to match existing "like for like"



Not to scale  
Note - to match existing "like for like"



Not to scale  
Note - to match existing "like for like"

Example A doesn't appear to have even used a ruler. It is very unlikely that any opening is this unsquared in terms of the angle of the sides to one another.

Example B doesn't show the proposed frame layout or type of opening. The arrow suggests the top half opens but is that a sliding sash or a top hung opening. It is also unclear how wide the frames are proposed to be and/or whether the opening would be flush with or project from the main window frame.

Example C is better in that some indication of frames is provided but it is still unclear how wide those frames are proposed to be and/or whether the opening would be flush with or project from the main window frame.

Example D shows that there would be some bars within the windows, but like the other examples it is still unclear how wide those frames are proposed to be and/or whether the opening would be flush with or project from the main window frame.

All of these examples are also not drawn to scale so dimensions that are not annotated cannot be measured, and those dimensions that are labelled don't have a unit size (i.e. are they centimetres, inches?). The examples also leave questions about how the windows are proposed to open.

The reference to being 'Like for like' replacements is also potentially misleading and inaccurate, because however closely the new windows are intended to match the existing, there will be slight differences and these differences are likely to be greater if the materials are proposing to change and/or there is a proposed change from single to double glazing, and larger frames and glazing bars often result from such changes. Therefore, the term 'like for like' should not be included.

**Examples of what is expected**

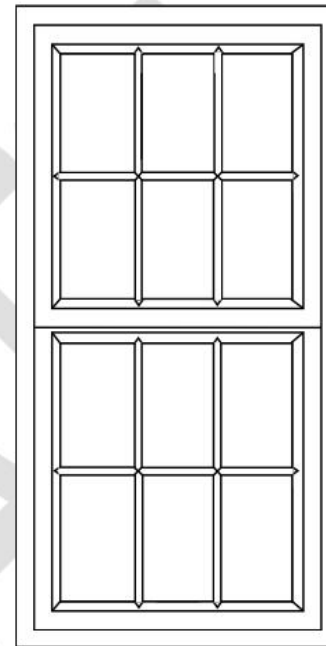
As set out above, all drawings of windows must be to scale, and clearly show all profiles, frame widths, method of opening and all other details of their features.

The following example is an illustration of the minimum level of detail expected on drawings for replacement windows. Along with a drawing along the lines of or more detailed than the illustration below, the window openings to which it relates on the building would also need to be identified, either through an annotated photograph or elevational drawing.

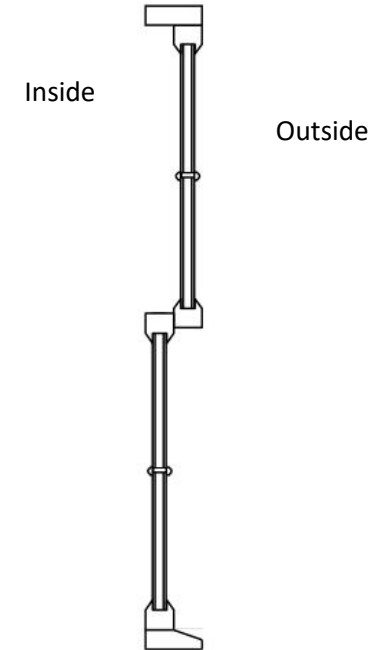
**Please note this is an illustration only, rather than a specific window design that may or may not work, and in no way provides any indication of the suitability or otherwise of a window of such a design.**

In addition to the above, larger scale cross section of certain detailing such as glazing bars may also be required (usually at a scale of 1:2 or 1:1)

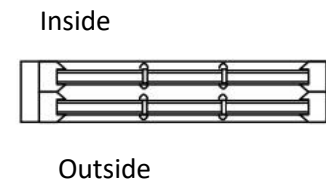
**Window 1 - Sash**



**Vertical Cross Section**



**Horizontal Cross**



**Scale 1:10**

Materials

White painted uPVC

Double glazed units

2.44.9. Further sources of information:

- [Historic England – The National Heritage List for England \(NHLE\)](#)
- [Historic England – General Advice on Historic Building maintenance, repair and conservation](#)
- [East Suffolk – District Wide Information on Conservation Areas including Appraisals](#)
- [East Suffolk – District Wide - Non-Designated Heritage Assets – Local Criteria](#)
- [East Suffolk Council – Historic Environment Supplementary Planning Document \(2021\)](#)

2.44.10. Please note:

- **such plans must be drawn to scale, and a photograph of a plan is not acceptable, as the process results in the photograph showing an image which is not at the same scale as that stated in the image. All plans must therefore be either drawn to scale electronically or drawn by hand and if being submitted electronically then scanned to scale, not photographed. Therefore, if photographs are submitted of plans (e.g. \*.jpg \*.png \*.gif) they will not be accepted as valid plans, and the application will be invalid until ‘to scale’ drawings are submitted.**
- **It is the applicant's responsibility to ensure that all submitted plans/drawings are drawn accurately, including in terms of how any surrounding buildings and trees are presented in relation to the application site and the proposals. They must be sure that development could proceed fully in accordance with the drawings/plans that are submitted. Inaccurate representation of the size or position of neighbouring buildings and/or buildings within the application site and/or the proposals could invalidate any consent. It is therefore recommended that all plans are drawn based upon measured surveys or in the event that an Ordnance Survey plan is used, that they are checked on the ground by the applicant/their agent for accuracy prior to submission.**
- **Although not a validation requirement, it is recommended that existing and proposed drawings/plans of the same type are drawn to the same scale as one another, in the interests of clarity and ensuring that it is as easy as possible to understand what the proposed changes are.**

## 2.45. *Landscape and Visual Impact Assessment*

- 2.45.1. **A Landscape and Visual Impact Assessment (LVIA) is required to validate an application for:**
- **schemes which are likely to have significant landscape or visual impacts, whether that is due to its scale, location or another factor.**
  - **All application where an Environmental Impact Assessment is required.**
- 2.45.2. A Landscape and Visual Impact assessment may form part of an environmental statement where a proposal would fall within the guidelines of an Environmental Impact Assessment (EIA) development.
- 2.45.3. A Landscape and Visual Impact assessment should include:
- a description of the site and the landscape context,
  - evaluation of the landscape sensitivity and the capacity to accommodate the development,
  - identification and assessment of landscape effects,
  - identification and assessment of visual effects,
  - visualisations of proposed development in line with Landscape Institute technical guidance,
  - measures that would avoid or minimise adverse effects,
  - where significant adverse effects are unavoidable, consideration of alternatives and why they have been rejected,
  - methodology of Landscape and Visual Impact Assessment with reference to best practice guidance.

- 2.45.4.** It is also recommended that a Landscape and Visual Impact Assessment is submitted for any sites which are covered by an allocation policy that specifically highlights a requirement for landscape assessment. These allocation policies are located within district level Local Plan documents and Neighbourhood Plans.
- 2.45.5.** A Landscape and Visual Impact Assessment should be proportionate to the scale of development and in some cases a Landscape and Visual Impact Appraisal will be satisfactory. This should be agreed with the Council before submission.
- 2.45.6. Links to national, district level and neighbourhood plan documents can be found in the further information section below, and in
- [National Planning Policy Framework](#) (NPPF) – Section relating to Conserving and enhancing the natural environment
  - [National Planning Policy Guidance](#) – Section on Natural Environment.
  - [Landscape and seascape character assessments - GOV.UK \(www.gov.uk\)](#)
  - [The Landscape Institute.](#)
  - [Guidelines to Landscape and Visual Impact Assessment Third Addition \(GLVIA 3\) produced by the Landscape Institute.](#)
  - [Historic Landscape Characterisation: a Tool for Understanding and Managing Whole Areas | Historic England](#)
  - [Suffolk Landscape Character Assessment](#)
  - [East Suffolk Council – Suffolk Coastal Landscape Character Assessment](#)
  - [East Suffolk Council – Waveney and Great Yarmouth Landscape Character Assessment](#)
  - [Suffolk Coast and Heaths Area of Outstanding Natural Beauty – Touching the Tide Landscape Character Assessment](#) (Area of Outstanding Natural Beauty now known as Suffolk & Essex Coast & Heaths National Landscape)
  - [Suffolk Coast and Heaths Area of Outstanding Natural Beauty – Valued Landscape Assessment Suffolk Coast & Heaths](#)

[Additional Project Area](#) (Area of Outstanding Natural Beauty now known as Suffolk & Essex Coast & Heaths National Landscape)

- [East Suffolk area – Neighbourhood Plans](#)

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*2.46. Landscape Masterplan, Landscape Strategy and/or full landscaping details.*

- 2.46.1. **An Indicative Landscape Masterplan or Landscape Strategy should be submitted for all major applications, minor applications in a sensitive landscape, and any proposal for an exception house under the relevant paragraph in the National Planning Policy Framework** (originally paragraph 55, subsequently 79, then 80 and at time of drafting this list, paragraph 84).
- 2.46.2. **It is recommended landscaping details are supplied up front for all applications for development where soft and/or hard landscaping is to be undertaken, this includes planning applications for:**
- **new build dwelling(s), commercial units, agricultural buildings, medical services and community uses, significant extensions to existing commercial units, agricultural units, medical services and community uses, and**
  - **The conversion of existing buildings to dwelling(s), commercial uses, medical services and community uses.**
- 2.46.3. It is important that consideration is given early in the process of designing any scheme to ensuring that sufficient space is allocated for landscaping within schemes from the outset, to ensure that there remains appropriate provision of such areas for landscaping including tree planting. Therefore, as set out above, an indicative Landscape Masterplan or Landscape Strategy will be required on all Major applications and minor applications a sensitive landscape, and any proposal for an exception house under the relevant paragraph in the National Planning Policy Framework. This includes applications for Outline Planning Permission, and they should demonstrate that sufficient space can be provided within the site for landscaping alongside the buildings, parking, access roads and other facilities/features.
- 2.46.4. The submission of landscaping details with the application including Reserved Matters submissions is strongly encouraged in order to reduce the potential need for conditions on the consent (if granted) which would then need to be discharged via a **discharge of condition** application, which can add additional time delays and costs to the construction process.
- 2.46.5. Details should include:
- Schedule of proposed planting of trees, hedges and shrubs,

- any existing trees and vegetation to be retained,
- surface materials for hard landscaping,
- boundary treatments,
- any excavation or changes in ground level,
- planting specification,
- tree pit details where tree planting is proposed in hard landscaping,
- the timescale for implementation, and
- proposals for long-term maintenance and landscape management.

2.46.6. In some circumstance, particularly with outline planning applications, applicants may wish to provide a lesser amount of landscaping detail, however in such a case it will need to be acknowledged that full landscaping details will be expected as part of reserved matters applications or as a pre- commencement condition.

