

## Appendix B: Table of Consultation Responses and Officer Comments

Person/Organisation	Date	Response	Officer Comments
Rob Hilton, Hilton Barnfield Architects	21.06.21	It looks good and is good to see it being updated. One fairly minor thing I noticed is there is no mention of scale bars on the drawing requirements though this is often requested. Also we are sometimes asked to provide copyright details for site location plans but again no reference is made to this.	This is referred to in section 4.2.
Simon Spencer MCIAT	21.06.21	All received and noted.	-
Sport England	22.06.21	Attached Sport England's Validation Checklist Requirements for planning applications affecting playing field land and provided a link to information on its website.	The website link has been added to section 4.23.
Jon Burgess, Local Partnership Adviser, Forestry Commission	24.06.21	Re 4.30 Tree Survey, would it be possible to include a note in this paragraph to draw attention to the need to obtain a Felling License from the Forestry Commission if the tree is not specifically mentioned within the Planning Permission. Paragraph 2.7 of <a href="#">Felling - Getting Permission</a> may be helpful to clarify. It would also be a very positive step to highlight the extra care that should be given to Veteran Trees. They are specifically identified in the NPPF as 'irreplaceable'. These trees will not necessarily be dedicated under a Tree Preservation Order and it is only 'best practise' that helps to keep them in good condition. Some of this best practise is identified here: <a href="https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences">https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences</a>	A note and the website links have been added to section 4.32.

<p>Sally Parish, Planning Manager (Highways Development management), Operations, Highways England</p>	<p>24.06.21</p>	<p><u>3.0. Definition of 'Major Development'</u></p> <p>We would remind the Local Planning Authority of the requirement to consult Highways England on all major applications, and/or those with the potential to impact on the safe and efficient operation of the strategic road network and its assets, as set out in the Town and Country Planning (Development Management Procedure) Order 2015. In addition to the transport impact of any proposals, Highways England will need to consider the impact on our assets including (but is not limited to), drainage, soft estate, technology, geotechnical and structures.</p> <p><u>4.29. Transport Statement/Assessment and Framework Travel Plan</u></p> <p>The draft documents states that scope of the Transport Statement/Assessment should be agreed with the Local Highway Authority, Devon County Council prior to submission. We strongly encourage applicants to engage in pre-application discussions with Highways England to establish the scope of any statement/assessment necessary to determine the impact of development on the safe operation of the strategic road network. We are happy to review draft documents ahead of the submission of any formal application.</p> <p>In respect of the submission of transport statements and assessments for the purposes of validating a planning application, we would like to remind the</p>	<p>The requirement to agree the scope of the Transport Statement/Assessment where applicable with Highways England (now National Highways) has been added to section 4.31.</p> <p>Other comments are noted.</p>
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		Local Planning Authority of the need to ensure that appropriate assessment of the impact of development on the strategic road network has been provided by applications with the potential to impact on our network, <u>prior to</u> the validation of the application. We are happy to provide advice to the Authority on the requirement for, or acceptability of, any transport statement/assessment, at pre-application or validation stage.	
Andrew Rowe, AR Land & Planning	28.06.21	<p>The list doesn't include a 'Affordable Housing Statement'.</p> <p>I would normally expect that to be included with all 'major' applications.</p> <p>So, unless it is assumed that it will be covered in the planning statement, I think this needs to be added.</p> <p>I know that other LPAs include this in their Local List, as makes sure that it is covered as part of the submission.</p>	It is intended this will be included in the Planning Statement – section 4.24 has been amended to make this clearer.
