



**Belfast**  
City Council

# Planning Service

## Draft Planning Application Validation Checklist

Consultation Report, March 2025



# Introduction

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## Purpose of this report

- 1.1 This report details the engagement process undertaken in consulting on the Planning Service's Draft Planning Application Validation Checklist. It outlines the results of this consultation, including a summary of the key issues raised through representations on the draft checklist. It provides the Council's response to the detailed comments provided by respondents and outlines the recommended changes to the final checklist.

## Background to the consultation

- 1.2 In October 2024, the Planning Committee and Strategic Policy and Resources Committee endorsed the Planning Service's consultation on its Draft Planning Application Validation Checklist.
- 1.3 The draft checklist was prepared in the context of the Planning (General Development Procedure) (Amendment) Order (Northern Ireland) 2024, that permits councils to prepare and publish a Planning Application Validation Checklist, which sets out mandatory additional information requirements for planning applications above the current minimum basic requirements (which remain unchanged).
- 1.4 The intention of a Planning Application Validation Checklist is to improve the quality of planning applications, resulting in quicker processing times and more efficient consultation process.

## Overview of the consultation process

- 1.5 The public consultation ran from 03 December 2024 to 10 February 2025 (10 weeks). It included the following:
  - Online survey on the Council's website using the Your say Belfast platform.
  - Engagement workshops with non-statutory consultees on 22<sup>nd</sup> January 2025 and statutory consultees on 23<sup>rd</sup> January 2025 (both online).
  - Customer workshop with planning agents, architects and applicants on 31<sup>st</sup> January 2025 (in person in City Hall).
  - One-to-one meetings with Shared Environmental Services (SES), DfI Rivers and NI Water on 10<sup>th</sup> February 2025 (online).
- 1.6 The Planning Committee provided comments on the draft checklist at its meeting on 11<sup>th</sup> February 2025.

## **Consultation**

- 1.7 The online survey was promoted via the Council's various social media channels.
- 1.8 Planning agents, architects and developers on the Planning Service's official customer list were made aware of the consultation via correspondence and invited to attend the Customer workshop on 31<sup>st</sup> January 2025.
- 1.9 The consultation was further promoted by email banners on staff emails.
- 1.10 The online survey was accompanied by a draft Section 75 Equality Screening and draft Rural Needs Impact Assessment. An editable Word version of the draft checklist was also made available for ease of review and comment.

# Summary of responses received

2.1 A total of 39 representations were made in response to the consultation, including 31 responses to the online survey and 8 other responses. Feedback was also received and captured from the in-person Customer workshop on 31<sup>st</sup> January 2025.

## Online survey

2.2 31 responses were received to the online survey from a variety of different stakeholders, including:

- Planning agents (35.5%)
- Private individuals (25.8%)
- Statutory consultees (22.6%)
- Non-statutory consultees (6.5%)
- Businesses (3.2%)
- Community groups (3.2%)

2.3 Some of the responses were anonymous. The respondents who agreed to share their details included:

- Erin Donaldson RTPI – Planning agent
- Community Places
- PSNI
- NI Water
- DAERA
- Northern Ireland Housing Executive (NIHE)
- Belfast City Council Waste Management Unit
- DfI Rivers
- Arc Design (NI)
- Turley
- Translink

## Other responses

2.4 Other representations were received outside the online survey from:

- Royal Society of Ulster Architects (RSUA)
- Radius Housing (Housing Association)
- DAERA NIEA
- DAERA Fisheries
- DfC HED
- Health and Safety Executive NI (HSENI)
- Belfast City Council Environmental Health
- Belfast City Council Access

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## Overview of key issues raised

2.5 The main themes arising from the consultation included:

- Broad agreement that the checklist is relevant and necessary.
- However, no consensus on how user friendly the checklist is – some felt that it was user friendly, others not, and most neither agreed nor disagreed.
- Some criticism as to the complexity of the checklist and that the information requirements may be onerous. In contrast, views that the information is needed, provided that it is reasonable and proportionate.
- Recognition that the indicative guide as to information requirements by type of planning application is overall very helpful.
- It would be useful to have some best practice examples of some of the requirements
- Desire for information requirements to be discussed with the Planning Service through a Pre-Application Discussion (PAD). Also, that information can be discussed and negotiated where appropriate as part of the validation process.
- Queries as to whether the various statements and assessments can be provided as part of another document (such as a planning statement or Design and Access Statement) or whether standalone documents are required – officers advise the former.
- General view that there should not be additional validation requirements for Householder applications (for example, neither a Biodiversity Checklist nor Climate Change Statement should be required).
- That information should only be required by the Council where it is relevant, reasonable and proportionate
- Specific suggestions on how parts of the checklist can be improved to make its implementation clearer and more reflective of planning policy.

## Appendix 1: Council responses to key issues raised raised through online survey

For ease of reference, proposed changes to the checklist in response to representations are highlighted in red text.

What is good about the checklist and what can we do to improve it?		
Comment	Officer response	Changes to Checklist
The process is cumbersome and time consuming for private practices. A bespoke checklist should be issued to applicants. This will help understanding of costs. Applicants are hesitant to commission reports unless they know they are essential.	The Planning Service does not have the resources to issue a bespoke checklist on each proposal. The checklist is intended to provide clear guidance to customers as to what information is required and when. The indicative guide sets out requirements per type of application. Information requirements can also be discussed with the Planning Service as part of a Pre-Application Discussion (PAD).	No change recommended.
The checklist is essential. However, it is overcomplicated and requires too much information. A Climate Change Statement and Health Impact Assessment should not be a requirement for most applications. A checklist that involves step by step questions which can generate a final validation list for a specific application would be really useful.	Climate change policies (Policies ENV2, ENV3 and ENV5) apply to all development proposals. Policy HC1 requires a Health Impact Assessment for Major residential, commercial and industrial developments. A step-by-step questionnaire to create a bespoke checklist has merit but would involve dedicated IT software and could be investigated at a later date.	No change recommended.

<p>The pdf version cannot be edited and an editable version would be useful. Some occasional reports are not covered and so an option for "Other" type of report would be useful. Some topics are already covered in a Design and Access Statement or Planning Service, and the checklist should allow the applicant to direct the Council to this information.</p>	<p>An editable Word version of the checklist was subsequently made available on the online consultation hub. The Planning Service will permit information to be provided in different formats, such as part of a Design and Access Statement or Planning Statement, and it will not be stipulated that each has to be provided as a standalone document.</p>	<p>The final checklist will make it clear that information can be provided in different formats, either as standalone document or part of another document such as a Design and Access Statement or Planning Statement. Where provided as part of another document, the applicant will be advised to clearly signpost this.</p>
<p>The checklist makes no mention of Planning Policy Statement 7 (PPS 7) in relation to reducing crime and anti-social behaviour. Nor the importance of incorporate security measures in the design of buildings, and providing natural surveillance, particularly of pedestrian and cycle routes. PPS 7 states that developers should take account of specialist advice when developing their proposals.</p>	<p>PPS 7 no longer applies as it has been superseded by the Belfast LDP Plan Strategy. Safety and security are covered by policies in the Plan including Policies DES1 (Principles of urban design) and RD1 (New residential developments). These remain important material planning considerations and will continue to be considered as part of the assessment of planning applications. It is considered that there are no specific validation information requirements around these areas, however, it is recommended that this is kept under review.</p>	<p>No change recommended at this time.</p>
<p>It is unclear which information is required for certain types of application. A questionnaire that triggers the need for certain reports/surveys would be helpful</p>	<p>The indicative guide is intended to provide clear guidance as to typical information requirements by type of application. A step-by-step questionnaire to create a bespoke checklist has merit but would involve dedicated IT software and could be investigated at a later date.</p>	<p>No change recommended.</p>
<p>It should be a pre-condition of submitting a planning application that the developer achieves agreement with NI Water and other statutory consultees on if and how a site can be serviced.</p>	<p>The checklist is intended to ensure that the right information is provided with applications on submission; it cannot ensure the acceptability of proposals which is a</p>	<p>No change recommended.</p>

	<p>matter for the assessment of the application. The standard application form requires information about how development proposals are expected to deal with surface water and foul sewage disposal. No specific additional information requirements are identified for the checklist.</p>	
<p>There are far too many reports to accompany a planning application. The cost of these are affecting developers appraisals and is unsustainable. The information requirements in the checklist should be reduced.</p>	<p>The checklist reflects planning policy requirements and the information that is required for applications to be fully assessed. Without the information, it is unlikely that planning permission could be granted.</p>	<p>No change recommended.</p>
<p>In some cases, the checklist will drive applicants to frontload their applications with expensive reports, which may not be ultimately required. It would be better if the reports could be sought once its know that there will be a positive outcome to the application. The expense of submitting reports may result in less applications being made to the council.</p>	<p>The Council's Pre-Application Discussion provides opportunity for applicants to discuss their proposals in advance of making an application, providing indication as to whether a proposal is likely to be acceptable in principle.</p>	<p>No change recommended.</p>
<p>The checklist is too general and doesn't set out specific circumstances when reports are required.</p>	<p>It is considered that the checklist does provide clarity and certainty as to when certain information is required with applications. Furthermore, the indicative guide provides guidance as to information requirements by type of application.</p>	<p>No change recommended.</p>
<p>There are too many items on the checklist. The majority are not relevant. Some requirements may require specialist advice to determine when the information is needed (not possible to determine by admin staff or planners).</p>	<p>The checklist reflects planning policy requirements and the information that is required for applications to be fully assessed. Without the information, it is unlikely that planning permission could be granted. The checklist provides clear guidance as to the</p>	<p>No change recommended.</p>



	<p>circumstances when certain information is required.</p>	
<p>The checklist is useful to agents and applicants to determine which information is required with applications and to front-load the application process. It should improve the quality of applications and therefore reduce delays. The checklist should emphasise that the requirements are indicative and will be assessed on a case-by-case basis. It is also important that applicants are aware that further information can be requested during the application process once the application is valid. It would be more useful if tailored checklist forms could be produced by type of application as set out in the indicative guide. We welcome the intention to publish an accompanying "checklist" that applicants can use to cross reference their submission. Sign-posting could be given to the Duty Planner who could assist with checklist requirements. The link to the DAERA website is broken – links should be regularly checked to make sure they are working. The process for validation is likely to be lengthy for planners and it would be useful for the timescale for validation to be set. The requirement for a Pre-Development Enquiry with NI Water could be highlighted to make sure waste water capacity issues are dealt with at an early stage in the process. There is no reference to the requirement for a Design and Access Statement within the checklist. Clarity could be included in the checklist. The checklist should be reviewed to ensure its continued relevance.</p>	<p>The guidance accompanying the checklist makes it clear that information requirements for applications will be assessed on a case-by-case basis, and that information will only be sought where it is reasonable and proportionate. Furthermore, that the checklist does not preclude the requirement for further information during the application process. However, the final guidance will ensure that these areas are explicit. The Duty Planner guidance is clear that customers can avail of the service to discussion application information requirements. All hyperlinks on the final checklist will be checked and fixed where needed. The Council routinely monitors hyperlinks to ensure they are working. The Planning Service will set internal targets for validation processes. The draft checklist is focused on the proposed new "local" information requirements and not pre-existing validation requirements. However, the final checklist will include current validation requirements for completeness (as the Council's existing <i>Application Checklist</i> does). The legislation requires the Validation Checklist to be reviewed every 3 years.</p>	<p>The final checklist will be explicit that information requirements will be assessed on a case-by-case basis, and that information will only be sought where it is reasonable and proportionate. Furthermore, that the checklist does not preclude the requirement for further information during the application process.</p> <p>Broken hyperlinks to be fixed.</p> <p>Service standards will be set in relation to the validation process.</p> <p>The final checklist will also include current legislative requirements around validation.</p>

<p>The checklist is a good idea (from a waste management perspective) and is probably as user friendly as it can get.</p>	<p>Comment noted.</p>	<p>No change recommended.</p>
<p>The checklist is not over friendly for application types such as HMOs proposals.</p>	<p>Refer to section summarising comments on the draft indicative guide for information requirements for HMO applications.</p>	<p>No change recommended.</p>
<p>A best practice example for each type of application would be useful. It should be clarified that the information requirements can be contained in a single document such as a Planning Statement. Confirmation should be provided of how detailed each document should be, for consistency in approach and proportionality.</p>	<p>The Planning Service may bring forward "example" information documents in the future, such as for Householder applications, however, these will not be available initially. The Council will permit information to be provided in different formats, such as part of a Design and Access Statement or Planning Statement, and it will not be stipulated that each has to be provided as a standalone document. The final checklist will be clear that the level of detail in information documents should be commensurate to the scale and complexity of the proposal.</p>	<p>The final checklist will be clear that the level of detail in information documents should be commensurate to the scale and complexity of the proposal.</p>
<p>The checklist gives clarity as to which information is required and when, and cross references planning policy.</p>	<p>Commented noted.</p>	<p>No change recommended.</p>
<p>Making it more robust should speed up the application process, placing the requirement on applicants to provide the necessary information upfront.</p>	<p>Commented noted.</p>	<p>No change recommended.</p>
<p>Step by step guidance should be provided as to whether a proposal is development that requires planning permission.</p>	<p>This comment does not relate to the checklist but a separate issue as to whether a proposal constitutes development that requires a planning application to be made. The Planning Service provides other forums for</p>	<p>No change recommended.</p>

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	providing advice to customers on whether planning permission is required including general enquires, Duty Planner service, Pre-Application Discussions and applications for a Certificate of Lawfulness.	
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<b>The checklist advises that Householder applications are accompanied by a Biodiversity Checklist and a short and succinct Climate Change Statement.</b>		
<b>Is there any other information that should be included or removed from Householder applications?</b>		
<b>Comment</b>	<b>Officer response</b>	<b>Changes to Checklist</b>
This adds another level of complication to a process that is already not simple. There should not be specific information requirements for Householder applications.	The majority of feedback from the consultation supports the removal of specific additional validation requirements for Householder applications. Officers advise that these specific requirements are removed in view of the consultation responses and the potential for these requirements to result in excessive delays to the validation process. This is particularly important given that Householder proposals make up approximately 40% of all applications. The Planning Service will look to bring forward specific plain English guidance for Householders at a later stage. It is recommended that Householder information requirements are kept under review.	<b>It is recommended that specific additional validation requirements for Householder applications are removed.</b>
The majority of Householder applications should not require this additional information. An ecologist is required to complete the Biodiversity Checklist. A template Climate Change Statement for Householder applications should be provided.	See above.	See above.
The provision of a Climate Change Statement could be difficult if the applicant is not using a planning agent.	See above.	See above.
The requirement for a Biodiversity Checklist and Climate Change Statement are excessive and potentially unnecessary. The information may not	See above.	See above.

be material to the specific proposal. The requirements are a further financial burden and barrier to the process which should be inclusive and equitable. There is no clarity on how the checklist will be applied on a case by case basis, creating uncertainty for applicants.		
Information from statutory consultees on how a site can be serviced, specifically NI Water.	The checklist is intended to ensure that the right information is provided with applications on submission; it cannot ensure the acceptability of proposals which is a matter for the assessment of the application. The standard application form requires information about how development proposals are expected to deal with surface water and foul sewage disposal. No specific additional information requirements are identified for the checklist.	No change recommended.
Requirement for biodiversity checklist should be removed.	See above.	See above.
The inclusion of these reports will be very onerous for householder. Red tape should be decreased, not increased.	See above.	See above.
Biodiversity Checklists always lead to further information and most likely a bat survey. The fees for these reports will far outweigh the planning fee and architect's fee for a simple addition to a private dwelling.	See above.	See above.
A Climate Change Statement is irrelevant for most householder proposals.	See above.	See above.

