

Local Validation Checklist Summary of Consultation Responses Report

May 2024



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1. Introduction

- 1.1. The City of Lincoln Council (CoL), North Kesteven District Council (NKDC) and West Lindsey District Council (WLDC) have worked jointly to develop a set of Local Validation Lists following the adoption of the 2023 Central Lincolnshire Local Plan. These lists set out the information that is required to be submitted before a planning application can be validated.
- 1.2. These lists were the subject of a consultation which ran from Wednesday 1st November until 23:59 on Wednesday 13th December 2023. Five key documents were consulted upon: -
 - Full application validation list
 - Householder validation checklist
 - Listed building consent checklist
 - Outline application validation checklist
 - Validation checklist matrix
- 1.3. The Central Lincolnshire Local Plans Team undertook the consultation and collated responses on behalf of the three planning authorities. A working group from the districts/city have reviewed the responses and provided an overall response to the consultation and have made the final conclusions in the preparations for each individual district/city to adopt the same Local Validation Lists. Within this report, the three “Authorities” is referenced this is referring to City of Lincoln, North Kesteven and West Lindsey.
- 1.4. During the consultation, respondents were commenting on the lists for all three district planning authorities unless they indicated otherwise.
- 1.5. The national information requirements for a planning application are set out in the Planning Practice Guidance (PPG). These set out the minimum information needed for a planning application to be registered as valid and for the Local Planning Authority (LPA) to begin processing the planning application.
- 1.6. In addition to the national information requirements, the National Planning Policy Framework (NPPF) advises that LPAs should publish a local list of their information requirements for planning applications. Local lists should clarify what information is usually required for applications of a particular type, scale or location. Information required by local lists should be relevant, necessary and material to the application in question and kept to the minimum needed to decide a planning application. These statutory tests are set out in [section 62 \(4A\) of the Town and Country Planning Act 1990](#) (inserted by the Growth and Infrastructure Act) and [article 11\(3\)\(c\) of the Town and Country Planning \(Development Management Procedure\) \(England\) \(Order\) 2015](#).
- 1.7. Ensuring that planning applications are supported by enough information is crucial to good decision making, and it provides certainty for applicants, the LPA, statutory consultees, communities and other interested parties and speeds up the decision-making process.
- 1.8. Local lists should be reviewed at least every 2 years.
- 1.9. The subsequent sections of this report set out the responses from both respondents and district/city from this consultation.

2. Full application checklist consultation responses

Table 1: Full application validation list comments and responses (Question 8) (*= comments only relating to NKDC)

Respondent	Comments	District/City response
Graham Flasby	looks like a design access and conservation is not subject to a national validation requirement	It is a national requirement in certain situations as set out in the Planning Practice Guidance (PPG) ¹ . However, to make it clearer the Authorities will list when these are required with the full application validation list with a link to the PPG.
Becky Phillips-Melhuish (LCC Highways)	I note that a groundwater risk assessment and contaminated land assessment are listed as required. Could you also include a wider requirement for a ground investigation report, which is used to determine suitable surface water drainage options. For example, it will determine the ground conditions, infiltration capacity, groundwater table etc.	The Authorities acknowledge this is a good idea. The Authorities consider that this is covered by the Drainage Statement as part of the Local Validation requirements.
Oliver J. Grundy	I am concerned that the validation checklist is potentially over complicating the validation process. There is a risk that this checklist approach could prompt additional supporting information to be required by a planning admin team by default under circumstances where various specialist reports are not realistically required. The checklist also appears to introduce requirements for reports which are not technically necessary under the quoted policy provisions, i.e. a landscape and visual impact assessment is not a requirement of Policy S61 and a Drainage Statement is not automatically mandated by Policy S21 and certain types of development simply cannot align with the energy statement checklist requirements (for example, the energy statement templates are unworkable when applied to intensive livestock developments, grain stores with integrated dryers and certain industrial buildings).	<p>Local Lists are recognised by the Planning Act.</p> <p>Validation requirements need to be proportionate to the development proposed. As such an Energy Statement will be necessary for intensive livestock developments, grain stores with integrated dryers and certain industrial buildings.</p> <p>Policy S21 references flood risk and a Drainage Statement is necessary to show compliance with this policy.</p> <p>The Authorities will look to ensure the lists are broken down into smaller chunks outlining the requirements that may be required dependent on the nature and scale (including location) of a scheme. It is accepted that this information will not be required on all applications and if there is any doubt of what is required, it is recommended that the applicant contact the determining Authority.</p>

¹ Paragraph: 030 Reference ID: 14-030-20140306 [Making an application - GOV.UK \(www.gov.uk\)](http://www.gov.uk)

