

Name	Comment	Response
<p>Steve Eastland, <b>Planning Agent</b></p>	<p><b>Executive Summary</b></p> <p>While the checklist aims to streamline application handling, it risks introducing procedural inefficiencies and unnecessary burdens due to its inflexible, overly cautious framework.</p> <p>We recommend a series of constructive improvements to enhance proportionality, discretion, and digital access. These changes would directly benefit both applicants and the Local Authority.</p> <p><b>1. General Comment</b></p> <p>As regular users of the planning system, we find the current draft validation checklist overly prescriptive and lacking in proportionality.</p> <p>The checklist takes a blanket approach to the documentation required, with insufficient consideration of the scale, nature, and individual characteristics of proposed developments.</p> <p>This ‘one-size-fits-all’ methodology results in both over-submission of unnecessary documents for smaller or simpler applications, and occasionally under-provision for complex cases – neither of which improves the efficiency of the system or effectiveness of planning outcomes.</p> <p><b>2. Key Issues</b></p> <p><b>2.1 Lack of Proportionality</b></p> <p>The checklist does not adequately distinguish between minor and major proposals. This leads to unjustified documentation demands (e.g., drainage reports or biodiversity surveys for single-dwelling infill schemes).</p> <p><b>2.2 Excessive Caution Culture</b></p> <p>The document implies that when in doubt, more documentation is better. This encourages excessive submissions, increasing cost and complexity for applicants and planning officers alike.</p> <p><b>2.3 No Screening or Waiver Mechanism</b></p> <p>There is no means to agree to a reduced set of requirements prior to submission. This rigidity leads to disputes and delays.</p> <p><b>2.4 Disproportionate Invalidations</b></p> <p>Introducing a validation penalty (£50+VAT) for second invalidations risks punishing minor procedural errors and undermines trust.</p>	<p>Text will be added to the document to confirm that submissions should be proportionate to the complexity and issues being raised by applications, however a number of technical consultees will expect to review a professional quality submission demonstrating the applicant is fully aware of their responsibilities and obligations in proposing development.</p> <p>The registration service does not operate a “more documentation is better” culture but does need to ensure applications are capable of being understood and evaluated by any relevant party.</p> <p>The invalidity fee is only applied after a second failure to submit sufficient information. Ongoing engagement with applicants / agents who are not able to make an acceptable applicant is time consuming and costly for the authority. Equally, it should not be</p>

	<p><b>2.5 Over-Reliance on the Planning Portal</b> Validation delays via the Planning Portal are well-documented. The checklist does not promote alternative direct submission methods.</p> <p><b>3. Recommendations</b></p> <ul style="list-style-type: none"> <li>- Implement a tiered or proportional checklist framework to differentiate clearly between types of development.</li> <li>- Introduce a validation statement of proportionality for case officers to exercise discretion.</li> <li>- Offer a pre-validation screening service or advice note option.</li> <li>- Regularly review and publish validation trend data to ensure requirements remain fit for purpose.</li> <li>- Promote direct application submissions to the LPA with appropriate digital tools.</li> </ul> <p><b>4. Encouraging Direct Submissions – A Mutual Benefit</b> We encourage Mid Devon District Council to promote direct submission of planning applications via email or the council's own portal, rather than through the Planning Portal. This would:</p> <ul style="list-style-type: none"> <li>- Reduce cost and delay for applicants;</li> <li>- Improve validation speed and service quality;</li> <li>- Retain the application service fee within the Local Authority rather than paying it to a third-party platform.</li> </ul> <p>This would offer practical and measurable benefits to all parties.</p> <p><b>5. Summary</b> We urge the Council to revise the draft checklist to allow a more flexible, proportionate, and modernised validation process.</p> <p>Doing so will support applicants and officers alike in achieving timely and effective planning decisions, aligned with the spirit and guidance of the National Planning Policy Framework (December 2024). Steve Eastland Steve Eastland Design Ltd BA (Hons), Dip Arch, RIBA, ARB</p>	<p>beyond reason for a suitable submission to be made following the initial invalidity letter.</p> <p>In relation to the Planning Portal, the validation list does provide three options for submission, via the Portal, directly by e mail or hard copy to MDDC offices. Whereas some validation services will consider Portal submissions to be more time efficient, MDDC's aim to ensure all documents are accurately and informatively titles does mean the Portal route does not currently offer time savings to MDDC and need not be a priority focus for process management.</p>
Sally Parish, Spatial Planning, South West Operations <b>National Highways</b>	<p>Thank you for consulting National Highways on the draft Mid Devon Local Validation Checklist 2025.</p> <p>Whilst we have no specific comments to make on the draft Local Validation Checklist document, National Highways requires that planning application submissions comply with the requirements of DfT Circular 01/2022 "Strategic road network and the delivery of sustainable development" when assessing the impacts on the SRN. This includes the requirement to</p>	Amended wording added to Transport Assessment