Additional guidance could be provided in the form of examples of specific information requirements. Links could be provided to templates or good practice.	See above.	See above.
The maps section, it should not be required for HMO applications where there is no change to the footprint of the building.	See comments later table in respect of the indicative list of information requirements for HMOs.	No change recommended.
The Council will have evidence of whether a Biodiversity Checklist has been a requirement of Householder applications such as proposals for single storey extensions. It would seem disproportionate for Householder applications and would place an additional burden on householders and costs. Similarly queries the requirement for a Climate Change Statement. Many applications are submitted by homeowners who will not have the expertise to produce these documents.	See above. Data for the last 12 months shows that there were only 2 consultations to DAERA for Householder applications.	No change recommended.
Putting applicants for minor proposals at additional cost for these reports is unreasonable.	See above.	See above.

<b>What do you find good about the indicative guide and how could we improve it?</b>		
<b>Comment</b>	<b>Officer response</b>	<b>Changes to Checklist</b>
Whilst the indicative is useful, it could be substantially simplified for Householder applications.	As previously mentioned, it is recommended that additional information validation requirements for Householder applications are removed.	No change recommended.
It needs to be as clear and concise as possible. The language is too technical at the minute.	The indicative guide is already simple and uses plain language. However, a non-technical glossary of terms will be added to the final checklist as recommended by the chair of the Planning Committee.	<b>It is recommended that a non-technical glossary of terms is included in the final checklist.</b>
It should be accepted that the information can be provided in different forms, such as through a Design and Access Statement. Otherwise, there will be overlap and this will avoid duplication and confusion for the public and consultees.	The Planning Service will permit information to be provided in different formats, such as part of a Design and Access Statement or Planning Statement, and it will not be stipulated that each has to be provided as a standalone document.	<b>The final checklist will make it clear that information can be provided in different formats, either as standalone document or part of another document such as a Design and Access Statement or Planning Statement. Where provided as part of another document, the applicant will be advised to clearly signpost this.</b>
There is no guidance on the level of detail required in the succinct and concise Climate Change Statement. Plain English guidance would be welcomed for smaller scale proposals.	As previously mentioned, it is recommended that additional information validation requirements for Householder applications are removed.	No change recommended.
It offers a more specific route for what requirements there are, because each development type is so different.	The indicative guide is aimed at providing specific guidance as to information requirements by type of application.	No change recommended.

You are not requesting sufficient information upfront in terms of availability of services.	The checklist is intended to ensure that the right information is provided with applications on submission; it cannot ensure the acceptability of proposals which is a matter for the assessment of the application. The standard application form requires information about how development proposals are expected to deal with surface water and foul sewage disposal. No specific additional information requirements are identified for the checklist.	No change recommended.
Clearly laid out and contains step by step instructions.	Comment noted.	No change recommended.
Householder applications should only consist of existing and proposed drawings.	As previously mentioned, it is recommended that additional information validation requirements for Householder applications are removed.	No change recommended.
If the information is unnecessary and expensive it will put off applicants undertaking projects.	Information will only be required in accordance with the checklist where it is reasonable and proportionate.	No change recommended.
Applications forms are complex enough without additional guidance to navigate. The barriers to the public submitting applications are increasing rather than decreasing.	The checklist reflects planning policy requirements and the information that is required for applications to be fully assessed. Without the information, it is unlikely that planning permission could be granted.	No change recommended.
It is clear and succinct and will be useful to applicants and agents preparing applications. More instructive guidance should be provided on which information requirements are mandatory. Under the 1-4 Residential Unit category, it should	In terms of whether information is mandatory, the checklist will be applied on a case-by-case basis and information will only be sought for an individual application where it is reasonable and proportionate. The indicative guide should be amended to	It is recommended that the indicative guide is amended to clarify that an Affordable Housing Form may be required for schemes of 1-4 Residential units where the site area exceeds 0.1 ha.



be clarified that sites greater than 0.1 ha also trigger affordable housing requirements.	clarify that an Affordable Housing Form may be required for schemes of 1-4 Residential units where the site area exceeds 0.1 ha.	
It is a good idea but some of the application types may warrant a Waste Management Plan (e.g. specialist housing accommodation and some non-domestic proposals).	The indicative guide should be amended to clarify that a Waste Management Plan is likely to be required with applications for Specialist residential accommodation.	It is recommended that the indicative guide is amended to clarify that a Waste Management Plan is likely to be required with applications for Specialist residential accommodation.
Covers general items.	Comment noted.	No change recommended.
It is useful but clarification should be provided as to the level of detail required to ensure a proportionate approach according to the type and scale of the proposal. It should be clarified that subject to discussion with Belfast City Council, not all reports will be required.	The final checklist should be clear that the level of detail in information documents should be commensurate to the scale and complexity of the proposal. The checklist will be applied on a case-by-case basis. There will be negotiation with applicants where information is requested but they do not believe it is required.	It is recommended that the final checklist is that the level of detail in information documents should be commensurate to the scale and complexity of the proposal.  It is also recommended that the final checklist is clear that there will be an initial process of negotiation where information is requested but applicants believe it is not required.
Advice is always welcome given how complex the process is, how many policies there are in the Local Development Plan and how many consultees.	Comment noted.	No change recommended.

<b>Indicative guide – is there any other information that should be included or removed from planning applications for hotels?</b>		
<b>Comment</b>	<b>Officer response</b>	<b>Changes to Checklist</b>
There may be other specific site requirements and the scale of information should be appropriate to the development.	The indicative guide acknowledges that there may be other information requirements depending on the location and specific characteristics of the proposal.	No change recommended.
You may need information on how the development can be serviced in terms of NI Water – water and waste water infrastructure and availability of essential services to accommodate the development.	The checklist is intended to ensure that the right information is provided with applications on submission; it cannot ensure the acceptability of proposals which is a matter for the assessment of the application. The standard application form requires information about how development proposals are expected to deal with surface water and foul sewage disposal. No specific additional information requirements are identified for the checklist.	No change recommended.
There should be no need for a Biodiversity Checklist or Climate Change Statement.	Completion of a Biodiversity Checklist is recommended by DAERA for all proposals and is required to inform compliance with Policy NH1. Climate change policies (Policies ENV2, ENV3 and ENV5) apply to all developments and this information is necessary to ascertain whether proposals meet the requirements of these policies.	No change recommended.
The checklist should include questions around whether proposals may affect any part of Northern Ireland’s marine areas. Marine information may be required as outlined in the UK MPS and draft Marine Plan. For example, this could include a Water Quality Statement,	Consideration of impacts on the marine environment should be added to the Guidance sections of the following checklist information requirements: Biodiversity Survey, Contaminated Land Assessment, Heritage Impact Assessment, Noise Impact	<b>It is recommended that reference to the consideration of impacts on the marine environment is added to the Guidance sections of the following checklist information requirements: Biodiversity Survey, Contaminated Land Assessment,</b>

Heritage Statement, Seascape Assessment, Land and Sea Interactions etc.	Assessment, Landscape/Townscape Visual Assessment and Appraisal. It can then be kept under review as to whether a specific Marine Impact Assessment should be added to the checklist at a later date.	Heritage Impact Assessment, Noise Impact Assessment, Landscape/Townscape Visual Impact Assessment or Appraisal.
Biodiversity and Climate Change Statement.	Completion of a Biodiversity Checklist is recommended by DAERA for all proposals. Climate change policies (Policies ENV2, ENV3 and ENV5) apply to all developments.	No change recommended.
Some sort of screening should take place to determine whether listed information is actually required. For example, are a Biodiversity Checklist and Climate Change Statement really required for sites in the City Centre?	The checklist will be applied on a case-by-case basis to determine whether the information is required for the specific application proposal.	No change recommended.
Climate Change Statements should be removed as they add no value to the process.	Climate change policies (Policies ENV2, ENV3 and ENV5) apply to all developments and this information is necessary to ascertain whether proposals meet the requirements of these policies.	No change recommended.
A Biodiversity Checklist may be required, however, there are so many variables and application types. It should not be at odds with DAERA standing advice.	Commented noted.	No change recommended.
Agrees other than the exception of the Biodiversity Checklist. Many City Centre sites are covered by hardstanding or an existing occupied building.	Completion of a Biodiversity Checklist is recommended by DAERA for all proposals and is required to inform compliance with Policy NH1. The checklist will be applied on a case-by-case basis to determine whether the information is required for the specific application proposal.	No change recommended.

<b>Indicative guide – is there any other information that should be included or removed from planning applications for HMOs?</b>		
<b>Comment</b>	<b>Officer response</b>	<b>Changes to Checklist</b>
There may be other specific site requirements and the scale of information should be appropriate to the development.	The indicative guide acknowledges that there may be other information requirements in addition to those listed depending on the location and specific characteristics of the proposal.	No change recommended.
You may need information on how the development can be serviced in terms of NI Water – water and waste water infrastructure and availability of essential services to accommodate the development.	The checklist is intended to ensure that the right information is provided with applications on submission; it cannot ensure the acceptability of proposals which is a matter for the assessment of the application. The standard application form requires information about how development proposals are expected to deal with surface water and foul sewage disposal. No specific additional information requirements are identified for the checklist.	No change recommended.
There should be no need for a Biodiversity Checklist or Climate Change Statement.	Completion of a Biodiversity Checklist is recommended by DAERA for all proposals and is required to inform compliance with Policy NH1. Climate change policies (Policies ENV2, ENV3 and ENV5) apply to all developments and a Climate Change is necessary to ascertain whether proposals meet the requirements of these policies.	No change recommended.
Remove Parking Survey, Residential Quality Statement and Waste Management Plan. These property structures are existing and unchanged. Unnecessary additional red tape and reducing the delivery of housing due to delays.	A Parking Survey may be required for an HMO use given the potential to increase parking demand. A Residential Quality Statement is necessary because of the requirement in Policy RD1 to meet space	<b>It is recommended that this requirement for a Waste Management Plan for HMO applications is replaced with the requirement to show a Waste Storage Area.</b>

	standards. On reflection, it is considered disproportionate to routinely require a Waste Management Plan for HMOs. However, it is recommended that this requirement is replaced with the new for applications for HMOs to show a Waste Storage Area.	
The requirement for a Parking Survey will be site specific, this should be clarified. Any Residential Quality Statement should be proportionate. The completion of tables and in addition to drawings causes duplication of work for planners to review and verify.	A Parking Survey may be required for an HMO use given the potential to increase parking demand. A Residential Quality Statement is necessary because of the requirement in Policy RD1 to meet space standards. It is recommended that the tables are completed because it is much easier to decipher the space standards than from the submitted drawings.	No change recommended.
Could include a Plan Compliance Statement.	Planning Service will permit information to be provided in different formats, such as part of a Compliance Statement, Design and Access Statement or Planning Statement, and it will not be stipulated that each has to be provided as a standalone document.	No change recommended.

<b>Indicative guide – is there any other information that should be included or removed from planning applications for Major developments?</b>		
<b>Comment</b>	<b>Officer response</b>	<b>Changes to Checklist</b>
There may be other specific site requirements and the scale of information should be appropriate to the development.	The indicative guide acknowledges that there may be other information requirements in addition to those listed depending on the location and specific characteristics of the proposal.	No change recommended.
You may need information on how the development can be serviced in terms of NI Water – water and waste water infrastructure and availability of essential services to accommodate the development. Applications should not be accepted into the process if the developer does not know if the site can be connected.	The checklist is intended to ensure that the right information is provided with applications on submission; it cannot ensure the acceptability of proposals which is a matter for the assessment of the application. The standard application form requires information about how development proposals are expected to deal with surface water and foul sewage disposal. No specific additional information requirements are identified for the checklist.	No change recommended.
Employability and Skills Profile – perhaps add in where social value applies in the case of public sector schemes. Make it clear that it applies where there is a skills shortage.	The checklist states: 'For public sector construction, confirmation that Social Value applies. A Construction Employability and Skills Plan is not necessary in such cases.' The checklist should be amended to state that an Employability and Skills Profile may be required where there is a skills shortage.	<b>It is recommended that the final checklist is clear that an Employability and Skills Profile may be required where there is a skills shortage.</b>
There should be no need for a Biodiversity Checklist, Climate Change Statement, CEMP,	Completion of a Biodiversity Checklist is recommended by DAERA for all proposals and is required to inform compliance with Policy NH1. Climate change policies (Policies	No change recommended.