2.46.7. Further information can be found via:

- [National Planning Policy Framework](#) – Section relating to Conserving and enhancing the natural environment
- [National Planning Policy Guidance](#) – Natural Environment
- [The Landscape Institute](#)
- [Royal Horticultural Society](#)
- [British Association of Landscape Industries](#)



- 2.46.8. Please also note - It is the applicant's responsibility to ensure that all submitted plans/drawings are drawn accurately, including in terms of how any surrounding buildings are presented in relation to the application site and the proposals. They must be sure that development could proceed fully in accordance with the drawings/plans that are submitted. Inaccurate representation of the size or position of neighbouring buildings and/or buildings within the application site and/or the proposals could invalidate any consent. It is therefore recommended that all plans are drawn based upon measured surveys or in the event that an Ordnance Survey plan is used, that they are checked on the ground by the applicant/their agent for accuracy prior to submission.**

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## 2.47. *Lighting Assessment / Details of Lighting Scheme*

- 2.47.1. **A Lighting Assessment/details of a lighting scheme will be required to validate an application for:**
- **all applications for development where the development is likely to result in a material increase in levels of light pollution (for example floodlighting or illumination in the countryside).**
  - **ll proposals located within an area covered by a “Dark Skies” policy (or similar policy) within a “Made” [Neighbourhood Plan](#), which specifies a requirement for the submission of a lighting statement/scheme/assessment for the type of development proposed (for example Mutford Neighbourhood Plan requires a lighting statement for new dwellings and commercial developments, but not for extensions to existing dwellings).**
- 2.47.2. An assessment should include details of any existing and proposed external lighting and the hours when the lighting would be switched on. These details should all include a layout plan with beam orientation and schedule of the equipment in the design (such as manufacturers specifications), and demonstrate how any artificial light spill may extend beyond the site in to neighbouring properties/gardens.
- 2.47.3. Details of “Dark Skies” and similar policies within “Made” Neighbourhood Plan Policies can be found on the Neighbourhood Plans section of the East Suffolk Website (link below).
- 2.47.4. Further information and guidance can be found via:
- [National Planning Policy Framework](#) – Section relating to Conserving and enhancing the natural environment
  - [National Planning Policy Guidance](#) – Section relating to light pollution
  - [DEFRA Artificial Light in the Environment Policy Update December 2013](#)
  - [Institute of Lighting Professionals – Guidance Note 1 for the reduction of obtrusive light 2021](#)
  - [East Suffolk Council – Waveney Local Plan \(Adopted March 2019\)](#)

- [East Suffolk Council – Suffolk Coastal Local Plan \(Adopted September 2020\)](#)
- [Neighbourhood Plans within East Suffolk](#)

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## 2.48. *Marketing Assessment*

### 2.48.1. **A Marketing Assessment is required for those applications that involve:**

- the loss or change of use of a public house,
- any application that involves or consists of the loss of a designated or non-designated heritage asset, on the grounds of redundancy and economic viable repair,
- any application that involves the loss of a building or use that provides employment ,
- conversion to residential use within any area safeguarded employment land as allocated within the development plan (i.e. the [Local Plans](#) and [Neighbourhood Plans](#)),
- Conversion of holiday lets to unrestricted residential dwellings
- an application that involves the loss of a community facility or community asset

### 2.48.2. A marketing assessment should include the details defined in [Appendix 4 of the East Suffolk Council Waveney Local Plan \(if within the former Waveney District Area\)](#) and [Appendix E of the East Suffolk Council – Suffolk Coastal Local Plan for the former Suffolk Coastal District Area](#).

## 2.49. *Models*

- 2.49.1. Physical Models of a proposed development can be useful at public in person consultation events, but the Local Planning Authority cannot upload the actual model to the website (i.e. the public record) and therefore is not particularly accessible during the application consultation process and long term retention is impractical. Therefore, if they are produced, photographs of that model from multiple angles should be submitted, rather than the actual physical model.
- 2.49.2. A suitable alternative could be supply [Isometric Drawings](#) and/or still shots/images from [virtual 3-dimensional models](#)

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## 2.50. *Noise Impact Assessment and/or acoustic report*

2.50.1. **A Noise Impact Assessment and/or Acoustic report are required to validate an application for:**

- **Proposals that generate noise such as industrial and/or commercial developments, for example workshops; public houses and clubs or**
- **Proposals that include equipment that can generate significant levels of noise e.g. refrigeration plant, equipment, air conditioning plant, sewage treatment plants requiring pumping equipment, air source heat pumps, wind turbines and other uses/forms of development including such equipment at residential properties and smaller commercial units such as restaurants and takeaways**
- **‘Major Development that require a [Transport Statement or Assessment](#).**
- **The introduction of new noise sensitive receptors (such as those associated with new residential dwellings, hospitals, or schools) adjacent to sources of noise, including roads, railways, commercial, industrial sources, pubs and clubs.**

2.50.2. Noise assessments or acoustic reports should be carried out by a suitable qualified and competent person.

2.50.3. For residential development, the assessment shall follow the principals of [ProPG: Planning & Noise – New Residential Development: Main Guidance](#) unless otherwise agreed by the Council’s Environmental Protection Team

**2.50.4.** here the application is for a commercial kitchen ventilation or extraction system a statement on the system should be included in the application detailing the position and design of the ventilation and extraction equipment, together with noise abatement techniques (if necessary). Reference should be made to the latest edition of EMAQ+ Guidance “Control of Odour and noise from Commercial Kitchen and Exhaust Systems”

2.50.5. Guidance on when a Noise Impact Assessment and/or acoustic report would most likely be required to validate an application for air source heat pumps, wind turbines, ground source heat pumps etc is included in the guidance on **renewable energy** accompanying this validation list.

**2.50.6.** Guidance on when a Noise Impact Assessment and/or acoustic report would most likely be required for sewage treatment plants is included in the notes on sewage treatment plants within each **application type** of the guidance

accompanying this list.

2.50.7. All Noise Impact Assessment or acoustic reports should have reference to the following guidance where relevant:

- BS 4142:2014+A1:2019 - Methods for rating and assessing industrial and commercial sound
- BS 8233:2014 - Guidance on sound insulation and noise reduction for buildings
- BS 5228-1:2009+A1:2014 - Code of practice for noise and vibration control on construction and open sites. Part 1: Noise
- BS 5228-2:2009+A1:2014 - Code of practice for noise and vibration control on construction and open sites – Part 2: Vibration

2.50.8. You are advised to contact the [Environmental Protection Team](#) to discuss the scope of any noise report submitted.

- [National Planning Policy Guidance – Section on Noise](#)
- [Noise Policy Statement for England](#)
- [Nuisance smells: how councils deal with complaints - GOV.UK \(www.gov.uk\)](#)
- [East Suffolk Environmental Protection Team](#)

## 2.51. Odour Assessment

### 2.51.1. An Odour Assessment is required to validate an application:

- **When a proposal, whether residential, commercial or of another type, has the potential to cause significant levels odour or any potential air quality matters for future occupants or those of adjoining areas or where a development is proposed near to an existing source of odour**

2.51.2. This includes both large scale developments , generating odour or air pollution directly by their use, including smaller developments such as restaurants/takeaways. This could include the transport of odourous materials.

2.51.3. Where an odour assessment is necessary reference should be made to the latest edition of the IAQM “Guidance on the assessment of odour for planning”. An appropriate site-specific assessment should be submitted for all residential proposals near known sources of odour, with particular regard to adjacent industrial uses or where an odorous use is proposed

2.51.4. Where the application is for a commercial kitchen ventilation or extraction system an assessment should be submitted in accordance with the latest edition of EMAQ+ Guidance – [“Control of Odour and Noise from Commercial Kitchen Exhaust Systems”](#)

2.51.5. The East Suffolk Environment Protection Team should be contacted to confirm the scope of any assessment.

2.51.6. An Odour Assessment may also need to be accompanied by an [Air Quality Assessment](#)

2.51.7. Further guidance and information can be found via:

- [National Planning Policy Framework \(NPPF\)](#)
- [Institute of Air Quality Management Guidance on the assessment of odour for planning](#)



## 2.52. *Open Space Assessment*

### 2.52.1. **An Open Space Assessment is required to validate an application for:**

- **Any development that results in the loss and/or creation of open space; ; and/or**
- **new residential development of five or more dwellings which is likely to generate demand for access to and use of open space and recreation facilities, and/or**
- **development on open space in the East Suffolk District, whether it is in public or private ownership.**

2.52.2. Where new residential development is proposed, the assessment should provide details of the open space to be provided in relation to the number and type of dwellings alongside details on how it is proposed that the open space will be managed and maintained in perpetuity.

2.52.3. Where development is proposed on open space (whether in public or private ownership), the assessment should demonstrate that the land or buildings are no longer required for that purpose, are not economically viable and there is no local demand for the land or buildings in their current use.

2.52.4. It should include:

- reasoned justification as to why development affecting such facilities should be allowed,
- details of the area of sports facilities to be lost and any replacement,
- information on any assessment considered to support the view that the open space, sport and recreation facilities are surplus to requirements,
- details of quality, accessibility, management and maintenance of proposed facilities and of existing facilities where there is a proposed loss,
- details of existing and proposed changing/toilet facilities,

- technical details including surfacing, fencing and floodlighting,
- details of proposed sports to be played, including the level to be played at.

2.52.5. Where built development is proposed on the designated local green spaces or open spaces as defined within either of the district level [Local Plan Documents](#) or within any of the 'Made' [Neighbourhood Plan](#) Areas it will need to be clearly demonstrated that it is required to enhance the role and function of the identified Local Green Space/open space.