	<p>provide a Transport Statement or Transport Assessment alongside a Travel Plan and Construction Traffic Plan, as applicable.</p> <p>In addition to traffic impact, applications are also required to assess the impact of proposals on National Highways assets including, but not limited to, drainage, geotechnical, structures, environmental, technology and lighting. National Highways should therefore be consulted on applications within close proximity of our network/estate and associated assets irrespective of the forecast traffic impact of the proposals.</p> <p>Kind regards,</p> <p>Sally</p> <p><b>Sally Parish, Spatial Planning, South West Operations</b> National Highways   Ash House   Falcon Road   Sowton Ind. Estate   Exeter   EX2 7LB</p>	
<p>Rick Napier Designing Out Crime Officer (NDC, TDC, MDDC) <b>Devon &amp; Cornwall Police</b></p>	<p>Thank you for inviting consultation regarding the above.</p> <p>My role as the Police Designing Out Crime Officer (DOCO) is to provide appropriate and relevant advice and recommendations to the Planning Authority, Developers and Architects with regard to designing out opportunities for crime, the fear of crime, anti- social behaviour (ASB) and conflict within the built environment, an effective method in improving the safety, security and wellbeing of those who will live, work and visit those environments.</p> <p>All relevant planning applications should demonstrate, generally in the Design and Access or Planning Statements, the following principles of Crime Prevention through Environmental Design (CPtED) and how they have been considered and incorporated into the design and layout of all new developments. This provides reassurance and will ensure a consistent level of security throughout and opportunities for crime, the fear of crime, ASB and conflict are minimised: -</p> <ul style="list-style-type: none"> <li>• Access and movement - Places with well-defined and well used routes with spaces and entrances that provide for convenient movement without compromising security.</li> <li>• Structure - Places that are structured so that different uses do not cause conflict.</li> <li>• Surveillance - Places where all publicly accessible spaces are overlooked.</li> <li>• Ownership - Places that promote a sense of ownership, respect, territorial responsibility and community.</li> <li>• Physical protection - Places that include necessary, well-designed security features.</li> <li>• Activity - Places where the level of human activity is appropriate to the location and always creates a reduced risk of crime and a sense of safety.</li> <li>• Management and maintenance - Places that are designed with management and maintenance in mind, to discourage crime.</li> </ul>	<p>Additional detail added to Planning Statement</p>

	<p>Therefore, I respectfully request <b>Consideration of designing out crime</b> remains as a requirement within the validation checklist "Planning Statement" as a minimum.</p> <p>Kind regards</p> <p><b>Rick Napier</b>  <b>Designing Out Crime Officer (NDC, TDC, MDDC)</b>  Devon &amp; Cornwall Police, Unit B, Oakwood Close, EX31 3NJ</p>	
<p>Grace Lewis,  Town Planner  <b>Network Rail</b></p>	<p>Network Rail is a statutory undertaker responsible for maintaining and operating the country's railway infrastructure and associated estate. Network Rail owns, operates, maintains and develops the main rail network. This includes the railway tracks, stations, signalling systems, bridges, tunnels, level crossings and viaducts. The preparation of development plan policy is important in relation to the protection and enhancement of Network Rail's infrastructure.</p> <p>As Network Rail is a publicly funded organisation with a regulated remit it would not be reasonable to require Network Rail to fund rail improvements necessitated by commercial development. It is therefore appropriate to require developer contributions to fund such improvements.</p> <p>The LPA should take into consideration the following comments for the submission of transport assessments for development near the railway or development that affects level crossings.</p> <p><b><u>Full Planning Application for Major Development and Outline Planning Application for Major Development:</u></b></p> <p><b>Transport Assessments and Level Crossings</b>  Network Rail needs to monitor and assess new development that may have an impact on rail services and/or safety of existing infrastructure. In order to carry out this function it is vital that sufficient information is submitted with a planning application. The submission of a Transport Assessment for outline applications and full planning permission is included in the Validation Guide, however the TA should reflect the scale of the development and the extent of the transport implications of the proposal, including rail.</p> <p><b>We recommend that any development of land which would result in a material increase or significant change of the traffic using existing rail infrastructure (particularly level crossings) and/or require rail improvements should also be added to this list of development when a TA is required.</b></p> <p>Network Rail has a strong policy to guide and improve its management of level crossings, which aims to; reduce risk at level crossings, reduce the number and types of level crossings, ensure</p>	<p>Comment added to the Transport Assessment. Network Rail added to glossary</p>

