



Meeting note

Project name	A417 Missing Link
File reference	TR010056
Status	Final
Author	The Planning Inspectorate
Date	17 May 2021
Meeting with	Highways England (the Applicant)
Venue	Microsoft Teams
Meeting objectives	Project update
Circulation	All attendees

Summary of key points discussed and advice given

The Planning Inspectorate (the Inspectorate) advised that a note of the meeting would be taken and published on its website in accordance with section 51 of the Planning Act 2008 (the PA2008). Any advice given under section 51 would not constitute legal advice upon which applicants (or others) could rely.

Project update

The Applicant had previously indicated in the project update meeting held on 9 December 2020 that a decision was outstanding in respect of whether a section of the A417 proposed to be de-trunked as part of the scheme would be owned and maintained by Gloucestershire County Council. The Applicant advised that discussions were ongoing in respect of several points of detail, including the naming of the de-trunked section of road, but that no fundamental issues remained unresolved.

The Inspectorate requested that the Applicant summarise the position regarding the scheme's interaction with National Trust (NT) land. The Applicant advised that it was confident there would be no dispute with NT regarding the land required for the scheme. The Inspectorate also sought an update on the position regarding the proposed acquisition of common land near Crickley Hill and at Barrow Wake, and the associated replacement common land that was proposed. The Applicant advised that relevant expertise was not on the call and it would provide a response in writing following the meeting.

The Inspectorate enquired as to whether any Statements of Common Ground (SoCG) would be submitted to the Inspectorate alongside the Development Consent Order (DCO) application. The Applicant advised that it was proposing to submit a Statement of Commonality and several advanced draft SoCGs as part of its application, however it confirmed that none of the SoCGs would be signed. These would be progressed alongside the DCO hearings if the application was accepted for Examination.

Feedback on draft documents

Please refer to **Annex A** for the Inspectorate's comments on the Applicant's draft application documents submission.

The Applicant provided an update in respect of actions it had taken following receipt of the Inspectorate's feedback on its draft application documents. For example, the Applicant advised that it had revised its application document tracker so that it could be used as a self-contained document during hearings. The Applicant noted the Inspectorate's observations regarding plan drafting consistency, and stated that it had addressed any issues highlighted. The Applicant had also addressed the consistency of terminology used in the draft DCO.

The Applicant queried whether the draft DCO and any subsequent revisions should be submitted in both Word and PDF format. The Inspectorate confirmed that this was the correct approach.

Submission logistics

The Applicant advised that it was expecting to submit its DCO application on 28 May 2021 subject to internal approval procedure at Highways England. It anticipated holding the Preliminary Meeting in late summer/ early autumn assuming the application was accepted for Examination. The Inspectorate queried whether the relevant local authorities (LA) had been briefed on the imminence of the submission. The Applicant responded that it had recently updated all key stakeholders, including LAs, regarding the approximate submission timeline.

The Inspectorate advised that it would immediately issue the Applicant with correspondence detailing the various actions required of the Applicant in the build-up to submission. The Inspectorate established that an updated geographic information system (GIS) shapefile would need to be submitted no later than close of business on 18 May 2021. The Inspectorate also requested that the Applicant provide its electronic file index to accompany the DCO application as soon as possible in order that compatibility with the Inspectorate's internal business systems could be checked in advance of the submission date.

The Applicant advised that it intended to submit its DCO application via a filesharing platform and queried whether this approach would be acceptable. The Inspectorate advised that this was a standard approach, but that it would be useful to arrange a test of the chosen platform prior to submission.

DCO hearing format

The Applicant sought advice on what format any future examination hearings associated with its application would take in light of the ongoing effects of COVID-19. The Inspectorate responded that examinations would continue to be delivered adopting virtual procedures for the foreseeable future. Any updates in this respect, including the potential for 'blended' events to feature in future examinations, would be communicated with the Applicant promptly.

Specific decisions/ follow-up required

The following actions were agreed:

- The Applicant agreed to provide the Inspectorate with an update regarding common land affected by the application, including the proposals for replacement common land to be offered, after the meeting and prior to submission.
- The Applicant to provide the Inspectorate with an updated GIS shapefile no later than 18 May 2021.
- The Applicant to provide the Inspectorate with its electronic file index as soon as possible prior to the submission of the DCO application.
- The Applicant to provide the Inspectorate with its list of LA contact details, not later than 18 May 2021, for the purposes of issuing correspondence regarding Adequacy of Consultation prior to the submission of the DCO application.
- The Applicant agreed to confirm the submission date to the Inspectorate on 21 May 2021.
- The Applicant and the Inspectorate agreed to liaise in respect of arranging a test of the Applicant's chosen filesharing platform.