<p>Employability and Skills Profile or Health Impact Assessment.</p>	<p>ENV2, ENV3 and ENV5) apply to all developments and a Climate Change is necessary to ascertain whether proposals meet the requirements of these policies. An (Outline) Construction Environmental Management Plan (CEMP) may be required given the significant scale of Major development. An Employability and Skills Profile is advised by the Council's Developer Contribution Framework and to help address inclusive growth, a core aim of the <i>Belfast Agenda</i> Community Plan. A Health Impact Assessment is required for Major developments by Policy HC1.</p>	
<p>The checklist should include questions around whether proposals may affect any part of Northern Ireland's marine areas. Marine information may be required as outlined in the UK MPS and draft Marine Plan. For example, this could include a Water Quality Statement, Heritage Statement, Seascape Assessment, Land and Sea Interactions etc.</p>	<p>Consideration of impacts on the marine environment should be added to the Guidance sections of the following checklist information requirements: Biodiversity Survey, Contaminated Land Assessment and Heritage Impact Assessment. It can then be kept under review as to whether a specific Marine Impact Assessment should be added to the checklist at a later date.</p>	<p>It is recommended that reference to the consideration of impacts on the marine environment is added to the Guidance sections of the following checklist information requirements: Biodiversity Survey, Contaminated Land Assessment and Heritage Impact Assessment.</p>
<p>It is questionable as to whether some of the listed information is required to determine an application, never mind validate one. It is imperative that there is flexibility and that judgement is applied as to the requirement for information.</p>	<p>The checklist reflects planning policy requirements and the information that is required for applications to be fully assessed. Without the information, it is unlikely that planning permission could be granted. The checklist will be applied on a case-by-case basis and information will only be sought where it is reasonable and proportionate.</p>	<p>No change recommended.</p>
<p>Depends on proposal.</p>	<p>Commented noted.</p>	<p>No change recommended.</p>

<p>The requirement for a phasing plan will be specific. Clarification that only required where a scheme is to be phased. A Design and Access Statement is a validation requirement for all applications for Major development. Additional design information should be a matter for during the application process. Determining open space requirements should be a matter for officers to assess during the application. The checklist does not accurately reflect the requirements of Policy OS3; there are two separate tests – one for hard and soft landscaping and the other for open space. The checklist should reflect the policy in full. A CEMP will be site specific.</p>	<p>Where the applicant confirms that the proposed development is not intended to be phased, then a Phasing Plan may not be required (depending on the circumstances of the case). A Design and Access Statement is an existing basic validation requirement and remains unchanged by the checklist. An Open Space Statement is intended to clearly set out the applicant’s approach to Policy OS3. Its principle purpose is to address requirements around open space for Major developments. The checklist should be amended so that the Residential Quality Statement section more accurately reflects the requirements of Policy OS3. The requirement for a CEMP will be assessed on a case-by-case basis but it likely to be required due to scale of Major development.</p>	<p>It is recommended that the Residential Quality Statement section of the checklist is amended to more accurately reflect the requirements of Policy OS3.</p>
<p>Provide details of adjoining land use and ownership so that the likelihood of further development can be established. Travel Plan with meaningful modal shift targets.</p>	<p>It is an existing basic validation requirement that applicants indicate adjacent land they control on a site location plan (blue line). It is agreed that a Travel Plan should be included in the indicative list of information requirements for applications for Major development.</p>	<p>It is recommended that a Travel Plan is included in the indicative list of information requirements for applications for Major development.</p>



<b>Indicative guide – is there any other information that should be included or removed from planning applications for Purpose Built Managed Student Accommodation?</b>		
<b>Comment</b>	<b>Officer response</b>	<b>Changes to Checklist</b>
There may be other specific site requirements and the scale of information should be appropriate to the development.	The indicative guide acknowledges that there may be other information requirements in addition to those listed depending on the location and specific characteristics of the proposal.	No change recommended.
You may need information on how the development can be serviced in terms of NI Water – water and waste water infrastructure and availability of essential services to accommodate the development. Applications should not be accepted into the process if the developer does not know if the site can be connected.	The checklist is intended to ensure that the right information is provided with applications on submission; it cannot ensure the acceptability of proposals which is a matter for the assessment of the application. The standard application form requires information about how development proposals are expected to deal with surface water and foul sewage disposal. No specific additional information requirements are identified for the checklist.	No change recommended.
Employability and Skills Profile.	It is agreed that an Employability and Skills Profile should be included in the indicative list of information requirements for applications for PBMSA.	<b>It is recommended that an Employability and Skills Profile is included in the indicative list of information requirements for applications for PBMSA.</b>
There should be no need for a Biodiversity Checklist or Climate Change Statement. The height should be in keeping with surrounding buildings. Sufficient light should be provided to lightwells.	Completion of a Biodiversity Checklist is recommended by DAERA for all proposals and is required to inform compliance with Policy NH1. Climate change policies (Policies ENV2, ENV3 and ENV5) apply to all developments and a Climate Change is necessary to ascertain whether proposals	<b>It is recommended that a Daylight, Sunlight and Overshadowing Assessment is included in the indicative information requirements for applications for PBMSA, as minimum to ensure satisfactory levels of sunlight and daylight to rooms.</b>

	meet the requirements of these policies. It is agreed that a Daylight, Sunlight and Overshadowing Assessment should be provided with applications for PBMSA, as minimum to ensure satisfactory levels of sunlight and daylight to rooms.	
The checklist should include questions around whether proposals may affect any part of Northern Ireland's marine areas. Marine information may be required as outlined in the UK MPS and draft Marine Plan. For example, this could include a Water Quality Statement, Heritage Statement, Seascape Assessment, Land and Sea Interactions etc.	Consideration of impacts on the marine environment should be added to the Guidance sections of the following checklist information requirements: Biodiversity Survey, Contaminated Land Assessment and Heritage Impact Assessment. It can then be kept under review as to whether a specific Marine Impact Assessment should be added to the checklist at a later date.	It is recommended that reference to the consideration of impacts on the marine environment is added to the Guidance sections of the following checklist information requirements: Biodiversity Survey, Contaminated Land Assessment and Heritage Impact Assessment.
It is questionable as to whether some of the listed information is required to determine an application, never mind validate one. It is imperative that there is flexibility and that judgement is applied as to the requirement for information.	The checklist reflects planning policy requirements and the information that is required for applications to be fully assessed. Without the information, it is unlikely that planning permission could be granted. The checklist will be applied on a case-by-case basis and information will only be sought where it is reasonable and proportionate.	No change recommended.
Parking Surveys and parking facilities – students use cars as well.	A Parking Survey may be required on a case-by-case basis and is not considered a routine requirement for PBMSA proposals.	No change recommended.
Policy HOU7 (adaptable and accessible accommodation) applies to new homes and not to PBMSA proposals as its not permanent accommodation. This is not a reasonable validation requirement.	The Council's new PBMSA SPG confirms that Policy HOU7 applies to PBMSA proposals as it is residential by nature.	No change recommended.

<p>Travel Plan.</p>	<p>It is agreed that a Travel Plan should be included in the indicative list of information requirements for applications for PBMSA.</p>	<p>It is recommended that a Travel Plan is included in the indicative list of information requirements for applications for PBMSA.</p>
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<b>Indicative guide – is there any other information that should be included or removed from planning applications for Residential Developments of 1 to 4 units inclusive?</b>		
<b>Comment</b>	<b>Officer response</b>	<b>Changes to Checklist</b>
There may be other specific site requirements and the scale of information should be appropriate to the development.	The indicative guide acknowledges that there may be other information requirements in addition to those listed depending on the location and specific characteristics of the proposal.	No change recommended.
You may need information on how the development can be serviced in terms of NI Water – water and waste water infrastructure and availability of essential services to accommodate the development. Applications should not be accepted into the process if the developer does not know if the site can be connected.	The checklist is intended to ensure that the right information is provided with applications on submission; it cannot ensure the acceptability of proposals which is a matter for the assessment of the application. The standard application form requires information about how development proposals are expected to deal with surface water and foul sewage disposal. No specific additional information requirements are identified for the checklist.	No change recommended.
None of the listed reports should need to be provided as too onerous.	The checklist reflects planning policy requirements and the information that is required for applications to be fully assessed. Without the information, it is unlikely that planning permission could be granted. The checklist will be applied on a case-by-case basis and information will only be sought where it is reasonable and proportionate.	No change recommended.

<p>The checklist should include questions around whether proposals may affect any part of Northern Ireland's marine areas. Marine information may be required as outlined in the UK MPS and draft Marine Plan. For example, this could include a Water Quality Statement, Heritage Statement, Seascape Assessment, Land and Sea Interactions etc.</p>	<p>Consideration of impacts on the marine environment should be added to the Guidance sections of the following checklist information requirements: Biodiversity Survey, Contaminated Land Assessment and Heritage Impact Assessment. It can then be kept under review as to whether a specific Marine Impact Assessment should be added to the checklist at a later date.</p>	<p>It is recommended that reference to the consideration of impacts on the marine environment is added to the Guidance sections of the following checklist information requirements: Biodiversity Survey, Contaminated Land Assessment and Heritage Impact Assessment.</p>
<p>Climate Change Statement.</p>	<p>A Climate Change is already included in the indicative guidance for applications for 1 – 4 Residential Units.</p>	<p>No change recommended.</p>
<p>Biodiversity Checklist. The requirement for reports should be proportionate.</p>	<p>Completion of a Biodiversity Checklist is recommended by DAERA for all proposals and is required to inform compliance with Policy NH1. Information will only ever be sought where its reasonable and proportionate.</p>	<p>No change recommended.</p>

<b>Indicative guide – is there any other information that should be included or removed from planning applications for Residential Developments of 5 to 9 units inclusive?</b>		
<b>Comment</b>	<b>Officer response</b>	<b>Changes to Checklist</b>
There may be other specific site requirements and the scale of information should be appropriate to the development.	The indicative guide acknowledges that there may be other information requirements in addition to those listed depending on the location and specific characteristics of the proposal.	No change recommended.
You may need information on how the development can be serviced in terms of NI Water – water and waste water infrastructure and availability of essential services to accommodate the development. Applications should not be accepted into the process if the developer does not know if the site can be connected.	The checklist is intended to ensure that the right information is provided with applications on submission; it cannot ensure the acceptability of proposals which is a matter for the assessment of the application. The standard application form requires information about how development proposals are expected to deal with surface water and foul sewage disposal. No specific additional information requirements are identified for the checklist.	No change recommended.
None of the listed reports should need to be provided as too onerous. Affordable housing should be provided by each Authority and not the private sector. This practice is leading developers to consider projects outside Belfast.	The checklist reflects planning policy requirements and the information that is required for applications to be fully assessed. Without the information, it is unlikely that planning permission could be granted. The checklist will be applied on a case-by-case basis and information will only be sought where it is reasonable and proportionate. The comment about affordable housing relates to the appropriateness of Policy HOU5, which is not a matter for the checklist. The Council will	No change recommended.

	consider issues of viability as a material consideration in accordance with the Development Viability SPG.	
The checklist should include questions around whether proposals may affect any part of Northern Ireland's marine areas. Marine information may be required as outlined in the UK MPS and draft Marine Plan. For example, this could include a Water Quality Statement, Heritage Statement, Seascape Assessment, Land and Sea Interactions etc.	Consideration of impacts on the marine environment should be added to the Guidance sections of the following checklist information requirements: Biodiversity Survey, Contaminated Land Assessment and Heritage Impact Assessment. It can then be kept under review as to whether a specific Marine Impact Assessment should be added to the checklist at a later date.	It is recommended that reference to the consideration of impacts on the marine environment is added to the Guidance sections of the following checklist information requirements: Biodiversity Survey, Contaminated Land Assessment and Heritage Impact Assessment.
Climate Change Statement.	A Climate Change is already included in the indicative guidance for applications for 5 – 9 Residential Units.	No change recommended.
No.	Commented noted.	No change recommended.
Threshold too low.	The checklist reflects planning policy requirements and the information that is required for applications to be fully assessed. Without the information, it is unlikely that planning permission could be granted. The checklist will be applied on a case-by-case basis and information will only be sought where it is reasonable and proportionate.	No change recommended.
Heads of Terms should not be required for Local applications unless circumstances require it. The drawings show the types of houses and therefore additional information is duplication, creating two documents to review. This will not save time.	Planning Agreement (Heads of Terms Form) is listed in the indicative information requirements because of the policy requirement for schemes of 5 – 9 Residential Units to provide an element of affordable housing (Policy HOU5).	No change recommended.

<p>Applications of this scale should not attract the requirement for a Section 76 planning agreement.</p>	<p>Planning Agreement (Heads of Terms Form) is listed in the indicative information requirements because of the policy requirement for schemes of 5 – 9 Residential Units to provide an element of affordable housing (Policy HOU5).</p>	<p>No change recommended.</p>
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<b>Indicative guide – is there any other information that should be included or removed from planning applications for Residential Developments of 10 to 49 units inclusive?</b>		
<b>Comment</b>	<b>Officer response</b>	<b>Changes to Checklist</b>
There may be other specific site requirements and the scale of information should be appropriate to the development.	The indicative guide acknowledges that there may be other information requirements in addition to those listed depending on the location and specific characteristics of the proposal.	No change recommended.
You may need information on how the development can be serviced in terms of NI Water – water and waste water infrastructure and availability of essential services to accommodate the development. Applications should not be accepted into the process if the developer does not know if the site can be connected.	The checklist is intended to ensure that the right information is provided with applications on submission; it cannot ensure the acceptability of proposals which is a matter for the assessment of the application. The standard application form requires information about how development proposals are expected to deal with surface water and foul sewage disposal. No specific additional information requirements are identified for the checklist.	No change recommended.
None of the listed reports should need to be provided as too onerous. Affordable housing should be provided by each Authority and not the private sector. This practice is leading developers to consider projects outside Belfast.	The checklist reflects planning policy requirements and the information that is required for applications to be fully assessed. Without the information, it is unlikely that planning permission could be granted. The checklist will be applied on a case-by-case basis and information will only be sought where it is reasonable and proportionate. The comment about affordable housing relates to the appropriateness of Policy HOU5, which is not a matter for the checklist. The Council will	No change recommended.

	consider issues of viability as a material consideration in accordance with the Development Viability SPG.	
The checklist should include questions around whether proposals may affect any part of Northern Ireland's marine areas. Marine information may be required as outlined in the UK MPS and draft Marine Plan. For example, this could include a Water Quality Statement, Heritage Statement, Seascape Assessment, Land and Sea Interactions etc.	Consideration of impacts on the marine environment should be added to the Guidance sections of the following checklist information requirements: Biodiversity Survey, Contaminated Land Assessment and Heritage Impact Assessment. It can then be kept under review as to whether a specific Marine Impact Assessment should be added to the checklist at a later date.	It is recommended that reference to the consideration of impacts on the marine environment is added to the Guidance sections of the following checklist information requirements: Biodiversity Survey, Contaminated Land Assessment and Heritage Impact Assessment.
Residential Quality Statement?	A Residential Quality Statement is required to address the requirements of Policies DES1 and RD1 in relation to space standards and amenity space.	No change recommended.
No.	Commented noted.	No change recommended.
Threshold too low.	The checklist reflects planning policy requirements and the information that is required for applications to be fully assessed. Without the information, it is unlikely that planning permission could be granted. The checklist will be applied on a case-by-case basis and information will only be sought where it is reasonable and proportionate.	No change recommended.
Biodiversity Statement should not be required. Heads of Terms should not be required for Local applications unless circumstances require it. The drawings show the types of houses and therefore additional information is duplication, creating two documents to review. This will not save time.	Completion of a Biodiversity Checklist is recommended by DAERA for all proposals and is required to inform compliance with Policy NH1. Planning Agreement (Heads of Terms Form) is listed in the indicative information requirements because of the	No change recommended.

	policy requirement for schemes of 5 – 9 Residential Units to provide an element of affordable housing (Policy HOU5).	
Travel Plan with meaningful modal shift targets. Details of adjoining lands to determine if further development will take place.	It is agreed that a Travel Plan should be included in the indicative list of information requirements for applications for 10 – 49 units. Adjoining land is considered as part of the assessment of the application.	It is recommended that a Travel Plan is included in the indicative list of information requirements for applications for 10 – 49 Residential Units.