2.52.6. It is recommended that such Assessments make reference to the requirements of

- the [National Planning Policy Framework \(NPPF\)](#),
- [National Planning Policy Guidance \(NPPG\)](#),
- the 'Open Space' policies within the Local Plan relating to area of the district in which the application is located i.e. Policy SCLP8.2 (Open Space) of the East Suffolk Council Suffolk Coastal Local Plan and Policy WLP8.23(Protection of Open Space) of the East Suffolk Council Waveney Local Plan, and any relevant site allocation policies within those Local Plans.
- Any open space related or relevant site allocation policies the relevant Neighbourhood Plan if the site is within a Neighbourhood Plan Area. And where appropriate:
  - [Sport England Playing Fields Policy and Guidance](#)
  - [Fields in Trust – Guidance for Outdoor Sport and Play](#)

### 2.53. *Parking layout plans*

#### 2.53.1. **Parking Layout Plans are required to validate an application for:**

- **Any development which includes alterations to existing parking and access arrangements, including those at individual dwellings**
- **Any full or reserved matters application for the development of 10 or more dwellings or 1,000m<sup>2</sup> of commercial floor space,**

2.53.2. This is required for all development where there is an increase in number of dwellings or bedrooms or for new commercial units proposing parking areas. It should clearly indicate the proposed parking spaces and associated infrastructure including any within carports cartlodges and garages. For smaller developments this may be included in the [block plan](#), but on larger schemes this should be a separate plan, ideally annotated with dimensions to demonstrate how all spaces accord with the [Suffolk County Council Parking Guidance](#)

2.53.3. The plan should highlight what type of vehicles the parking spaces are to be provided for (e.g. cars, two-wheeled motor vehicles, bicycles etc) which spaces are to be equipped with electric charging points and how those spaces meet the [Suffolk County Council Parking Guidance](#)

2.53.4. It is recommended that in drafting such layout plans, the following are considered:

- The section in the [National Planning Policy Framework \(NPPF\)](#) relating to Sustainable Transport,
- the parking and sustainable transport relevant policies within the [Local Plan](#) relating to area of the district in which the application is located i.e. Policy SCLP7.1 (Sustainable Transport) & SCLP7.2 (Parking Proposals and Standards) of the East Suffolk Council Suffolk Coastal Local Plan and Policies WLP8.21) (Sustainable Transport) and WLP8.29 (Design) of the East Suffolk Council Waveney Local Plan, and any relevant site allocation policies within those Local Plans.
- Any parking or transport related or relevant site allocation policies the relevant Neighbourhood Plan if the site is within a [Neighbourhood Plan Area](#).

- the [Suffolk County Council Parking Guidance](#)
- The [Suffolk Design: Streets Guide](#)

**2.53.5. Please note:**

- **Such plans must be drawn to scale, and a photograph of a plan is not acceptable, as the process results in the photograph showing an image which is not at the same scale as that stated in the image. All plans must therefore be either drawn to scale electronically or drawn by hand and if being submitted electronically then scanned to scale, not photographed. Therefore, if photographs are submitted of plans (e.g. \*.jpg \*.png \*.gif) they will not be accepted as valid plans, and the application will be invalid until 'to scale' drawings are submitted.**
- **It is the applicant's responsibility to ensure that all submitted plans/drawings are drawn accurately, including in terms of how any surrounding buildings and trees are presented in relation to the application site and the proposals. They must be sure that development could proceed fully in accordance with the drawings/plans that are submitted. Inaccurate representation of the size or position of neighbouring buildings and/or buildings within the application site and/or the proposals could invalidate any consent. It is therefore recommended that all plans are drawn based upon measured surveys or in the event that an Ordnance Survey plan is used, that they are checked on the ground by the applicant/their agent for accuracy prior to submission.**
- **Although not a validation requirement, it is recommended that existing and proposed drawings/plans of the same type are drawn to the same scale as one another, in the interests of clarity and ensuring that it is as easy as possible to understand what the proposed changes are.**

## 2.54. *Phasing Plan/Schedule*

- 2.54.1. A phasing Plan/Schedule is required where the development is to be phased, for whatever reason.
- 2.54.2. A Phasing Plan/Schedule must detail which order the development is going to take place. It is recommended this is provided in the form of an annotated layout plan(s) and a schedule listing the order in which each plot/unit will be commenced and completed.
- 2.54.3. If the phasing is proposed the description of development on the application form should also make it clear that the development is to be phased. E.g. “Erection of 20 dwellings (phased)”.
- 2.54.4. There should be a clear planning reason for phasing a development i.e. there needs to be a reason as to why certain elements of the scheme have to take prior to others. Potential examples of when phasing maybe required on a scheme could include:
- on large housing development site where certain facilities have to be in place prior to a certain stage of development to ensure they are in secured and in place and an appropriate time, e.g. phase one could be units 1-10, phase 2 the public open space, phase 3, units 20-35 etc.
  - where existing heritage assets are required to be restored and converted prior to a certain proportion of the new build units.
  - Where the development includes self-build units as they are likely to be developed at different times.
- 2.54.5. The phasing of development can also have consequences for [Community Infrastructure Levy \(CIL\)](#) payments, but this in itself should not be a reason for phasing a development.
- 2.54.6. **Please note:**
- **such plans must be drawn to scale, and a photograph of a plan is not acceptable, as the process results in the photograph showing an image which is not at the same scale as that stated in the image. All plans must therefore be either drawn to scale electronically or drawn by hand and if being submitted electronically then scanned to scale, not photographed. Therefore, if photographs are submitted of plans (e.g. \*.jpg \*.png \*.gif)**

**they will not be accepted as valid plans, and the application will be invalid until ‘to scale’ drawings are submitted.**

- **It is the applicant's responsibility to ensure that all submitted plans/drawings are drawn accurately, including in terms of how any surrounding buildings and trees are presented in relation to the application site and the proposals. They must be sure that development could proceed fully in accordance with the drawings/plans that are submitted. Inaccurate representation of the size or position of neighbouring buildings and/or buildings within the application site and/or the proposals could invalidate any consent. It is therefore recommended that all plans are drawn based upon measured surveys or in the event that an Ordnance Survey plan is used, that they are checked on the ground by the applicant/their agent for accuracy prior to submission.**
- **Although not a validation requirement, it is recommended that existing and proposed drawings/plans of the same type are drawn to the same scale as one another, in the interests of clarity and ensuring that it is as easy as possible to understand what the proposed changes are.**

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## 2.55. *Planning Statement*

- 2.55.1. **A planning statement is required for all applications where the context and justification for a proposed development needs to be demonstrated, and in particular all applications for major development, change of use and developments that do not accord with the development plan.**
- 2.55.2. **However, if you wish to submit a statement to explain and/or justify your proposals with reference to relevant planning policies, you may do so on any scale of application.**
- 2.55.3. A planning statement should:
- detail how the proposal has taken account of national and local planning policy,
  - identify the context for the development and why the site has been chosen,
  - detail the intensity and type of use and who the users would be,
  - detail any consultation that has taken place with the local authority, statutory consultees or wider public and the feedback from that consultation (where this has not been incorporated as a separate statement of community involvement)
- 2.55.4. It may also include details of consultations with the local planning authority, the wider community and the statutory consultees that have been undertaken prior to submission of an application (a [statement of community involvement](#) may be incorporated into the planning statement where appropriate).

### **Community Assets**

- 2.55.5. Where a proposal affects a community asset either in terms of the way it functions, its potential future viability and/or its total loss, a [Community Facilities Justification Statement](#) should be submitted (either as part of the planning statement or as a separate document). This should include:
- reference to the [List of Assets of Community Value](#) (ACVs) (please note if a site is not on this list it can still be a community asset worthy of retention).

- Details/evidence for the change/reduction/loss of the asset.

### **Sports and Playing Fields**

2.55.6. Where proposals effect or create sports facilities and/or playing fields, or generate a substantial need for them, a planning statement should also include the following and/or make reference to an [Open Space Assessment](#) submitted on the application:

- reasoned justification as to why development affecting such facilities should be allowed,
- details of the area of sports facilities to be lost and any replacement,
- information on any assessment considered to support the view that the open space, sport and recreation facilities are surplus to requirements,
- details of quality, accessibility, management and maintenance of proposed facilities and of existing facilities where there is a proposed loss,
- details of existing and proposed changing/toilet facilities,
- technical details including surfacing, fencing and floodlighting,
- details of proposed sports to be played, including the level to be played at.



## 2.56. *Public Rights of Way*

- 2.56.1. Developers will be expected to make opportunities to enhance access to the countryside, coast and to services and facilities through improvements to the public rights of way network.
- 2.56.2. As the effect of development on a public right of way is a material consideration in the determination of a planning application, applications should include details about the definitive position of public rights of way across or adjacent to or within the vicinity of a development site and how they will be protected and enhanced. Proposals which seek to create or amend public rights of way should include a statement on the creation process proposed and detailed plans of the locations, width and surface proposed, as those works are likely to be development requiring planning permission and therefore should form part of the application, to avoid the potential need for a further application at a later date.
- 2.56.3. Therefore, if there is a Public Right of Way on or adjoining your application site:
- its definitive route should be shown on the [Proposed Block Plan/Site Layout Plan](#). The route must be that shown on the [Suffolk County Council Definitive Map](#), not the route as it appears on the ground (although it can be useful to also indicate that route).
  - Details of how it will be protected and/or enhanced by the proposal should be submitted (e.g. the location of temporary fencing during construction to prevent materials etc from being stored on the route)
  - If your scheme seeks to create or amend public rights of way, the application must also include a statement on the creation process proposed and detailed plans of the locations, width and surface proposed.
- 2.56.4. Further information on the material consideration of Public Rights of way can be found in [Planning Practice Guidance: Open space, sports and recreation facilities, public rights of way and local green space - Public rights of way and National Trails](#)
- 2.56.5. The process of diverting, creating or extinguishing a right of way is a separate legal process from planning permission under the Town and Country Planning Act 1990 Section 257 or 258 and all those details of location, width and surface will need to be provided when a Public Path Order is applied for and will be looked at by the Highway Authority for Suffolk, Suffolk County Council Rights of Way, and the relevant officer at East Suffolk Public Path Orders or relevant

colleague in Babergh Mid Suffolk processing the order under the provision of the rights of way services agreement.

- 2.56.6. Following the amendment of Section 257 by the Growth and Infrastructure Act 2013, a public path order may be made in anticipation of planning permission. However, an order made in advance of planning permission cannot be confirmed by either the local authority or the Secretary of State until that permission has been granted.