Michael Orridge	It is not clear about existing buildings/ structures that are proposed to be demolished as part of the development, instead of formal drawings (floor plans, elevations and roof plan) can photographs be acceptable?	Existing plans are preferable. However, the Authorities consider photographs may be acceptable to supplement plans in some situations and will be considered on a case-by-case basis taking a proportionate approach to the proposed development.
Robert Cole	National validation requirements are generally sufficient to allow for validation purposes. Mandatory policy requirements such as BNG and Energy Statements these could be included as part of a validation checklist however anything that requires a level of planning judgement should be left to the Councils discretion as a requirement for determination rather than validation. It doesn't make sense for applicants to need to expend on reports where they are not necessary in order to ensure validation.	Local Lists are recommended by the Planning Act, and the justification for the proposed requirements is to assess compliance with the adopted Central Lincolnshire Local Plan, April 2023.
Alan J Ford	Plainly, the documents are written by Town Planners for Town Planners; no thought has been given to the layperson who is also very interested in all aspects of all threats to their villages / Districts only to find that the entire documents are not designed in any way or form for 'Joe Public' to understand. I suspect that this is deliberate - the less info given reduces the opportunity of objecting.	Planning applications are by their very nature, quite technical. Every effort has been made to use plain English wherever possible, but, given the technical nature, sometimes this may not be as easy to understand for everyone as would be ideal. The wording has been reviewed for clarity to ensure it is as accessible as possible.
Margaret Alison Thomas	As per outline comments	Response given on outline comments.
Fraser Mayfield Key*	It has been of some concern for a number of years that we simply as a nation are not achieving any local or national building targets as set out by national policy or successive governments. The ability of developers and individuals is severely being hampered to build new housing especially in NKDC by the rigorous NO slant to all developments put forward rather than the national policy as instructed by government as YES first unless a good reason why not to develop. It is my opinion that the planning process is broken at its core and far to long winded and expensive upfront to facilitate all but the National builders to bring schemes forward The one size fits all approach does not encourage local firms to build unique and interesting high quality housing suitable for the modern purchaser in our	Local Lists are recognised by the Planning Act, and the justification for the proposed requirements is to assess compliance with the Central Lincolnshire Local Plan.

	<p>area. It is actively discouraging expansion of numerous small villages that ultimately ends in their decline rather than encouraging sustainability and tourism that Lincolnshire desperately needs. The application validation list is simply too much.</p>	
<p>Thomas J N Smith</p>	<p>Tree surveys and arboriculture method statement should firstly only be required on medium to large development sites (unless there are significant harms in planning terms on small sites or a large number of veterans and other aged trees at risk from small sites)</p> <p>Energy statements should be a matter of building regulations not planning (it is not the duty of the planning authority to dictate to small house builders and self/custom house builders how the heat and power their homes) unless there is a national requirement that require them to be implemented through for example the environmental act 2023. Otherwise, this is totally inappropriate and overzealous and you WILL reduce sites coming forward by smaller developers directly undermining the aims of the CLLP on the number of dwellings they wish to build within the plan period this view point again should apply to small sites of up to 20 dwellings (unless the LPA can evidence a different legal definition for a small site either based on national policy or other relevant documentation this is especially important if we are wanting rural exemption sites and more first time buyer homes to be built this energy statement requirement though planning will further undermine both those. It is also inappropriate given that CoL and WLDC and NKDC are the only 3 LPAs doing this locally through the local plans. I would argue the above also applies to the below polices</p> <ul style="list-style-type: none"> • Completed Energy Efficiency Checklist Excel format • Biodiversity/Ecology Survey Report • Biodiversity Gain Plan4 • Biodiversity Net Gain Metric (completed) 	<p>Energy Statements are an existing policy requirement under the Central Lincolnshire Local Plan 2023. Biodiversity Net Gain (BNG) applies to all sites bar exceptions under the Environment Act (2021).</p>

Olav Holm-Johansen	The validation check list is becoming over complicated. The risk being that additional supporting information is required in circumstances where such information is realistically not required. The checklist also looks to introduce requirements which are not technically required under the quoted policy provisions.	Noted though does not give specific example. Local Lists are recognised by the Planning Act, and the justification for the proposed requirements is to assess compliance with the Central Lincolnshire Local Plan 2023.
Rosamund Worrall	No issues to raise in respect of the historic environment. The clear and concise footnote information is helpful to guide expectations for submissions.	Noted.

