

Responses:

Individual		
Topic	Summary of comments	DNPA Response
Carbon Reduction Statement	I have already invested heavily in thermal improvements, solar energy, air source heat pump, etc. So, if I were to put in an application, I would have little to add here and would not get planning permission. This seems unfair.	Agree that properties that already have measures to reduce carbon should not be penalised. Additional wording has been added to read: <u>'Where carbon reduction measures are already provided at the property these should be described with an explanation of how the proposed development integrates with these'.</u>
Accessible and Adaptable Dwellings Statement/ Energy Efficiency Report/ Carbon Reduction Statement	- There are no evaluation criteria setting out the required standards needed for permission to be granted. This will lead to inconsistent decisions and will lack clarity on why a particular application has been approved or refused. - In line with SCI, DNPA will need to set out clearly why documents are accepted or rejected. To do this DNPA will need to decide what is and what is not acceptable now and in the future. - The evaluation criteria should be publicised before proceeding.	Whether an application is granted planning permission is dependent on an assessment against the Local Plan policies. This is not changing, and the Local Validation Checklist cannot add new thresholds or standards for when permission should or should not be granted. Instead, the Local Validation Checklist ensures adequate information is provided to enable the Planning Officer to make a robust determination. An Officer's Report or Planning Committee Report is published on our website for each planning application that is determined, and this sets out the Officer's reasoning for their recommendation and/ or decision. Applicants and other interested parties are encouraged to contact the National Park Authority to discuss

		individual cases where there are concerns in regard to inconsistency of decision making.
Energy Efficiency Report	• Will be expensive to produce. • What if the building needs substantial structural works, or is unsuitable – is this report still needed?	DNPA acknowledge that there is a cost implication, however whole life carbon assessments are increasingly common and available and are the most effective way of ensuring compliance with Local Plan policy. Agree that the Local Plan policy does not require an energy efficiency consideration in every case. As such the requirement has been retitled to 'Evidence for Replacement Homes' and the wording for the requirement has been amended to read: <i>What is required:</i> <i>A report that identifies clear reasons for demolition of the existing house and justification in the context of Dartmoor Local Plan policy 3.8. This should include an explanation of the design process and environmental and energy efficiency benefits of the scheme and be supported by whole life carbon assessments.</i> <i>Applications must provide either:</i> <i>a structural survey of the existing dwelling by a suitably qualified person that demonstrates that <u>the property is not structurally sound and is not capable of being made habitable, or</u></i>

		<u>Where the existing property is structurally capable of repair, applications must provide:</u> [... rest of wording unchanged]
Planning Agents/ Architects		
Topic	Summary of comments	DNPA Response
Accessible and Adaptable Dwellings Statement/ Energy Efficiency Report/ Carbon Reduction Statement	- These are all matters for building regulation matters not planning. Should just stick to one requirement/ process which is building control. - These additional requirements add extra costs and encourage works without consent being carried out.	The local validation checklist is not adding new policy requirements. These documents provide the information to evidence that proposals are meeting the existing policy within the Local Plan. The amount of information required for each application will be proportionate to the proposed development and therefore costs for the smaller schemes will be reduced.
Accessible and Adaptable Dwellings	There are too many different standards, just ask for Homes for Life Standard instead.	Building Regulations Approved Document M, 'Access to and use of buildings' makes provision for an enhanced standard which can be required by Local Planning Authorities. Strategic Policy 3.2 makes use of this provision.
Carbon Reduction Statement	Do not support for Householder applications. It will be too expensive for people who want to do small domestic works who are already struggling with crippling construction costs. A threshold based on floorspace would be better.	The amount of information required for each application will be proportionate to the proposed development. There is no expectation for householder applications to require technical reports and therefore costs for the smaller schemes will be reduced.
Consultees		
Consultee	Topic	Summary of comments
		DNPA Response