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### *2.57. Refuse storage/presentation plan*

- 2.57.1. Applications will not be made invalid because they lack information regarding Refuse Collection, however you are strongly advised to submit this information upfront with the following applications as it will speed up the process because this information will not then be asked for during the course of application process (likely delaying determination) and it may reduce the need to submit further applications to discharge conditions on proposals for:
- Creation of new dwellings,
  - New retail business,
- And
- Industrial or leisure or other similar developments.
- 2.57.2. All applications for new dwellings should provide details of bin storage and collection/presentation points. This may be included on a [block or layout plan](#) where appropriate.
- 2.57.3. Bin presentation and storage areas should be situated within the application site, outside of the area of the highway which is maintainable at public expense (including pavements), because if they are left in such areas bins may present an obstruction to highway users.
- 2.57.4. On larger schemes a separate drawing showing these areas may be required in order to enable sufficient detail of these and other features to be shown and annotated. Details of routes and swept path diagrams for vehicular turning and manoeuvring, suitable for the vehicles used within the East Suffolk District for the collection of waste and recycling, must also be shown on schemes where those vehicles are going to need to enter the application site.
- 2.57.5. National, district level and neighbourhood plan policies seek to ensure proposals are appropriately assessed in terms of the refuse and recycling bin storage and presentation areas, in the interests of amenity and highway safety.
- 2.57.6. Please note:**

- **such plans must be drawn to scale, and a photograph of a plan is not acceptable, as the process results in the photograph showing an image which is not at the same scale as that stated in the image. All plans must therefore be either drawn to scale electronically or drawn by hand and if being submitted electronically then scanned to scale, not photographed. Therefore, if photographs are submitted of plans (e.g. \*.jpg \*.png \*.gif) they will not be accepted as valid plans, and the application will be invalid until 'to scale' drawings are submitted.**
- **It is the applicant's responsibility to ensure that all submitted plans/drawings are drawn accurately, including in terms of how any surrounding buildings and trees are presented in relation to the application site and the proposals. They must be sure that development could proceed fully in accordance with the drawings/plans that are submitted. Inaccurate representation of the size or position of neighbouring buildings and/or buildings within the application site and/or the proposals could invalidate any consent. It is therefore recommended that all plans are drawn based upon measured surveys or in the event that an Ordnance Survey plan is used, that they are checked on the ground by the applicant/their agent for accuracy prior to submission.**
- **Although not a validation requirement, it is recommended that existing and proposed drawings/plans of the same type are drawn to the same scale as one another, in the interests of clarity and ensuring that it is as easy as possible to understand what the proposed changes are.**

## *2.58. Retail / Leisure Impact Assessments*

2.58.1. **A Retail /leisure Assessment is required for planning applications for all proposals relating to main town centre uses, on sites outside of town centres, including: -**

- **New development;**
- **Redevelopment of existing facilities;**
- **Extensions to existing facilities;**
- **Changes of use involving development;**
- **Applications to vary or remove existing planning conditions, which would have the effect of creating additional floorspace e.g. mezzanine floor, or changing the range of goods sold.**

2.58.2. **This is required for developments within the former Waveney area (based upon [Local Plan](#) Policy WLP8.18) for:**

- **Town centre uses over 350sqm on edge of centre or on out of centre sites.**

2.58.3. **This is required for developments within the former Suffolk Coastal Area, (based upon [Local Plan](#) Policy SCLP4.8) for:**

- **Ipswich Area – proposals outside the Ipswich town centre with a Floor Space Impact Threshold (gross) larger than 750sqm,**
- **Felixstowe – proposals outside the centre with a Floor Space Impact Threshold (gross) larger than 750sqm,**

- **Woodbridge – proposals outside the centre with a Floor Space Impact Threshold (gross) larger than 750sqm,**
- **Aldeburgh, Framlingham, Leiston and Saxmundham - – proposals outside the centre with a Floor Space Impact Threshold (gross) larger than 350sqm,**

2.58.4. A requirement for such an assessment is also included within some [Neighbourhood Plan](#) Policies

2.58.5. In accordance with the [National Planning Policy Framework \(NPPF\)](#) , any retail or leisure impact assessment should include:

- the impact of the proposal on existing, committed and planned public and private investment in a centre or centres in the catchment area of the proposal and
- the impact of the proposal on town centre vitality and viability, including local consumer choice and trade in the town centre and wider area (as applicable to the scale and nature of the scheme)

2.58.6. It must also include a sequential test, which should consider whether there are any sequentially preferable sites that exist and should assess such sites in terms of availability, suitability and viability. Sequentially preferable sites are those within existing centres, then edge of centre locations and only if suitable sites are not available (or expected to become available within a reasonable period) should out of centre sites be considered (see NPPF).

## 2.59. Roof Plans

2.59.1. Applications must include roof plans showing the existing and proposed arrangement, for proposals that comprise:

- the conversion of the building(s) involving significant external works (including works to the roof such as the insertion of rooflights and dormers, the replacement of the roof structure and/or the replacement of the roof coverings),
- any 'Major' or 'Minor' planning application or Listed Building application which includes an extension and/or alteration that would result in a new roof being connected to the existing roof,
- and/or the replacement of a roof on a dwellinghouse or any other building (e.g. the removal of the existing roof and installation of a new roof to enable the creation of accommodation within the roofspace). Such applications are also likely to also require at least one [streetscene](#) drawing.

2.59.2. Roof plans must be:

- Be at a scale of 1:100 or 1:50 (ideally at the same scale as the floor plans) for all new buildings and for all proposals where extensions/alterations are proposed to existing buildings, that would result in additional roofslopes connecting/tying in with the existing and/or resulting in complex roofslope arrangements.
- Include a scale bar
- Include a title to identify the development and subject of the drawing
- Include a unique drawing number which also indicates any revisions (e.g.1234Revision B)
- All revisions to previous plans should be described to identify any changes (e.g. Revision A – additional rooflight on rear roofslope)
- Include the date the plan was prepared or amended

2.59.3. Although not an essential requirement, it is recommended that such plans include dimensions, to enable ease of understanding for those consulted on and/or viewing the plans.

**2.59.4. Please note:**

- **such plans must be drawn to scale, and a photograph of a plan is not acceptable, as the process results in the photograph showing an image which is not at the same scale as that stated in the image. All plans must therefore be either drawn to scale electronically or drawn by hand and if being submitted electronically then scanned to scale, not photographed. Therefore, if photographs are submitted of plans (e.g. \*.jpg \*.png \*.gif) they will not be accepted as valid plans, and the application will be invalid until 'to scale' drawings are submitted.**
- **It is the applicant's responsibility to ensure that all submitted plans/drawings are drawn accurately, including in terms of how any surrounding buildings and trees are presented in relation to the application site and the proposals. They must be sure that development could proceed fully in accordance with the drawings/plans that are submitted. Inaccurate representation of the size or position of neighbouring buildings and/or buildings within the application site and/or the proposals could invalidate any consent. It is therefore recommended that all plans are drawn based upon measured surveys or in the event that an Ordnance Survey plan is used, that they are checked on the ground by the applicant/their agent for accuracy prior to submission.**
- **Although not a validation requirement, it is recommended that existing and proposed drawings/plans of the same type are drawn to the same scale as one another, in the interests of clarity and ensuring that it is as easy as possible to understand what the proposed changes are.**



## 2.60. *Rural Workers Dwelling Statement*

### 2.60.1. **A Rural Workers Dwelling Statement is required on:**

- **all planning applications for new rural workers dwellings.**
- and**
- **All applications seeking to vary or remove agricultural or other rural workers occupancy conditions on existing dwellings.**

2.60.2. The [National Planning Policy Framework \(NPPF\)](#) requires that local planning authorities should avoid new isolated homes in the countryside, unless there are special circumstances such as an essential need for a rural worker to live permanently at or near their place of work in the countryside.

2.60.3. This is also a requirement of the [East Suffolk Local Plans](#) (Policy SCLP5.6 within the former Suffolk Coastal Area, and Policy WLP8.8 within the former Waveney Area). A requirement for such information is also included within some [Neighbourhood Plan](#) Policies.

2.60.4. In order to seek to demonstrate compliance with the NPPF, Local Plan Policies, and Neighbourhood Plan Policies, and any relevant [Supplementary Planning Guidance](#), proposals for the development of isolated rural workers dwellings must provide key information to ensure unnecessary and potentially obtrusive development in the countryside is avoided.

### **Applications for new rural workers dwellings**

2.60.5. In order to demonstrate compliance with the NPPF and Local Plan Policies WLP8.8 and SCLP5.6, applications for new rural workers dwellings must be accompanied with evidence showing that:

- There is a clearly established existing functional need.
- The need relates to a full-time worker, or one who is primarily employed in agriculture and does not relate to a part time requirement.

- The unit and the agricultural activity concerned have been established for at least three years, have been profitable for at least one of them, are currently financially sound and have a clear prospect of remaining so.
- The functional need could not be fulfilled by another existing dwelling on the unit, or any other existing accommodation in the area which is suitable and available (or could be made available) for occupation by the workers concerned.

And

- Any other requirements set out in the relevant Neighbourhood Plan (where applicable)

**Applications seeking to vary or remove occupancy conditions**

2.60.6. In accordance with Local Plan Policies WLP8.8 and SCLP5.6, those applications seeking to vary or remove agricultural occupancy conditions must be accompanied with a statement showing that:

- There is evidence that there is no long-term need for an agricultural worker dwelling in the on the holding/business and in the locality.
- Include evidence to show that the property has marketed to ensure proper coverage within the relevant sector for at least one year at a price which reflects the existence of the occupancy condition,
- The dwelling has been made available to a minimum of three Registered Providers operating locality on terms that would prioritise its occupation by a rural worker as an affordable dwelling and that option has been refused.

and

- Any other requirements set out in the relevant [Neighbourhood Plan](#) (where applicable)

## *2.61. Site Location Plan*

### 2.61.1. As a minimum such plans must:

- Be at a scale of 1:1250 or 1:2500 (and the scale should be identified/labelled),
- Show at least two named roads when possible, in rural areas one road is sufficient, along with any surrounding buildings/local landmarks (e.g. church, named farmstead etc), to enable the site to be clearly identified.
- If the site is close to the Strategic Road Network (i.e. the roads managed/maintained by National Highways rather than Suffolk County Council) and/or the proposal is likely to affect the traffic movements to a particular junction(s) onto the Strategic Road Network, these should also be shown on the site location plan.
- If submitted based on OS data, the plan needs to contain the relevant licence information as required by copyright law.
- Direction of North needs to be indicated.
- Include a title to identify the development and subject of the drawing
- Include a unique drawing number which also indicates any revisions (e.g.1234 Revision B)
- All revisions should be described to identify any changes (e.g. Revision A – Layout changed)
- Include the date the plan was prepared or amended
- Include a red line around the application site (see below).