Section 51 advice regarding draft application documents submitted by Highways
England



A417 Missing Link – TR010056

Section 51 advice regarding draft application documents submitted by Highways England

On 25 February 2021 Highways England submitted the following draft documents for review by the Planning Inspectorate as part of its Pre-application Service¹:

1. Draft Introduction to the Application
2. Draft Development Consent Order
3. Draft plans (including draft Works Plans, Land Plans, Rights of Way and Access Plans, Special Category Land Plans, Classification of Roads Plans, Clearways and Prohibitions Plans and De-trunking Plans)
4. Draft Environmental Statement chapters 1 to 4

The advice recorded in the table comprising this document relates solely to matters raised upon the Planning Inspectorate's review of the draft application documents, and not the merits of the proposal. The advice is limited by the time available for consideration and is raised without prejudice to the acceptance or otherwise of the eventual application.

¹ See <https://infrastructure.planninginspectorate.gov.uk/application-process/pre-application-service-for-applicants/>



Draft Introduction to the Application		
Ref No.	Paragraph/Section	Comment/Question
1.	1.2.2	As part of the Examination the Applicant is likely to be requested to provide an updated document tracker at each deadline as a live reference to the latest versions of documents. To this end the Inspectorate would advise for the Application Document Tracker at Appendix A to be decoupled and provided as a discrete application document.

Draft Development Consent Order		
Ref No.	Article/Requirement	Comment/Question
2.	General	The Applicant should ensure that when the draft Development Consent Order (dDCO) is finalised for submission all internal references and legal footnotes are checked and that the drafting follows best practice set out in the Inspectorate’s Advice Note 13 and Advice Note 15 and any guidance on statutory instrument (SI) drafting.
3.	General	A thorough justification should be provided in the Explanatory Memorandum (EM) for every Article and Requirement, explaining why the inclusion of the power is appropriate in the specific case. The extent of justification should be proportionate to the degree of novelty and/or controversy in relation to the inclusion of that particular power.
4.	General	Notwithstanding that drafting precedent has been set by previous DCOs, whether or not a particular provision in this DCO is appropriate will be for the Examining Authority (ExA) to consider and examine taking account of the facts of this particular DCO application and having regard to any views expressed by the relevant authorities and Interested Parties.
5.	General	The Applicant will be asked to maintain a list of all plans and other documents that will require Secretary of State (SoS) certification (including plan/document references). These should be updated throughout the examination process and submitted to the ExA before the close of the examination.
6.	General	The dDCO is proposed to be a SI and so should follow the statutory drafting conventions. The application dDCO (and any subsequent revisions submitted in the course of the examination) should be in the form required by the SI template and validated as such through the ‘Publishing’ section of the legislation.gov.uk website.



Draft Development Consent Order		
Ref No.	Article/ Requirement	Comment/Question
7.	General	<p>The application dDCO and any subsequent versions of the submitted to the examination:</p> <ul style="list-style-type: none"> • should be supplied in both .pdf and Word formats, together with versions showing any changes from the previously submitted version by way of tracked changes; and • should be accompanied, where relevant, by a document explaining the changes made².
8.	General	<p>The Office of the Parliamentary Counsel Drafting Guidance (June 2020) at para 1.2.9 recommends against the use of "shall" in drafting statute, preferring the use of imperatives such as "must", "is/are to" or similar wording. The current dDCO uses "shall" in various locations.</p>
9.	General	<p>The Inspectorate notes that a draft EM was not provided by the Applicant to read against the provisions in the dDCO.</p>
10.	General - references to Part 1 of the 1961 Act	<p>Some Articles make provision for "<i>compensation to be determined, in case of dispute, under Part 1 of the 1961 Act</i>". It is acknowledged that a provision in this form was in the various Model Provisions and was commonplace in DCOs and other Orders. However, Part 1 of the 1961 Act only relates to compensation for Compulsory Acquisition. In order for there to be certainty that it would apply in other situations (eg the temporary stopping up of streets under Article 15, survey of land under Article 23, temporary use of land under Article 34) the Applicant should consider whether a modification should be included and if not explain why.</p>
11.	Article 2	<p>The definition of 'commence' as drafted could enable a wide range of works before discharge of the Requirements. The EM should explain why it is necessary to undertake these works before discharge of Requirements and clarify any impacts of these works, so that the ExA can consider whether this is justified or whether it is more appropriate that the works be controlled by Requirement.</p> <p>The Applicant should explain in the EM if the works excluded from the definition of commence are <i>de minimis</i> or have minimal potential for adverse impacts, and if so, how this is secured in the dDCO. The DCO should not permit works outside those assessed in the Environmental Statement (ES) and Applicant should consider limiting these works to those assessed within the ES.</p>