<b>Indicative guide – is there any other information that should be included or removed from planning applications for Residential Developments of 50 units or above?</b>		
<b>Comment</b>	<b>Officer response</b>	<b>Changes to Checklist</b>
There may be other specific site requirements and the scale of information should be appropriate to the development.	The indicative guide acknowledges that there may be other information requirements in addition to those listed depending on the location and specific characteristics of the proposal.	No change recommended.
You may need information on how the development can be serviced in terms of NI Water – water and waste water infrastructure and availability of essential services to accommodate the development. Applications should not be accepted into the process if the developer does not know if the site can be connected.	The checklist is intended to ensure that the right information is provided with applications on submission; it cannot ensure the acceptability of proposals which is a matter for the assessment of the application. The standard application form requires information about how development proposals are expected to deal with surface water and foul sewage disposal. No specific additional information requirements are identified for the checklist.	No change recommended.
Employability and Skills Profile.	It is agreed that an Employability and Skills Profile should be included in the indicative list of information requirements for applications for PBMSA.	<b>It is recommended that an Employability and Skills Profile is included in the indicative list of information requirements.</b>
The checklist should include questions around whether proposals may affect any part of Northern Ireland’s marine areas. Marine information may be required as outlined in the UK MPS and draft Marine Plan. For example, this could include a Water Quality Statement, Heritage	Consideration of impacts on the marine environment should be added to the Guidance sections of the following checklist information requirements: Biodiversity Survey, Contaminated Land Assessment and Heritage Impact Assessment. It can then be kept under review as to whether a specific	<b>It is recommended that reference to the consideration of impacts on the marine environment is added to the Guidance sections of the following checklist information requirements: Biodiversity</b>

Statement, Seascape Assessment, Land and Sea Interactions etc.	Marine Impact Assessment should be added to the checklist at a later date.	Survey, Contaminated Land Assessment and Heritage Impact Assessment.
Residential Quality Statement?	A Residential Quality Statement is required to address the requirements of Policies DES1 and RD1 in relation to space standards and amenity space.	No change recommended.
Design and Access Statement should be included.	A Design and Access Statement is an existing basic validation requirement and remains unchanged by the checklist.	No change recommended.
Is a Health Impact Assessment necessary?	Policy HC1 requires a Health Impact Assessment to be provided with applications for Major development.	No change recommended.
Biodiversity Statement should not be required. Heads of Terms should not be required for Local applications unless circumstances require it. The drawings show the types of houses and therefore additional information is duplication, creating two documents to review. This will not save time.	Completion of a Biodiversity Checklist is recommended by DAERA for all proposals and is required to inform compliance with Policy NH1. Planning Agreement (Heads of Terms Form) is listed in the indicative information requirements because of the requirement for schemes of 5 units or more, or sites of 0.1 ha or greater, to provide an element of affordable housing (Policy HOU5).	No change recommended.
Travel Plan with meaningful modal shift targets. Details of adjoining lands to determine if further development will take place.	It is agreed that a Travel Plan should be included in the indicative list of information requirements for applications for 50 plus units. Adjoining land is considered as part of the assessment of the application.	It is recommended that a Travel Plan is included in the indicative list of information requirements for applications for 50 plus Residential Units.

<b>Indicative guide – is there any other information that should be included or removed from planning applications for Short Term Let Accommodation?</b>		
<b>Comment</b>	<b>Officer response</b>	<b>Changes to Checklist</b>
There may be other specific site requirements and the scale of information should be appropriate to the development.	The indicative guide acknowledges that there may be other information requirements in addition to those listed depending on the location and specific characteristics of the proposal.	No change recommended.
You may need information on how the development can be serviced in terms of NI Water – water and waste water infrastructure and availability of essential services to accommodate the development. Applications should not be accepted into the process if the developer does not know if the site can be connected.	The checklist is intended to ensure that the right information is provided with applications on submission; it cannot ensure the acceptability of proposals which is a matter for the assessment of the application. The standard application form requires information about how development proposals are expected to deal with surface water and foul sewage disposal. No specific additional information requirements are identified for the checklist.	No change recommended.
None of the reports ought to be required.	Most applications for short-term let accommodation involve a change of use only with no external alterations. On reflection, it is advised that only a Short-Term Let Accommodation Statement is required with the requirement for a Biodiversity Checklist and Climate Change Statement removed from the indicative list (the indicative guide should be updated to state that these documents may be required where external alterations are proposed).	<b>It is recommended that the requirement for a Biodiversity Checklist and Climate Change are Statement removed from the indicative list and only potentially required where external alterations are proposed.</b>

<p>But not for single standalone units. Yes, to proposals of four units or greater.</p>	<p>Comment noted.</p>	<p>No change recommended.</p>
<p>The checklist should include questions around whether proposals may affect any part of Northern Ireland’s marine areas. Marine information may be required as outlined in the UK MPS and draft Marine Plan. For example, this could include a Water Quality Statement, Heritage Statement, Seascape Assessment, Land and Sea Interactions etc.</p>	<p>Consideration of impacts on the marine environment should be added to the Guidance sections of the following checklist information requirements: Biodiversity Survey, Contaminated Land Assessment and Heritage Impact Assessment. It can then be kept under review as to whether a specific Marine Impact Assessment should be added to the checklist at a later date.</p>	<p>It is recommended that reference to the consideration of impacts on the marine environment is added to the Guidance sections of the following checklist information requirements: Biodiversity Survey, Contaminated Land Assessment and Heritage Impact Assessment.</p>
<p>A Biodiversity Checklist and Climate Change Statement are unnecessary if the proposal only involves a change of use.</p>	<p>Most applications for short-term let accommodation involve a change of use only with no external alterations. On reflection, it is advised that only a Short-Term Let Accommodation Statement is required with the requirement for a Biodiversity Checklist and Climate Change Statement removed from the indicative list (the indicative guide should be updated to state that these documents may be required where external alterations are proposed).</p>	<p>It is recommended that the requirement for a Biodiversity Checklist and Climate Change are Statement removed from the indicative list and only potentially required where external alterations are proposed.</p>

<b>Indicative guide – is there any other information that should be included or removed from planning applications for Specialist Residential Accommodation?</b>		
<b>Comment</b>	<b>Officer response</b>	<b>Changes to Checklist</b>
There may be other specific site requirements and the scale of information should be appropriate to the development.	The indicative guide acknowledges that there may be other information requirements in addition to those listed depending on the location and specific characteristics of the proposal.	No change recommended.
You may need information on how the development can be serviced in terms of NI Water – water and waste water infrastructure and availability of essential services to accommodate the development. Applications should not be accepted into the process if the developer does not know if the site can be connected.	The checklist is intended to ensure that the right information is provided with applications on submission; it cannot ensure the acceptability of proposals which is a matter for the assessment of the application. The standard application form requires information about how development proposals are expected to deal with surface water and foul sewage disposal. No specific additional information requirements are identified for the checklist.	No change recommended.
Only a Transport Assessment Form should be required.	It is agreed that a Transport Assessment Form (with potential for a Transport Assessment) should be included in the indicative list.	<b>It is recommended that a Transport Assessment Form (with potential for a Transport Assessment) is included in the indicative list for applications for special residential accommodation.</b>
Yes, but only for proposals of four units or greater.	Comment noted.	No change recommended.
The checklist should include questions around whether proposals may affect any part of Northern Ireland’s marine areas. Marine information may be required as outlined in the	Consideration of impacts on the marine environment should be added to the Guidance sections of the following checklist information requirements: Biodiversity Survey,	<b>It is recommended that reference to the consideration of impacts on the marine environment is added to the Guidance sections of the following checklist</b>



<p>UK MPS and draft Marine Plan. For example, this could include a Water Quality Statement, Heritage Statement, Seascape Assessment, Land and Sea Interactions etc.</p>	<p>Contaminated Land Assessment and Heritage Impact Assessment. It can then be kept under review as to whether a specific Marine Impact Assessment should be added to the checklist at a later date.</p>	<p>information requirements: Biodiversity Survey, Contaminated Land Assessment and Heritage Impact Assessment.</p>
<p>A Biodiversity Checklist is unnecessary.</p>	<p>Completion of a Biodiversity Checklist is recommended by DAERA for all proposals and is required to inform compliance with Policy NH1.</p>	<p>No change recommended.</p>
<p>Travel Plan.</p>	<p>It is agreed that a Travel Plan should be included in the indicative list of information requirements for applications for specialist residential accommodation.</p>	<p>It is recommended that a Travel Plan is included in the indicative list of information requirements for applications for specialist residential accommodation.</p>

<b>Indicative guide – is there any other information that should be included or removed from planning applications for Telecommunications development?</b>		
<b>Comment</b>	<b>Officer response</b>	<b>Changes to Checklist</b>
There may be other specific site requirements and the scale of information should be appropriate to the development.	The indicative guide acknowledges that there may be other information requirements in addition to those listed depending on the location and specific characteristics of the proposal.	No change recommended.
None of the listed reports ought to be required.	The checklist reflects planning policy requirements and the information that is required for applications to be fully assessed. Without the information, it is unlikely that planning permission could be granted.	No change recommended.
The checklist should include questions around whether proposals may affect any part of Northern Ireland's marine areas. Marine information may be required as outlined in the UK MPS and draft Marine Plan. For example, this could include a Water Quality Statement, Heritage Statement, Seascape Assessment, Land and Sea Interactions etc.	Consideration of impacts on the marine environment should be added to the Guidance sections of the following checklist information requirements: Biodiversity Survey, Contaminated Land Assessment and Heritage Impact Assessment. It can then be kept under review as to whether a specific Marine Impact Assessment should be added to the checklist at a later date.	<b>It is recommended that reference to the consideration of impacts on the marine environment is added to the Guidance sections of the following checklist information requirements: Biodiversity Survey, Contaminated Land Assessment and Heritage Impact Assessment.</b>
Does the Council really consider that a Climate Change Statement is required for a telecommunications mast?	It is agreed that a Climate Change Statement is unlikely to be required with most telecommunications applications. Therefore, it is advised that the requirement for a Climate Change Statement should be removed from the indicative guide for applications for telecommunications development.	<b>It is recommended that the requirement for a Climate Change Statement is removed from the indicative guide for applications for telecommunications development.</b>

<p>A Biodiversity Checklist is unnecessary.</p>	<p>Telecommunication proposals may result in tree loss, removal of hedgerows and clearance of vegetation. Completion of a Biodiversity Checklist is recommended by DAERA for all proposals and is required to inform compliance with Policy NH1.</p>	<p>No change recommended.</p>
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<b>Indicative guide – is there any other information that should be included or removed from planning applications for Town Centre Uses?</b>		
<b>Comment</b>	<b>Officer response</b>	<b>Changes to Checklist</b>
There may be other specific site requirements and the scale of information should be appropriate to the development.	The indicative guide acknowledges that there may be other information requirements in addition to those listed depending on the location and specific characteristics of the proposal.	No change recommended.
You may need information on how the development can be serviced in terms of NI Water – water and waste water infrastructure and availability of essential services to accommodate the development. Applications should not be accepted into the process if the developer does not know if the site can be connected.	The checklist is intended to ensure that the right information is provided with applications on submission; it cannot ensure the acceptability of proposals which is a matter for the assessment of the application. The standard application form requires information about how development proposals are expected to deal with surface water and foul sewage disposal. No specific additional information requirements are identified for the checklist.	No change recommended.
The following documents are not required: Biodiversity Statement, Climate Change Statement and Office Impact Assessment.	Completion of a Biodiversity Checklist is recommended by DAERA for all proposals. Climate change policies (Policies ENV2, ENV3 and ENV5) apply to all developments. An Office Impact Assessment is required for office proposals of 1,000 sqm gross or greater outside centres to address Policy EC6 of the Plan Strategy.	No change recommended.

Developments in Town Centres and Rural Areas should be treated the same. This would be a less bureaucratic/administrative burden.	This is a comment on planning policy and not directly related to the checklist.	No change recommended.
The checklist should include questions around whether proposals may affect any part of Northern Ireland's marine areas. Marine information may be required as outlined in the UK MPS and draft Marine Plan. For example, this could include a Water Quality Statement, Heritage Statement, Seascape Assessment, Land and Sea Interactions etc.	Consideration of impacts on the marine environment should be added to the Guidance sections of the following checklist information requirements: Biodiversity Survey, Contaminated Land Assessment and Heritage Impact Assessment. It can then be kept under review as to whether a specific Marine Impact Assessment should be added to the checklist at a later date.	It is recommended that reference to the consideration of impacts on the marine environment is added to the Guidance sections of the following checklist information requirements: Biodiversity Survey, Contaminated Land Assessment and Heritage Impact Assessment.
We would question the need for an Open Space Statement in instances of change of use.	Policy OS3 requires open space to be provided equivalent to at least 10% of the total site area, irrespective of whether the proposal only involves a change of use. Therefore, an Open Space Statement is considered necessary.	No change recommended.
Don't agree with why a Retail Impact Assessment, Sequential Test and Office Impact Assessment is required for Town Centre Uses in the City Centre or town centre. Better to have two options – for inside and outside the City Centre/town centre. Open space unlikely to be feasible for developments in the City Centre where there are high buildings to footprint ratios.	The checklist is clear that a Retail Impact Assessment, Sequent Test and Office Impact Assessment are only required for town centre uses "outside" a centre. Policy OS3 applies to all proposals including high buildings with small footprints (for example, the roof space may be able to be utilised for open space).	No change recommended.
Travel Plan and existing sustainable transport links.	It is agreed that a Travel Plan should be included in the indicative list of information requirements for applications for town centre uses.	It is recommended that a Travel Plan is included in the indicative list of information requirements for applications for town centre uses.

<b>Specific Validation Checklist information requirements – Further comments on Adaptable and Accessible Accommodation Statement</b>		
<b>Comment</b>	<b>Officer response</b>	<b>Changes to Checklist</b>
Not needed – current regulations are sufficient.	Policy HOU7 goes beyond the requirements of current Building Regulations in relation to adaptable and accessible accommodation. An Adaptable and Accessible Accommodation is required to address the requirements of this policy.	No change recommended.

<b>Specific Validation Checklist information requirements – Affordable Housing Proposal Form</b>		
<b>Comment</b>	<b>Officer response</b>	<b>Changes to Checklist</b>
Affordable housing should be provided by the public sector.	The comment relates to the appropriateness of Policy HOU5 (affordable housing), which is not a matter for the checklist.	No change recommended.
This is holding up applications. Planning should not be involved in affordable housing; the free market will decide.	The comment relates to the appropriateness of Policy HOU5 (affordable housing), which is not a matter for the checklist.	No change recommended.
This sets out a duplication of work alongside the planning drawings.	The information covered in the Affordable Housing Form goes beyond that shown in the proposed drawings and is therefore required.	No change recommended.

<b>Specific Validation Checklist information requirements – Air Quality Impact Assessment</b>		
<b>Comment</b>	<b>Officer response</b>	<b>Changes to Checklist</b>
Where a proposal affects or might affect the whole or any part of Northern Ireland’s marine area the assessment should incorporate consideration of air quality issues on the marine area to ensure compliance with Section 8 of the Marine Act (Northern Ireland) 2013.	Consideration of potential impacts on the marine environment should be added to the Guidance sections of Air Quality Impact Assessment.	It is recommended that reference to the consideration of air quality impacts on the marine environment is added to the Guidance section of Air Quality Impact Assessment.
In specific circumstances but cannot apply generally.	Comment noted.	No change required.