### **Guidance on the Red and Blue Lines**

- 2.61.2. The application site must be edged clearly with a red line, including all land necessary to carry out the proposed development – for example, land required for access to the site from a public highway, visibility splays, landscaping, car-parking and open areas around buildings. If an existing access is going to be used, the red line needs to go up to the edge of highway land.
- 2.61.3. Applicants should check that all land within the red line is within their ownership or control or consists of adopted highway. Where the red line includes third party land this needs to be reflected in the ownership certificate on the [application form](#).
- 2.61.4. A blue line must be drawn around any other land owned or controlled by the applicant, close to, or adjoining the application site.
- 2.61.5. **Please note:**
- **such plans must be drawn to scale, and a photograph of a plan is not acceptable, as the process results in the photograph showing an image which is not at the same scale as that stated in the image. All plans must therefore be either drawn to scale electronically or drawn by hand and if being submitted electronically then scanned to scale, not photographed. Therefore, if photographs are submitted of plans (e.g. \*.jpg \*.png \*.gif) they will not be accepted as valid plans, and the application will be invalid until ‘to scale’ drawings are submitted.**
  - **It is the applicant's responsibility to ensure that all submitted plans/drawings are drawn accurately, including in terms of how any surrounding buildings and trees are presented in relation to the application site and the proposals. They must be sure that development could proceed fully in accordance with the drawings/plans that are submitted. Inaccurate representation of the size or position of neighbouring buildings and/or buildings within the application site and/or the proposals could invalidate any consent. It is therefore recommended that all plans are drawn based upon measured surveys or in the event than an Ordnance Survey plan is used, that they are checked on the ground by the applicant/their agent for accuracy prior to submission.**

- **Although not a validation requirement, it is recommended that existing and proposed drawings/plans of the same type are drawn to the same scale as one another, in the interests of clarity and ensuring that it is as easy as possible to understand what the proposed changes are.**

### **Examples of unacceptable Site Location Plans**

- 2.61.6. The following examples are based upon some of the most common reasons that site location plans are not suitable when submitted for planning applications. They are provided to illustrate what not to do.

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### Example 1

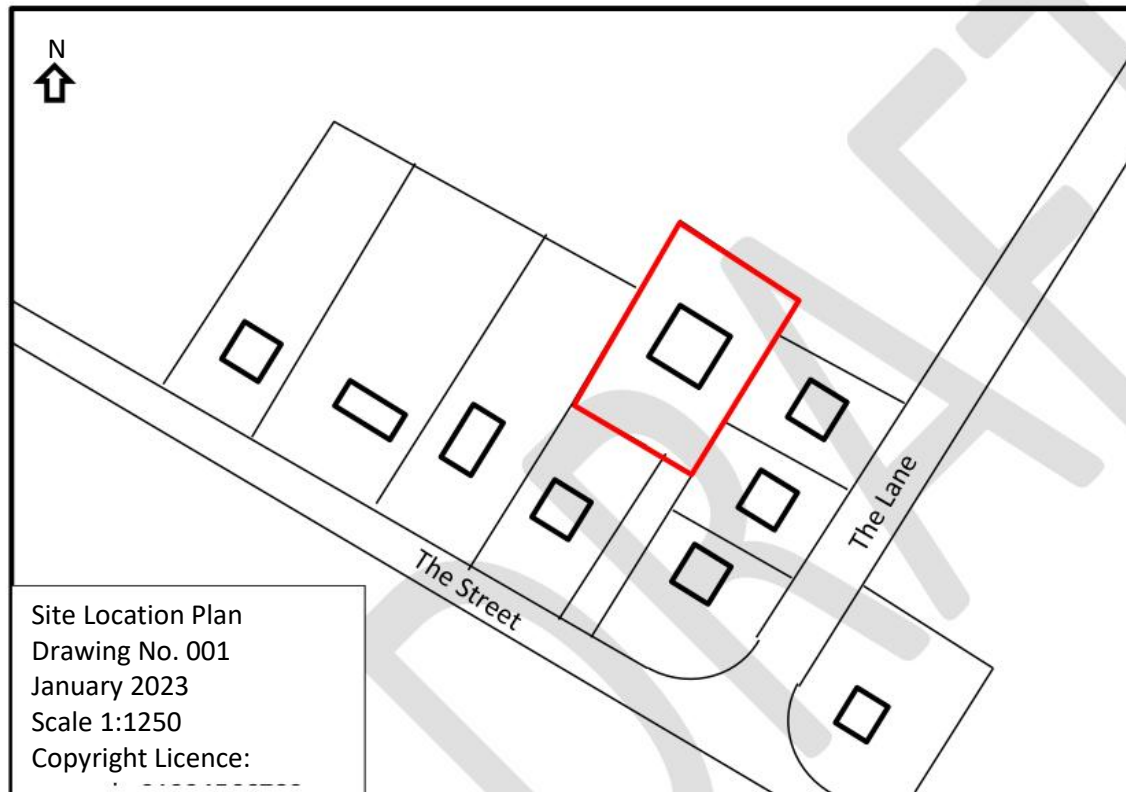
- 2.61.7. This example is **unacceptable** for many reasons including being an aerial photograph, rather than a map to a recognised scale. It also doesn't have a red line around the boundaries of the application site, which is required to identify the boundaries of the site and its location. It also doesn't have the necessary copyright licence for a site location plan.

Google Maps images are not suitable for site location plans.



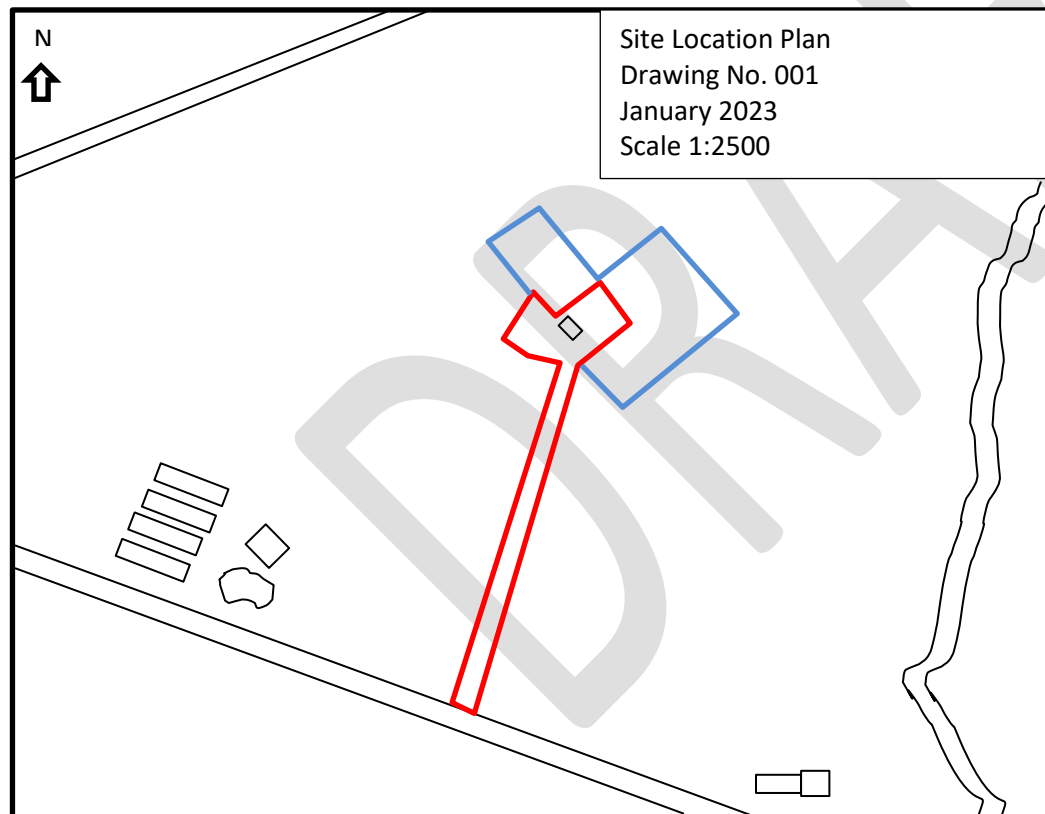
### Example 2

- 2.61.8. This example is also **unacceptable**, because although it is to a recognised scale, with two named roads, the red line doesn't appear to include all of the application site because the access to the highway has not been included.



### Example 3

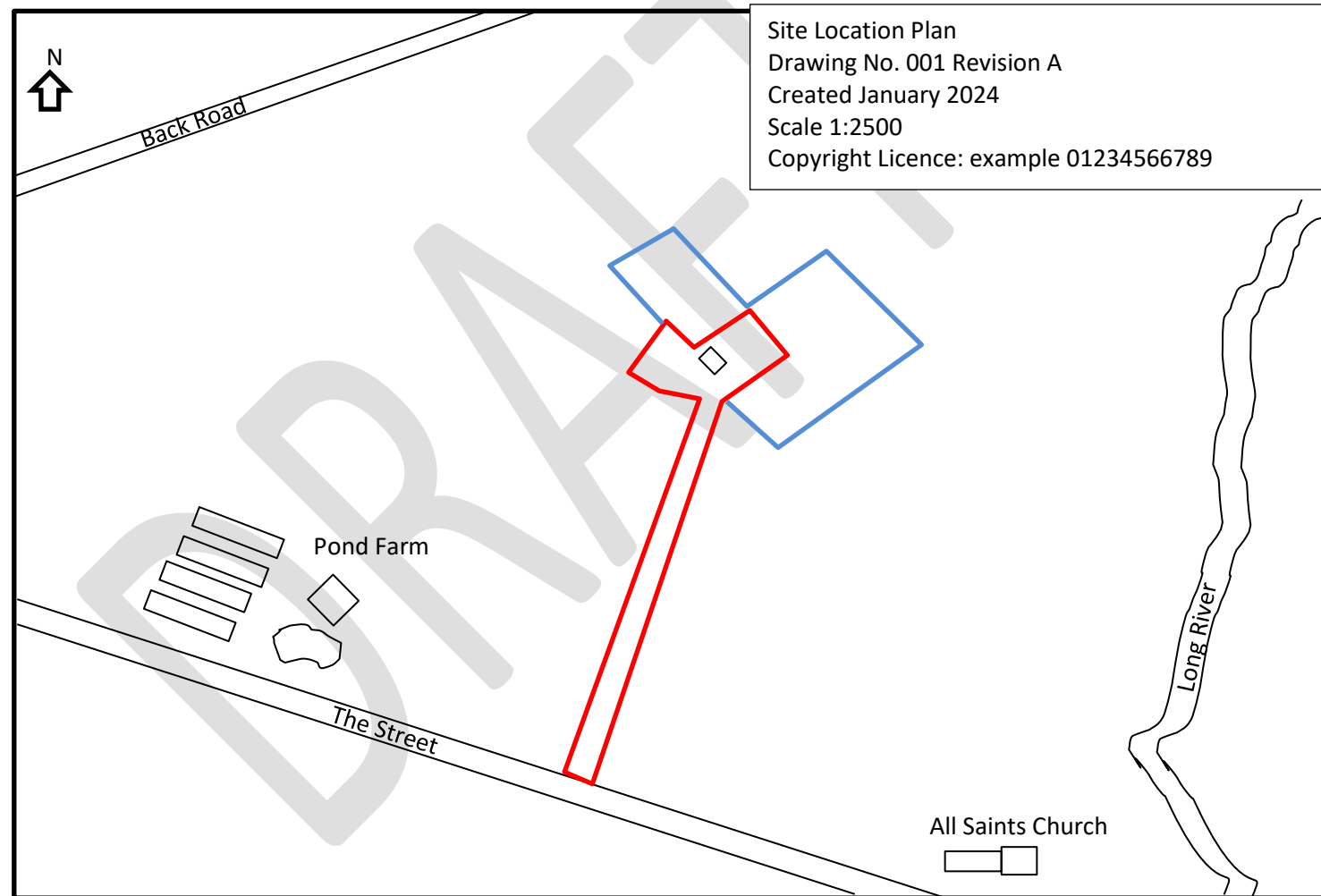
- 2.61.9. This example is also **unacceptable**, because although it is to a recognised scale, has the red line around the application site including the access to the road, and a blue line around other land under the same ownership, and the required copyright licence information, there are so few landmarks or named roads that the site cannot be easily identified.
- 2.61.10. In this case either a larger plan is required or annotation needs to be added to identify the roads and/or at least two landmarks such as the nearby farmstead and/or what appears to be a church, and/or the river, so that those looking at it can understand where the site is located.