3. Outline application checklist responses

Table 2: Outline application checklist comments and responses (Question 9) (*= comments relating to NKDC only)

Respondent	Comments	District/City response
Oliver J. Grundy	Comments in relation to question 8 above are generally applicable. I do not think that introduction of a validation checklist will prove beneficial. It will essentially be more needless bureaucracy.	Local Lists are recognised by the Planning Act, and the justification for the proposed requirements is to assess compliance with the Central Lincolnshire Local Plan 2023.
Michael Orridge	It is not clear about existing buildings/ structures that are proposed to be demolished as part of the development, instead of formal drawings (floor plans, elevations and roof plan) can photographs be acceptable?	Existing plans are preferable. Photographs are not a national requirement, and this does not require specific local list requirement. The Authorities consider photographs may be acceptable in some situations and will be considered on a case-by-case basis taking a proportionate approach to the proposed development.
Robert Cole	This appears proportionate	Noted
Alan J Ford	See (question) 8 above	The proposed required documents are necessary to allow planning assessment.
Margaret Alison Thomas	Developer should be required to make a presentation to the relevant parish council if the outline planning application is for more than 10 properties prior to submission. A flood risk assessment should be required as part of the validation for 10+ properties.	Whilst pre-application consultation is encouraged it is not mandatory or a policy requirement. Requirements for FRA are set in the National Planning Policy Framework (NPPF). Please see footnote 59 of the NPPF: https://www.gov.uk/guidance/national-planning-policy-framework/14-meeting-the-challenge-of-climate-change-flooding-and-coastal-change#footnote59

Fraser Mayfield Key*	Same comments as above, the lists are simply too long and discourage development	Local Lists are recognised by the Planning Act, and the justification for the proposed requirements is to assess compliance with the 2023 CLLP.
Mrs Hayley Broderick*	The Parish Council would like an Outline Planning Application to include a Flood Risk Assessment and a Drainage Statement as part of the application process.	This is not a national requirement; however, some clarity will need to be provided as to when a Flood Risk Assessment is needed.
Thomas J N Smith	The biodiversity requirements are totally unreasonable at an outline stage. Outline is merely the principle of the development (and possibly access considered) you are adding needless detail onto the early stage of an application stage which is not meant to be that detailed you are also adding additional costs on to applicants making outline applications less desirable to undertake	The biodiversity requirements are necessary to comply with Policy S61 of the Central Lincolnshire Local Plan 2023 and will become mandatory through the provisions of the Environment Act 2021.
Olav Holm-Johansen	Comments as per Full Validation List above. Not beneficial and creating needless bureaucracy.	Noted though does not give specific example. Local Lists are recognised by the Planning Act, and the justification for the proposed requirements is to assess compliance with the Central Lincolnshire Local Plan 2023.
Rosamund Worrall	No issues to raise in respect of the historic environment. The clear and concise footnote information is helpful to guide expectations for submissions.	Noted.

4. Householder checklist responses

Table 3: Householder checklist comments and responses. (question 10) (*= comments relating to NKDC only)

Respondent	Comments	District/City response
Oliver J. Grundy	Comments in relation to question 8 above are generally applicable. I do not think that introduction of a validation checklist will prove beneficial. It will essentially be more needless bureaucracy.	Local Lists are recognised by the Planning Act, and the justification for the proposed requirements is to assess compliance with the Central Lincolnshire Local Plan 2023.
Michael Orridge	It is not clear about existing buildings/ structures that are proposed to be demolished as part of the development, instead of formal drawings (floor plans, elevations and roof plan) can photographs be acceptable?	Existing plans are preferable. Photographs are not a national requirement, and this does not require specific local list requirement. The Authorities consider photographs are acceptable in some situations and will be considered on a case-

		by-case basis taking a proportionate approach to the proposed development.
Robert Cole	This appears proportionate	Noted
Alan J Ford	See 8 above	The proposed required documents are necessary to allow planning assessment.
Fraser Mayfield Key*	Same comments as above, the lists are simply too long and discourage development	Local Lists are recognised by the Planning Act, and the justification for the proposed requirements is to assess compliance with the Central Lincolnshire Local Plan 2023.
Olav Holm-Johansen	Comments as per Full Validation List above. Not beneficial and creating needless bureaucracy.	Noted though does not give specific example. Local Lists are recognised by the Planning Act, and the justification for the proposed requirements is to assess compliance with the Central Lincolnshire Local Plan 2023.
Rosamund Worrall	No issues to raise in respect of the historic environment. The clear and concise footnote information is helpful to guide expectations for submissions.	Noted.

5. Listed building checklist responses

Table 4: Listed building checklist comments and responses (question 11)

Respondent	Comments	District/City response
Graham Flasby	looks like a design access and conservation is not subject to a national validation requirement	It is a national requirement in certain situations as set out in the Planning Practice Guidance (PPG) ² . However, to make it clearer the Authorities will list when these are required with the full application validation list with a link to the PPG.
Becky Phillips-Melhuish (LCC - Highways)	I note that a groundwater risk assessment and contaminated land assessment are listed as required. Could you also include a wider requirement for a ground investigation report, which is used to determine suitable surface water drainage options. For example, it will determine the ground conditions, infiltration capacity, groundwater table etc.	A Groundwater Risk Assessment and Contaminated Land Assessment are not required for validating Listed Building Applications and do not appear on this list. These applications would only relate to an existing historic building which in most cases would have established drainage and therefore would not require a Ground Investigation Report.
Oliver J. Grundy	I am concerned that the validation checklist is potentially over complicating the validation process. There is a risk	Local Lists are recognised by the Planning Act