	<p>level crossings are fit for purpose, ensure Network Rail works with users / stakeholders and supports enforcement initiatives. Without significant consultation with Network Rail and if proved as required, approved mitigation measures, Network Rail would be extremely concerned if any future development impacts on the safety and operation of any of the level crossings within Teignbridge. The safety of the operational railway and of those crossing it is of the highest importance to Network Rail.</p> <p>Level crossings can be impacted in a variety of ways by planning proposals:</p> <ul style="list-style-type: none"> <li>• By a proposal being directly next to a level crossing</li> <li>• By the cumulative effect of development added over time</li> <li>• By the type of crossing involved</li> <li>• By the construction of large developments (commercial and residential) where road access to and from site includes a level crossing</li> <li>• By developments that might impede pedestrians ability to hear approaching trains</li> <li>• By proposals that may interfere with pedestrian and vehicle users' ability to see level crossing warning signs</li> <li>• By any developments for schools, colleges or nurseries where minors in numbers may be using a level crossing</li> <li>• By any development or enhancement of the public rights of way</li> </ul> <p>It is Network Rail's and indeed the Office of Rail Regulation's (ORR) policy to reduce risk at level crossings not to increase risk as could be the case with an increase in usage. The Office of Rail Regulators, in their policy, hold Network Rail accountable under the Management of Health and Safety at Work Regulations 1999, and that risk control should, where practicable, be achieved through the elimination of level crossings in favour of bridges or diversions.</p> <p>The Council have a statutory responsibility under planning legislation to consult the statutory rail undertaker where a proposal for development is likely to result in a material increase in the rail volume or a material change in the character of traffic using a level crossing over a railway:-</p> <ul style="list-style-type: none"> <li>• (Schedule 4 (j) of the Town &amp; Country Planning (Development Management Procedure) Order, 2015) requires that "<i>...development which is likely to result in a material increase in the volume or a material change in the character of traffic using a level crossing over a railway</i>" (public footpath, public or private road) the Planning Authority's Highway Engineer must submit details to both the Secretary of State for Transport and Network Rail for separate approval.</li> </ul> <p>The developer is required to fund any required qualitative improvements to the level crossing as a direct result of the development proposed.</p> <p>We would therefore appreciate the Council providing Network Rail with an opportunity to comments on any future pre-application or planning applications should they be submitted for</p>	
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	<p>sites adjoining the railway or within close proximity to the railway as we may have more specific comments to make (further to those above).</p> <p><b><u>What information is required:</u></b></p> <p>Under this heading Transport assessments are required when development is likely to result in a material increase or change in traffic. This does not specifically mention the railway however Network Rail would require a TA for any development likely to result in a material increase or change in traffic over a level crossing. This refers to both vehicular, and pedestrian footpath level crossings.</p> <p><b><u>Glossary:</u></b></p> <p>It would be useful to mention Network Rail within the Glossary so the LPA, Developers, agents etc are aware of our statutory status and the need to consult us on development within 10m of the railway or where a level crossing may be impacted.</p> <p>We trust these comments will be considered in your preparation of the forthcoming validation documents.</p> <p>Yours Sincerely,</p> <p><b>Grace Lewis MRTPI</b>  Town Planner  Network Rail  Temple Point, Redcliffe Way, Bristol, BS1 6NL</p>	
Stephen Reed Senior Historic Environment Officer Historic <b>Environment  Team  Climate  Change,  Environment  and  Transportation</b>	<p>Thank you for the opportunity to consult on the Mid Devon Validation Checklist. The Historic Environment Team only has a couple of comments on the “Additional Information and Glossary” section of the draft validation checklist as set out below:</p> <ul style="list-style-type: none"> <li>• Additional Information and Glossary, page 85 Listed Buildings: Listed buildings can also be searched for using a map facility on the Historic England website, maybe include “A map search facility is also available at <a href="https://historicengland.org.uk/listing/the-list/map-search/">https://historicengland.org.uk/listing/the-list/map-search/</a>.” In this paragraph.</li> <li>• Additional Information and Glossary, page 86 Scheduled Ancient Monument - the location and extent of any Scheduled Monument should be checked using The National Heritage List for England (not the Magic website). The location of Scheduled Monuments, listed buildings, registered parks and gardens, registered battlefields and</li> </ul>	Changes made