Chris Davey, Deputy Airfield Operations Duty Manager, Exeter International Airport	29.06.21	Thank you for sending that draft local list, and having reviewed it there is nothing Exeter Airport would comment on.	-
Mike Walton, Exeter Cycling Campaign	05.07.21	<p><b>Design and Access Statement and Transport Statement/assessment statement</b></p> <p>Our expectation is that any application will have due regard for and demonstrate how they meet the design principles laid out in the Wheels for Wellbeing '<a href="#">A guide to inclusive cycling</a>'</p>	<p>The website links have been added to sections 4.9 and 4.31 respectively.</p> <p>The Local List does not set new policy or detailed guidance on existing policies; the Council's</p>

		<p><b>Transport Statement/assessment statement</b>  We would expect that any applicant will be asked to demonstrate adherence to the extant design standards for cycle infrastructure (currently <a href="#">Local Transport Note 1/20</a>)</p> <p>We would suggest that additional cycle parking standards are included too. Our suggestion would be the soon-to-be government endorsed '<a href="#">Standards for public cycle parking</a>'</p> <p>There are particular paragraphs in the current NPPF which we would want applicants to explicitly demonstrate how they are being met. In particular, paragraph 91,102, 103, 104 &amp; 110.</p>	<p>current cycle parking standards are set out in the Sustainable Transport Supplementary Planning Document (2013).</p>
<p>Harriet Fuller,  Planning Adviser,  Sustainable Places,  Environment Agency</p>	<p>05.07.21</p>	<p><b>4.2 Plans required</b>  We would advise that the guidance also indicates that, for proposals in flood zones 2 and 3, plans should display levels to metres Above Ordinance Datum (mAOD). This is especially important and indeed useful for establishing flood levels and appropriate floor levels.</p> <p><b>4.6 Construction Management Report</b>  We recognise that a construction management report may aim cover matters relating to environmental health and disturbance. However, in line with our frequent recommendations for Construction Environment Management Plans (CEMPs), we would suggest that information relating to management of runoff to prevent the pollution of watercourses is also a requirement of a</p>	<p>Section 4.2 has been amended accordingly.</p> <p>Construction Management Reports are referenced because they are a statutory requirement for some prior approval applications. The Council secures Construction Method Statements, Construction Environment Management Plans (CEMPs) and information relating to management of runoff to prevent the</p>

		<p>Construction Method Plan. Alternatively, you may consider including a separate section relating to CEMPs (see below for further advice).</p> <p><b>4.7 Contaminated Land Risk Assessment</b>  We note the council's intention to not burden small developers to produce an assessment in certain circumstances, notably where there is a current approval of where a contaminated land report has already been submitted as part of a previous application. Whilst we do not disagree with this approach, we recommend that the report, whether old or recently written, should still be submitted as part of the live application for review. In some cases, the results of such an assessment or report informs the requirement of planning conditions and further work.</p> <p><b>4.10 Ecology Report</b>  We are pleased to see that details relating to net gain and monitoring are requested to be included in an Ecology Report. We also support the indication of when a report is required on page 12.</p> <p><b>4.14 Flood Risk Assessment</b>  In conjunction with the guidance relating to the Sequential Test, we recommend that the Exception Test is also highlighted to encompass the national planning policy requirement for proposals to be safe for their lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, reducing flood risk overall.</p>	<p>pollution of watercourses during construction via planning conditions on appropriate applications. They are not considered a validation requirement.</p> <p>Section 4.7 has been amended accordingly.</p> <p>Noted.</p> <p>It is not considered necessary to refer to the Exception Test in section 4.14 (now 4.16) – the detailed guidance in this respect can be found by clicking on the website links provided.</p>