² Paragraph: 030 Reference ID: 14-030-20140306 [Making an application - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/making-an-application)

	<p>that this checklist approach could prompt additional supporting information to be required by a planning admin team by default under circumstances where various specialist reports are not realistically required. The checklist also appears to introduce requirements for reports which are not technically necessary under the quoted policy provisions, i.e. a landscape and visual impact assessment is not a requirement of Policy S61 and a Drainage Statement is not automatically mandated by Policy S21 and certain types of development simply cannot align with the energy statement checklist requirements (for example, the energy statement templates are unworkable when applied to intensive livestock developments, grain stores with integrated dryers and certain industrial buildings).</p>	<p>Validation requirements need to be proportionate to the development proposed. As such an Energy Statement will be necessary for intensive livestock developments, grain stores with integrated dryers and certain industrial buildings.</p> <p>Policy S21 references flood risk and a Drainage Statement is necessary to show compliance with this policy.</p> <p>The Authorities will look to ensure the lists are broken down into smaller chunks outlining the requirements that may be required dependent on the nature and scale (including location) of a scheme. It is accepted that this information will not be required on all applications and if there is any doubt of what is required, it is recommended that the applicant contact the determining Authority.</p>
Michael Orridge	<p>It is not clear about existing buildings/ structures that are proposed to be demolished as part of the development, instead of formal drawings (floor plans, elevations and roof plan) can photographs be acceptable?</p>	<p>Existing plans are preferable. Photographs are not a national requirement, and this does not require specific local list requirement. The Authorities consider photographs may be acceptable in some situations and will be considered on a case-by-case basis taking a proportionate approach to the proposed development.</p>
Robert Cole	<p>National validation requirements are generally sufficient to allow for validation purposes. Mandatory policy requirements such as BNG and Energy Statements these could be included as part of a validation checklist however anything that requires a level of planning judgement should be left to the Councils discretion as a requirement for determination rather than validation. It doesn't make sense for applicants to need to expend on reports where they are not necessary in order to ensure validation.</p>	<p>Local Lists are recognised by the Planning Act, and the justification for the proposed requirements is to assess compliance with the Central Lincolnshire Local Plan 2023.</p>
Alan J Ford	<p>Plainly, the documents are written by Town Planners for Town Planners; no thought has been given to the layperson who is also very interested in all aspects of all threats to their villages / Districts only to find that the entire documents are not designed in any way or form for 'Joe Public' to understand. I suspect that this is deliberate - the less info given reduces the opportunity of objecting.</p>	<p>The proposed required documents are necessary to allow planning assessment.</p>

Margaret Alison Thomas	As per outline comments	<p>Whilst pre-application consultation is encouraged it is not mandatory or a policy requirement.</p> <p>Requirements for FRA are set in the National Planning Policy Framework (NPPF). Please see footnote 59 of the NPPF: https://www.gov.uk/guidance/national-planning-policy-framework/14-meeting-the-challenge-of-climate-change-flooding-and-coastal-change#footnote59</p>
Fraser Mayfield Key	<p>It has been of some concern for a number of years that we simply as a nation are not achieving any local or national building targets as set out by national policy or successive governments. The ability of developers and individuals is severely being hampered to build new housing especially in NKDC by the rigorous NO slant to all developments put forward rather than the national policy as instructed by government as YES first unless a good reason why not to develop. It is my opinion that the planning process is broken at its core and far to long winded and expensive upfront to facilitate all but the National builders to bring schemes forward The one size fits all approach does not encourage local firms to build unique and interesting high quality housing suitable for the modern purchaser in our area. It is actively discouraging expansion of numerous small villages that ultimately ends in their decline rather than encouraging sustainability and tourism that Lincolnshire desperately needs. The application validation list is simply too much.</p>	<p>Local Lists are recognised by the Planning Act, and the justification for the proposed requirements is to assess compliance with the Central Lincolnshire Local Plan 2023.</p>
Thomas J N Smith	<p>Tree surveys and arboriculture method statement should firstly only be required on medium to large development sites (unless there are significant harms in planning terms on small sites or a large number of veterans and other aged trees at risk form small sites). Energy statements should be a matter of building regulations not planning (it is not the duty of the planning authority to dictate to small house builders and self/custom house builders how the heat and power their homes) unless there is a national requirement that require them to be implemented through</p>	<p>Energy Statements are an existing policy requirement under the Central Lincolnshire Local Plan 2023. BNG applies to all sites bar exceptions under the Environment Act.</p>