<b>Specific Validation Checklist information requirements – Archaeological Impact Assessment</b>		
<b>Comment</b>	<b>Officer response</b>	<b>Changes to Checklist</b>
Where a proposal affects or might affect the whole or any part of Northern Ireland’s marine area the assessment should incorporate consideration of impacts on marine archaeology to ensure compliance with Section 8 of the Marine Act (Northern Ireland) 2013.	Consideration of potential impacts on the marine archaeology should be added to the Guidance sections of Archaeological Impact Assessment.	It is recommended that reference to the consideration impacts on marine archaeology is added to the Guidance section of Archaeological Impact Assessment.

<b>Specific Validation Checklist information requirements – Archaeological Site Evaluation</b>		
<b>Comment</b>	<b>Officer response</b>	<b>Changes to Checklist</b>
Where a proposal affects or might affect the whole or any part of Northern Ireland’s marine area the assessment should incorporate consideration of impacts on marine archaeology to ensure compliance with Section 8 of the Marine Act (Northern Ireland) 2013.	Consideration of potential impacts on the marine archaeology should be added to the Guidance sections of Archaeological Site Evaluation.	It is recommended that reference to the consideration impacts on marine archaeology is added to the Guidance section of Archaeological Site Evaluation.

<b>Specific Validation Checklist information requirements – Biodiversity Checklist</b>		
<b>Comment</b>	<b>Officer response</b>	<b>Changes to Checklist</b>
This should only be required in very nature sensitive locations, and not be a blanket requirement.	Completion of a Biodiversity Checklist is recommended by DAERA for all proposals and is required to inform compliance with Policy NH1.	No change recommended.
Where a proposal affects or might affect the whole or any part of Northern Ireland’s marine area the assessment should incorporate consideration of impacts on marine biodiversity, taking account of the biodiversity duty, and ensure compliance with Section 8 of the Marine Act (Northern Ireland) 2013.	Consideration of potential impacts on the marine biodiversity should be added to the Guidance sections of Biodiversity Survey.	It is recommended that reference to the consideration impacts on marine biodiversity is added to the Guidance section of Biodiversity Survey.
Specific circumstances yes, but not for Householder applications.	The majority of feedback from the consultation supports the removal of specific additional validation requirements for Householder applications. Officers advise that these specific requirements, including Biodiversity Checklist,	It is recommended that the requirement for a Biodiversity Checklist for Householder applications is removed from the final checklist.



	are removed in view of the consultation responses and the potential for these requirements to result in excessive delays to the validation process.	
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<b>Specific Validation Checklist information requirements – Biodiversity Survey</b>		
<b>Comment</b>	<b>Officer response:</b>	<b>Changes to Checklist</b>
This should only be required in very nature sensitive locations, and not be a blanket requirement.	Completion of a Biodiversity Checklist is recommended by DAERA for all proposals and is required to inform compliance with Policy NH1.	No change recommended.
Where a proposal affects or might affect the whole or any part of Northern Ireland’s marine area the assessment should incorporate consideration of impacts on marine biodiversity, taking account of the biodiversity duty, and ensure compliance with Section 8 of the Marine Act (Northern Ireland) 2013.	Consideration of potential impacts on the marine biodiversity should be added to the Guidance sections of Biodiversity Survey.	<b>It is recommended that reference to the consideration impacts on marine biodiversity is added to the Guidance section of Biodiversity Survey.</b>

<b>Specific Validation Checklist information requirements – Climate Change Statement</b>		
<b>Comment</b>	<b>Officer response</b>	<b>Changes to Checklist</b>
Not needed. Current Building Regulations are sufficient.	Policies ENV2, ENV3 and ENV5 go beyond the requirements of current Building Regulations in relation to climate change. A Climate Change Statement is required to address the requirements of these policies.	No change recommended.
This statement should include consideration of whether a proposal has the potential to generate or cause an increase in greenhouse gas emissions and the ability of a proposal to adapt to a changing climate that incorporates nature-based solutions. This will ensure compliance with Section 8 of the Marine Act (Northern Ireland) 2013.	Where applicable, it is considered that this should be dealt with as part of a Climate Change Statement. This should be referenced in the guidance section of Climate Change Statement.	<b>It is recommended that reference to the consideration of climate change impacts on the marine environment is added to the Guidance section of the Climate Change Statement.</b>
Needs to be meaningful rather than a tick box exercise.	Comment noted.	No change proposed.

<b>Specific Validation Checklist information requirements – Community Cohesion and Good Relations Statement</b>		
<b>Comment:</b>	<b>Officer response</b>	<b>Changes to Checklist</b>
This goes too far as a requirement. Developers should not be required to engage with social engineering.	A Community Cohesion and Good Relations Statement is intended to address the requirements of Policy CRG1.	No change recommended.
Confirmation that this statement can be provided as part of a Planning Statement rather than a separate document.	Planning Service will permit information to be provided in different formats, such as part of a Compliance Statement, Design and Access Statement or Planning Statement, and it will not be stipulated that each has to be provided as a standalone document.	No change recommended.

<b>Specific Validation Checklist information requirements – Outline Construction Environmental Management Plan</b>		
<b>Comment:</b>	<b>Officer response</b>	<b>Changes to Checklist</b>
Not needed. Current regulations are sufficient.	Building Regulations do not address mitigation of environmental impacts during construction and an Outline Construction Environmental Management Plan may be required in certain instances.	No change recommended.

<b>Specific Validation Checklist information requirements – Contaminated Land Assessment</b>		
<b>Comment:</b>	<b>Officer response</b>	<b>Changes to Checklist</b>
<p>This statement should include consideration of the impact on transitional, coastal and marine water quality. It should also include an assessment on compliance with the Water Environment (Water Framework Directive) Regulations (Northern Ireland) 2017, Marine Strategy Regulations 2010 and other legislation that drives the protection and improvement in the quality of transitional, coastal and marine waters. This will ensure compliance with Section 8 of the Marine Act (Northern Ireland) 2013.</p>	<p>Where applicable, it is considered that this should be dealt with as part of a Land Contamination Assessment. This should be referenced in the guidance section of Contaminated Land Assessment.</p>	<p>It is recommended that reference to the consideration of impacts on marine water quality is added to the Guidance section of Contaminated Land Assessment.</p>

<b>Specific Validation Checklist information requirements – Contextual Design Information</b>		
<b>Comment:</b>	<b>Officer response</b>	<b>Changes to Checklist</b>
<p>As previously stated, a Design and Access Statement is a validation requirement and will be read alongside the planning drawings. A level of assessment needs to be undertaken to understand the need for any further design information over and above. Making this a validation requirement needs to be very clear on what is required at the outset as opinions will vary widely on what is reasonably necessary to determine a planning application.</p>	<p>The potential requirement for Contextual Design Information will be scrutinised very carefully by officers at the validation stage and will only be sought where it is reasonable and proportionate.</p>	<p>No change recommended.</p>

<b>Specific Validation Checklist information requirements – Daylight, Sunlight and Overshadowing Assessment</b>		
<b>Comment:</b>	<b>Officer response</b>	<b>Changes to Checklist</b>
This will affect density and risks ending up making our cities spread out into one large suburb.	Impact of proposals on daylight, sunlight and overshadowing is one of many planning considerations relevant to the assessment of applications, and will be balanced against objectives of making effective use of land (density) and other factors.	No change recommended.

<b>Specific Validation Checklist information requirements – Demolition Justification Statement</b>		
<b>Comment:</b>	<b>Officer response</b>	<b>Changes to Checklist</b>
Regard must be given to the fact that the demolition of buildings, which are not located within an area of townscape character or area of village character, is permitted development. Clarification that this statement is not required, under particular circumstances, would be welcomed.	It is recognised that the demolition of unprotected buildings in non-designated areas is normally permitted development. However, Policy ENV2 remains applicable and a Demolition Justification Statement should be provided.	No change recommended.

<b>Specific Validation Checklist information requirements – Drainage Assessment</b>		
<b>Comment:</b>	<b>Officer response</b>	<b>Changes to Checklist</b>
<p>You need to seek confirmation from the developer on how the development can be serviced in terms of NI Water - water and waste water infrastructure and the availability of essential services to accommodate the development. Applications should not be accepted into the planning process where the developer does not know if the site can be connected to the water and waste water infrastructure. A drainage assessment needs to include how or if the site can be serviced in terms of waste water - not just the onsite drainage. How the site impacts on the existing offsite waste water infrastructure.</p>	<p>The checklist is intended to ensure that the right information is provided with applications on submission; it cannot ensure the acceptability of proposals which is a matter for the assessment of the application. The standard application form requires information about how development proposals are expected to deal with surface water and foul sewage disposal. No specific additional information requirements are identified for the checklist. The Council's Planning and Flood Risk SPG confirms that the main purpose of a Drainage Assessment is to consider the risks of surface water run-off, including impact on flooding where applicable.</p>	<p>No change recommended.</p>
<p>This statement should include consideration of the impact on transitional, coastal and marine water quality. It should also include an assessment on compliance with the Water Environment (Water Framework Directive) Regulations (Northern Ireland) 2017, Marine Strategy Regulations 2010 and other legislation that drives the protection and improvement in the quality of transitional, coastal and marine waters. This will ensure compliance with Section 8 of the Marine Act (Northern Ireland) 2013.</p>	<p>DfI Rivers has advised that specific permissions are required to discharge into tidal waters. As such, there is no requirement for any changes.</p>	<p>No change recommended.</p>

<p>Content with the information required in the validation checklist – this reflects the policy position. Additionally, it may be useful to advise the applicant of their need to obtain other permissions from DfI Rivers Directorate or NI Water regarding the requirement for safe disposal of stormwater/site runoff, as the time to obtain these consents can lead to delays in the planning process.</p>	<p>The checklist should be amended to include reference to the potential need to obtain other permissions from DfI Rivers regarding safe disposal of storm water/surface water run-off.</p>	<p>It is recommended that the checklist is amended to include reference to the potential need to obtain other permissions from DfI Rivers regarding safe disposal of storm water/surface water run-off.</p>
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<b>Specific Validation Checklist information requirements – Economic Statement</b>		
<b>Comment:</b>	<b>Officer response</b>	<b>Changes to Checklist</b>
<p>Why is such a thing necessary? We live in a capitalist society – the market will determine private investment.</p>	<p>The economic impacts of development, whether positive or negative, can be a material consideration relevant to assessment of a planning application.</p>	<p>No change recommended.</p>
<p>If the circumstances require the statement, but not in general.</p>	<p>Commented noted.</p>	<p>No change recommended.</p>

<b>Specific Validation Checklist information requirements – Employability and Skills Profile</b>		
<b>Comment:</b>	<b>Officer response</b>	<b>Changes to Checklist</b>
This comment is for council internal use. Once the policy is agreed, it will be useful for Planning and Employability and Skills teams to have a meeting to discuss planning applications where we have recommended the contractor provides a skills and employability plan, particularly in analysing what we need for construction.	Commented noted.	No change recommended.
Why is such a thing necessary? We live in a capitalist society – the market will determine private investment.	An Employability and Skills Profile is advised by the Council’s Developer Contribution Framework and to help address inclusive growth, a core aim of the <i>Belfast Agenda</i> Community Plan. Economic prosperity is a material planning consideration.	No change recommended.
Why does the Council require such information to determine a planning application when other schemes cover this same criteria outside the planning process.	An Employability and Skills Profile is advised by the Council’s Developer Contribution Framework and to help address inclusive growth, a core aim of the <i>Belfast Agenda</i> Community Plan. Economic prosperity is a material planning consideration. The checklist is clear that where Social Value clauses apply, there is no requirement for a Construction Employability and Skills Plan.	No change recommended.



<b>Specific Validation Checklist information requirements – Environmental Statement (EIA)</b>		
<b>Comment:</b>	<b>Officer response</b>	<b>Changes to Checklist</b>
<p>An Environmental Impact Assessment is subject to separate legislation and it is not currently a legal requirement for submission of an ES with applications. The EIA process is also a distinct process of assessment of likely significant environmental effects and those can be determined through a scoping exercise. It would not be reasonable or necessary for this checklist to add further assessments to be included in EIA development or suggest that an ES is deficient in anyway through separate legislation. This could have unintentional consequences for a planning application for EIA development. Applications can be determined EIA post submission and therefore it is unclear what the council's intentions will be for an application if an ES is requested post submission.</p>	<p>The checklist proposes that an Environmental Statement is a validation requirement where the proposal is Environmental Impact Assessment (EIA) development (either required as Schedule 1 development or Schedule 2 development following a positive EIA screening process). The checklist is not proposing any additional information over and above this in respect of EIA.</p>	<p>No change recommended.</p>

<b>Specific Validation Checklist information requirements – Flood Risk Assessment</b>		
<b>Comment:</b>	<b>Officer response</b>	<b>Changes to Checklist</b>
<p>You need to seek confirmation from the developer on how the development can be serviced in terms of NI Water - water and waste water infrastructure and the availability of essential services to accommodate the development. Applications should not be accepted into the planning process where the developer does not know if the site can be connected to the water and waste water infrastructure. A drainage assessment needs to include how or if the site can be serviced in terms of waste water - not just the onsite drainage. How the site impacts on the existing offsite waste water infrastructure.</p>	<p>The checklist is intended to ensure that the right information is provided with applications on submission; it cannot ensure the acceptability of proposals which is a matter for the assessment of the application. The standard application form requires information about how development proposals are expected to deal with surface water and foul sewage disposal. No specific additional information requirements are identified for the checklist. The Council's Planning and Flood Risk SPG confirms that the main purpose of a Drainage Assessment is to consider the risks of surface water run-off, including impact on flooding where applicable.</p>	<p>No change recommended.</p>
<p>In relation to the information required at the validation checklist stage, the checklist states that a Flood Risk Assessment (FRA) should be provided with applications where the following circumstances apply:</p> <ul style="list-style-type: none"> <li>• when the proposed development is within fluvial / coastal flood plain / reservoir flood inundation area; or</li> <li>• where a more accurate definition of the flood plain and its extents is needed. However, whilst the above information is correct, in relation to fluvial and coastal flood risk, the process of arriving at the requirement to need an FRA is sequential i.e. the principle of</li> </ul>	<p>The checklist should be amended to make it clear that development in a flood plain should meet the Exceptions Test and that where the Council confirms that the proposal is an exception, a Flood Risk Assessment will then need to be prepared. It is further advised that whether a proposal is considered an Exception should be discussed with the Planning Service as part of a PAD in advance.</p>	<p>It is recommended that the checklist is amended to make it clear that development in a flood plain should meet the Exceptions Test and that where the Council confirms that the proposal is an exception, a Flood Risk Assessment will then need to be prepared. In the Guidance section, it should further advised that whether a proposal is considered an Exception should be discussed with the Planning Service as part of a PAD in advance.</p>