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	<p>This sets out the requirement for flood mitigation measures, and the consideration of the most recent climate change allowance requirements.</p> <p>In addition, we advise that the FRA should not only “identify and assess the risks of all forms of flooding to and from the development”, but also establish the appropriate design flood level (i.e. the 1 in 100, 1 in 200 or 1 in 1000 year event plus climate change) in order to “demonstrate how these flood risks will be managed, taking into account the climate change allowances” (i.e. Finished floor levels or other flood resilience or resistance measures).</p> <p>Under the section of Flood Risk Assessment, we would also advise that guidance is provided relating to Main Rivers and the requirement for and EA permit (Flood Risk Activity Permit) for proposals within 8metres of the river bank. There is often a requirement for easement of a certain distance due to the requirement for maintenance and access. Further advice is here:  <a href="https://www.gov.uk/guidance/flood-risk-activities-environmental-permits">https://www.gov.uk/guidance/flood-risk-activities-environmental-permits</a> .</p> <p>We also advise that it may be better to include the Devon, Cornwall and Isles of Scilly Local Enquiries team’s email on page 47 in order to reduce delay. The recommended email address to use is:  <a href="mailto:DCISEnquiries@environment-agency.gov.uk">DCISEnquiries@environment-agency.gov.uk</a> .</p> <p><b>3.13 Prior Approval</b>  Under the various Prior Approval applications on page 21, we would advise that a flood risk</p>	<p>The website link to the GOV.UK page on environmental permits has been added.</p> <p>The email address has been amended accordingly.</p> <p>Flood risk is not a prior approval issue for the agricultural classes of</p>
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	<p>assessment is required for development within Flood zones 2 and 3.</p> <p><b>Fish</b> Section 4.11 focusses on Bats and Birds in relation to the ecology report. We suggest that your authority considers whether additional requirements relating to fish habitat and migration should be a requirement of ecology reports where appropriate.</p> <p><b>Foul Drainage</b> Whilst we recognise that it may be fairly unusual to receive proposals involving non-mains connection for foul drainage within Exeter city, it may be prudent to include advice regarding non-mains drainage. A Foul Drainage Assessment (FDA) should be submitted with all development involving a non-mains foul drainage system to justify the use, and consider whether it is appropriate in that location. The FDA form is available online at <a href="https://www.gov.uk/government/publications/foul-drainage-assessment-form-fda1">https://www.gov.uk/government/publications/foul-drainage-assessment-form-fda1</a> .</p> <p><b>Construction Environment Management Plan (CEMP)</b> We note that CEMPs are not a statutory requirement, however it would be beneficial to the environment if you could recommend that one is submitted with certain size developments. A CEMP aims to pull together and manage the pollution control and waste management requirements during the construction phase, considering: soil/sediment</p>	<p>development on page 21 (now page 24).</p> <p>This issue can be addressed in Ecology Reports (section 4.11).</p> <p>There is no statutory, policy/guidance ‘driver’ for making this a validation requirement. It can be requested as extra information where necessary – see section 2.3.</p> <p>This is not considered to be a validation requirement, however they are regularly secured by condition (see above). Some of these issues will be covered in the Waste Audit Statement.</p>
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		runoff, watercourse pollution prevention measures, waste management, vehicle washing and cleaning, plant management and any necessary permitting requirements. (Note, this is not an exhaustive list).	
Kris Calderhead, Designing Out Crime Officer, Exeter Police Station	08.07.21	Is it appropriate to include something on Designing out Crime within the Validation List? I think some areas ask for a statement in relation to designing out crime for certain planning applications and some don't include anything as presumably it is referenced elsewhere. I'd be grateful for and be led by your thoughts.	A Designing Out Crime Statement has been added to the list of local requirements – see sections 3.2 and 4.10.