**Example of an acceptable Site Location Plan**

2.61.11. The following example of a Site Location Plan is acceptable because it meets all of the criteria defined above.



## 2.62. Streetscene

### 2.62.1. Existing and/or Proposed Streetscene drawings will be required when an application involves:

- Substantial forward projecting extension(s) or alteration(s) of an elevation of any building (including dwellings) fronting a public highway or open space (including but not limited to roads, public footpaths, playing fields etc)
- Upwards extension of any building (including dwellings) including the replacement of roofs to create accommodation within the roofspace and/or the erection of an entire new floor,
- New or Replacement buildings of any use including dwellings, commercial or other uses where the site is situated within an existing row or close group of dwellings or other buildings.
- The creation of new streets e.g. schemes for houses served by a new access road.

### 2.62.2. Streetscene drawings must:

- These drawings need to show the existing and proposed appearance of any existing streetscene that would be altered by the proposed development, and/or any new streetscenes which would be created as a result of the proposed development.
- Include accurate existing and proposed ground, eaves and ridge levels of existing buildings on and adjacent to the site. These will need to be based upon accurate surveys and therefore a [topographic survey](#) and elevational surveys may need to be undertaken.
- Be drawn to scale, a scale of 1:100 is usually recommended.
- Be annotated and clear labelled as to which street scene (ie. location is shown for each drawing)

### 2.62.3. Where *appropriate* streetscene drawings can be combined with [cross section drawings](#).

**2.62.4. Please note:**

- **such plans must be drawn to scale, and a photograph of a plan is not acceptable, as the process results in the photograph showing an image which is not at the same scale as that stated in the image. All plans must therefore be either drawn to scale electronically or drawn by hand and if being submitted electronically then scanned to scale, not photographed. Therefore, if photographs are submitted of plans (e.g. \*.jpg \*.png \*.gif) they will not be accepted as valid plans, and the application will be invalid until 'to scale' drawings are submitted.**
- **It is the applicant's responsibility to ensure that all submitted plans/drawings are drawn accurately, including in terms of how any surrounding buildings and trees are presented in relation to the application site and the proposals. They must be sure that development could proceed fully in accordance with the drawings/plans that are submitted. Inaccurate representation of the size or position of neighbouring buildings and/or buildings within the application site and/or the proposals could invalidate any consent. It is therefore recommended that all plans are drawn based upon measured surveys or in the event that an Ordnance Survey plan is used, that they are checked on the ground by the applicant/their agent for accuracy prior to submission.**
- **Although not a validation requirement, it is recommended that existing and proposed drawings/plans of the same type are drawn to the same scale as one another, in the interests of clarity and ensuring that it is as easy as possible to understand what the proposed changes are.**

## 2.63. *Structural Survey*

### 2.63.1. **A Structural Survey is required to validate an application that involves:**

- **substantial demolition,**
- **And/or structural alterations to,**
- **And/or would affect the structural integrity of the building and/or involve the substantial conversion, demolition, extension or alteration of:**
  - **a listed building or non-designated heritage asset, the conversion of a building to a new use,**
  - **the demolition (including any part demolition) of an agricultural building, as part of a change of use of a building,**
  - **And/or Demolition in a Conservation Area.**

### 2.63.2. Structural surveys must be carried out by a suitably qualified professional and will need to:

- Include details about the condition of a building and whether it is capable of accommodating all of the proposed works,
- And identify any remedial or other works to ensure the retention of the building (these should also be detailed in the [‘Conversion Specification’](#)).

### 2.63.3. A structural survey submitted in relation to a heritage asset (designated or otherwise) must include:

- an extensive photographic survey detailing the current structural condition, and,
- where applicable, a schedule of repairs necessary to make the building structurally sound. (these should also be detailed in the [‘Conversion Specification’](#)).

**2.63.4. Please note:**

- **plans included as part of or accompanying the Structural Survey must be drawn to scale, and a photograph of a plan is not acceptable, as the process results in the photograph showing an image which is not at the same scale as that stated in the image. All plans must therefore be either drawn to scale electronically or drawn by hand and if being submitted electronically then scanned to scale, not photographed. Therefore, if photographs are submitted of plans (e.g. \*.jpg \*.png \*.gif) they will not be accepted as valid plans, and the application will be invalid until 'to scale' drawings are submitted.**
- **It is the applicant's responsibility to ensure that all submitted plans/drawings are drawn accurately, including in terms of how any surrounding buildings and trees are presented in relation to the application site and the proposals. They must be sure that development could proceed fully in accordance with the drawings/plans that are submitted. Inaccurate representation of the size or position of neighbouring buildings and/or buildings within the application site and/or the proposals could invalidate any consent. It is therefore recommended that all plans are drawn based upon measured surveys or in the event that an Ordnance Survey plan is used, that they are checked on the ground by the applicant/their agent for accuracy prior to submission.**
- **Although not a validation requirement, it is recommended that existing and proposed drawings/plans of the same type are drawn to the same scale as one another, in the interests of clarity and ensuring that it is as easy as possible to understand what the proposed changes are.**

## 2.64. *Sustainable Drainage Strategy*

- 2.64.1. The [National Planning Policy Framework \(NPPF\)](#) requires that all major development incorporate Sustainable Drainage Systems (SuDS) unless there is clear evidence that this would be inappropriate.
- 2.64.2. Therefore, Sustainable Drainage Systems (SuDs) are required at validation stage for all applications for major development which is defined as development of
- ten or more dwellings (or 0.5 hectares for residential development where the number of dwellings is unknown)
  - for the creation of more than a 1000 square metres of floor space and/or
  - where the site is greater than one hectare).
- 2.64.3. Detailed advice on the requirements of SuDS information and format for inclusion in application submissions is contained in [Suffolk Flood Risk Management Partnership Strategy Appendix A – SuDS Design Guide, and Appendix C – Protocol](#).
- 2.64.4. SuDs measures must be shown on all relevant plans submitted, in order to demonstrate how SuDs integrate with planned public open spaces, landscaping, roads, trees and buildings. Plans should identify multifunctional SuDs for example, those which enhance biodiversity or improve water quality. Details should be submitted that include any soakage test results and calculations, drainage, design layout and calculations (including summary on [Suffolk County Council SW Drainage Proforma](#)), proposals for protection of SuDs and watercourses during construction, details of adoption and maintenance.
- 2.64.5. **The proforma is to be completed with all Major applications.**
- 2.64.6. Sustainable drainage systems should be considered with regard to any existing flood risk to the site, and/or other issues identified with the site specific [Flood Risk Assessment](#) (where applicable).
- 2.64.7. National, district level and neighbourhood plan policies seek to ensure proposals are appropriately located and designed to minimise flood risk both to the development itself and existing development elsewhere. The specific policies relating

to flood risk and drainage, are too numerous to list here, but it is recommended that the relevant flood and drainage related policies are referred to and considered, in the design of any proposals.

2.64.8. The [Suffolk Local Flood Risk Management Strategy](#) can provide developers some context into flood management for Suffolk on a larger scale, including links to and extracts from key national guidance documents. Please contact the Council's Drainage Engineering Team on tel. 01473 432854 or the Environment Agency website for further information

2.64.9. Further information can be found via the following links:

- [National Planning Policy Framework](#) – Section relating to “Meeting the challenge of climate change, flooding and coastal change”
- [National Planning Policy Guidance](#) – Flood risk and coastal change
- [Map of National Flood Risk Zones](#)
- [Suffolk Flood Risk Management Strategy \(published by the Suffolk Flood Risk Management Partnership\)](#)
- [Suffolk County Council Guidance on development and flood risk](#)
- [East Suffolk Strategic Flood Risk Assessment](#)

2.64.10. Please note:

- **such plans must be drawn to scale, and a photograph of a plan is not acceptable, as the process results in the photograph showing an image which is not at the same scale as that stated in the image. All plans must therefore be either drawn to scale electronically or drawn by hand and if being submitted electronically then scanned to scale, not photographed. Therefore, if photographs are submitted of plans (e.g. \*.jpg \*.png \*.gif) they will not be accepted as valid plans, and the application will be invalid until 'to scale' drawings are submitted.**
- **It is the applicant's responsibility to ensure that all submitted plans/drawings are drawn accurately, including in terms of how any surrounding buildings and trees are presented in relation to the application site and the**

**proposals. They must be sure that development could proceed fully in accordance with the drawings/plans that are submitted. Inaccurate representation of the size or position of neighbouring buildings and/or buildings within the application site and/or the proposals could invalidate any consent. It is therefore recommended that all plans are drawn based upon measured surveys or in the event that an Ordnance Survey plan is used, that they are checked on the ground by the applicant/their agent for accuracy prior to submission.**

- **Although not a validation requirement, it is recommended that existing and proposed drawings/plans of the same type are drawn to the same scale as one another, in the interests of clarity and ensuring that it is as easy as possible to understand what the proposed changes are.**

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## 2.65. *Sustainable Construction Statement /Plan*

### 2.65.1. A Sustainable Construction Statement is required for:

- **Proposals or ‘Major’ development of 10 or more houses, and commercial or school development schemes of 1,000sqm or more of floorspace.**