<p>development is to be accepted by the Council through meeting an exception to policy, prior to a FRA being undertaken. This sequential process, along with the defined exceptions, is laid out in the Council's publication, SPG 15 – Planning and Flood Risk. The issue that potentially could arise is that an applicant could prepare a FRA, at potentially significant cost, on foot of the instruction in the checklist, only to be subsequently told at their application doesn't meet any of the exceptions listed within the SPG.</p> <p>In relation to the FRA requirement for development in proximity to reservoirs, we would suggest that the validation checklist includes a link to the published Technical Guidance Note 25, "TGN 25 – The Practical Application of Strategic Planning Policy for 'Development in Proximity to Reservoirs'" and also a link to the online reservoir maps. This may require applicants to liaise with DfI Reservoirs Authority to determine the status of the reservoir affecting their site which may have implications on development proposals. We note that these links are already included in the publication, SPG 15 - Planning and Flood Risk (paragraph 4.10.10), however, to make it clear to the applicant that they need additional information on the affecting reservoir, we are of the opinion that they should be included in the validation checklist</p>	<p>The checklist should be amended to include reference to flood risk in relation to reservoirs and TGN 25 and link to online reservoir maps.</p>	<p>It is recommended that the checklist is amended to include reference to flood risk in relation to reservoirs and TGN 25 and link to online reservoir maps. In addition, the potential need for liaison with DfI Reservoirs Authority in respect of determining the status of a reservoir affecting a development site.</p>
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<b>Specific Validation Checklist information requirements – Health Impact Assessment</b>		
<b>Comment:</b>	<b>Officer response</b>	<b>Changes to Checklist</b>
Not sure what this is?	A Health Impact Assessment helps to ensure that health and wellbeing are properly considered in planning policies and development proposals. It is a requirement for applications for Major development or proposals with potential to have a significant adverse impact on health or wellbeing.	No change recommended.
The policy requires a HIA for major applications in instances where there is potential for significant adverse effect and a mandatory requirement beyond those circumstance would be an unreasonable validation requirement.	This is incorrect: Policy HC1 requires an HIA where its Major development (residential, commercial or industrial) <b>or</b> any other form of proposal (i.e. another type of Major development or Local development) which has potential to have significant adverse effect on public health and wellbeing.	No change recommended.

<b>Specific Validation Checklist information requirements – Heritage Impact Assessment</b>		
<b>Comment:</b>	<b>Officer response</b>	<b>Changes to Checklist</b>
Where a proposal affects or might affect the whole or any part of Northern Ireland’s marine area the assessment should incorporate consideration of impacts on marine heritage assets to ensure compliance with Section 8 of the Marine Act (Northern Ireland) 2013.	Where applicable, it is considered that this should be dealt with as part of a Heritage Impact Assessment. This should be referenced in the guidance section of Heritage Impact Assessment.	It is recommended that reference to the consideration of impacts on marine heritage quality is added to the Guidance section of Heritage Impact Assessment.

<b>Specific Validation Checklist information requirements – Housing Mix Statement</b>		
<b>Comment:</b>	<b>Officer response</b>	<b>Changes to Checklist</b>
There is potential for duplication of work for this statement in addition to the planning drawings that will provide this information. Confirmation that the requirements of this statement can be included in the assessment of a proposal against policy detailed within a Supporting Planning Statement, rather than a separate document, would be welcomed.	The table and information in the Housing Mix Statement provides information over and above that necessarily provided in the drawings. The information will also help the Planning Service save time in cross referencing drawings, particularly for larger schemes where there are many plans. Planning Service will permit information to be provided in different formats, such as part of a Compliance Statement, Design and Access Statement or Planning Statement, and it will not be stipulated that each has to be provided as a standalone document.	No change recommended.

<b>Specific Validation Checklist information requirements – Landscape/Town Visual Impact Assessment (LVIA)</b>		
<b>Comment:</b>	<b>Officer response</b>	<b>Changes to Checklist</b>
Where a proposal affects or might affect the whole or any part of Northern Ireland’s marine area the assessment should incorporate consideration of impacts on seascape to ensure compliance with Section 8 of the Marine Act (Northern Ireland) 2013.	Where applicable, it is considered that this should be dealt with as part of an LVIA or LVA. This should be referenced in the guidance sections of LVIA and LVA.	It is recommended that reference to the consideration of impacts on seascape is added to the Guidance section of LVIA and LVA.
This will be case specific and subject to the EIA Regulations.	An LVIA will be required on a case-by-case basis and only where it is reasonable and proportionate. The checklist confirms that where it is required, it will only be where the proposal is EIA development.	No change recommended.

<b>Specific Validation Checklist information requirements – Landscape/Town Visual Appraisal (LVA)</b>		
<b>Comment:</b>	<b>Officer response</b>	<b>Changes to Checklist</b>
Where a proposal affects or might affect the whole or any part of Northern Ireland’s marine area the assessment should incorporate consideration of impacts on seascape, taking account of existing character and quality; its value, sensitivity and capacity to accommodate change. This will ensure compliance with Section 8 of the Marine Act (Northern Ireland) 2013.	Where applicable, it is considered that this should be dealt with as part of an LVIA or LVA. This should be referenced in the guidance sections of LVIA and LVA.	It is recommended that reference to the consideration of impacts on seascape is added to the Guidance section of LVIA and LVA.

<b>Specific Validation Checklist information requirements – Lighting Impact Assessment</b>		
<b>Comment:</b>	<b>Officer response</b>	<b>Changes to Checklist</b>
Where a proposal affects or might affect the whole or any part of Northern Ireland’s marine area the assessment should incorporate consideration of light pollution on coastal communities, marine activities, uses and/or the marine area to ensure compliance with Section 8 of the Marine Act (Northern Ireland) 2013.	Where applicable, it is considered that this should be dealt with as part of a Lighting Impact Assessment. This should be referenced in the guidance section of Lighting Impact Assessment.	It is recommended that reference to the consideration of impacts of lighting on the marine environment is added to the Guidance section of Lighting Impact Assessment.

<b>Specific Validation Checklist information requirements – Marketing Statement</b>		
<b>Comment:</b>	<b>Officer response</b>	<b>Changes to Checklist</b>
Not sure why this would be needed. Too much control here.	A Marketing Statement is intended to provide information required from applicants to address Policies BH2, EC4 and TLC2 in respect of demolition of buildings in a Conservation Area; loss of zoned employment land; and loss of tourism, leisure and cultural assets.	No change recommended.

<b>Specific Validation Checklist information requirements – Masterplanning Statement</b>		
<b>Comment:</b>	<b>Officer response</b>	<b>Changes to Checklist</b>
Confirmation that the requirements of this statement can be included in the assessment of a proposal against policy detailed within a Design and Access Statement, rather than a separate document, would be welcomed. This is about the approach to design which potentially starts at first principles.	The Planning Service will permit information to be provided in different formats, such as part of a Compliance Statement, Design and Access Statement or Planning Statement, and it will not be stipulated that each has to be provided as a standalone document.	No change recommended.

<b>Specific Validation Checklist information requirements – Noise Impact Assessment (NIA)</b>		
<b>Comment:</b>	<b>Officer response</b>	<b>Changes to Checklist</b>
Where a proposal affects or might affect the whole or any part of Northern Ireland’s marine area the assessment should incorporate consideration of noise and vibration on the amenity of coastal communities, marine activities, uses and/or the marine area to ensure compliance with Section 8 of the Marine Act (Northern Ireland) 2013.	Where applicable, it is considered that this should be dealt with as part of a Noise Impact Assessment. This should be referenced in the guidance section of Noise Impact Assessment.	It is recommended that reference to the consideration of impacts of noise and vibration on the marine environment is added to the Guidance section of Noise Impact Assessment.



<b>Specific Validation Checklist information requirements – Office Impact Assessment</b>		
<b>Comment:</b>	<b>Officer response</b>	<b>Changes to Checklist</b>
Not sure why this would be needed. Too much control here.	An Office Impact Assessment is intended to provide information required from applicants to address Policy EC6 in respect of the impacts of larger office developments outside the City Centre and other centres.	No change recommended.

<b>Specific Validation Checklist information requirements – Parking Survey</b>		
<b>Comment:</b>	<b>Officer response</b>	<b>Changes to Checklist</b>
Parking surveys for HMOs is ridiculous. They are existing properties. Yet, on another note, parking surveys are not required for purpose built student accommodation, it does not make sense to suggest that students do not drive. Case in point, recently approved planning application for purpose built student accommodation had over 700 rooms yet 11 parking spaces.	A Parking Survey may be required for an HMO use given the potential to increase parking demand. A Parking Survey may be required for PBMSA proposals on a case-by-case basis depending on the site location.	No change recommended.

<b>Specific Validation Checklist information requirements – Purpose Built Managed Student Accommodation Statement</b>		
<b>Comment:</b>	<b>Officer response</b>	<b>Changes to Checklist</b>
Confirmation that the requirements of this statement can be included in the assessment of a proposal against policy detailed within a Planning Statement, rather than a separate document, would be welcomed. This is a development specific requirement, and where accompanied by a Planning Statement this will address Policy HOU12 in any event. In our experience most PBMSA is major and it is not necessary to have both a planning statement and Purpose Built Managed Student Accommodation statement saying the same thing.	The Planning Service will permit information to be provided in different formats, such as part of a Compliance Statement, Design and Access Statement or Planning Statement, and it will not be stipulated that each has to be provided as a standalone document.	No change recommended.

<b>Specific Validation Checklist information requirements – Phasing Plan</b>		
<b>Comment:</b>	<b>Officer response</b>	<b>Changes to Checklist</b>
A phasing plan is necessary to ensure sustainable transport modes are available as early as possible in major housing and mixed used developments.	Commented noted.	No change recommended.

<b>Specific Validation Checklist information requirements – Planning Agreements (Heads of Term Form)</b>		
<b>Comment:</b>	<b>Officer response</b>	<b>Changes to Checklist</b>
It would be useful if the Heads of Terms template/form was published on the website to inform applicants, agents and interested parties.	It is corporate policy not to publish templates and forms on the Council's website. However, a copy of the Heads of Terms Form has previously been circulated to customers and is available electronically on request to the Planning Service.	No change recommended.
These are used much too often and are adding significant delay and cost to the process. No other Councils use S76 agreements in this way (social housing).	The Council uses Section 76 planning agreements where it is the most appropriate vehicle for securing the planning obligation necessary to make the proposed development acceptable, such as to secure affordable housing, a Financial Developer Contribution or ensure appropriate enforcement of the obligation. The Council has introduced new processes (announced at the June 2024 Planning Committee) to front-load, speed-up and improve the planning agreement process.	No change recommended.
If identified and agreed in advance of the planning application being submitted it will speed up the process.	Commented noted (also see officer commentary on point above).	No change recommended.

<b>Specific Validation Checklist information requirements – Short-term Let Accommodation Statement</b>		
<b>Comment:</b>	<b>Officer response</b>	<b>Changes to Checklist</b>
Not sure why this would be needed. Too much control here.	A Short-term Let Accommodation Statement is intended to provide information required from applicants to address Policy HOU13 and is considered necessary.	No change recommended.
At this moment in time, a short-term let refers to the duration someone is staying in a dwelling. It does not require planning permission unless it exceeds six residents or results in a material change of use, which, in the majority of cases, it does not. The internal characteristics of the dwelling house remain unchanged, as do the surrounding areas. Currently, a short-term let falls under Class C1 dwelling house (whether or not it is the sole or main residence). If any issues arise within the property, they would first be escalate through Environmental Health before it could be deemed to constitute a material change of use in the surrounding area. Recent High Court Ruling Mr. Justice Humphreys ruled that these buildings should be treated as dwellings. He also stated that policy does not override the law and serves only as guidance and direction. The judge’s words: “Planning policies are measures of guidance and direction, not to be construed by applying the tools and standards appropriate to the construction of a statute or legal instrument.” An experienced planning officer, if conducting a thorough examination,	The checklist applies to proposals for short-term let accommodation where there is a material change of use and planning permission is required. Whether a specific proposal constitutes development is not a matter for the checklist. The comment about retaining part of the property as permanent housing (criterion f. of Policy HOU13) relates to merits of the policy itself which again is not a matter for the checklist.	No change recommended.

<p>would know full well that a short-term let, in reality, retains its status as a dwelling. The physical building itself remains a dwelling regardless of how it is occupied. This has been proven in multiple court cases across the United Kingdom. Until a law is enacted to regulate short-term lets, this remains a waste of planning departments' resources. The justification for applications based on retaining a form of residency within the dwelling is misleading, as common sense dictates that this is not enforceable and cannot be effectively governed.</p>		
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<b>Specific Validation Checklist information requirements – Travel Plan</b>		
<b>Comment:</b>	<b>Officer response</b>	<b>Changes to Checklist</b>
<p>Should be concise and robust – not a copy from previous applications submitted.</p>	<p>Commented noted. The checklist recommends that the content of Travels Plans follows the advice contained in the Council's Transportation SPG.</p>	<p>No change recommended.</p>

<b>Specific Validation Checklist information requirements – Viability Assessment</b>		
<b>Comment:</b>	<b>Officer response</b>	<b>Changes to Checklist</b>
Not sure why this would be needed. Too much control here.	Viability can be a material consideration relevant to consideration of a planning application. It is particularly relevant to cases where it may not be viable to provide affordable housing (Policy HOU5); justification for demolition of a building that makes a material contribution to the character or appearance of a Conservation Area (Policy BH2); or loss of a tourism, leisure or cultural asset (Policy TLC2). Further guidance is contained in the Council's Development Viability SPG.	No change recommended.
The title of this section could perhaps be "Financial Viability Assessment" to differentiate from sustainability in the context of affordable housing.	Viability Assessment is consistent with the terminology used in the Development Viability SPG and should be retained.	No change recommended.

<b>Specific Validation Checklist information requirements – Wind Energy Statement</b>		
<b>Comment:</b>	<b>Officer response</b>	<b>Changes to Checklist</b>
Not sure why this would be needed. Too much control here.	A Wind Energy Statement is intended to provide information required from applicants to address ITU 4 and is considered necessary.	No change recommended.