	19.07.21	<p>I've put together the below as a simple outline for something that could be included in the Validation List if you see fit.</p> <p>Designing out Crime Statement</p> <p>Where or when this item is required:</p> <ul style="list-style-type: none"> <li>• All Major developments</li> <li>• Educational Buildings</li> <li>• New neighbourhood community facilities</li> <li>• Premises where the intended occupants are particularly vulnerable and require higher standards of security to ensure their personal safety, i.e. care homes, drug rehabilitation centres etc.</li> <li>• ATM/ cash machines</li> </ul> <p>Guidance</p>	

		<p>The statement should detail how Crime Prevention Through Environmental Design principles are to be incorporated into the development. This includes:</p> <ul style="list-style-type: none"> <li>• Access and Movement - places with quality connections and well-defined routes, that provide convenient movement without compromising security</li> <li>• Structure – encouraging ‘active frontages’ and limiting access to private space</li> <li>• Surveillance – encouraging overlooking of public spaces by those who will take action should a crime be committed</li> <li>• Ownership – clearly defining where public space ends and private space begins and encouraging people to take ownership of their environment</li> <li>• Physical Protection – ensuring buildings include appropriate physical measures to prevent crime</li> <li>• Activity – ensuring the level of human activity is appropriate to the location to reduce the risk of crime and increase perceptions of public safety</li> <li>• Management and Maintenance – discouraging disorder by creating places that are well looked after with minimum cost implications.</li> </ul>	
<p>Carly Ireland MSc. MCIEEM, Devon Wildlife Trust</p>	<p>13.07.21</p>	<p><b>P12 Ecology Report – Bats and Birds</b> Redevelopment of existing buildings that involves works to roofs, roof spaces, external cladding* or cellars Please add in *, cracks/crevices within walls</p>	<p>Section 3.2 amended accordingly.</p>

	<p><b>3.15 Prior Approval: Demolition of Building</b> In 'When required' section, please include standard text relating to biodiversity (as in 3.14)</p> <p><b>4.10 Ecology Report</b> We would recommend that you stipulate the ecologist carrying out the work is a member of CIEEM and that work is carried out according with CIEEM best practice guidelines and within CIEEM Codes of Conduct. This will provide a level of assurance that the work is being undertaken to an appropriate standard.</p> <p>Extended phase 1 habitat survey should be replaced with Preliminary Ecological Appraisal.</p> <p><i>Suite of measures * to avoid/mitigate/compensate impacts</i> Please insert *following the mitigation hierarchy</p> <p><i>Details of biodiversity enhancements/net gain that will be provided *</i> Please insert *using the latest national Biodiversity metric to ensure a minimum net gain of 10%. For sites that have a higher biodiversity value (either on the site itself or the setting of the site) then we would like to see a 20% net gain.</p> <p><i>Protected species surveys may need to be undertaken over an extended period *</i> Please add in *prior to submission of any application.</p>	<p>Not relevant to section 3.15 (now 3.17) – no change.</p> <p>Section 4.10 (now 4.11) amended accordingly.</p> <p>Section 4.10 (now 4.11) amended accordingly.</p> <p>Section 4.10 (now 4.11) amended accordingly.</p> <p>Section 4.10 (now 4.11) amended accordingly. NB. There is no statutory or policy 'driver' to require 20% net gain at the current time, therefore this has been omitted.</p> <p>Section 4.10 (now 4.11) amended accordingly.</p>
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		<p><i>All reports must be up-to-date *</i> Please insert *(see CIEEM guidelines on the Lifespan of Ecological Reports and Surveys)</p> <p>ECC should require all applications to demonstrate with suitable evidence how they will provide robust ecological corridors within the site and complementing/extending ecological networks external to the site. These corridors should utilise only native species and should align to the Nature Recovery Network.</p> <p><b>4.11 Ecology Report – Bats and Birds</b> Bat and bird reports are required for the applications listed, unless:</p> <ul style="list-style-type: none"> <li>• <i>The entire roof space has already been converted to living space</i></li> </ul> <p>Please remove this bullet point. A building which does not include a loft space may still provide bat roosting opportunities. Carrying out re-roofing works on such a building could result in an offence to both the developer and potentially the local authority if bats were found to be utilising roosting spaces beneath slates/tiles or within cracks/gaps within the building.</p> <ul style="list-style-type: none"> <li>• <i>Works are to a flat roof or a single layer sheet metal roof</i></li> </ul>	<p>Section 4.10 (now 4.11) amended accordingly.</p> <p>Noted.</p> <p>Section 4.11 (now 4.12) amended accordingly.</p>