	<p>for example the environmental act 2023. Otherwise, this is totally inappropriate and overzealous and you WILL reduce sites coming forward by smaller developers directly undermining the aims of the CLLP on the number of dwellings they wish to build within the plan period this view point again should apply to small sites of up to 20 dwellings (unless the LPA can evidence a different legal definition for a small site either based on national policy or other relevant documentation this is especially important if we are wanting rural exemption sites and more first time buyer homes to be built this energy statement requirement though planning will further undermine both those. It is also inappropriate given that CoL and WLDC and NKDC are the only 3 LPAs doing this locally through the local plans. I would argue the above also applies to the below policies</p> <ul style="list-style-type: none"> • Completed Energy Efficiency Checklist Excel format Biodiversity/Ecology Survey Report • Biodiversity Gain Plan4 • Biodiversity Net Gain Metric (completed) 	
Olav Holm-Johansen	<p>The validation check list is becoming over complicated. The risk being that additional supporting information is required in circumstances where such information is realistically not required. The checklist also looks to introduce requirements which are not technically required under the quoted policy provisions.</p>	<p>Noted though does not give specific example.</p> <p>Local Lists are recognised by the Planning Act, and the justification for the proposed requirements is to assess compliance with the Central Lincolnshire Local Plan 2023.</p>
Rosamund Worrall	<p>No issues to raise in respect of the historic environment. The clear and concise footnote information is helpful to guide expectations for submissions.</p>	<p>Noted.</p>

6. General comments and response.

Table 5: General comments made and responses (question 12)

Respondent	Comments	District/City response
Graham Flasby	In my experience conservation and design is where checks are required.	Noted
Oliver J. Grundy	<p>Though I am sure the checklists were drafted with the best of intentions, I advise that they are likely to prove counter productive. I recommend that the direction of travel should be towards simplifying the application process. The checklists are likely to increase the propensity for specialist reports to be required where they are realistically unnecessary. There needs to be more room for planning officer discretion as opposed to reliance upon a 'tick box' approach. The checklist requirements risk compounding a number of problems that seem to be arising from implementation of certain policy provisions, which are already having an adverse impact upon the number of planning applications coming forwards (a lot of developers are no longer interested in pursuing schemes in Central Lincs) and LPA budgets are being harmed through the lack of planning admin fee revenue as a result. I should point out that there is a significant cost to preparation of the various reports indicated in the full planning app checklist. If the checklist system is eventually interpreted in a manner that prompts the default requirement for even half of the items listed on the full planning app checklist, it would be difficult to prepare/submit even a basic planning application for less than £50,000. The planning system in Central Lincs has already ground down into a bureaucratic mire with a shortage of specialists required to address various policy provisions and numerous developments necessary to support the local economy, food security etc have been rendered non-viable. If introduced, the checklist should merely be an informative (not a form to be completed with each planning app) and notes clearly</p>	<p>Local Lists are recognised by the Planning Act, and the justification for the proposed requirements is to assess compliance with the Central Lincolnshire Local Plan 2023.</p> <p>The supporting documents being sought are already required by policy which leads to avoidable delay if planning applications are being held up for this information to be supplied.</p> <p>Whilst there are no clear examples, footnote 2 of the full application list does state that supporting documents are only required "Where applicable depending on the scale, nature and location of development."</p> <p>The Authorities will look to make the lists clearer and will include a summary as to what is required for each application type.</p>

	added stating that the majority of specialist supporting information is not mandatory.	
Michael Orridge	There is no require for the purpose of validation to consider daylighting/ shadows caused by a development. Should there be a document required to be produced in accordance with the relevant British Standard? Would you be able to advertise well in advance before the final versions of these documents will become enforceable please. To avoid unexpected delays at validation and so we can advise our clients and potential clients accordingly.	Daylight/Shadow testing would exceed the policy requirements under S53 and can always be requested by the case officer if particularly relevant to the application before them. The Authorities will ensure appropriate communication and transitional arrangements are in place prior to adoption of the Local Validation List requirements.
Robert Cole	Full application validation checklist needs to be considered in greater detail. It's too onerous.	Local Lists are recognised by the Planning Act, and the justification for the proposed requirements is to assess compliance with the Central Lincolnshire Local Plan 2023.
Alan J Ford	See Q8 above	The proposed required documents are necessary to allow planning assessment.
Margaret Alison Thomas	Developers should be required to present to households affected by significant developments of 10+ houses IF planning permission is granted before building is allowed to commence. As well as a time limit by which building should start there should also be a date by which building should be completed.	Comment not applicable to this consultation. This consultation is on the validation checklists.
Fraser Mayfield Key	Please simplify the planning process as i strongly believe if Lincolnshire does not do this voluntarily i do believe Government will take it increasingly out of your control.	Local Lists are recognised by the Planning Act, and the justification for the proposed requirements is to assess compliance with the Central Lincolnshire Local Plan 2023. The Local Validation list will ensure that necessary documents are provided up front, preventing delays and/or avoidable refusals of planning permission.
Amelia Crawford	We have no comments to make on the proposed validation lists.	Noted.
Ellie Smith	The SRN in the vicinity of the above-mentioned districts consists of the A1 and A46 trunk roads. National Highways has considered the contents of the consultation documents and have no comments to make.	Noted.
Sharon Jenkins	Natural England does not have any specific comments on this Local List Validation.	Noted.