<b>Have you any other comments about the Draft Planning Application Validation Checklist?</b>		
<b>Comment:</b>	<b>Officer response</b>	<b>Changes to Checklist</b>
There are too many information requirements (51). This complicates an already cumbersome process. It's simply too much information and is overwhelming for Clients and for Agents to navigate with some clients.	The checklist reflects planning policy requirements and the information that is required for applications to be fully assessed. Without the information, it is unlikely that planning permission could be granted.	No change recommended.
It should not be used as a hard and fast rule to request information that may not be appropriate or required. There should be an ability to discuss any differences in opinion and a level of flexibility allowed.	The checklist will be applied on a case-by-case basis and information will only be sought where it is reasonable and proportionate. There will be opportunity for applicants to discuss any differences of opinion through negotiation with the Planning Service. Where agreement cannot ultimately be reached, the Council will then issue a Notice of invalidity which the applicant can then appeal to the PAC if they so wish.	No change recommended.
Community Places welcomes mechanisms that support the provision of quality planning applications, however, would note that the absence of any requirements for renewable energy projects that fall below the major threshold, such as Battery Energy Storage Systems (BESS), Anaerobic Digestors or single turbines. These types of developments can have significant and far reaching impacts, much in excess of small scale householder development, yet there has been no consideration in respect of the necessary information required at the outset of the planning application process.	The checklist may require specific information for BESS, Anaerobic Digestors or single wind turbines such as a Biodiversity Statement, Landscape/Townscape Visual Assessment or Appraisal, Noise Impact Assessment and Wind Energy Statement.	No change recommended.

Thank you for going above and beyond to help applicants. I wish more councils were this thorough with their information and this easy to work with.	Comment noted.	No change recommended.
The validation checklist whilst welcome does not go far enough in terms of the impact proposed development will have on water and waste water infrastructure. Applications are being accepted into the planning process where it is entirely possible that there is no water (potable) or waste water infrastructure capacity available to service the development. Ignoring this key issue will result in developments approved which if constructed can't be occupied.	The checklist is intended to ensure that the right information is provided with applications on submission; it cannot ensure the acceptability of proposals which is a matter for the assessment of the application. The standard application form requires information about how development proposals are expected to deal with surface water and foul sewage disposal. No specific additional information requirements are identified for the checklist.	No change recommended.
Thanks for giving this opportunity to respond.	Comment noted.	No change recommended.
It's too long because the requirements are too numerous. Unsustainable.	The checklist reflects planning policy requirements and the information that is required for applications to be fully assessed. Without the information, it is unlikely that planning permission could be granted.	No change recommended.
The checklist is not needed; it will add thousands of pounds in expense to customers and ultimately reduce the number of applications being submitted. This provides no positive outcome for anyone.	The checklist reflects planning policy requirements and the information that is required for applications to be fully assessed. Without the information, it is unlikely that planning permission could be granted.	No change recommended.



<p>The Planning Application Validation Checklist should make for more complete planning applications, reduce unnecessary correspondence between planners and applicants and lead to quicker response from the planners as there is less scope to not to make decisions. Lack of decision making by planners is a major problem.</p>	<p>Comment noted.</p>	<p>No change recommended.</p>
<p>When taking any 'authorisation or enforcement' decision relating to any act which affects or might affect the whole or any part of the marine area, Section 58 of the Marine and Coastal Access Act 2009 (MCAA) and Section 8 of the Marine Act (Northern Ireland) 2013, require that a public authority must make such decisions in accordance with the appropriate marine policy documents; unless relevant considerations indicate otherwise. If you do not make a decision in accordance with the UK MPS and the Marine Plan (when adopted) the legislation further requires you, as the Public Authority, to state your reasons for not doing so.</p>	<p>Consideration of impacts on the marine environment should be added to the Guidance sections of the following checklist information requirements: Biodiversity Survey, Contaminated Land Assessment, Heritage Impact Assessment, Noise Impact Assessment, Landscape/Townscape Visual Assessment and Appraisal. It can then be kept under review as to whether a specific Marine Impact Assessment should be added to the checklist at a later date.</p>	<p>It is recommended that reference to the consideration of impacts on the marine environment is added to the Guidance sections of the following checklist information requirements: Biodiversity Survey, Contaminated Land Assessment, Heritage Impact Assessment, Noise Impact Assessment, Landscape/Townscape Visual Impact Assessment or Appraisal.</p>
<p>Far too many items listed in the validation checklist. Perhaps the council should consider splitting these items between a 'validation checklist' and a 'determination checklist' - as many assessments require specialist input (from statutory consultees) as to whether they are actually required or not. Such advice can only be obtained following validation.</p>	<p>The checklist reflects planning policy requirements and the information that is required for applications to be fully assessed. Without the information, it is unlikely that planning permission could be granted. The checklist does not preclude additional information being required at later date, for example, in response to a request for a statutory or non-statutory consultee.</p>	<p>No change recommended.</p>

<p>The Housing Executive welcomes the Council’s proposal to introduce a Validation Checklist which is in response to legislation published by DfI in October 2024, which comes into effect on 1st April 2025. We note that the Validation Checklist is based on the Council’s existing “Application Checklist” which is a useful aid for applicants and agents when submitting planning applications. The new validation checklist can also better reflect policy requirements contained in the new LDP. We believe that the Validation Checklist can help ensure all relevant information needed to make a planning application determination is received at the outset of an application submission, thereby leading to quicker response times from statutory consultees. The processing of applications is often delayed as additional information is requested from applicants and often takes time to be collated and submitted. We also believe that the Validation Checklist will help promote higher quality, frontloaded applications, with applicants becoming more aware of information requirements. As a statutory consultee we believe that fuller information will help us assess applications more quickly and can reduce the instances that a re-consultation is required, as new plans or documents are received. A high number of our consultations are re-consultations on applications as new plans or information is submitted often in a fragmented approach. We therefore strongly support mechanisms such as</p>	<p>Commented noted. One of the main objectives of a Validation Checklist is to improve the efficiency of the statutory and non-statutory consultation process, and this is recognised by NIHE.</p>	<p>No change recommended.</p>
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<p>the Validation Checklist, which can lead to a reduction in re-consultations; this will lower our workload and can help improve statutory consultation response timescales.</p>		
<p>The legislation requires the checklist to be reasonable and it is to ensure necessary information is available to determine an application. That will not always be possible at validation stage and cannot be foreseen by any checklist but also, it will require planning judgement during an application process that will not always require the completion of a report. The checklist should ensure that the information reasonably required for statutory consultees is provided. Avoiding duplication of work on all sides is fundamental to a more efficient planning process. In instances of pre application discussion, those reports considered necessary and agreement on how the supporting reports can be presented, should be confirmed by the council in writing, prior to submission of applications to support the validation process.</p>	<p>Comment noted.</p>	<p>No change recommended.</p>

<b>Please provide any comments or suggestions for improvements relating to the draft equality screening document</b>		
<b>Comment:</b>	<b>Officer response</b>	<b>Changes to Checklist</b>
As noted previously, the vast majority of applications submitted are householder applications. The requirement for completion of Biodiversity Checklists and Climate Change Statements may warrant use of an agent which is an additional cost. The process should be straightforward enough and introduction of this additional information may cause difficulty for applicants who do not wish to use an agent if they have additional needs (e.g. dyslexia) or language difficulties. Perhaps this is where Community Places NI can assist and would recommend they are consulted as part of this process.	As previously mentioned, it is proposed to remove additional validation information requirements (i.e. Biodiversity Checklist and Climate Change Statement) for Householder applications.	It is recommended that the final checklist removes additional information requirements for Householder applications.
If everyone is equal in the eyes of the law, then there should not be "different groups of customers, service users, staff and visitors".	Comment noted.	No change recommended.

<b>Please provide any comments or suggestions for improvements relating to the draft rural needs assessment</b>		
<b>Comment:</b>	<b>Officer response</b>	<b>Changes to Checklist</b>
There were no responses to this question.		

<b>Are you aware of any other impacts, equality considerations, or rural needs that we haven't identified?</b>		
<b>Comment:</b>	<b>Officer response</b>	<b>Changes to Checklist</b>
Actual needs of rural environments and the type of development in these areas.	Commented noted.	No change recommended.
Considerations and proper weight needs to be given to the environmental impact of new development on the overloaded water and waste water infrastructure.	Commented noted.	No change recommended.

## Appendix 2: Council responses to other key issues raised raised outside the online survey

For ease of reference, proposed changes to the checklist in response to representations are highlighted in **red text**.

<b>Royal Society of Ulster Architects (RSUA)</b>		
RSUA states that it is the professional body for architects in Northern Ireland. It has 870 chartered members and over 300 student members. RSUA strives to enhance the built environment of Northern Ireland for the benefit of all through the promotion of architecture.		
<b>Comment:</b>	<b>Officer response</b>	<b>Changes to Checklist</b>
<p>RSUA is generally content with the Council using a new Planning Application Validation Checklist.</p> <p>However, it advises caution regarding the additional information requirements for applicants outlined in the new Checklist.</p> <p>The Council should be careful to avoid a situation where, after requesting an applicant to assess which additional information is necessary, it then asks for further extensive reports, only for these reports to later be deemed superfluous or unnecessary by statutory consultees.</p> <p>The importance of this point is underscored by the fact that RSUA members have previously expressed confusion regarding the specific detail required of them when asked by BCC to</p>	<p>The Planning Service is mindful of the cost and time involved in applicants preparing information in support of their planning applications. The Council will only require information – whether at validation stage or later in the process – where it is reasonable and proportionate.</p>	<p>No change recommended.</p>

<p>report on meeting any of its given additional information requirement(s).</p> <p>By only requesting the additional information essential to the progress and approval of an application, the Council can prevent the new Checklist from generating unnecessary work and wasting resources for all parties involved in the planning process.</p>		
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<b>Radius Housing (Housing Association)</b>		
<b>Comment</b>	<b>Officer response</b>	<b>Changes to Checklist</b>
<p>The idea of a checklist has merit in terms of front-loading planning applications, and the expectation then would be that there is a knock-on reduction in processing times once an application has been received as valid and 'complete.' The concern would be if the process became overly onerous and reports/ surveys would be required as standard, rather than because of the site-specific circumstances or context.</p> <p>It is assumed that the actual requirements for a project application could be determined through the more bespoke PAD process that had been the aspiration of Council.</p> <p>A more in-depth pre-application process across all councils would help identify information required at application stage and would allow applicants sufficient time to prepare.</p>	<p>The Council will only require information – whether at validation stage or later in the process – where it is reasonable and proportionate.</p> <p>The Validation Checklist and information requirements for specific proposals can be discussed as part of a PAD.</p>	<p>No change recommended.</p>

<b>DAERA NIEA</b>		
DAERA NIEA has provided comments from its Drinking Water Inspectorate, Water Management Unit and Inland Fisheries, and Marine and Fisheries Division.		
<b>Comment</b>	<b>Officer response</b>	<b>Changes to Checklist</b>
<p><b>Drinking Water Inspectorate</b></p> <p>DWI think that an application should provide assurance that a drinking water supply is available for a development, whether this be from the mains supply provided by the Statutory Water Undertaker (NI Water Ltd) or via a private water supply (borehole / well / spring). DWI would suggest looking for assurance that the developer has confirmed sufficient available capacity of the mains networks or aquifer unit.</p>	<p>The availability of drinking water is not a specific planning policy requirement, although Policy SP1a (strategic policy) does require necessary supporting infrastructure requirements to be met. In the absence of a specific policy requirement, it is not recommended that the checklist requires applicants to provide information around drinking water supply.</p>	<p>No change recommended.</p>
<p><b>Water Management Unit and Inland Fisheries</b></p> <p>Water Management Unit and Inland Fisheries commented that the consultation format currently issued may limit the value of the responses from our planning consultation teams. Water Management Unit and Inland Fisheries (including Marine colleagues) would be keen on attending any workshops or discussions to provide advice and input on issues which if resolved would assist applicants in providing the required information and content to facilitate an assessment of the application.</p>	<p>Officers have sought a meeting with DAERA to discuss its comments further, however, it was not possible to arrange due to DAERA's availability. It is advised that DAERA's observations can be revisited as part of the review of the checklist.</p>	<p>No change recommended.</p>