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		<p>Please remove this bullet point. A building such as this which for example comprises cob walls provides significant potential bat roosting habitat. Carrying out works on such a building could result in an offence to both the developer and potentially the local authority if bats were found to be utilising roosting spaces within cracks/gaps within the building.</p> <p><b>4.15 Green Infrastructure Statement</b> We would advise the inclusion of a statement requiring the use of native species within all new/enhanced green infrastructure. ECC should require all applications to demonstrate with robust evidence how they contribute to the Nature Recovery Network/Local Nature Recovery Strategies (LNRS). Green infrastructure is a key part of this.</p> <p><b>4.19 Lighting Assessment</b> We feel there should be a presumption <u>against</u> the introduction of exterior lighting (for biodiversity and climate grounds) unless a clear need can be demonstrated.</p> <p>Details of permanent physical barriers should be included as a more robust, enforceable and effective barrier to lighting, e.g. using walls, hedges and shrubs/trees to create dark areas/corridors - rather than relying mainly on lighting strategies which are difficult to enforce post development and are of limited effectiveness.</p>	<p>Section 4.15 (now 4.17) amended accordingly. Devon Local Nature Partnership website link added.</p> <p>Noted.</p> <p>Noted – this can be secured through detailed landscaping schemes and Landscape and Ecological Management Plans (LEMPs) to be conditioned.</p>
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		<p><b>4.30 Tree Survey and Arboricultural Impact Assessment</b>  <i>For larger applications it will also be appropriate to provide details of the landscape strategy for the site, including indications of new *planting. Please add *native</i></p>	<p>Section 4.30 (now 4.32) amended accordingly.</p>
<p>Emma Reid, Planner, Walsingham Planning</p>	<p>28.07.21</p>	<p>It would also be helpful if the introduction to the Draft Document contained a validation checklist in the form of a matrix... This would provide an easily digestible summary and a reference point for the more detailed information provided later in the document.</p> <p>One of the main difficulties we face when identifying validation requirements, is differentiating the requirements for outline and reserved matters applications, it is therefore appreciated that the new local list differentiates between the two. We do however have concerns about your approach in grouping outline and full applications together when the level of information necessary can often be very different. However, if the goal is to simplify the Reserved Matters process and not request documents which have already been provided in detail at the outline stage, we support this general approach. In our experience it can be difficult to provide some information in any meaningful way at the outline stage. Particularly in the instance of major residential applications when detailed design matters such as layout have not yet been confirmed.</p>	<p>The information requirements in section 3.0 are already tabulated for ease of use. It's considered that a matrix covering all requirements would be too large and unwieldy for practical use.</p> <p>Section 3.2 states when a local requirement would not be required for outline applications.</p>

		<p>With regards to Part 4 of the Draft Document we have the following comments in relation to specific items:</p> <ul style="list-style-type: none"> <li>• Green Infrastructure Statement: The guidance at 4.15 states that a masterplan is required to identify and define green infrastructure provision within the proposed development and how these proposed GI assets connect to the wider GI network. It is our opinion that this can be dealt with through the provision of Design and Access Statements and illustrative masterplan drawings which are national requirements.</li> <li>• Sustainability/Net Zero Carbon Statement: We understand the need for the provision of such a document in light of the climate emergency and Exeter City Council's carbon neutrality goals, however, from our experience this level of detail can be arbitrary at the outline stage. It is our opinion that this should be required at either the Reserved Matters stage or via an appropriately worded condition.</li> <li>• Viability Assessment: Whilst initial viability work can be carried out at the outline stage there are often factors which can only be assessed once the detailed design of a scheme is completed. Factors that were not originally identified can arise later in the development process and may need to be factored in at the Reserved Matters stage.