

# Development Management

## Validation Checklist for Planning Applications

### Introduction

The purpose of this Validation Checklist is to provide applicants with clear guidance on the information required for the submission of planning applications, in accordance with Government policy and legislation.

If an applicant does not submit an application in accordance with the statutory requirements and locally adopted requirements the Local Planning Authority is entitled to declare that the application is invalid, and so decline to register it. In doing so, the Local Planning Authority will set out its reasons for declaring an application invalid in writing to the applicant specifying the information required in order to make the application valid. The information must be submitted within a defined timescale otherwise the application will be returned. Where an application is not accompanied by information required by the Local Planning Authority, applicants should provide a short written justification to accompany the application as to why they consider it is not appropriate to include the information in the particular circumstances. In such cases, the Local Planning Authority will not consider applications to be invalid unless it is satisfied that it can give reasons and provide them to the applicant.

For larger or more complex schemes applicants should seek agreement on the Validation Checklist requirements through pre-application discussions.

All applicants should aim for succinctness in their supporting documentation. However, a number of detailed reports may be necessary to support some applications.

In circumstances where applicants do not agree with the requirement for information or plans set out by the Local Planning Authority, they should discuss the point of concern with the Local Planning Authority. Where discussions fail to resolve any conflict in views there is no right of appeal. However, where applicants consider that any particulars or evidence required by the Local Planning Authority do not meet the requirements set out in Article 11(3)(c) of the Town and Country Planning (Development Management Procedure) Order 2015 (as amended) they may dispute the decision in accordance with Article 12 of the Order. Applicants who want to challenge a decision to not validate an application can do so under other procedures, such as the judicial process on legal grounds.

If the Local Planning Authority considers that the *quality* of the supporting information is inadequate and fails to validate an application on this basis, an applicant may appeal to the Planning Inspectorate under Section 78 of the Town and Country Planning Act 1990 (as amended) with the relevant grounds for appeal being non-determination within the 8 or 13 week determination period.

# Notes on how this guidance should be used by applicants

This Validation Checklist consists of three parts:

**Part A** sets out the statutory **national requirements** for all applications. Planning applications submitted without any one of the listed items are unlikely to be validated. Plans marked “not to scale” or “do not scale” will not be registered. Applicants will be informed in writing of where the application is deficient and the timescale within which it should be provided.

**Part B** provides a list of additional **local requirements**. These requirements will need to be met in particular circumstances and will be dependent on factors such as site location, characteristics of the site, the scale and nature of the development and local policy requirements. They will not necessarily be required in every case. Applicants will be informed in writing of where the application is deficient and the timescale within which it should be provided.

**Part C** contains a **summary matrix** of the information likely to be required for different application types.

## General Points

Applicants can apply online via the Planning Portal: [www.planningportal.gov.uk](http://www.planningportal.gov.uk).

All plans and drawings must state the paper size, key dimensions, a scale and include a scale bar.

All plans must be to a recognised metric scale i.e. 1:100, 1:50.

The Council welcomes pre-application discussions, particularly for larger, complex and sensitive applications. The Council charges for [pre-application](#) advice.

Where a householder or full application is accompanied by an application for Listed Building Consent and the householder / full application is found to be invalid, the Council will request that the Listed Building Consent application is also held in abeyance until such time that all relevant information is received. This is to ensure that the scheme can be assessed comprehensively.

Proposals for mixed-use developments should comply with all the validation requirements for each of the proposed elements (e.g. residential and commercial) as set out in the Matrix (Part C).

## A: National Requirements for Applications

National information requirements are set out in the [Town and Country Planning \(Development Management Procedure\) \(England\) Order 2015](#) and in the Planning Practice Guidance (PPG).

Please supply the following with your application:

1. **Application form and ownership certificates:**
  - a. The completed application form, signed and dated. Select the relevant application form on the Planning Portal.
  - b. Completed ownership certificate (A, B, C or D) as required by Article 14 of the Town and Country Planning (Development Management Procedure) (England) Order 2015. Where Ownership Certificates B or C have been completed, notices required by Article 13 of the Town and Country Planning (Development Management Procedure) (England) Order 2015 must be given and/or published in accordance with this Article. A failure to comply with the requirements of Article 14 will result in the Local Planning Authority refusing to entertain the application in accordance with section 327A of the 1990 Act.
2. **Location Plan:** A plan which identifies the land to which the application relates drawn to an identified scale and showing the direction of north (at a scale of 1:1250). Application site (including access) to be outlined in red, any other land in which the applicant has an interest outlined in blue. Location Plans are available to purchase online via the [Planning Portal](#).
3. **Other plans:** Any other plans, drawings and information necessary to describe the development which is the subject of the application, such as:
  - a. existing and proposed site / block plans (at a scale of 1:100 or 1:200)
  - b. existing and proposed elevations (at a scale of 1:50 or 1:100)
  - c. existing and proposed floor plans (at a scale of 1:50 or 1:100)
  - d. existing and proposed site sections and finished floor and site levels (at a scale of 1:50 or 1:100)
  - e. existing and proposed roof plans (at a scale of 1:50 or 1:100)
4. **A Design and Access Statement for:**
  - a. all major developments, as defined in [Article 2](#) of the Town and Country Planning (Development Management Procedure) (England) Order 2015
  - b. applications within Conservation Areas which comprise provision of one or more dwellings or building(s) where the floorspace to be created is 100m<sup>2</sup> or more

- c. Listed Building Consent (Listed Building Consent applications should also include a Heritage Statement). Details of what to include in a Design and Access Statement are set out in the validation requirements in the [PPG](#) (paragraph 29 onwards).
5. **Fee:** The appropriate fee can be calculated using [Planning Portal Fee Calculator](#), or see the current [fee schedule](#).

6. **Fire Statement:** A Fire Statement is required for planning permission for development which includes 'a relevant building', defined as:

- Contains two or more dwellings or educational accommodation **and**
- Meet the height condition: 18m or more in height, or 7 or more storeys

Fire Statements are also required for:

- The provision of one or more relevant buildings; or
- Development of an existing relevant building; or
- Development within the curtilage of a relevant building.

Fire Statements will evidence thinking on safety matters to ensure they have been incorporated into planning applications.

A prescribed form is required to be used and can be downloaded from:

<https://www.gov.uk/government/publications/planning-application-forms-templates-for-local-planning-authorities>

For further information please visit: [Fire safety and high-rise residential buildings \(from 1 August 2021\) - GOV.UK \(www.gov.uk\)](#)

7. **Community Infrastructure Levy Form:** The Community Infrastructure Levy (CIL) is a planning charge for developers and landowners that supports the development of local infrastructure. It's charged per square metre on new developments that include new dwellings of any size or any development where the internal area of a new building, extension or change of use exceeds 100 square metres. More information and forms can be found on the Watford Borough Council [website](#).
8. **Biodiversity Net Gain (BNG) Metric:** Where an applicant believes the development would be subject to the biodiversity gain condition, the application must be accompanied by minimum information set out in [Article 7 of The Town and Country Planning \(Development Management Procedure\) \(England\) Order 2015](#):
  - confirmation that the applicant believes that planning permission, if granted, the development would be subject to the biodiversity gain condition;
  - the pre-development biodiversity value(s), [either on the date of application or earlier proposed date \(as appropriate\)](#);

- where the applicant proposes to use an earlier date, this proposed earlier date and the reasons for proposing that date;
- [the completed metric calculation tool](#) showing the calculations of the pre-development biodiversity value of the onsite habitat on the date of application (or proposed earlier date) including the publication date of the biodiversity metric used to calculate that value;
- a statement whether activities have been carried out prior to the date of application (or earlier proposed date), that result in loss of onsite biodiversity value ([‘degradation’](#)), and where they have:
  - a statement to the effect that these activities have been carried out;
  - the date immediately before these activities were carried out;
  - the pre-development biodiversity value of the onsite habitat on this date;
  - the completed metric calculation tool showing the calculations, and
  - any available supporting evidence of this;
- a description of any [irreplaceable habitat](#) (as set out in [column 1 of the Schedule to the Biodiversity Gain Requirements \(Irreplaceable Habitat\) Regulations 2024](#)) on the land to which the application relates, that exists on the date of application, (or an earlier date); and
- plan(s), drawn to an identified scale and showing the direction of North, showing onsite habitat existing on the date of application (or earlier proposed date), including any irreplaceable habitat (if applicable).

Within the planning application form applicants will be asked to confirm whether this information accompanies the application. Where these details have been provided elsewhere in accompanying documents, applicants are encouraged to cross-reference to these rather than duplicate this information within the application form.

## B: Local Requirements

These documents are required to show compliance with local policies and strategies and will be considered necessary to form a complete planning application.