<p><b>Directorate Devon County Council</b></p>	<p>protected wreck sites can be searched for using the National Heritage List for England at <a href="#">Search the List – Find listed buildings, monuments, battlefields and more   Historic England</a></p> <ul style="list-style-type: none"> <li>○ I would suggest rewording this section to: <ul style="list-style-type: none"> <li>▪ “<b>Scheduled Ancient Monument</b> - A 'nationally important' archaeological site or historic building, given protection against unauthorised change – designated under the Ancient Monuments and Archaeological Areas Act 1979. The location of Scheduled (Ancient) Monuments can be checked at <a href="https://historicengland.org.uk/listing/the-list/">https://historicengland.org.uk/listing/the-list/</a> using a keyword, postcode or list entry number. A map search facility is also available at <a href="https://historicengland.org.uk/listing/the-list/map-search/">https://historicengland.org.uk/listing/the-list/map-search/</a>.</li> </ul> </li> </ul> <p>Please do get back to me if you need any additional information or clarification.</p> <p>All the best,</p> <p>Steve</p>	
<p>Natural England</p>	<p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p><b>Natural England has no significant comments to make on the Mid Devon Local Plan – Local Validation Checklist.</b></p> <p>The lack of comment from Natural England should not be interpreted as a statement that there are no impacts on the natural environment. Other bodies and individuals may wish to make comments that might help the Local Planning Authority (LPA) to fully take account of any environmental risks and opportunities relating to this document.</p> <p>If you disagree with our assessment of this proposal as low risk, or should the proposal be amended in a way which significantly affects its impact on the natural environment, then in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, please consult Natural England again.</p>	<p>Noted</p>
<p>Susan McGeever Clerk to Sampford Peverell Parish Council</p>	<p>The Local Validation Checklist 2025 has been reviewed by Sampford Peverell Parish Council and it satisfied with the checks as detailed.</p> <p>However, the checking of applications against actual housing needs would be welcomed.</p>	<p>Housing Needs Assessments are likely to be commissioned separately by the Planning Authority and used to inform housing mix for affordable housing units</p>

		resulting from new development.
Susan McGeever Clerk to Clayhidon Parish Council	<p>Clayhidon Parish Council are content with the validation checks.</p> <p>It would be useful if housing needs were also taken into consideration.</p>	Housing Needs Assessments are likely to be commissioned separately by the Planning Authority and used to inform housing mix for affordable housing units resulting from new development.
Devon County Council, Planning Manager	<p>Devon County Council is broadly supportive of the details within the draft validation checklist. The County Council has some comments to make on validation requirements relating to highways and transport, flood risk management, historic environment, ecology, waste planning, mineral planning and climate change as detailed below.</p> <p><b>Highways and Transport</b> Paragraph 118 of the National Planning Policy Framework (NPPF) states that, "All developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a vision-led transport statement or transport assessment so that the likely impacts of the proposal can be assessed and monitored". Planning Practice Guidance (PPG) also states that, "Travel Plans, Transport Assessments and Statements are all ways of assessing and mitigating the negative transport impacts of development in order to promote sustainable development. They are required for all developments which generate significant amounts of movements".</p> <p>The County Council supports the requirements set out on page 80 of the consultation document for a transport statement/assessment and travel plan based on the NPPF and PPG guidance above. It is recommended that reference to major development should be removed as other applications may also be considered to generate significant amounts of movement. For applications that propose changes to the existing highway, a Stage 1 or Stage 2 road safety audit will be required in accordance with GG119 – Road safety audit and should be included in the validation checklist.</p> <p><b>Flood Risk Management</b> The County Council welcomes the Surface Water Drainage Strategy requirement. The District Council may benefit from including or linking to the detailed requirements</p> <p>Mid Devon District Council Phoenix House Phoenix Lane Tiverton EX16 6PP <b>VIA EMAIL ONLY TO</b> <a href="mailto:DMConsultations@middevon.gov.uk">DMConsultations@middevon.gov.uk</a> <b>Climate Change, Environment and Transport</b> County Hall Topsham Road Exeter EX2 4QD Tel: 0345 155 1015 Email: <a href="mailto:Planning@devon.gov.uk">Planning@devon.gov.uk</a> 7th August 2025</p>	Updates and amendments added to the relevant sections of the checklist