</li> </ul>	<p>A Green Infrastructure Masterplan is a separate requirement to ensure that this issue is given due and proper consideration in the formation of the proposals, including any illustrative masterplan drawings or parameters plans for outline applications.</p> <p>This is a requirement for all applications for major development, including outline applications to ensure that this issue is given due and proper consideration in the formation of the proposals. A further, more refined statement could be secured via planning condition for subsequent reserved matters.</p> <p>This is required to assess the level of affordable housing when planning permission is granted. S106 legal agreements could, in theory, include a review mechanism where this is agreed by all parties.</p>
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		<ul style="list-style-type: none"> <li>Waste Audit Statement: The provision of Waste Audit Statement at the outline stage in our opinion can be arbitrary and superficial in nature. This is because it is difficult for developers to estimate the type and volume of waste generated so early in the development process. This is an issue which we have experienced during the application process with other council's under the Devon Waste Plan, where we have provided a Waste Audit Statement but a condition has ultimately been required once the correct level of detail is available. It is our view that provision of such detail should be reserved and provided in accordance with a prior to commencement of development condition for a Construction Management Plan.</li> </ul> <p>In addition, as the National Planning Policy Framework has been updated during this consultation period, any references to the document in the Local Validation Checklist should be updated to reflect the latest Framework.</p>	<p>This is a policy requirement of the Devon Waste Plan.</p> <p>The references to the National Planning Policy Framework (NPPF) have been updated accordingly.</p>
Mike Deaton, Chief Planner, Devon County Council	28.07.21	<p><b>General</b></p> <p>The NPPF was revised on the 20th July 2021, across the document references and potential contents relating to the NPPF need to be updated.</p> <p>For various requirements included in the tables, there is further details later in the document. For ease of use, and clarity, it would be useful within the</p>	<p>The references to the NPPF have been updated accordingly.</p> <p>This is addressed in section 3.0 and not considered necessary.</p>

		<p>table to signpost when and where there is further information included later in the document.</p> <p>Public Health colleagues welcome the inclusion of requirements regarding:</p> <ul style="list-style-type: none"> <li>- 4.3 - Air Quality Assessment</li> <li>- 4.8 - Daylight and Sunlight Report</li> <li>- 4.21- Open space/Recreation Assessment</li> <li>- 4.31 - Ventilation and Extraction Equipment Details (noting that there may be further provisions as a result of the COVID-19 Pandemic around ventilation requirements, though this will most likely fall under Environmental Health and Health and Safety Executive)</li> </ul> <p>Would like to highlight that NPPF requires planning to achieve healthy, inclusive, and safe places, and provide social, recreational, and culture facilities and services the communities need. Particular reference is drawn to the aims of enabling and supporting healthy lifestyles, and taking into account the support and delivery of local strategies to improve health. This should allow consideration of wider utility within the community rather than mitigating through provision elsewhere; this is particularly pertinent with lower income areas who may be restricted in travel options and benefit from local and easily accessible amenities.</p> <p><b>Section 3.0 - Page 7</b> It is noted that the Consultation Draft Local List directs users to online 'wildlife assessment check'.</p>	<p>Noted.</p> <p>Noted. Whilst Health Impact Assessments are sometimes a validation requirement, there is no statutory or policy 'driver' to require this in Exeter at the current time. This can be reviewed through the new Exeter Plan being prepared.</p> <p>Noted. This can be tested and possibly incorporated through a future review of the Local List.</p>