Olav Holm-Johansen	<p>Concern that the checklists will prove counterproductive. The process should be simplified, not complicated. These checklists will increase the need for specialist reports where they are unrealistically required, subsequently unnecessarily increasing the applicants costs for submissions. These checklists will compound the problems already faced by the policy provisions and will have an impact on the number of applications received. If introduced the checklists should be informative and advise that specialist supporting reports are not mandatory.</p>	<p>Noted though does not give specific example.</p> <p>Local Lists are recognised by the Planning Act, and the justification for the proposed requirements is to assess compliance with the Central Lincolnshire Local Plan 2023.</p>
Michael Braithwaite	<p>Thank you for providing the opportunity to comment on the proposed Local Validation lists for planning applications for the Central Lincolnshire Authorities. This is a key exercise, bringing the application process into line with the requirements of the recently adopted Local Plan. We have a number of comments, which appear to apply equally to the various lists, and hence have provided a single letter rather than duplicating our comments in different forms. As a general comment we note the list requires individual documents to address each policy in turn, whether this deals with retail sequential tests, energy statements, minerals assessments, green wedge assessments or one of many other policy areas. Some of these responses would potentially be very short, leading to the submission of a wide range of, potentially very short, documents, although they may be supported by more technical documents. As these documents will generally be consumed online, there is a real risk of overwhelming the reader, whether they be the planning officer, statutory consultee or members of the public. We suggest that the policy interpretation can in many cases be collected together into a single "Planning Statement" the use of which will ensure much of the policy interpretation can be seen together in a single location, allowing a fuller consideration of each policy, and the relationship between different policies. Further to the general point of providing a more comprehensible range of submission documents</p>	<p>Validation requirements need to be proportionate to the development proposed. The Local Validation list would not prohibit the inclusion of shorter statements within in overarching planning statement though this would need to be clearly labelled in order for the council to ascertain that this is where the statement is provided.</p> <p>A Glint and Glare Assessment is required for renewable energy developments and is recognised as a planning consideration in National Planning Policy Guidance: https://www.gov.uk/guidance/renewable-and-low-carbon-energy#solar-farms</p> <p>Footnote 2 of the full application list does state that supporting documents are only required "Where applicable depending on the scale, nature and location of development."</p>

	<p>we note that some of the existing guidance, notably for the production of an energy statement, expects the implications of other policies to be assessed within the statement. Such an approach may lead to an inconsistent approach to policies, whereas analysis in a single document should allow for a more consistent assessment of the different policies impacting on specific sites. Whereas some issues will need to be covered by separate technical reports (Traffic Assessments, Biodiversity Net Gain Statement, etc) it is beneficial to debate the implications of the different issues in a single separate document. Examples of policy issues which can be presented together include: Demolition Justification Statement. Affordable Housing exception site justification (we note Entry Level exception proposals are not named in the Local Plan and question whether they should be identified in this section – limiting the title to affordable housing should be sufficient). Minerals Assessment. Green Wedge Assessment. Energy Statement for outline applications or relatively simple proposals. Having a joint presentation allows for anyone considering the application to obtain an understanding about the proposal to gain a fuller understanding from a single document. A single document can often also summarise the other issues and begin to explore how the different issues relate to each other. This approach allows for issues to be balanced against each other without duplication, or the risk of missing key policy elements when considering a planning application. Certainly consultees to the process may miss out on key information when faced with such a plethora of individual documents. As such, we request that the list is amended to allow, where appropriate, for different policy statements to be brought together in a single statement. The list is extensive, and some reports are specific to particular forms of development e.g. The Aviation Navigations System Communications Assessment, the Shadow Flicker Assessment and Glint</p>	
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	<p>and Glare Assessment will only apply to commercial Renewable Energy Proposals and as such could be separated from the main list. (We note Glint and Glare are not mentioned in policy S14 related to renewable energy production, it is only mentioned specifically in policy S53 and the text in the validation list should be updated).</p> <p>We request the list comes with a commentary to make it easier to understand which applications need to be supported by which reports. Thank you for the opportunity to comment on the draft Local Validation List. Please do not hesitate to contact the office should you have any questions.</p>	
Rosamund Worrall	Nothing further to add.	Noted

7. Validation matrix responses.

Table 6: Validation matrix comments and responses (question 13)

Respondent	Comments	District/City response
Oliver J. Grundy	I fail to see how this will be of any use. Alarming, without small print to indicate otherwise, the matrix column for full planning applications seems to suggest that 50 plans and specialist reports are required per submission. Obviously this is not the case. The Matrix will likely just lead to confusion.	Comments noted – Review Matrix providing clarity as to when specific documents are required (either within the matrix or corresponding lists).
Michael Orridge	no comment.	Noted
Robert Cole	Full application list appears excessive	Comments noted – Review Matrix providing clarity as to when specific documents are required (either within the matrix or corresponding lists).
Alan J Ford	Mind boggling!	Comments noted – Review Matrix providing clarity as to when specific documents are required (either within the matrix or corresponding lists).