	<p>sets out within Sustainable Drainage System – Guidance for Devon (2023)<sup>1</sup>, for both Outline and Full planning applications in sections 9.1 and 9.2 respectively.</p> <p>The County Council would also like to make note that applications should consider how surface water will be managed during the construction stage.</p> <p>Historic Environment (sent direct to Mid Devon District Council from Stephen Reed – 11th July 2025)</p> <p>Listed Buildings (page 85): Listed buildings can also be searched for using a map facility on the Historic England website. It is suggested that a link to this is also included - <a href="https://historicengland.org.uk/listing/the-list/map-search/">https://historicengland.org.uk/listing/the-list/map-search/</a>.</p> <p>Scheduled Ancient Monument (page 86): The location and extent of any Scheduled Monument should be checked using The National Heritage List for England (not the Magic Map website). The location of Scheduled Monuments, listed buildings, registered parks and gardens, registered battlefields and protected wreck sites can be searched for using the National Heritage List for England at <a href="#">Search the List – Find listed buildings, monuments, battlefields and more   Historic England</a></p> <p>Suggested rewording below:</p> <p>- <b>“Scheduled Ancient Monument</b> - A 'nationally important' archaeological site or historic building, given protection against unauthorised change – designated under the Ancient Monuments and Archaeological Areas Act 1979. The location of Scheduled (Ancient) Monuments can be checked at <a href="https://historicengland.org.uk/listing/the-list/">https://historicengland.org.uk/listing/the-list/</a> using a keyword, postcode or list entry number. A map search facility is also available at <a href="https://historicengland.org.uk/listing/the-list/map-search/">https://historicengland.org.uk/listing/the-list/map-search/</a>.</p> <p>Ecology</p> <p><b>Air Quality and Biodiversity Net Gain (pages 55 and 56)</b></p> <p>The County Council is content with the information provided within the Air Quality and Biodiversity Net Gain requirements, and considers the references to legislation and further guidance appropriate.</p> <p><b>Ecology Report (pages 57 and 58)</b></p> <p>This section requires all applications to submit a Wildlife and Geology Trigger Table and, subject to the findings of this, a Wildlife and/or Geology Report. The County Council supports the inclusion of this requirement.</p> <p>It is noted that this section states that the Wildlife and/or Geology Report must comply with the British Standard for Biodiversity, and refers to “GS42020”. This reference should be amended to “BS42020”.</p> <p>Whilst mention is made to surveys for protected and priority species, the County Council requests that reference is also made to assessing County Wildlife Sites, Priority Habitats and Protected Sites, including:</p> <ul style="list-style-type: none"> <li>• Sites of Special Scientific Interest (SSSI’s);</li> <li>Special Areas of Conservation (SAC’s);</li> <li>• Special Protection Areas (SPA’s); and</li> <li>• Ramsar Sites.</li> </ul>	
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The County Council supports the inclusion of 'Biodiversity – Ecological Reports' on page 59. It is recommended that a link to the Guidelines for Ecological Impact Assessment (EclA)2 is included. The County Council welcomes the inclusion of the requirements of such report in a list format. However, the following amendments are recommended, with additions shown in red text and deletions in strikethrough:

- desk study *based on industry standard data sources (e.g. MAGIC3 and Devon Biological Records Centre4)*
  - *locations and details of statutory and non-statutory protected sites within the zone of influence*
  - phase 1 *habitat* survey *with habitats classified according to the UK Habitats Classification.*
  - *Biodiversity Net Gain habitat condition assessment information (where full statutory metric used)*
  - Natural England Offsetting Metric calculations showing the net biodiversity loss/gain
  - protected species surveys, *methods and results*
  - any additional habitat and species surveys advised by the ecologist
  - assessment of importance of biodiversity *identified ecological* features
  - assessment of impacts/*effects on identified ecological features*
  - suite of measures to avoid/mitigate/compensate impacts
  - details of how these will be delivered
  - details of biodiversity enhancements/*Biodiversity Net Gain* that will be provided and
  - a scheme for monitoring the effectiveness of mitigation/compensation.
- (also see minimum Biodiversity Net Gain information requirements on page 56)*