² Example: https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010020/TR010020-000463-TR010020_APP_3.6%20-%20Document%20explaining%20changes%20made%20to%20dDCO%20for%20Deadline%205.pdf



Draft Development Consent Order		
Ref No.	Article/ Requirement	Comment/Question
12.	Article 2	The definition of 'maintain' as drafted could enable a wide range of works to take place outside of those assessed within the ES. The Applicant should consider limiting the works to those assessed within the ES or, if some flexibility is required, to those that would not give rise to any material new or materially different environmental effects to those assessed within the ES.
13.	Article 5	Notwithstanding other precedents, the EM should explain further the effect of and necessity for Article 5(2). How much land (and how far from the DCO boundary) might be affected by the provision? What enactments are likely to be engaged?
14.	Article 7	This Article appears to be intended to allow development not authorised by the DCO, but which is required for the scheme, to be carried out within the Order limits pursuant to planning permission. This would appear to obviate the need, in such circumstances, to apply to change the DCO (through section 153 of the Planning Act 2008). This Article should be justified in the EM.
15.	Article 27	Should this Article be called 'Compulsory acquisition of rights and imposition of restrictive covenants'? Full justification should be provided for the power to impose restrictive covenants. The Applicant should note paragraph 26 of Advice Note 15: <i>"Before deciding whether or not the power is justified the Secretary of State will need to consider issues such as proportionality; the risk that the use of land above or below a structure could be sterilised if it has to be acquired outright in the absence of a power to impose restrictive covenants".</i>
16.	Article 40	See Article 35 in the made A63 Castle Street DCO ³ . The Secretary of State amended this Article to ensure that the loss of trees is limited to those assessed within the Environmental Statement. The Applicant is advised to clarify the number and location(s) of any trees subject to Tree Preservation Orders that are likely to be impacted by the scheme and ensure they are depicted on the relevant plans.

³ Available at: https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010016/TR010016-000903-TR010016_DCO%20as%20made%20by%20SoS.pdf



Draft Development Consent Order		
Ref No.	Article/ Requirement	Comment/Question
17.	Article 40	<p>Where it is known that specific hedgerows need to be removed, they should be listed in a Schedule and this Article amended to refer to the Schedule. Where this is not possible the Applicant should consider adding an additional paragraph to this Article to the effect that any other hedgerows should only be removed once the prior consent of the local planning authority has been obtained.</p> <p>The Applicant should have regard to paragraph 22.1 and the good practice point 6 in the Planning Inspectorate’s Advice Note 15. If the Applicant wishes to adopt a different approach it is advisable to justify this in the EM.</p>
18.	Article 41	<p>Article 41 deals with removal of human remains. In paragraph 12 there is reference to the Secretary of State (SoS). Under A2 ‘Secretary of State’ is defined as the Secretary of State for Transport. Normally, approval for reinternment is given by the Secretary of State for Justice.</p> <p>The Applicant is advised to consider drawing appropriate distinction.</p> <p>Notwithstanding drafting precedents in other DCOs, the Applicant is advised to consider whether the EM should explain why this power is necessary in the circumstances of the Proposed Development.</p>
19.	Requirement 1	<p>The Inspectorate notes that the naming convention attributed to iterations of the Environmental Management Plan varies from both made DCOs and those associated with live applications for highway-related development (aligning with recent updates to the DMRB). Is there a consistent position being developed at Highways England in respect of how EMPs are defined/controlled within DCOs? Or is it left to the discretion of individual project teams?</p> <p>Should EMP (design stage) also be interpreted in Requirement 1?</p>
20.	Requirement 7	<p>Should the Manual of Contract Documents for Highways Works be defined in Requirement 1? A definition is provided in the made A63 Castle Street DCO.</p>
21.	Schedule 2, Part 2	<p>Advice Note 15 Appendix 1 provides standard drafting for Articles dealing with discharge of Requirements. Where an applicant seeks for any amendment(s) to be made to the drafting of the standard wording provided in this appendix, it should be justified in full in the EM accompanying the dDCO.</p>
22.	Schedule 2, Part 2	<p>It is likely that an appointed ExA will ask questions about the appropriateness of the agreement of the SoS being deemed after the period specified.</p>