1. **Streetscene Elevation:** An elevation drawing showing the relationship of the proposed development in the streetscene (i.e. in relation to development either side of the site) is required for all extensions to dwellings involving a raise in ridge height, all new or replacement dwellings and all new commercial developments. If a site fronts two highways it may be that more than one streetscene elevation is required.
2. **Planning Statement:** A Planning Statement identifies the context and need for a proposed development and includes an assessment of how the proposed development accords with development plan policy and relevant material considerations such as national planning policy. The level of detail should be proportionate to the development proposal. Submissions which just list the policies without providing the required commentary will not be considered as valid. Submissions which do not address the current development plan will also not be considered as valid.
3. **Housing Schedule:** Proposals with a residential element are to provide a Housing Schedule. This should set out the total number of units; type and tenure of units; the number of habitable rooms and floorspace for the different elements of the market; and affordable and specialist housing, provided as appropriate. In conjunction with this, a housing trajectory setting out the anticipated annual completions should be provided as part of a planning application. Where the number of completions expected each year cannot be provided, applicants should give an indication of whether delivery is likely to take place within the first 5 years following permission being granted, between 5-10 years or beyond 10 years. More information can be found in Chapter 3 of Watford Local Plan (2021-2038).
4. **Affordable Housing Statement:** Proposals will be required to provide a mix of affordable housing tenures, including a minimum of 60% of new affordable homes as homes for social rent. More information can be found in Chapter 3 of Watford Local Plan (2021-2038).
5. **Financial Viability Appraisal:** Where the affordable housing requirements as set out in Chapter 3 of Watford Local Plan (2021-2038) cannot be met, a Financial Viability Appraisal will be required. The Financial Viability Appraisal is submitted as a public document and will be published on the Watford Borough Council's website. Requests for Financial Viability Appraisals to be confidential will result in the invalidation of applications.
6. **Energy and Sustainability Statements:** A statement which sets out how proposals will meet policy requirements to mitigate the impact of climate change and contribute towards sustainable development. The statement should be a freestanding document supplied by a suitably qualified person. For major non-residential

proposals this should include a BREEAM pre-assessment certificate. More information can be found in Chapter 8 of Watford Local Plan (2021-2038).

7. **Tree Survey and Report:** If the site is covered by a Tree Preservation Order or contains trees and is within a Conservation Area, or if the site has trees within or adjacent to it which are greater than 75mm in diameter, then the advice of a suitably qualified arboriculturalist should be sought to identify all relevant trees to be included in a **Tree Survey**.

If it is acknowledged that significant trees on the site are likely to be affected by the proposals it will be necessary to provide an Arboricultural Impact Assessment (AIA), Arboricultural Method Statement (AMS) and Tree Protection Plan (TPP).

Further information is available on the Arboricultural Association website at [www.trees.org.uk](http://www.trees.org.uk).

8. **Landscaping Plan:** A landscaping plan should set out the strategy for hard and soft landscaping for the development and an indication of the materials and plant species to be used. Plant species should, where appropriate, be native species that will contribute to biodiversity.
9. **Transport Assessments, Transport Statements and Travel Plans:** All developments that generate significant amounts of movement should be supported by a Transport Statement or Transport Assessment as appropriate to allow an assessment as to whether the effects of a proposal on the transport system are acceptable, and to consider the traffic and road safety implications of development. In addition, developments generating a significant amount of movement should provide a Travel Plan. More information can be found in Chapter 11 of Watford Local Plan (2021-2038).
10. **Heritage Statement:** Applications for, or that could impact upon, a heritage asset or its setting should be accompanied by a Heritage Statement. More information can be found in Chapter 7 of the Watford Local Plan (2021-2038).

As a guide a Heritage Statement must:

- Include an assessment/description of the significance of the heritage asset or assets which may be affected by the proposed development. The contribution of the heritage assets setting to that significance should also be considered. Significance is defined as ‘the value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic. Significance derives not only for a heritage asset’s physical presence, but also from its setting.’
- Set out the works proposed and explain the principles behind and the justification for the proposed development.

- Detail the expected impact the proposed works will have on the heritage asset and its setting
- Outline the steps taken to avoid or minimise any identified impacts. This could include modifications to methods, materials chosen or design and/or archaeological/architectural investigation and recording.

The level of detail should be proportionate to the importance of the heritage asset and the types of work being proposed. For example, a proposal that would involve significant large scale work to a Listed Building would require a detailed and extensive statement produced by a suitably qualified professional. In contrast an application for relatively minor works to an un-listed building in a Conservation Area is likely to only require a short statement.

11. **Land Contamination Assessment:** Paragraph 184 of the National Planning Policy Framework (2021) makes it clear that the responsibility for providing information on whether a site is contaminated rests with the developer and that it is the responsibility of the developer to ensure that the development is safe and suitable for its intended use.