**Ecology Planning guidance and useful links (page 84)**

It is noted that some of the links included in this section are no longer existing or are not suitable. The following links are recommended:

- Protected Sites and Species - <https://www.gov.uk/environment/planningdevelopment-protected-sites-species-land-species>
- Devon County Council - <https://www.devon.gov.uk/environment/wildlife>  
Biodiversity Net Gain Planning Practice Guidance
  - <https://www.gov.uk/guidance/biodiversity-net-gain>
- Biodiversity Net Gain guidance - <https://www.gov.uk/guidance/understandingbiodiversity-net-gain>
- Habitat Regulations Assessment - <https://www.gov.uk/guidance/habitatsregulations-assessments-protecting-a-european-site>
- The Association of Local Government Ecologists (ALGE)  
- <https://www.alge.org.uk/>
- How to find an ecological consultant - <https://cieem.net/i-need/>

	<p>Waste Planning</p> <p>2 <a href="https://cieem.net/resource/guidelines-for-ecological-impact-assessment-ecia/">https://cieem.net/resource/guidelines-for-ecological-impact-assessment-ecia/</a></p> <p>3 <a href="https://magic.defra.gov.uk/">https://magic.defra.gov.uk/</a></p> <p>4 <a href="https://www.dbrc.org.uk/services/data-search/">https://www.dbrc.org.uk/services/data-search/</a></p> <p>The County Council as Waste Planning Authority (WPA) welcomes the inclusion of the Waste Audit Statement (WAS) section on page 82 of the validation list, as well as reference to the Devon Waste Plan and the Waste Management and Infrastructure SPD. The County Council recommends making reference directly to Policy W4, as this sets out the policy requirement for a WAS.</p> <p>In addition to this, Policy W10 of the Devon Waste Plan seeks to protect waste management sites from constraint by non-waste development. The County Council seeks to protect such facilities through the implementation of waste consultation zones. For applications located within a waste consultation zone, the applicant should demonstrate:</p> <ul style="list-style-type: none"> <li>• the proposal will not prevent or restrict the operation of the existing or permitted waste management facility; or</li> <li>• any potential impacts on the operation of the waste management facility can be adequately mitigated by the applicant; or</li> <li>• there is no longer a need for the waste management facility, having regard to the availability of equivalent capacity within Devon; or</li> <li>• a suitable and deliverable alternative location can be provided for the waste management facility; or</li> <li>• the proposal is in accordance with a site allocation in an adopted Local Plan.</li> </ul> <p>The County Council acknowledges that this information may be better placed within another document such as the planning statement or noise assessment, rather than a standalone document. Mid Devon District Council may wish to consider the most appropriate place within the validation checklist to refer to this requirement.</p> <p>The County Council would like to take this opportunity to remind the LPA to consult the WPA on major applications, and those located within a Waste Consultation Zone.</p> <p>Mineral Planning</p> <p>Policy M2 of the Devon Minerals Plan seeks to protect mineral resources and infrastructure within Mineral Safeguarding Areas from sterilisation or constraint by non-mineral development, unless it can be demonstrated that the mineral resource is not of current or potential economic or heritage value.</p> <p>The geology of Mid Devon is such that there are important resources of sand &amp; gravel and limestone within the district. These mineral resources are of local and national importance and are necessary to meet society's need. Further to this, there are two operational strategic mineral sites within Mid Devon, Westleigh Quarry (limestone) and Hillhead Quarry (sand and gravel), and a further site located to the north east of Burlescombe that is currently mothballed. The Devon Minerals Plan also identifies a sand and gravel Preferred Area at Land West of Penslade Cross, Uffculme. It is therefore vital that the County Council, as Mineral Planning Authority (MPA), seeks to protect these resources through the implementation of Mineral Safeguarding Areas (MSA) and Policy M2 of the Devon Minerals Plan.</p>	
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	<p>Given this, the County Council strongly recommends that the validation list includes a section related to Mineral Resource Assessments. This requirement should state that where development is being proposed within or close to a MSA, the applicant may be required to submit a mineral resource assessment. Applicants are welcome to contact the Mineral Planning Authority (<a href="mailto:mineralsplanning@devon.gov.uk">mineralsplanning@devon.gov.uk</a>) to discuss this further for their application.</p> <p>The County Council would like to take this opportunity to remind the LPA to consult the MPA on any within or close to a Mineral Safeguarding Area or Mineral Consultation Area.</p> <p>Climate Change</p> <p>The County Council welcomes the continued requirement for all applications to complete the Climate Emergency – Planning Application Checklist. It is recommended that reference is also made to Devon’s Carbon Plan.</p>	
Historic England	<p>The draft Validation Checklist presents a comprehensive, rigorous and useful guide for a range of users. It sets out a clear structure that provides robust guidance on the validation process, including timeframes and routes for appeal for when an application may have been deemed invalid.</p> <p>However, there are certain aspects of the draft document that might be improved. Therefore, we would like to make a few general observations on Validation and a some more specific recommendations on the particular way in which the Checklist deals with Heritage.</p> <p><b>General Comments</b></p> <p>With the move towards “Digital Planning”, there are a variety of digital file-formats that may form the basis of a planning application. Therefore, the Local Authority could flag whether optional digital formats are acceptable or not, eg. DWG, GIS, BIM, IFC, KML, OBJ files etc... There could potentially be a short section dealing exclusively with this issue.</p> <p>The list of requirements for each type of application has been clearly specified; however, it is not yet clear to applicant why particular information is required, in each specific case. Therefore, the whole document might be strengthened further by referencing the particular “policy justification” (from the Local Plan, NPPF etc ... ). This could be achieved by adding a “policy column” throughout the document, referencing where each of the specific submission requirements have their roots in policy. This would greatly aid the applicant, as they would be able to reference the original policy. Access the original policy would provide more details to the applicant and to help them get a clearer idea of exactly what is required from them and why.</p> <p>While Part 2 provides useful “at-a-glance” guidance for each type of application, the whole document would benefit from a single up-front matrix/table showing all application types vs document requirements for easy cross-comparison.</p>	Amendments made to cross refer to policy linkages as well as amplify the range of protections and extent of any Heritage Statement in line with these comments.