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		<p>We would like to highlight we have a locally developed 'wildlife and geology trigger table' which we require alongside all planning applications to DCC. This ensures a consistent basis by which potential wildlife implications are always considered. We welcome districts to utilise the same table – which some have adopted as part of their validation requirements.</p> <p><a href="http://www.devon.gov.uk/environment/wildlife-geology-planning-guidance">Wildlife and geology planning guidance - Environment (devon.gov.uk)</a></p> <p><b>Section 3.2 – Page 14</b> Where refers to 'Transport Statement/Assessment and Framework Travel Plan'. Note that it references under 'When required?' Schemes with significant transport implications (see thresholds in Appendix B of Guidance on Transport Assessment (DfT, 2007). This is 15 years old and superseded, so suggest could be indicative thresholds – available to discuss this element of the validation list, using the DCC Highways Officer contacts contained in Section 4.29.</p> <p>Where refers to 'Waste Audit Statement'. The middle column of this table refers to Policy W4: Waste Prevention of the Devon Waste Plan. It should also refer to Para 8 of the National Planning Policy for Waste (NPPW). This should also be added to the local requirements table on page 30 of the document and para 4.33 of the document.</p>	<p>Whilst the Guide has been withdrawn, the thresholds in Appendix B are still considered to provide a good indication of when a Transport Statement or Assessment is required for certain developments. Revised thresholds can be agreed with Devon County Council highways officers and incorporated through a future review of the Local List.</p> <p>Sections 3.2 and 3.22 (now 3.25) have been amended accordingly. Website link to National Planning Policy for Waste added to section 4.33 (now 4.35).</p>
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		<p><b>Section 4.2 – Page 35</b> We welcome the requirement for PROW to be included on site layout plans to ensure they are appropriately identified and considered in the planning process.</p> <p><b>Section 4.18 – Page 50</b> Suggest that there is a requirement for LVIA's to be carried out by a suitably qualified landscape professional according to latest good practice guidance, i.e. the Landscape Institute/IEEMA's 2013 'Guidelines for Landscape and Visual Impact Assessment' (GLVIA3) and associated Technical Guidance Note -TGN 06/19 - on the <a href="#">Visualisation of development   Landscape Institute</a>. These should be mentioned.</p> <p>Tall buildings in Exeter have a significant and potentially adverse effect on the views and character not only of the cityscape but also the surrounding rural areas within its visual influence. Therefore the requirement for all tall buildings to have a LVIA is welcome. There are, in addition to the LI TGN06/19, other guidance documents available that specifically address assessment and visualisation of tall buildings in urban locations, namely the 'London View Management Framework' Supplementary Planning Guidance (2012). Exeter City Council may wish to consider requiring applications for tall buildings to be assessed in accordance with this.</p>	<p>Noted.</p> <p>Section 4.18 (now 4.20) has been amended accordingly.</p> <p>Noted.</p>
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		<p>In addition, where large scale development could potentially have a significant visual influence over neighbouring districts and rural areas, the LVIA should draw upon and take into account relevant local landscape character assessments that underpin landscape policies of Devon Minerals and Waste Plans as well as neighbouring Local and Neighbourhood Plans. Information about these is available on DCC's website here: <a href="#">Devon's landscape character assessment (DLCA) - Planning</a>. This is particularly important where development affects Teignbridge since they have removed their designation of Areas of Great Landscape Value in favour of strong landscape policies linked to the Devon-wide landscape character assessments. These landscapes should still be regarded as 'valued landscapes'.</p> <p>You may wish to also require a Landscape and Ecological Management Plan (which is a DCC planning application requirement). There is often strong overlap between landscape design and ecological mitigation and enhancement - in the form of habitat creation and ongoing management. DCC has published guidance on how we review LEMPs here: <a href="#">Landscape and Ecological Management Plans (LEMPs)- Version 1 - Planning (devon.gov.uk)</a>. You may wish to refer to/adapt this - subject to your landscape and ecology officers agreeing with its content. Currently, BS42020 guidance on LEMPs is heavily weighted for biodiversity when in fact,</p>	<p>Website link added.</p> <p>This is not considered to be a validation requirement for Exeter, however they are regularly secured by condition.</p>