Dean Prior Parish Council	General comment	- Requirements are over-complicated and lead to additional expense for applicant that will put people off applying for permission and lead to more unauthorised works. - Additional requirements only give DNPA more opportunity to deny planning permission. - There is no point for the new requirements these should be left to Building Regulations.	The local validation checklist is not adding new policy requirements. These documents provide the information to evidence that proposals are meeting the existing policy within the Local Plan. The amount of information required for each application will be proportionate to the proposed development and therefore costs for the smaller schemes will be reduced.
Devon county Council	Energy Efficiency Report	Welcomes requirement, accords with efforts in Devon Carbon Plan particularly consideration of embodied carbon in materials and existing structures.	Noted.
Devon County Council	Transport Assessment/ Statement and Travel Plan	- Supports requirement for Transport Assessment/ Statement and Travel Plan. - Recommend that proposals changing an existing highway require a Stage 1 or Stage 2 Road Safety Audit in accordance with GG119 – Road Safety Audit.	Although DNPA acknowledge that Road Safety Audits are sometimes required, there are also concerns that this requirement may be too onerous for the vast majority of applications within the national park. To raise awareness of the potential need for Road Safety Audits additional wording has been added to the Transport Assessment/ Statement and Travel Plan section as set out below: <i>The scope of the Transport Statement or Assessment (<u>including requirements for Road Safety Audits</u>) should be agreed with the Highway Authority (Devon County Council) before submission.</i>

Devon County Council	Archaeological Assessment	Recommend amending requirement for Archaeological Field Evaluation to: <i>'Where recommended by the Dartmoor National Park Archaeologist, or in consideration of the results of the DBA, a planning application may need to be supported by the results of a programme of Archaeological Field Evaluation in line with ClfA Universal guidance for archaeological field evaluation'</i>.	DNPA acknowledge that there are circumstances where our Archaeologist may differ in view to a Desk Based Assessment. However, the purpose of the Local Validation Checklist is to add certainty and efficiency to the application process and identify set criteria for when certain documents will always be required. The recommended wording would add uncertainty in this regard.
Devon County Council	Statement of Heritage Significance	Recommend rewording 4th paragraph to: <u>'Where the site has archaeological potential to include archaeological interest the Statement of Heritage Significance should include the results of a desk based archaeological assessment and, if required, the results of a programme of archaeological field evaluation'</u>	Agree, section has been reworded.
Devon County Council	Sustainable Drainage Strategy	- Support surface water requirement. - Recommend adding <u>'where required'</u> to start of final bullet under Householder and Minor applications section.	Agree, suggested wording has been added.
Devon County Council	Carbon Reduction Statement	Welcomes requirement, accords with efforts in Devon Carbon Plan.	Noted.
Devon Wildlife Trust	Introduction	Recommend adding wording that ecology surveys should be commissioned at earliest opportunity and will influence development design.	Although DNPA agree with the sentiment, the intention is to keep the introduction as short as possible and focus on the practicalities of the validation process.

Devon Wildlife Trust	Householder Applications	• Ecology and geology surveys should not be required in same form • Requirement for each should be separated so neither is overlooked	The Dartmoor Wildlife Trigger Table and Ecology or Geology Surveys form follows a structure provided by Devon County Council and is applied across Devon. It would be inconsistent with neighbouring Local Planning Authorities to fundamentally alter the form. To ensure Ecology and Geology are presented as two distinct disciplines, but also its clear for users that the link will take them back to the same form, the links have been amended to read: <i>“Ecology Surveys (see Dartmoor Wildlife Trigger Table)</i> <i>Geology Surveys (see Dartmoor Wildlife Trigger Table)”</i>
Devon Wildlife Trust	Full applications both Major and Minor	• Disagree with requirement for either ‘Biodiversity Enhancement (local requirement) or Biodiversity Net Gain (mandatory national requirement)’. Both should be required as BNG is required under the Environment Act 2021 and biodiversity enhancements are required by NPPF.	These requirements relate directly to Local Plan Strategic Policy 2.3 Biodiversity Net Gain, which has partly been superseded by the national BNG requirements. Due to the wording of the policy, we cannot insist that all applications refer to the enhancement as set out in Table 2.3 of the Local Plan for validation purposes.
Devon Wildlife Trust	Reserved matters	• Updated ecology surveys should be in the ‘must submit’ section because of the length of time between outline and reserved matters application.	As referred to in the comment, ecological surveys sometimes do go out of date between outline and reserved matter stages however this does not happen every time and the LVC cannot mandate additional documents that are not necessary to determine the application. As such, the requirement will remain in the ‘You

			may also need to submit' section. Additional wording will be added to the Ecology Survey section: When required: • <u>Householder, Full and Outline applications</u> • <u>Applications for Listed Building Consent</u> • <u>Reserved matters applications where the ecology reports of the outline consent are out of date.</u>
Devon Wildlife Trust	Non-material amendment	• Wildlife Trigger Table should be required for this application type.	This type of application confirms whether a proposed alteration to a previous permission is deemed as non-material and does not change the impact of the approved development on matters previously assessed. If there is the potential for the proposal to impact on ecology than the application will not be permitted and a different type of application, where the impact can be assessed, will be required.
Devon Wildlife Trust	Works to trees in a Conservation Area/ Tree Preservation Order and Hedgerow Removal Notice	• Wildlife Trigger Table should be required for this application type.	Paragraph 45 of the NPPF requires local validation requirements are kept to a minimum and be relevant, necessary and material to the application in question. The DNPA Tree Officer will consider the amenity of the tree, including its general habitat value, as part of the application or notice. Where protected species are present this will be covered through other relevant legislation and guidance.