Margaret Alison Thomas	None	Noted
Olav Holm-Johansen	Of no use and potentially confusing.	Comments noted – Review Matrix providing clarity as to when specific documents are required (either within the matrix or corresponding lists).
Rosamund Worrall	We note that the matrix differentiates between heritage statements and heritage impact assessments and includes LBC heritage impact assessment requirements under local validation requirements. This could be misconstrued as it would be required to meet national requirements too, and separating them out could cause confusion to applicants. Should you wish to pursue including the two elements in the final validation documents, it may be useful to include a footnote to set the Councils' views on the difference between the two so that applicants are clear on expectations around information required. However, heritage statement information relating to full, outline and householder applications may well require an element of assessment work ie assessment of the impact of the development on a heritage asset, to inform the considerations of a scheme.	Comments noted – Review Matrix providing clarity as to when specific documents are required (either within the matrix or corresponding lists).

8. Additional changes to be considered.

8.1. The table below sets out the summary of comments raised by Officers during the consultation.

Table 7: Other suggestions on the Local Validation Lists made by Officers from the Authorities

Officer suggestions	
Comments made by Districts/City	<ul style="list-style-type: none"> • CIL forms adding to LD's and RESM's • Fire Statements – National requirement for alteration of an existing or within the curtilage of two or more dwellings (includes flats) or educational accommodation and meets the height condition of 18 metres or more, or 7 or more storeys. • Suggest amending Open Space Assessment to 'Open Space or Playing Field Assessment. Linking to policies 59, 64, 65. • The document named Annex should this have a little more detail? E.g. Residential annex statement/justification
Comments by Local Plans Team	<ul style="list-style-type: none"> • There is no reference to a 'biodiversity gain statement' in the most recent guidance so this needs removing. • For info, the statutory framework for biodiversity net gain includes specific modifications for planning permissions (including outline permissions) that have the effect of permitting development in phases. For these permissions, the standard approach where an approved Biodiversity Gain Plan must include details of significant onsite habitats enhancements, allocated registered offsite gains and the purchase of biodiversity credits is not possible. • For the purposes of biodiversity net gain, a phased development is a development where there is: <ul style="list-style-type: none"> • a grant of outline planning permission where the reservation of matters for subsequent approval has the effect of requiring or permitting development to proceed in phases; or • a grant of any kind of planning permission, where the grant is subject to conditions (whether requiring the subsequent approval of any matters or otherwise) having that effect. • Instead of the standard approach for the Biodiversity Gain Plan: <ul style="list-style-type: none"> ○ an Overall Biodiversity Gain Plan must be submitted to and approved by the planning authority before any development can be begun. ○ a Phase Biodiversity Gain Plan for each phase must be submitted to and approved by the planning authority before the development of that phase can be begun • Outline applications which do not meet a) or b) would be subject to the standard provisions for BNG. • As per comments on full application list - may wish to clarify or add 'completed in full including on-site and off-site baseline and post intervention maps'. • PPG states where a development is subject to mandatory net gain, the application must be accompanied by: <ul style="list-style-type: none"> ○ a statement as to whether the applicant believes that planning permission, if granted, would be subject to the biodiversity gain condition;

- the pre-development biodiversity value of the onsite habitat on the date of application (or an earlier date) including the completed metric calculation tool used showing the calculations, the publication date and version of the biodiversity metric used to calculate that value;
- where the applicant wishes to use an earlier date, the proposed earlier date and the reasons for proposing that date;
- a statement confirming whether the biodiversity value of the onsite habitat is lower on the date of application (or an earlier date) because of the carrying on of activities ('degradation') in which case the value is to be taken as immediately before the carrying on of the activities, and if degradation has taken place supporting evidence of this;
- a description of any irreplaceable habitat (as set out in column 1 of the Schedule to the Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations [2024]) on the land to which the application relates, that exists on the date of application, (or an earlier date); and
- a plan, drawn to an identified scale which must show the direction of North, showing onsite habitat existing on the date of application (or and earlier date), including any irreplaceable habitat.
- If this information has not been provided, the local planning authority must refuse to validate the application.
- This doesn't need to be repeated in Local List as national requirement, however PPG goes on to say:
 - "In addition to these minimum information requirements, further information may need to be provided in order to assist the consideration of biodiversity net gain as part of the planning application in particular where there are particular considerations around significant onsite biodiversity enhancements or use of offsite biodiversity gains. Specific further requirements may be set out in the local planning authority's local list of information requirements."
- PPG also suggests could include requirements from Local Plan which could influence have the biodiversity net gain objective is met.
- The PPG also says, "If planning obligations are going to be used to secure biodiversity net gain, when local planning authorities are updating their local lists, they may want to consider whether these will include details of likely planning obligations to be entered into."
- Can no longer request Biodiversity Gain Plan in order to validate planning application. PPG states once planning permission has been granted, a Biodiversity Gain Plan must be submitted and approved prior to commencement of development.
- The PPG advises that a developer may want to submit a draft plan for information ahead of the determination of the planning application, although this is not a national information requirement. Could we strongly encourage the submission of a draft BGP as a local information requirement?
- May want to consider adding a footnote for clarify what is a 'completed' metric. Could require the metric to include on-site and off-site baseline and post intervention maps, for example?
- Full and completed onsite metric, Ecological Survey report (including full UKHab survey), and Habitat Management and monitoring plan for Onsite habitats