### 2.65.2. As a minimum, the **Sustainable Construction Statement** should:

- On application sites anywhere in the district, the Sustainable Construction Statement should:
  - For all new residential development in the District the statement should demonstrate how the development is going to achieve the optional technical standard in terms of water efficiency of 110 litres/person/day unless it can be demonstrated that it is not viable or feasible to do so,
  - Seek to demonstrate how the scheme complies with
    - the [National Planning Policy Framework \(NPPF\)](#),
    - and the [National Planning Policy Guidance \(NPPG\)](#) (particularly sections relating to Climate Change, Renewable energy and low carbon energy)
    - Policies of the relevant [Local Plan](#) (further details below),
    - Any relevant policies within [Neighbourhood Plan](#) if the application site is within a Neighbourhood Plan Area.
    - The [East Suffolk Sustainable Construction SPD](#)
- On applications within the former Waveney Area, in accordance with Policy WLP8.28(Sustainable Construction) [East Suffolk Council – Waveney Local Plan \(Adopted March 2019\)](#), the Sustainability Statement should also demonstrate that where practical the scheme incorporates:
  - Improved efficiency of heating, cooling, and lighting of buildings by maximising daylight and passive solar gain

- through the orientation and design of buildings.
- Sustainable water management measures such as the use of sustainable drainage systems, green roofs and/or rainwater harvesting systems.
  - Locally sourced and recycled materials.
  - Renewable and low carbon energy generation into the design of new developments. Larger schemes should explore the scope for District heating.
  - Minimising construction waste, including designing out waste during the design stage, selecting sustainable and efficient building materials and reusing materials where possible.
  - Accessible and unobtrusive sustainable waste management facilities such as adequate provision of refuse/recycling/composting bin storage.
  - A show home demonstrating environmentally sustainable options which can be purchased and installed in homes bought off-plan
  - On all new office and school developments in the former Waveney area of equal or greater than 1,000sqm gross floorspace the Sustainable Construction Statement should set out how the scheme is to achieve the British Research Establishment Environmental Assessment Method 'Very Good' standard or equivalent unless it can be demonstrated that it is not viable or feasible to do so.
  - On applications within the former Suffolk Coastal Area, in accordance with Policy SCLP9.2 (Sustainable Construction) of the [East Suffolk Council – Suffolk Coastal Local Plan](#), the Sustainability Statement should also:
    - Demonstrate that new developments of more than 10 dwellings will achieve higher energy efficiency standards that result in a reduction in CO2 emissions below the Building Regulations, with exceptions only being allowed where this is not viable or feasible to meet the standards,
    - Set out whether the use of locally sourced, reused and recycled materials, along with on-site renewable energy generation has been considered in order to achieve environmental net gain in new build or conversion

developments, and if locally sourced, reused and recycled materials are not proposed to be utilised, why they have been discounted,

- Explain how the development proposals incorporate measures for minimising waste arising from the construction process. All new non-residential developments of equal or greater than 1,000sqm gross floorspace are required to achieve the British Research Establishment Environmental Assessment Method 'Very Good' standard or equivalent unless it can be demonstrated that it is not viable or feasible to do so.
- Proposals should improve the efficiency of heating, cooling and lighting of buildings by maximising daylight and passive solar gain through the orientation of buildings.

- 2.65.3. In addition to text, and specifications of particular features to be incorporated etc, the Sustainable Construction Statement/Plan must include a copy of the proposed block/site layout plan is annotated to show which properties are proposed to be Part M4(2) compliant.
- 2.65.4. For those properties that are to be M4(2) compliant, the information to be submitted must be as listed in the [Sustainable Construction Supplementary Planning Document \(SPD\)](#) including the space and design requirements. Such details may need to be a combination of floor plans/other drawings, technical specifications and written statement.
- 2.65.5. The Sustainable Construction statement must also include the [M4\(2\) checklist](#).
- 2.65.6. The Sustainable Construction Statement could also include the [Energy Statement](#).

*2.66. Telecommunications report*

- 2.66.1. A telecommunications report is required for all applications for new sites for telecommunications equipment (excluding prior approval applications)**
- 2.66.2. Telecommunications applications will need to be accompanied by:
- Area of search.
  - Details of the proposed structure.
  - Technical justification.
  - Evidence of mast sharing.
  - Details of any consultation undertaken.
- 2.66.3. It can form part of a [Planning Statement](#), but that document should be titled to make it clear it includes the above information.

## 2.67. *Topographical Survey*

### 2.67.1. **A topographical survey will be required when:**

- **The proposal is for new buildings or structures (other than fences, gates, free-standing walls and other means of enclosure, unless they are proposed to retain earth) on a site with a significant change in levels, or where there is a significant change in levels between the site and neighbouring land,**
- **The scheme includes significant ground level works i.e. excavation of or building up land, terracing or levelling of areas of land with or without retaining walls, or sufficient scale as to constitute an engineering operation (i.e. usually undertaken using machinery rather than a spade)**

2.67.2. Where a topographical survey is submitted, there will be no need for an 'existing block plan', but a ['proposed block plan'](#) will still be required (other than for retrospective applications). The proposed block plan must show the proposed ground levels once all other works included within the scheme have been undertaken.

2.67.3. Where there are significant variations in ground level on a site or adjacent land and/or significant ground level works are proposed, the application should also include existing and proposed ['cross sections'](#).

2.67.4. A [hydrographical or Bathymetric Survey](#) will also be required where an application site and/or proposed works would either involve works below high tide level in the sea or an estuary, or below potential water levels within a river, stream, pond, reservoir or other water feature. Where a site is both above and below water level, these surveys can be combined on one drawing.

2.67.5. Whilst LIDAR (Light Detection and Ranging) data can be used for some sites, instead of a topographical survey, the scale and level of data would need to be akin to that normally collected through a topographical survey, in order to be sufficiently detailed for application purposes.

### 2.67.6. **Please note:**

- **such plans must be drawn to scale, and a photograph of a plan is not acceptable, as the process results in the photograph showing an image which is not at the same scale as that stated in the image. All plans must**

therefore be either drawn to scale electronically or drawn by hand and if being submitted electronically then scanned to scale, not photographed. Therefore, if photographs are submitted of plans (e.g. \*.jpg \*.png \*.gif) they will not be accepted as valid plans, and the application will be invalid until 'to scale' drawings are submitted.

- It is the applicant's responsibility to ensure that all submitted plans/drawings are drawn accurately, including in terms of how any surrounding buildings and trees are presented in relation to the application site and the proposals. They must be sure that development could proceed fully in accordance with the drawings/plans that are submitted. Inaccurate representation of the size or position of neighbouring buildings and/or buildings within the application site and/or the proposals could invalidate any consent. It is therefore recommended that all plans are drawn based upon measured surveys or in the event that an Ordnance Survey plan is used, that they are checked on the ground by the applicant/their agent for accuracy prior to submission.
- Although not a validation requirement, it is recommended that existing and proposed drawings/plans of the same type are drawn to the same scale as one another, in the interests of clarity and ensuring that it is as easy as possible to understand what the proposed changes are.

## 2.68. *Transport Statement or Assessment*

### 2.68.1. **When required to validate an application:**

- **On all developments that are likely to generate significant levels of movements to and from the site, or within the site in the case of larger mixed-use developments. E.g.**
  - Major Housing Schemes
  - Major Commercial schemes that include an increase in floorspace
  - Major Commercial schemes for a change of use to a proposal that would increase comings and goings from a site e.g. a change to retail, office or logistics uses
  - Major community, health or education schemes.
- **All ‘major’ developments that are likely to generate significant levels of movements to and from the site (e.g. 30+ dwellings or more 1,000sqm commercial floorspace),**

#### **And/or**

- **On sites for the development of sites allocated in the Local Plan Policies or Neighbourhood Plan Policies which specifically refer to the submission of such documents.**

2.68.2. If you are unsure if your application would fall into one of the above categories, please contact the Local Planning Authority for definitive advice prior to commissioning such a statement or assessment.

2.68.3. The [National Planning Policy Framework \(NPPF\)](#) requires that all developments that generate significant amounts of movement should be required to provide a [travel plan](#), and the application should be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be assessed.

2.68.4. The Transport Statement/Assessment should consider and take account of:

- The details of the proposed development, including its location, layout and transport access and layout across all modes of transport. Neighbouring uses and the local/nearby road, public transport, cycle and pedestrian pathway network,
- Connectivity to/from existing facilities/services likely to be required by occupants/users of the proposed development, and connectivity for those in existing developments to/from facilities and services that are proposed as part of the development scheme (e.g. schools, shops, medical centres etc),
- Existing public transport provision and frequency of services, including accessibility to the proposed development and any changes proposed.
- A qualitative and quantitative description of the travel characteristics of the proposed development, including movements across all modes of transport that would result from the development and in the vicinity of the site.
- The trips likely to be generated by committed development in the vicinity of the site (i.e. allocated sites and/or those with planning permission),
- Data about current traffic flows on links and at junctions (including by different modes of transport and the volume and type of vehicles) within the vicinity of the site and identification of critical links and junctions on the highways network.
- An analysis of the injury accident records on the public highway in the vicinity of the site access for the most recent 5-year period if the proposed site has been identified as within a high accident area.
- An assessment of the likely associated environmental impacts of transport related to the development, particularly in relation to proximity to environmentally sensitive areas (such as air quality management areas or noise sensitive areas). This may need to cross-reference with/be accompanied by an [Air Quality Assessment](#) and/or [Noise Impact Assessment or Acoustic Report](#).
- A description of parking facilities in the area and the parking strategy of the development.



and

- Ways of encouraging environmental sustainability by reducing the need to travel.

2.68.5. The Transport Statement/Assessment should also demonstrate that:

- The opportunities for sustainable transport modes (including cycle and pedestrian) have been taken up depending on the nature and location of the site, to reduce the need for major transport infrastructure.
- Safe and suitable access to the site can be achieved for all people.
- Improvements can be undertaken within the transport network that cost effectively limits the significant impacts of the development. Development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe.

2.68.6. The Transport Statement/Assessment should consider the impact upon the Strategic Road Network (i.e. the adopted roads managed/maintained by National Highways rather than Suffolk County Council), if the scheme would:

- Be likely to generate more than 30 additional two-way trips in the peak hours at the nearest Strategic Road Network Junction, or
- It is physically located so close to a Strategic Road Network junction that traffic entering and leaving the site could affect the safe and free flowing operation of the junction in question.

2.68.7. In such cases the Transport Statement/Assessment should set out how those future development trips will be distributed on the road network, particularly at peak hours and in terms of both Light Goods Vehicles and Heavy Goods Vehicles. The assessment should be undertaken in accordance with DfT Circular 01/2022 “The Strategic Road Network and the Delivery of Sustainable Development” or any subsequent version. The document “The strategic road network: Planning for the future (A guide to working with Highways England on planning matters)” and the Planning Practice Guidance PPG (the National Planning Policy Framework NPPF dated December 2023 or any subsequent version) provides additional information.