Devon Wildlife Trust	Biodiversity Net Gain	For off-site gains the name of the habitat bank to be used must be provided with evidence that units are available. Where the developer is providing the net gain on other land they own a draft Habitat Management and Monitoring Plan and BNG plan must be submitted.	Paragraph 45 of the NPPF requires that local validation requirements should be kept to a minimum and be relevant, necessary and material to the application in question. A legal agreement may be required for some sites delivering BNG off-site and therefore, information should be submitted at the outset to clarify whether BNG is proposed on-site or off-site. Where on-site delivery is proposed there should be sufficient level of confidence that this can be delivered. Details on habitat banks however are not essential at the planning application stage. The following wording has been added to the BNG section: <u><i>In addition to the national requirements, applications must specify whether BNG will be delivered on-site or off-site. Schemes proposing to deliver BNG on site must submit a completed metric calculation showing the post-development biodiversity value of the on-site habitat and a site plan showing indicative habitat detail to demonstrate that delivery of BNG on-site is achievable.</i></u>
Devon Wildlife Trust	Dartmoor Wildlife Trigger Table and Ecology or Geology Surveys and	Strongly urge DNPA to state that surveys should be undertaken by members of CIEEM.	DNPA agree that all ecology reports must be to a high standard but do not agree that only those who are CIEEM registered are able to do this. Wording has been added to the relevant sections to read:

	Dartmoor Householder/ Building Checklist		<i>All ecology reports submitted to DNPA must be authored by qualified ecologists. Where the author is not a member of a recognised professional body (such as CIEEM or IEMA), they may be required to provide evidence of their qualifications, relevant experience, and any necessary licences to demonstrate that the report meets the required standards. DNPA reserves the right to reject reports where such evidence is not provided or is deemed insufficient.</i>
National Highways	General comment	• No specific comments to make. • All planning submissions must comply with the requirements of DfT Circular 01/2022 “Strategic road network and the delivery of sustainable development” including Transport Statement or Transport Assessment alongside a Travel Plan and Construction Traffic Plan, as applicable. • Impacts on National Highways assets including, but not limited to, drainage, geotechnical, structures, soft estate, technology and lighting must also be considered. • National Highways should be consulted on applications within close proximity of our network/estate and associated assets irrespective of the forecast traffic impact of the proposals.	Noted.
DNPA Officers			

Topic	Summary of comments	DNPA Response
Plans and Drawing	Some plans have 'do not scale' on them. Can criteria be added to specify that plans cannot be marked 'do not scale'.	Noted, this undermines the requirement for plans to be drawn to scale. Additional wording added to second bullet: <i>be drawn to a recognised metric scale and the scale indicated on the drawing <u>(plans marked 'do not scale' will not be validated).</u></i>
SCAIL	proposals funded through the Slurry Infrastructure Grant do not require SCAIL.	Noted, to avoid requesting unnecessary documents wording has been added to include this exception: When required: <i>agricultural development where the SSSI risk zones identify potential air polluting impacts from agricultural development <u>with the exception of proposals which have been selected for Slurry Infrastructure Grant</u></i>
Flood Risk Assessment	Updated mapping and FRA template from Environment Agency needs to be reflected	Noted, the wording has been amended to align with EA wording: <i>Flood Zone 1 and the flood map for planning shows it is at increased risk of flooding from rivers or sea during its lifetime <u>in the future</u></i> Further Information: <u>The Environment Agency has prepared an FRA template and associated guidance which can be accessed from the Planning Portal.</u>

		Exceptions to the sequential test have also been added for clarity and to align with footnote 62 of the NPPF.
General	The document does not make any reference to fees.	The phrase 'Planning Fee' will be added under 'What is required' for every application type subject to a fee. This can incorporate a hyperlink to the fee page on the planning portal where further information is provided.