- 8.2. The Authorities have considered the suggestions made by Officers and further updates made by the government during the intermediate time and have ensured the Local Validation Lists are in line with national requirements of both Biodiversity Net Gain legislation the most update to date Planning Practice Guidance (PPG).

9. Conclusion.

- 9.1. The three Authorities have reviewed the final lists and comments raised by all, and where appropriate have taken on board refinements in the final adopted lists. The Local Validation Lists aim to assist and provide clarity for people submitting a planning application to ensure that the right things are submitted for relevant applications. In turn, this will help reduce delays in validation process as everyone will know upfront what is required.
- 9.2. Following the consultation, the three Authorities have summarised the main amendments to the lists as follows:
- To provide greater clarity and a quick checklist, the matrix has been removed and now sits as a summary within each validation list.
 - The Local Validation Lists are set out into categories now to provide simplicity as to what is required for each application. This includes:
 - Category 1- National validation requirements. Documents required through National Legislation or policy.
 - Category 2- Local validation requirements. Documents required through Local Plan policies or other development plan documents.
 - Category 3- Other requirements. Documents that may be required depending on the nature and location of the development. One example of this is Flood Risk Assessments which was raised during the consultation.
 - The lists include notes with additional information for applicants.
 - During the consultation, “gains statement” and “plan” was a national requirement. National government change this after the consultation. Instead, a BNG Statement is now required as part of the local validation requirements. (Referred to in the lists as Category 2) to comply with Local Plan Policy S61.
 - Ecological Impact Assessment is included instead of Ecological Survey Report that was originally consulted upon. This name change to the document reflects new guidance from DEFRA this spring.
 - During consultation, a post development habitat/landscape map was required as part of statutory requirements. Since the consultation, the Planning Practice Guidance (PPG) has been updated and is no longer a national requirement. Therefore, post development habitat/landscape map is now included in the local list (Category 2) as opposed to Category 1 requirement.
- 9.3. The three Authorities would like to thank all those who took time to take part in the consultation. The Local Validation Lists will come into effect from **Monday 20th May 2024**.

10. Appendix 1: Copy of the local validation consultation form.



Local Validation Lists – Response Form

Please read the whole form prior to completing.

Important information about data protection. Our Privacy Statement is available online at:

<https://www.central-lincs.org.uk/about-central-lincolnshire/central-lincolnshire-planning-policy-privacy-notice>

Thank you for taking the time to respond to the Local Validation Lists consultation. Please ensure that your response is submitted before the consultation closes at 23:59 on Wednesday 13 December 2023.

* Indicates required field

Full name: *					
Email address:					
Organisation (where applicable):					
Postal Address:					
Post Code: *					
Which of the following best describes you?					
Local resident	<input type="checkbox"/>	Developer/agent/Architect	<input type="checkbox"/>	Statutory consultee	<input type="checkbox"/>
Parish/district councillor	<input type="checkbox"/>	Other (please specify)			
If your response is only in relation to the validation list for specific districts, please specify. Otherwise, it will be taken to apply for the lists in use in all districts.					
City of Lincoln	<input type="checkbox"/>	North Kesteven	<input type="checkbox"/>	West Lindsey	<input type="checkbox"/>
Please state any specific comments here relating to the “ Full Application Validation List ”.					

Please state any specific comments here relating to the “**Outline Application Validation List**”.

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Please state any specific comments here relating to the “**Householder Validation List**”.

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Please state any specific comments here relating to the “**Listed Building Consent Validation List**”.

--

Please state any **general comments** relating to all of the checklists.

--

Please provide any comments relating to the **validation matrix**

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Thank you for your time. Please email your response to: talkplanning@central-lincs.org.uk.

Alternatively, it may be posted to Central Lincolnshire Local Plans Team, Districts Council Offices, Kesteven Street, Sleaford. NG34 7EF