Draft Development Consent Order		
Ref No.	Article/ Requirement	Comment/Question
23.	Schedule 1	<p>The Applicant is advised to consider the draft Works Plans against the corresponding descriptions in the dDCO and make amendments to correct errors or to provide clarification, for example:</p> <ul style="list-style-type: none"> • Check that the correct sheet numbers are in the Works description eg Work nos. 3a, 6c, 7, 15 and 30. • Check for typographical errors eg words 'the diversion of' duplicated in Work no.12.
24.	Schedule 3, Part 5	<p>The Applicant is advised to review this Part. The Inspectorate notes for example:</p> <ul style="list-style-type: none"> • The first entry in the table states "<i>point N on sheet 4 of the speed limits plans</i>". This point is on Sheet 6 of the Speed Limits Plans, not Sheet 4. • Point 18 is on Sheet 3, however the dDCO states it is on Sheet 4. • Points 22 and 23 do not appear on Sheet 3 of the Classification of Roads Plans, as stated in the dDCO. Point 23 appears on Sheet 4, but there does not appear to be a point 22 (just 22a/22b). • Points 20 and 21 are shown on Sheet 3 as national speed limit, however the dDCO states it is a 40mph limit.

Draft Plans		
Ref No.	Plan Ref	Comment/Question
25.	General	The Inspectorate notes that it was not possible to compare the Land Plan and Special Category Land Plan information to the Book of Reference (BoR), as a draft BoR was not provided.
26.	General	The Inspectorate notes that no scale is provided on some of the key plans eg Classification of Roads Plans.
27.	General	The Applicant is advised to check that the red line boundary is not obscured at any point on any plans eg draft Works Plans (Sheet 6) – label for Attenuation basin No. 11a, Work no. 10b.



Draft Plans		
Ref No.	Plan Ref	Comment/Question
28.	General	The Applicant is advised to ensure that all works are inside the red line boundary on all plans eg draft Works Plans (Sheet 2), the utilities diversion centreline below the 'End of Work No. 15' label transects an area that is not within the Order Limits.
29.	General	The Applicant is advised to check that there are no small, isolated, apparently superfluous sections of 'red line boundary' on any of the plans eg Classification of Road Plans (Sheet 4), above cut line to Sheet 5. This apparent error appears in numerous locations across all draft plans provided.
30.	General	The Applicant is advised to check that the cut line references on all plans refer to the correct plan eg Works Plans (Sheet 5), the cut line beneath the north arrow does not relate to Sheet 4.

Draft Land Plans		
Ref No.	Land Plan Ref	Comment/Question
31.	Sheet 1 of 6	<p>The Applicant is advised to review all sheets comprising the Land Plan. Regarding Sheet 1, the Inspectorate notes the following:</p> <ul style="list-style-type: none">• There appears to be an unlabelled plot to the right of plot 1/10a.• The labels for plots 1/1y, 1/16b, 1/1aa and 1/1ac straddle other plots which hinders identification.• The cut line appears to be missing at the "<i>Continued on Sheet 2</i>" label.
32.	Sheet 2 of 6	<p>Regarding Sheet 2, the Inspectorate notes the following:</p> <ul style="list-style-type: none">• There appears to be a very small unlabelled triangular plot just south of plot 2/10j.• Plots 2/10g and 2/10h appear to be contiguous. Is 2/10h the unlabelled blue plot to the right?• The label for plot 2/2r straddles plot 2/2q which hinders identification.



Draft Land Plans		
Ref No.	Land Plan Ref	Comment/Question
		<ul style="list-style-type: none"> The "Continued on sheet 3" text on the far right of Sheet 2 (right of Inset C label) appears to be included in error.
33.	Sheet 3 and 4 of 6	Regarding sheets 3 and 4, the Inspectorate notes the following: <ul style="list-style-type: none"> The labels for plots 3/7d, 3/2x and 4/3f straddle other plots which hinders identification. There appears to be an unlabelled plot below 4/10c.
34.	Location Plan	The inset boxes are not labelled.