The Environment Agency's [Land Contamination Technical Guidance](#) provides further information.

12. **Wind Assessment:** Tall buildings have the potential to create adverse wind effects, resulting in a detrimental impact on pedestrian comfort and in the most extreme cases can cause safety issues. Wind assessments or wind micro climate studies can help to understand the effects a building will have on the local wind environment and can suggest ways to mitigate any adverse impacts. Wind mitigation is a specialist area and advice should be sought from experienced practitioners and a report submitted with the planning application. The type of assessment required will depend on the height of the building proposed and should be discussed with officers at pre-application stage. It is however advised that tall buildings of 30 metres or more are likely to require either Wind Tunnel testing or Computational (CFD) Simulations. The assessment should be prepared by a suitably qualified consultant using the relevant assessment methodology.
13. **Daylight, Sunlight and Overshadowing Assessment:** Applications including or near to residential development will require a Daylight, Sunlight and Overshadowing Assessment. The assessments should be undertaken in accordance with the relevant up to date British Research Establishment (BRE) Guidelines.
14. **Light Impact Assessment:** Proposals involving the provision of publicly accessible developments in the vicinity of residential property, a Listed Building or a Conservation Area where external lighting would be provided or made necessary by the development, are required to be accompanied by a Lighting Impact Assessment prepared by a lighting specialist. This must include details of any external lighting, the proposed hours when the lighting would be switched on, a layout plan with beam orientation and ground lux levels, and a schedule of equipment.

15. **Noise Impact Assessment:** Proposals that raise issues of noise and / or disturbance to the occupants of nearby buildings, and for developments that are considered to be noise sensitive, e.g. residential developments in close proximity to railway lines, must be supported by a Noise Impact Assessment prepared by a suitably qualified acoustician. More information can be found in Chapter 8 of the Watford Local Plan (2021-2038).
16. **Ventilation and Extraction Details:** Proposals that raise issues of odour emissions e.g. extraction systems for restaurants / takeaways/ Class B2 General Industrial Uses, must be accompanied by details of the equipment to be installed including odour abatement measures. Such details must demonstrate that odours will not be discernible at the nearest residential property.
17. **Flood Risk Assessment (FRA):** A Flood Risk Assessment is required for development proposals of 1 hectare or greater in Flood Zone 1 and for proposals for new development located in Flood Zones 2 and 3 as designated by the Environment Agency. This is to ensure sites for development consider flood risk impact within and outside of the site and pass the sequential and exception tests. The Watford Local Plan (2021-2038) has designated sites for development (site allocations) which have already passes a sequential and exception test through the [Level 2 Strategic Flood Risk Assessment \(2020\)](#) and this may not be required again. Developers are encouraged to use the [Strategic Flood Risk Assessment Level 1 \(2019\)](#) to inform their Flood Risk Assessment.

Further details of when a Flood Risk Assessment is required to be submitted, and what it should include, are contained in the Environment Agency's [Planning Applications: Assessing Flood Risk](#) guidance.

The Environment Agency also provides site-specific [pre-application advice](#) for some types of development. This includes a preliminary opinion and additional technical advice, if required, for which there is a charge.

More information can be found in Chapter 9 of the Watford Local Plan (2021 – 2038).

18. **Surface Water Drainage Scheme:** With regard to surface water drainage, the Flood and Water Management Act (2010) introduced the requirement for Sustainable Drainage Systems (SuDs) in new developments. The [Government's Ministerial Statement](#) of 18 December 2014 requires that all developments of 10 dwellings or more and all major commercial developments must incorporate SuDs, details of which must be submitted at the planning application stage. More information can be found in Chapter 9 of the Watford Local Plan (2021-2038) and detailed guidance on the Lead Local Flood Authority [website](#).

To assist developers and Local Planning Authorities, the Lead Local Flood Authority has developed a set of policies and guidance within the Local Flood Risk Management Strategy and a checklist of information that should be provided to support any planning application.

Applicants are encouraged to check and comply with the County Council's Flood validation list and complete a Surface Water Drainage Statement in order to expedite their consultation process. The validation list and form can be found on Hertfordshire County Council's [website](#).

19. **Biodiversity Assessment:** In order to be policy compliant, new development should seek to achieve a biodiversity net gain of 10%, or more, measured using the latest Defra [Metric](#). For small sites, the beta test version of the metric can be used.

Once further guidance has been locally adopted all relevant development proposals will need to follow this guidance. Further national requirements are also expected in late 2023 and all development must adhere to this.