- 2.68.8. Where any mitigation proposed physically interacts with the SRN, National Highways recommends the DMRB design standards and expect that any mitigation scheme to be supported by (where applicable):
- a. Appropriate designs and supporting junction modelling.
  - b. Requirements for Safety Risk Assessment (GG104)
  - c. Walking, Cycling and Horse-riding Assessment and Review (WCHAR – GG142)
  - d. Stage One Road Safety Audit (GG119)
- 2.68.9. It is also recommended that a Construction Management Plan is submitted with such application and early engagement takes place with National Highways for such proposals prior to the submission of an application.
- 2.68.10. Whilst not an essential component of making an application valid, it is recommended that consideration is given to Active Travel and Sustainable transport in designing the site to promote and prioritise active and sustainable travel modes. In considering such matters it is recommended agents/applicants refer to the:
- [Active Travel England: Planning Advice toolkit](#)
  - [East Suffolk Cycling and Walking Strategy,](#)
  - [East Suffolk Healthy Environments Supplementary Planning Document \(expected to be adopted later in 2024\)](#)
- 2.68.11. The Transport Statement/Assessment should also consider/have regard to
- [Suffolk Streets Guide](#) ,
  - [National Planning Policy Framework](#) – Section “Promoting sustainable transport”,
  - [National Planning Policy Guidance](#) – Travel Plans, Transport Assessments and Statements and
  - [Suffolk County Council Travel Plan Guidance.](#)
- 2.68.12. The Transport Statement/Assessment may also need to be accompanied by a [Travel Plan](#).

- 2.68.13. Suffolk County Council Development Management team should be contacted to provide further advice as to the scope of the assessment and what information should be included within a Transport Assessment/Transport Statement:  
[Highways.DevelopmentControl@suffolk.gov.uk](mailto:Highways.DevelopmentControl@suffolk.gov.uk)

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## 2.69. *Travel Plan*

### 2.69.1. **When required to validate an application:**

**This is required for all applications where the proposed development is likely to generate significant traffic movements and have significant transport implications i.e.**

- **Major Housing Schemes**
- **Major Commercial schemes that include an increase in floorspace**
- **Major Commercial schemes for a change of use to a proposal that would increase comings and goings from a site e.g. a change to retail, office or logistics uses**
- **Major community, health or education schemes.**

2.69.2. A Travel Plan is a long-term management strategy for an organisation or site that seeks to deliver sustainable transport objectives through action and is articulated in a document that contains a suitable action plan and is annually reviewed and monitored. The Travel Plan should also link to the supporting Transport Assessment or Statement that will also need to be submitted.

2.69.3. The scope and content for a Travel Plan should ideally be discussed prior to any application being submitted in consultation with the Highway Authority (Suffolk County Council).

2.69.4. Opportunities and improvements to deliver sustainable transport objectives could include funding or providing bus services and/or the appropriate related infrastructure for bus services.

2.69.5. Travel Plans should include an evaluation and consideration of:

- Benchmarked travel data including trip generation databases,
- Information related to the nature of the proposed development,

- Forecast level of trips by all modes of transport likely to be associated with the development,
- Any relevant information about existing travel habits of the surrounding area,
- Proposals that form part of the scheme to reduce the need for travel to and from the site via all modes of transport
- Proposals to improve public transport services.
- Parking Strategy options (if appropriate – and having regard to national policy on parking standards and the need to avoid unfairly penalising motorists,

and

- Proposals to enhance the use of existing, new and improved public transport services and facilities for other sustainable transport modes including cycling and walking by both occupants of the proposed development by the existing wider community.

2.69.6. They should also have regard to the

- [Suffolk Streets Guide \(2022 Edition\)](#) ,
- [National Planning Policy Framework – Section 9 \(Promoting sustainable transport\)](#),
- [National Planning Policy Guidance – Travel Plans, Transport Assessments and Statements](#) and
- [Suffolk County Council Travel Plan Guidance](#).

## 2.70. *Variation of Condition Planning Statement/Specification*

### 2.70.1. **When required to validate an application:**

- **on all applications seeking to vary a condition(s) on previous planning permissions or Listed Building Consents**

2.70.2. A variation of Condition Statement should explain which conditions the applicant is seeking to vary and how they are seeking to vary them.

2.70.3. In the case of applications seeking to vary the condition that states the approved drawings/plans on Planning Permissions, this Variation of Condition Statement/Specification must also include:

- a list identifying all of the physical changes proposed from the previously consented scheme, including those to elevations and floorspace,
- details of any changes in floorspace (fresh [CIL form](#) will also be required),
- drawings annotated to highlight the changes,
- and
- a list of the new/proposed plans and which previously consented plans they are proposed to supersede/replace.

2.70.4. Where the plans or conditions proposed to be varied affect the surveys and assessments previously approved, those surveys and assessments may need to be resubmitted and amended to reflect changes, eg. layout changes may affect an approved Surface Water / [Sustainable Drainage Strategy](#) and/or [Parking layout plans](#) and/or [Landscape Masterplan, Landscape Strategy and/or full landscaping details](#) and/or other matters.

2.70.5. In the cases of applications seeking to vary other conditions (including those on Listed Building Consents), the Variation of Condition Statement/Specification should explain how the applicant is seeking to vary the conditions (i.e. which elements of the wording) and explain why these changes are sought.

2.70.6. This is also an opportunity for the applicant/agent to provide any justification they wish to make for such changes. As

part of this justification it may be beneficial to provide additional supporting documents relevant to the reasons for the proposed changes e.g. [Flood Risk Assessment](#)

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## 2.71. *Ventilation/Extraction Equipment Details and Assessment*

### 2.71.1. **When required to validate an application:**

- **all applications for restaurants, cafes, pubs, wine bars and any other drinking establishment and all hot food takeaways, that are proposing new businesses or alterations/extensions that affect the areas used for cooking, and**
- **Any other applications proposing filtration plant, ventilation, refrigeration or similar equipment including air source heat pumps and air conditioning.**

### 2.71.2. Details should include details of the:

- type, size and location of the filtration plant, ventilation or similar equipment,
- a scheme to attenuate noise and vibration,
- final noise levels emitted,
- the sizes and route of the ductwork, and
- the location of the final discharge point, including where applicable details of odour control and filtration equipment proposed to be fitted.

2.71.3. Development should be expected to protect the amenity of the wider environment by minimising odour, noise and other forms of disturbance.

2.71.4. In cases where an outline assessment of the noise emissions indicates that the development may generate noise disturbance, a further assessment may be required by the Environmental Protection Team.

2.71.5. Further details can also be found in the [Air Quality Assessment](#), [Odour Assessment](#) and [Noise Assessment](#) Sections of this list.



#### 2.71.6. Please note:

- such plans must be drawn to scale, and a photograph of a plan is not acceptable, as the process results in the photograph showing an image which is not at the same scale as that stated in the image. All plans must therefore be either drawn to scale electronically or drawn by hand and if being submitted electronically then scanned to scale, not photographed. Therefore, if photographs are submitted of plans (e.g. \*.jpg \*.png \*.gif) they will not be accepted as valid plans, and the application will be invalid until 'to scale' drawings are submitted.
- It is the applicant's responsibility to ensure that all submitted plans/drawings are drawn accurately, including in terms of how any surrounding buildings and trees are presented in relation to the application site and the proposals. They must be sure that development could proceed fully in accordance with the drawings/plans that are submitted. Inaccurate representation of the size or position of neighbouring buildings and/or buildings within the application site and/or the proposals could invalidate any consent. It is therefore recommended that all plans are drawn based upon measured surveys or in the event that an Ordnance Survey plan is used, that they are checked on the ground by the applicant/their agent for accuracy prior to submission.
- Although not a validation requirement, it is recommended that existing and proposed drawings/plans of the same type are drawn to the same scale as one another, in the interests of clarity and ensuring that it is as easy as possible to understand what the proposed changes are.

#### Further information

- [National Planning Policy Framework](#) – Section 15 (Conserving and enhancing the natural environment)
- [National Planning Policy Guidance](#) – Noise
- [National Guidance – Noise impact assessments involving calculations or modelling](#)
- [East Suffolk Council – Environmental Protection](#)

## 2.72. *Viability Assessment*

### 2.72.1. **A Viability Assessment is required to validate an application where it:**

- **cites viability as a factor in the legal agreement draft heads of terms, particularly for applications involving less affordable housing or other housing mix requirements than would otherwise normally be required by planning policy,**
- **Where a proposal seeks to provide less than the policy requirement in terms of:**
  - **Affordable housing provision,**
  - **Other housing mix requirements,**
  - **Other on-site requirements defined in local planning policy,**
  - **seeks the conversion of holiday lets to unrestricted dwellings,**
  - **Or seeks a use which is not policy compliant on the grounds of viability.**

2.72.2. The policy requirement referred to above relates to the housing mix policies within both district level Local Plan documents and those set out in [Neighbourhood Plans](#), such as Policy FRAM3 (Housing Mix) of the Framlingham Neighbourhood Plan.

2.72.3. The NPPF requires that all viability statements are publicly available for inspection.

2.72.4. A full un-redacted viability assessment should be provided at the time of submission. In order to fully assess whether the case made by an applicant for not meeting the policy requirements is reasonable and justifiable, the local planning authority will require the applicant to submit an evaluation with all the following information:


- existing use value supported by an independent valuation,
- land acquisition price and the basis for its purchase,
- salient terms of acquisition (for example subject to planning, soils, ground conditions survey),
- purchase process (for example private treaty, open market bid, auction),
- purchase costs including legal and agents' fees,
- estimated sales values with independent supporting evidence including schedule of unit sizes,
- estimated construction costs supported by tender costs or QS schedule to include a specified contingency, contract related fees and itemised/defined 'abnormal',
- itemised preliminary costs,
- professional fees presented under each respective heading,
- S106/CIL costs as advised by the local planning authority,
- assumptions regarding phasing,
- financing rate and evidence of financing terms/details (for example debt/equity ratio),
- estimated profit together with contextual information appropriate to the developers target returns,
- value/cost of the affordable housing provision, where relevant, together with tenure assumption and calculation of any commuted sum, and any supporting evidence.

2.72.5. Valuation using standard viability models such as Homes and Community Agency, Royal Institute of Chartered Surveys, Three Dragons, will be acceptable providing they provide all the above information and are supported by an appropriate cash flow analysis.

2.72.6. Further information and guidance can be found via the following:

- [National Planning Policy Framework](#)
- [National Planning Policy Guidance – Viability:](#)
- [Royal Institute of Chartered Surveyors \(RICS\) – Financial Viability in planning: Conduct and Reporting](#)
- [East Suffolk Council – Community Infrastructure Levy](#)
- [National Development Appraisal Tool](#)

DRAFT


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This document is available in alternative formats and in different languages on request. If you need support or assistance to help you read and/or understand this document, please contact the Council using one of the methods above.

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