Draft Works Plans		
Ref No.	Work Plan Ref	Comment/Question
35.	Sheets 3, 4 and 5 of 6	The Applicant is advised to review all works numbering. The Inspectorate notes, for example: <ul style="list-style-type: none"> Is the label on Sheet 3 that says "Start of Work No.6c" correct? Should this be "Start of Work No.6b"? The dDCO does not include a Work nos. 3i and 3l. Should these be work no 7i and 7l respectively?
36.	Sheets 1, 4 and 5 of 6	The Applicant should check the annotation of all wildlife crossings. The Inspectorate notes, for example: <ul style="list-style-type: none"> The 1i and 6d labels on Sheet 4 do not point to any form of structure. Work 1i on Sheet 5 points to a drainage ditch, is this correct?
37.	Sheet 1 of 6	Work no. 1e is described in the dDCO as the construction of a culvert but is annotated as a drainage ditch.
38.	Sheet 1 of 6	Work no. 1f is described in the dDCO as the construction of an open channel. It is annotated on the Works Plans by a thin solid black line, however there is no corresponding item for "open channel" in the key.



Draft Works Plans		
Ref No.	Work Plan Ref	Comment/Question
39.	Sheet 5 of 6	Car parks are not illustrated consistently eg see Work nos. 3e and 3c.
40.	Sheet 3 of 6	Regarding Work no. 16, it would be useful for the utilities centreline on the top of the sheet to be labelled for ease of reference. Given that this work is also shown on Sheet 1, should there be a continuation from Sheet 3 to Sheet 1?
41.	Sheet 2 of 6	Regarding Work no. 20, the linear power cable diversion work shown on Sheet 2 has no centre line and has no end point, so it is unclear what route the work follows and where it ends. It overlaps with Work no. 7k which makes it even less clear. The Applicant is advised to consider how to present these works in a way that is clear and reliable for the examination.

Draft Rights of Way and Access Plans		
Ref No.	Rights of Way and Access Plan Ref	Comment/Question
42.	Sheets 2 and 6 of 6	<p>The Applicant is advised to review all Rights of Way and Access Plans. The Inspectorate notes, for example:</p> <ul style="list-style-type: none">• Should the rectangle on Sheet 2 that says "see inset C" say "see insets C and F"? Currently inset F is not referenced anywhere.• Should PR5 and PR10 in Schedule 3 of the dDCO say "<i>Sheet 2</i>" instead of "<i>Sheets 2</i>"?• The upper arrows labelling PR4 and PR8 on Sheet 2 extend beyond the end of the blue lines.• PR8 does not appear on Sheet 6 as stated in Schedule 3 of the dDCO.



Draft Special Category Land Plans		
Ref No.	Special Category Land Plan Ref	Comment/Question
43.	Sheet 2 of 5	Plots 2/10g and 2/10h appear to be contiguous. Is 2/10h the unlabelled blue plot to the right?
44.	Sheets 5 and 6 of 6	The Inspectorate notes that Sheet 5 has reference number 002061 and Sheet 6 has reference number 002062, however the draft application index has inverted these references.

Draft Classification of Roads Plans		
Ref No.	Classification of Road Plan Ref	Comment/Question
45.	Sheet 3 of 6	The Applicant is advised to review all Classification of Roads Plans. The Inspectorate notes, for example: <ul style="list-style-type: none">Schedule 3 Part 3 of the dDCO states "<i>Unclassified road connecting U50853 to U50944 between points 22 and 23 on sheet 3 of the classification of roads plans, comprising 260 metres</i>". Sheet 3 does not contain these points. They are on Sheet 4 but do not appear to be connected to each other.
46.	Sheet 4 of 6	There are two 'Point G' annotations on Sheet 4.
47.	Sheet 6 of 6	Regarding Sheet 6, the Inspectorate notes: <ul style="list-style-type: none">Schedule 3, Part 4 of the dDCO describes points 34 and 35 as "<i>Realigned A417(T)</i>", however this is illustrated on Sheet 6 by a black line which the key identifies as "<i>New unclassified roads</i>".