Protected species surveys may be required in certain instances including when development, demolition, extension or conversions happen to:

- Buildings close to water, woodland, hedgerows or mature gardens and trees with; unconverted loft spaces, uneven loft tiles, hanging tiles, weather boarding, small openings into soffits or behind bargeboards,
- timber framed or brick barns with predominantly intact tiled roofs,
- land within 150m of a historical pond with no movement barriers between,
- underground structures, and
- trees with cracks, splits or cavities.

More information can be found in Chapter 9 of Watford Local Plan (2021-2038), through Defra and Natural England websites.

20. **Health Impact Assessment:** Required for proposals that may have an adverse impact on the immediate area and affect people living in the development and close by. Health Impacts Assessments are expected as part of a planning application submitted for the following types of applications:

- a) Major residential proposals of 100 units or more;
- b) Major transport infrastructure improvements, including major new roads or major new junctions, existing rail networks, rail stations and transport interchange areas and the proposed Mass Rapid Transit System along the disused former Croxley Rail link; and
- c) Any other locally or nationally significant infrastructure project.

There are two types of Health Impact Assessments which may be appropriate:

1. Rapid Assessment for simpler proposals; or
2. In-depth assessment for more complicated and larger proposals

More information can be found in Chapter 12 of the Watford Local Plan (2021 – 2038) and through [Hertfordshire County Council](#) and their adopted [Health Impact Assessment Position Statement](#).

21. **Training, Skills and Employment Strategy:** Major development proposals will be required to submit a training, skills and employment strategy to demonstrate training programmes and apprenticeships provided, fair tender opportunities for small or medium enterprises and opportunities being offered to local businesses in their supply chains. More information can be found in Chapter 4 of Watford Local Plan (2021-2038).

# C: Matrix

	Application Form	Location Plan	Block Plan	GL Additional Questions Form and floor space calculations where GL liable	Statutory Biodiversity Metric (Excel format)	Fire Statement	Elevation Drawings (existing and proposed)	Floor Plans (existing and proposed)	Roof Plans (existing and proposed)	Section Drawings (existing and proposed)	Streetscene Drawings (existing and proposed)	Design and Access Statement	Planning Statement	Housing Schedule	Affordable Housing Statement	Financial Viability Appraisal	Energy and Sustainability Statements	Tree Survey and Report	Public Realm Strategy	Landscaping Plan	Transport Assessment / Transport Statement / Travel Plan	Heritage Statement	Land Contamination Assessment	Wind Assessment	Daylight, Sunlight and Overshadowing Assessment	Light Impact Assessment	Noise Impact Assessment	Ventilation and Extraction Details	Flood Risk Assessment	Surface Water Drainage Scheme	Materials Details and Specifications	Biodiversity Assessment	Health Impact Assessment / Rapid Health Impact Assessment	Training, Skills and Employment Strategy			
Householder Applications	X	X	X	X			X	X	X									X									X										
Replacement Dwellings	X	X	X	X	X		X	X	X	X	X	X					X	X		X		X					X										
New residential development (9 or fewer dwellings)	X	X	X	X	X		X	X	X	X	X	X	X	X			X	X		X	X	X	X			X	X	X	X		X			X			
New residential development (10 or more dwellings)	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X			X	X	X	
Commercial Change of use Applications	X	X	X	X	X	X	X	X	X	X												X					X	X									
Residential Conversion Applications	X	X	X	X	X		X	X	X	X								X		X		X					X	X									
New commercial development (less than 1000sqm)	X	X	X	X	X		X	X	X	X	X	X	X				X	X		X	X	X	X		X	X	X	X	X	X			X				
New commercial development (more than 1000sqm)	X	X	X	X	X		X	X	X	X	X	X	X				X	X	X	X	X	X	X		X	X	X	X	X	X	X			X		X	
Certificate of Lawful Development	X	X	X				X	X	X																												
Listed Building Consent	X	X	X				X	X	X	X		X											X										X				
Advertising Consent	X	X	X				X																X														
Outline Application	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	
Section 96 Non Material Minor Amendment Application	X	X	X				X	X	X																												
Section 73 Minor Material Amendment Application	X	X	X	X	X		X	X	X																		X										
Applications relating to buildings in Conservation Areas and/or Locally Listed Buildings	X	X	X		X		X	X	X													X										X					
Applications relating to flues, vents, condensers, AC units and Air Source Heat Pumps.																											X										

X: Required
X: Required in most circumstances
X: Required where appropriate