<p><b>Marine Conservation Branch response</b></p> <p>Marine Conservation Branch has reviewed the Planning Application Validation checklist for Belfast Council and has the following comments:</p> <ul style="list-style-type: none"> <li>• Section 6. Biodiversity Checklist: We advise the following policies and legislation are also considered: The UK Marine Policy Statement (MPS), the Conservation (Natural Habitats, etc.) Regulations (Northern Ireland) 1995 (as amended), The Environment Order (Northern Ireland) 2002, the Wildlife and Natural Environment Act (Northern Ireland) 2011, The Marine Act (Northern Ireland) 2013 and the Wildlife (Northern Ireland) Order 1985 (as amended).</li> <li>• Section 6. Biodiversity Checklist: We advise that DAERA is currently undergoing an internal review to update the NI Biodiversity Checklist documents in the DAERA's website linked in this section. This work is to include further information requests and criteria for the Marine Environment.</li> <li>• Section 6. Biodiversity Checklist: We advise that the following hyperlinks are also included under the 'Guidance section' relating Marine Conservation Advice:</li> </ul>	<p>It is advised that reference is made in the final checklist to the importance of applicant's addressing marine impacts in the Guidance sections of the Biodiversity Checklist and Biodiversity Survey.</p> <p>Commented noted.</p> <p>A general reference to consideration of potential marine impacts should be included in the Biodiversity Survey section of the checklist. However, the additional hyperlinks are considered unnecessary given that the Biodiversity Checklist is a set document.</p>	<p>It is recommended that reference is made the importance of applicant's addressing marine impacts in the Guidance section of Biodiversity Survey.</p> <p>No change recommended.</p> <p>It is recommended that reference is made to potential marine impacts in guidance sub-section of the Biodiversity Survey section of the checklist.</p>
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<ul style="list-style-type: none"> <li>○ Marine Guidance Documents   Department of Agriculture, Environment and Rural Affairs</li> <li>○ Marine Invasive Non-native Species Guidance   Department of Agriculture, Environment and Rural Affairs</li> <li>○ Marine Wildlife Disturbance</li> <li>● Section 7. Biodiversity Survey: We advise that the following hyperlinks are also included under the 'Guidance section' relating Marine Conservation Advice:             <ul style="list-style-type: none"> <li>○ Maps   Northern Ireland Coastal Observatory</li> <li>○ Northern Ireland Marine Map Viewer</li> <li>○ Marine Guidance Documents   Department of Agriculture, Environment and Rural Affairs</li> <li>○ Section 8. Climate Change Statement. We advise the inclusion of the hyperlink to the NI coastal observatory: Maps   Northern Ireland Coastal</li> </ul> </li> <li>● Observatory and the addition of coastal erosion and sea level rise considerations.</li> <li>● Section 10. (Outline) Construction Environmental Management Plan (CEMP):</li> </ul>	<p>A hyperlink should be included to the Marine Guidance documents on the DAERA website.</p> <p>These issues are considered to be too specific for inclusion in the checklist.</p> <p>A specific methodology for piling can be secured by a planning condition where necessary. No need to amend the checklist.</p>	<p>It is recommended that the Guidance sub-section of the Biodiversity Checklist section of the final checklist includes a hyperlink to the Marine Guidance documents on the DAERA website.</p> <p>No change recommended.</p> <p>No change recommended.</p>
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<p>We advise the inclusion of construction methodology of 'Piling' if required.</p> <ul style="list-style-type: none"> <li>• Section 10. (Outline) Construction Environmental Management Plan (CEMP): We advise the inclusion of biosecurity plans.</li> <li>• Section 10. (Outline) Construction Environmental Management Plan (CEMP): We advise that the following hyperlinks are also included under the 'Guidance section': Planning in the Coastal Area             <ul style="list-style-type: none"> <li>○ DAERA Standing Advice - WTR - Pollution Prevention Guidance - Sept 2022 Final.pdf (daera-ni.gov.uk)</li> <li>○ DAERA Standing Advice - Marine Litter.pdf (daera-ni.gov.uk)</li> <li>○ Marine Invasive Non-native Species Guidance   Department of Agriculture, Environment and Rural Affairs</li> <li>○ Marine Wildlife Disturbance</li> </ul> </li> </ul> <p>Sections 24 &amp; 25: We advise that 'Seascape' is considered in sections 24 and 25</p>	<p>Reference to biosecurity plan should be added to the Guidance section of (Outline) Construction Environmental Management Plan.</p> <p>It is considered that the inclusion of these hyperlinks would result in too much information in the Guidance sub-section, but that the issue can be covered by general reference to potential marine impacts.</p> <p>Potential impact on seascape should be referenced in the Guidance sections of Landscape/Townscape Visual Impact Assessment (LVIA) and Landscape/Townscape Visual Appraisal (LVA).</p>	<p>It is recommended that reference to biosecurity plan should be added to the Guidance section of (Outline) Construction Environmental Management Plan.</p> <p>No change recommended.</p> <p>It is recommended that potential impact on seascape should be referenced in the Guidance sections of Landscape/Townscape Visual Impact Assessment (LVIA) and Landscape/Townscape Visual Appraisal (LVA).</p>
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DfC Historic Environment Division		
Comment	Officer response	Changes to Checklist
<p><u>Heritage Impact Assessment</u></p> <p>Typo in description of this information type.</p> <p>Reference should be made to “heritage assets” rather than “built heritage”.</p> <p>In term of when a Heritage Impact Assessment is required, this should be for proposals that would “likely impact” (rather than “likely significantly impact”). It should be also required where it would likely impact on the <b>setting</b> of a Listed Building or Scheduled Monument.</p> <p>Regarding what should be included in a Heritage Impact Assessment, this should be changed to: ‘Identify, analyse, and evaluate the heritage asset(s) and setting; evaluate proposed changes; assess the impact of the proposals on the heritage asset; justify the design solution.’</p>	<p>The final checklist should be amended in line with the advice from DfC HED.</p>	<p>It is recommended that the final checklist incorporates the changes recommended by DfC HED.</p>
<p><u>Archaeological Impact Assessment</u></p> <p>The “When is it required?” section should be amended to: ‘An Archaeological Impact Assessment should be provided for large-scale development proposals which may involve significant archaeological impacts, to include assessment of direct physical impacts and impacts upon the setting of archaeological assets and designations.’</p> <p>The checklist’s assertion that that an Archaeological Impact Assessment is only</p>	<p>The advice that an Archaeological Impact Assessment should only apply to “large-scale development proposals...” is too ambiguous and should be removed. Otherwise, reference to “significant archaeological impacts” is considered appropriate. The suggested wording goes onto refer to what should be included in the assessment, but this is referred to in the next sub-section of the checklist.</p>	<p>It is recommended that the final checklist is modified to include reference to “significant archaeological impacts”.</p>

<p>required where proposals involve breaking the ground is incorrect.</p>	<p>It is considered unreasonable to require the assessment where the proposal is for change of use only.</p>	
<p><u>Archaeological Site Evaluation</u> Under the "When is it required?" sub-section, advises that the following passage is added: 'Archaeological site evaluations will normally be specifically requested in DfC Historic Environment Division consultation advice. Please consult the consultation response for specific details.'</p>	<p>The purpose of the checklist is to "front-load" information at the beginning of the process, therefore including advice that the evaluation will also be requested through consultation advice is unnecessary. Advice from HED that an evaluation is required could have also been provided through a Pre-Application Discussion and this principle will be referenced in the final checklist.</p>	<p>No change recommended.</p>

<b>DAERA Inland Fisheries</b>		
<b>Comment</b>	<b>Officer response</b>	<b>Changes to Checklist</b>
<p><u>Biodiversity Checklist and Biodiversity Survey</u></p> <p>Welcomes the inclusion of a Biodiversity Checklist and Biodiversity Survey as part of the checklist.</p> <p>Advises that a hyperlink is included in each to DAERA standing advice for development that may have an effect on the water environment.</p>	<p>The additional hyperlink is considered unnecessary given that the Biodiversity Checklist is a set document. However, it is recommended that the hyperlink is included in the Biodiversity Survey section of the checklist.</p>	<p>It is recommended that the checklist includes a hyperlink to DAERA standing advice for development that may have an effect on the water environment.</p>
<p><u>(Outline) Construction Environmental Management Plan.</u></p> <p>Welcomes the inclusion of an (Outline) Construction Environmental Management Plan.</p> <p>Under the “When is it required?” section, reference should also be made to artificial modification of watercourses, including culverting.</p> <p>Advises that a hyperlink is included to DAERA standing advice for development that may have an effect on the water environment.</p>	<p>Reference to artificial modification of watercourses, including culverting is not considered necessary as such works are likely to require planning permission in their own right.</p> <p>It is recommended that the hyperlink is included in the (Outline) Construction Environmental Management Plan section of the checklist.</p>	<p>It is recommended that the checklist includes a hyperlink to DAERA standing advice for development that may have an effect on the water environment.</p>
<p><u>Drainage Assessment</u></p> <p>Advises that a hyperlink is included to DAERA standing advice for development that may have an effect on the water environment.</p>	<p>It is considered that this is more appropriate for the Contaminated Land Assessment section of the checklist.</p>	<p>It is recommended that the Contaminated Land section of the checklist includes a hyperlink to DAERA standing advice for development that may have an effect on the water environment.</p>

<p><u>Lighting Impact Assessment</u></p> <p>Lighting impact assessments are useful from a biodiversity perspective; artificial lighting can impact on the natural behaviours of fish species. To ensure this aspect is considered the “When is it required?” section should include Sensitive Receptors such as the aquatic environment.</p>	<p>The “When is it required?” section should be amended to include reference to impact on sensitive aquatic environment receptors.</p>	<p>It is recommended that the “When is it required?” sub-section is amended to include reference to impact on sensitive aquatic environment.</p>
<p><u>Noise Impact Assessment (NIA)</u></p> <p>This section also includes vibration. Inland Fisheries would recommend that the guidance section has the link to: Standing advice for development that may have an effect on the water environment (including groundwater and fisheries).</p>	<p>It is recommended that the hyperlink is included in the Noise Impact Assessment section of the checklist.</p>	<p>It is recommended that the checklist includes a hyperlink to DAERA standing advice for development that may have an effect on the water environment.</p>

<b>Health and Safety Executive NI (HSENI)</b>		
<b>Comment</b>	<b>Officer response</b>	<b>Changes to Checklist</b>
Looking through the documentation the checklists seem to be targeting mainly residential type developments and industrial or utilities are not the focus. Is this to reflect the number of applications in these areas and industrial type applications are so specialised, checklists would have limited application?	The checklist's focus on residential types of development is because of the greater range of planning policies – and resulting information requirements – relating to residential proposals. Employment and commercial applications will generally require more generic information such as a Contaminated Land Assessment, Noise Impact Assessments, Transport Assessment Form (TAF) or Transport Assessment etc.	No change recommended.
Follow up comment following the Officer response above: We agree with the approach, for the less frequent consultations with the likes of HSENI, there are various types of meetings such as PADs, site visits, etc to clarify the information we need to advise the Council.	Commented noted.	No change recommended.



<b>Environmental Health (BCC)</b>		
<b>Comment</b>	<b>Officer response</b>	<b>Changes to Checklist</b>
<p><b>Air Quality Impact Assessment</b></p> <ul style="list-style-type: none"> <li>Title should be changed to Ambient Air Quality Impact Assessment</li> <li>Outline Construction Environmental Management should be referred to as such through the document (to replace "Environment")</li> <li>Suggested amendments to the wording of this information requirement.</li> </ul>	<p>Terminology to be amended throughout the checklist.</p> <p>Change accepted.</p> <p>Changes accepted.</p>	<p>It is recommended that terminology is amended throughout the checklist.</p> <p>It is recommended that Outline Construction Environmental Management is referred to as such through the document (to replace "Environment").</p> <p>It is recommended that the wording of this section is amended as advised by Environmental Health.</p>
<p><b>(Outline) Construction Environmental Management Plan</b></p> <ul style="list-style-type: none"> <li>Suggested amendments to the wording of this information requirement.</li> </ul>	<p>Changes accepted.</p>	<p>It is recommended that the wording of this section is amended as advised by Environmental Health.</p>
<p><b>Contaminated Land Assessment</b></p> <ul style="list-style-type: none"> <li>Suggested amendments to the wording of this information requirement.</li> </ul>	<p>Changes accepted.</p>	<p>It is recommended that the wording of this section is amended as advised by Environmental Health.</p>
<p><b>Lighting Impact Assessment</b></p> <ul style="list-style-type: none"> <li>Suggested amendments to the wording of this information requirement.</li> </ul>	<p>Changes accepted.</p>	<p>It is recommended that the wording of this section is amended as advised by Environmental Health.</p>

<p><b>Noise Impact Assessment</b></p> <ul style="list-style-type: none"> <li>• Suggested amendments to the wording of this information requirement.</li> <li>• Confirmation of other types of sensitive receptor.</li> </ul>	<p>Changes accepted.</p>	<p>It is recommended that the wording of this section is amended as advised by Environmental Health.</p>
<p><b>Odour Impact Assessment</b></p> <ul style="list-style-type: none"> <li>• Suggested amendments to the wording of this information requirement.</li> </ul>	<p>Changes accepted.</p>	<p>It is recommended that the wording of this section is amended as advised by Environmental Health.</p>

<p><b>Access (BCC)</b></p>		
<p><b>Comment</b></p>	<p><b>Officer response</b></p>	<p><b>Changes to Checklist</b></p>
<p>Unable to ascertain where that the role of public rights of way is mentioned in the checklist. This is a very complex matter and normally it is only explored if there is an asserted public right of way. However, there is a possibility that public rights of way which the Council are unaware of may be affected by an application of any scale.</p>	<p>The issues raised by the City &amp; Neighbourhoods Department relates to how the Planning Service engages with it around rights of way issues generally and is a matter that will be taken forward separately. The comments do not specifically relate to the checklist itself.</p>	<p>No change recommended.</p>

<b>Feedback from Customer Workshop on 31<sup>st</sup> January 2025</b>		
<b>Comment</b>	<b>Officer response</b>	<b>Changes to Checklist</b>
The checklist is useful in providing clarity and removing uncertainty around information requirements with applications.	Commented noted.	No change recommended.
The Council's current <i>Application Checklist</i> is due a refresh. Cannot see circumstances where an appeal would be lodged against a Notice of invalidity.	Commented noted.	No change recommended.
It's important that the information submitted in support of an application is of sufficient quality.	The checklist sets out guidance as to the type, level and detail of information that should be included within specific information requirements, with a view to promoting the quality of that documentation.	No change recommended.
We would welcome an editable pdf of the draft checklist to make it easier to comment on it.	An editable Word version of the checklist was made available on the online consultation hub.	No change recommended.
Queries the inclusion of an Environmental Statement as an information requirement in the checklist.	The checklist proposes that an Environmental Statement is a validation requirement where the proposal is Environmental Impact Assessment (EIA) development (either required as Schedule 1 development or Schedule 2 development following a positive EIA screening process). The checklist is not proposing any additional information over and above this in respect of EIA.	No change recommended.
The indicative guide on information requirements by type of application is helpful and user-friendly.	Comment noted.	No change recommended.

It would be good to have some best practice examples of the information types.	This is an area that the Planning Service may follow up later and can be considered as part of the review of the checklist.	No change recommended.
Can the documentation be submitted as part of a Planning Statement, Design and Access Statement or other single document rather than mandating that it is standalone for each information type?	The Planning Service will permit information to be provided in different formats, such as part of a Design and Access Statement or Planning Statement, and it will not be stipulated that each has to be provided as a standalone document.	The final checklist will make it clear that information can be provided in different formats, either as standalone document or part of another document such as a Design and Access Statement or Planning Statement. Where provided as part of another document, the applicant will be advised to clearly signpost this.
It important that the checklist is applied consistently.	The checklist is considered to provide clear guidance as to the circumstances when an information type is required and what should be contained in the documentation. Furthermore, staff training will be rolled out to ensure consistency of approach. Concerns about consistency raised by staff, managers, customers and other interested parties to be considered and remedied.	No change recommended.
Checklist requirements should be reasonable.	The Council will be applied on a case-by-case basis and only require information where its reasonable and proportionate.	No change recommended.
We would like there to be opportunity to discuss additional information required by the Council with officers before a Notice of invalidity is issued.	There will be an initial process of negotiation where information is requested but applicants believe it is not required.	It is recommended that the final checklist is clear that there will be an initial process of negotiation where information is requested but applicants believe it is not required.

It is important that levels information is provided on drawings.	This is a current basic validation requirement and will remain so.	No change recommended.
What are the different information requirements for applications for outline planning permission?	Outline planning permissions establish the principle of development and so any matters that relate to the principle, including relevant information requirements, require to be addressed at the outline application stage. The Planning Service will look to bring forward specific customer guidance on outline applications in the future.	No change recommended.
What are the implications if a bat survey cannot be submitted for several months, and the Biodiversity Checklist cannot be finalised? Can the remainder of the application be progressed?	Where there is a reasonable and proportionate requirement for the information, if it is outstanding the application will remain invalid until it is provided.	No change recommended.
Will there be targets for the time taken for the Planning Service to validate an application?	The Planning Service will set internal targets and customer standards around its validation processes.	Service standards will be set in relation to the validation process.
Will there be a time period for returning the application if it is invalid and the additional information is not provided by the applicant?	The Planning Service is finalising its internal processes around administration of the checklist. Where the application is invalid and the information is not provided, the Council will issue a Notice of invalidity to which the applicant may appeal to the PAC.	No change recommended.
The checklist could result in more requests for a Pre-Application Discussion (PAD) as customers wish to speak to the Planning Service about information requirements for their application.	The checklist and information requirements for a specific application can be discussed with the Planning Service as part of a PAD.	No change recommended.

<p>Good quality application submissions should be rewarded and poor quality penalised.</p>	<p>The checklist is expected to improve the quality of applications which should result in quicker decisions. Where an application is of insufficient quality, it will result in delays and potentially refusal of permission.</p>	<p>No change recommended.</p>
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