Draft Clearways and Prohibitions Plans		
Ref No.	Clearways and Prohibitions Plan Ref	Comment/Question
48.	Sheets 1 to 6	<p>The Applicant is advised to review all Clearways and Prohibitions Plans.</p> <ul style="list-style-type: none">• Should the notes sections refer to both parts 6 and 7 of Schedule 3 of the dDCO rather than just part 6? Should the entry under Schedule 3, Part 7 of the dDCO include the words 'of the clearways and prohibitions plans'?• The clearway to be revoked on Sheet 2 (marked in pink) is difficult to follow owing to the complexity of the annotations on this plan. The Applicant is advised to consider how to present this information in a way that is clear and reliable for the examination.• Two points (Z and AA) on Sheet 6 have no corresponding entry in Part 6 of Schedule 3 of the dDCO.

Draft De-trunking Plans		
Ref No.	De-trunking Plan Ref	Comment/Question
49.	Sheets 1 to 6	<p>The notes section of these plans does not tie them to relevant provisions in the dDCO, as is the case with other Schedule 3 plans.</p>



Environmental Statement (ES) Chapters 1 to 4:

- **ES Chapter 1 – Introduction**
- **ES Chapter 2 – The Project (for PINS)**
- **ES Chapter 3 – Assessment of Alternatives**
- **ES Chapter 4 – Environmental Assessment Methodology**

Ref No.	Para/Section	Comment/Question
50.	ES Chapter 2 Paras 2.8.3.8 and 2.8.39	<p>Paragraphs 2.8.38 and 2.8.39 detail the proposed demolition works, including the demolition of a residential property (Pinewood) and a commercial property (Crickley Hill Tractors).</p> <p>Schedule 1 (Authorised Development) of the dDCO does not include reference to these structures. It does, however, include reference to the proposed demolition of a “<i>glass house</i>” at Clause (n) of Work no.1, which is not mentioned in ES Chapters 1 to 4. Furthermore, Clause (b) of Work no.4 includes the “<i>the demolition of the Air Balloon roundabout</i>”, which again, is not consistent with information provided within the ‘Demolition’ section of ES Chapter 2.</p> <p>Details of the proposed demolition works should be clearly detailed within the ES and consistent with the information presented in the dDCO.</p>



Environmental Statement (ES) Chapters 1 to 4:

- **ES Chapter 1 – Introduction**
- **ES Chapter 2 – The Project (for PINS)**
- **ES Chapter 3 – Assessment of Alternatives**
- **ES Chapter 4 – Environmental Assessment Methodology**

Ref No.	Para/Section	Comment/Question
51.	ES Chapter 3 Table 3.3	<p>Table 3.3 states that two new crossings will be provided as part of the Proposed Development: the Cotswold Way crossing and the Gloucestershire Way crossing. Table 3.3 also states that the previously proposed green bridge at Crickley Hill has been removed from the scope of the project following concerns raised at the 2019 statutory consultation.</p> <p>Work no.5 of the dDCO includes the “<i>construction of a green bridge</i>”. It’s assumed that this relates to the proposed Gloucestershire Way crossing. Similarly, Work no.2 states “<i>the construction of a bridge for walking, cycling and horse riding...</i>”, which it’s assumed relates to the proposed Cotswold Way crossing. However, in neither case is this explicitly stated in the dDCO nor made clear. It would be helpful to the Inspectorate if consistent naming and terminology could be applied (across all documents submitted as part of the DCO application) when referring to proposed bridges, crossings and underpasses.</p> <p>Furthermore, the dDCO includes references to the construction of “<i>wildlife crossings</i>” (Clause (i) of Work no.1 and Clause (d) of Work no.6), which is not terminology that can be found within ES Chapters 1 to 4. The ES should include detail of any proposed wildlife crossings (including assessment where significant effects are likely to occur) and there should be a consistent use of terminology between documents.</p>

General

1. Where references are provided to other Application documents it would be beneficial to provide the full title thereof inclusive of document reference number. Should further draft documents be provided for review, the Applicant may wish to consider providing a full list of known application documents (for purpose of signposting) as well as their respective reference number.
2. [DCLG: Application form Guidance](#), paragraph 3 states: “*The application must be of a standard which the Secretary of State considers satisfactory: Section 37(3) of the Planning Act requires the application to specify the development to which it relates, be made in the prescribed form, be accompanied by the consultation report, and be accompanied by documents and information of a prescribed description. The Applications Regulations set out the prescribed form at Schedule 2, and prescribed documents and information at regulations 5 and 6.*”