**Heritage Specific Comments**

We welcome the particular sections on Heritage, particularly the very helpful Local Requirements section on Heritage Statements (page 62).

However, when discussing heritage, the Checklist does not explicitly reference the Mid Devon Local Plan (particularly policy DM25 Development Affecting Heritage Assets). Furthermore, it does not recommend reference to Conservation Area Appraisals (CAAS), where heritage documents are required. The checklist would benefit from including both of these key references.

The checklist does specify where Heritage Impact Assessments (HIAs) may be needed. However, there are no thresholds or triggers specified for when one might be required. The inclusion of a “trigger table” might be useful, to help identify situations where there is either the potential for harm and an HIA is required, or where harm is unlikely and an HIA is not required. Such a list of criteria might include: proximity to listed buildings, known archaeology, conservation areas etc ...

More generally, the applicant could be encouraged to:

- consult Conservation Area Appraisals (CAAs)
- use the Devon Historic Environment Record (HER)
- assess significance of assets using the Historic England or ICOMOS criteria.

It would be helpful to add links to both Mid Devon CAAs, the Devon HER,

Currently, there is no mention of Setting, Views, or Townscape Impacts within the Checklist. Even though there may be a reference to a general Landscape and Visual Impact Assessment (LVIA) elsewhere, the Checklist would benefit from a reference to visual impact on setting and the landscape context specifically with respect to heritage. Such a study should also investigate the potential for cumulative, or indirect impact on heritage. The checklist might recommend that “setting” and “views” are provided within a Heritage Statement, or at least cross-referenced with an LVIA, if one is required elsewhere.

Finally, there is no specific mention of Scheduled Monuments, Registered Parks and Gardens, Registered Battlefields, Protected Wreck Sites, or non-designated heritage assets. It might be helpful to explicitly mention these asset classes and describe their relative importance to the applicant. Although there are no UNESCO World Heritage Sites within the Mid-Devon borders, it might be helpful to mention the existence of this important further designation for completeness.