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		<p>landscape management should be wider- and should be about fulfilling and sustaining the multiple objectives of the landscape/environmental mitigation and enhancement design - including biodiversity and amenity enhancement, landscape integration, reducing surface water runoff, filtering air pollution, providing noise attenuation etc. The scope of LEMPs can include management of SuDS features. A LEMP can therefore also help ensure that the multiple benefits of green infrastructure are sustained into the future.</p> <p>The above would ensure that the validation requirements are consistent with NPPF (2021) paragraphs 130, 174, and 195 in particular, EIA Regulations and also Policy W12 of the Devon Waste Plan and Policy M18 of the Devon Minerals plan. It may also be appropriate to mention these policy/statutory 'drivers' in Table 3.2 under LVIA.</p> <p><b>Section 4.22 – Page 53</b> Beside 'Any community benefits' suggest insert brackets to include (promoting healthy and safe communities), as worded in the NPPF</p> <p><b>Section 4.33 – Page 58</b> We welcome the inclusion of section 4.33 in the updated Local Validation List, specifically reference to Policy W4 of the adopted Devon Waste Plan and the inclusion of a link to the further guidance provided in the County Council's Waste Management and Infrastructure Supplementary</p>	<p>Section 4.22 (now 4.24) has been amended accordingly.</p> <p>Noted.</p>
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		<p>Planning Document. The requirement for major planning applications to be accompanied by a Waste Audit Statement has been poorly implemented since the adoption of the Devon Waste Plan and this amendment to the Local Validation List will assist in ensuring this policy requirement is met in Exeter going forward.</p>	
<p>Stephanie Parker-Stephenson, Lead Adviser (Sustainable Development) Devon, Cornwall and Isles of Scilly Area Team, Natural England</p>	<p>28.07.21</p>	<p><b>2.1 Pre-application advice</b>  Applicants may also wish to be aware that Natural England have a pre-application Discretionary Advice Service (DAS). Further information can be found at <a href="https://www.gov.uk/guidance/developers-get-environmental-advice-on-your-planning-proposals">https://www.gov.uk/guidance/developers-get-environmental-advice-on-your-planning-proposals</a>.</p> <p><b>4.3 Air Quality Assessment</b>  We welcome the inclusion of air quality assessments (on page 38) and advise that assessment should also consider the potential effects on ecological receptors. In particular, dust as well as nutrient inputs through ammonia and nitrogen deposition can affect sensitive species. We suggest that the <a href="#">Air Pollution Information Service (APIS)</a> is referenced. APIS provides specific air pollution advice based on habitats, ecosystems and species, and provides critical loads for acidity and nitrogen for designated features within every SAC, SPA or SSSI in the UK.</p> <p>Natural England has published a set of mapped Impact Risk Zones (IRZs) for Sites of Special Scientific Interest (SSSIs), which can be accessed via <a href="#">Defra's MAGIC mapping website</a>. This helpful</p>	<p>This information will be provided through the pre-application service and does not need to be in the Local List.</p> <p>Section 4.3 has been amended accordingly.</p> <p>Whilst this website is known to officers, it is not considered necessary to add this to the criteria for when an Air Quality Assessment</p>

		<p>GIS tool can be used to help consider whether a proposed development is likely to affect a SSSI and to inform where an Air Quality Assessment may be required for a SSSI.</p> <p>The review of the Exeter validation list offers an opportunity to highlight to applicants the availability of the <a href="#">Simple Calculation of Atmospheric Limits (SCAIL)</a> assessment which should be applied to certain types of agricultural developments and developments that include sources of combustion within certain distances of protected habitats.</p> <p><b>4.10 Ecology Reports</b></p> <p>This section sets out the expectations for the content of Ecology Reports, for ease of use it might be advisable to again provide the link to the Wildlife Assessment Checklist to enable developers to ascertain whether they do need to provide an Ecology Report.</p> <p>The report contents list appears to broadly summarise the process set out in the recognised <a href="#">CIEEM guidance</a>, it might be useful for the developer if a link to CIEEM was provided in the Further Information section. The contents list should make it clear that Phase 2 habitat surveys may also be required (if advised by the Ecologist), and that the developer will need to demonstrate that the mitigation hierarchy has been applied to the suite of measures.</p>	<p>is required to validate planning applications.</p> <p>Website link added.</p> <p>Website link added.</p> <p>Website link added. Reference to Phase 2 habitat survey added. Reference to the mitigation hierarchy already added following Devon Wildlife Trust's comments.</p>
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