

**EFFICIENCY REVIEW REPORT
PLANNING LIAISON
(Planning Application Procedures)**

November 1995

Planning Library

Reference: 069

**Please return to
Technical Planning**

CONTENTS

<u>SECTION</u>	<u>PAGE</u>
MANAGEMENT SUMMARY	1
1. PREAMBLE	3
2. INTRODUCTION	3
3. PRESENT ARRANGEMENTS FOR PLANNING APPLICATION LIAISON	5
4. REVIEW DETAIL	7
5. SUMMARY OF RECOMMENDATIONS	17
 <u>APPENDIX</u>	
A (i) Review Brief and Group Membership	19
(ii) Project Outline Plan	20
B Types of Planning Application of interest to NRA	21
C Breakdown of Planning and FTE Costs	22
D Further Statistics for Regional Planning Liaison	23
E Examples of Existing Standard Paragraphs and Letters	
(i - v) Northern Area	24
(vi - vii) Eastern Area	29
(vii - xii) Central Area	31
F Examples of Central Area's current format	36
G Extract from Northern Area Questionnaire	40
H Listings of IDB's	
(i) Northern Area	41
(ii) Eastern Area	42

EFFICIENCY REVIEW OF PLANNING APPLICATION LIAISON

MANAGEMENT SUMMARY

The review undertook to 'examine ways of improving the delivery of service concerning planning application procedures and, if possible, identify resources which could be alternatively utilised'. The full terms of reference and details of the review group membership are provided in Appendix A.

The NRA is a statutory consultee of Local Planning Authorities (LPA) and as such are required to make responses which relay to the LPA the NRA's interests concerning planning applications. This consultation is an important procedure because, whereas the NRA may not have legislative powers to enforce certain of its regulations, it can achieve its objectives if planning decisions contain appropriate NRA comments which are then embodied in the conditions of the application when approved.

At present the Region operates a visitor system whereby Area planning staff visit District Council Planning Departments (LPA) to examine their current list of applications. A postal system is used where the number of planning applications are small, eg. because of a shared boundary with another NRA Region. In principle the visitor will comment on all applications whilst at the LPA office, however, some applications require more detailed research and are brought back to the NRA. These are then passed out to the functions as part of the internal consultee process.

A total of 70,000 applications per year are examined by the visitors of which 12,500 are commented upon back at NRA offices. It is estimated that 21 full time equivalent (FTE) staff (both planning and functional officers), costing £700K per annum, are involved. 85% of this cost is associated with responses back at NRA offices. More detailed statistics of staffing and costs are provided in Appendix C and D pages 21 and 22 respectively.

The group identified nine key aspects of the work associated with planning application liaison around which a number of recommendations have been made. The key aspects are:

- Visitor Guidelines;
- Response Format;
- Standards/Level of Service;
- IS Equipment;
- Internal Drainage Board (IDB) involvement;
- Visitor/Postal System;
- Letter Direct/Indirect to Applicant;
- Future Training;
- One Stop Shop.

The group consider that if the report recommendations are adopted in total, it should be possible to divert a minimum of four FTE from the planning application liaison process to more proactive development planning work. The recommendations are summarised overleaf.

Implementation of the recommendations contained in the report are proposed to be managed through the Regional Planning Group who have agreed in principle with the review findings. Recommendations will not be implemented without due consideration of the impact and or requirements of the Environment Agency.

SUMMARY OF RECOMMENDATIONS

The following recommendations have been made within the report:

- i) Each function to critically examine their assessment criteria used during responses to planning applications. This has been partially completed by members of the group but further examination should be undertaken, especially to ensure Regional consistency. It is anticipated this will lead to less responses requiring internal consultation;
- ii)* Establish a set of Anglian Region Guidelines which contain all relevant details for the visitor, such that they may be as effective as possible, and to provide a reference for training new visitors/planning staff;
- iii)* Subject to proof of effectiveness, adopt the response format currently used in Central Area as the Regional standard, ie. Preamble, Comment, Informatives, Advice, Sign-off. This simplifies the response and uses planning 'language';
- iv)* Examine the planning liaison standards/levels of services currently deployed in the Region and agree a Regional level of service albeit strategically planned variances may be allowed. This may lead to mini centres of excellence ie. particular skills/resources being located at specific Area Offices;
- v)* Monitor the effectiveness of NRA responses by examining the LPA decision notices;
- vi)* Commission a review of the IS needs for both the short and long term, with a view to improving the effectiveness of the liaison procedures;
- vii) Cease the consultee work currently being undertaken on behalf of some IDB's, with effect from 1st April 1996;
- viii)* Maintain the visitor system but review this option once the consultation procedure has been consolidated with an LPA. If a decision is taken to revert to a postal system at that time then contact with the LPA should be maintained via regular formal meetings. Objective would be to reduce costs but maintain effectiveness;
- ix) Adopt a direct approach with applicants ie. send NRA information (Informatives/Advice, Consent and Licence Application forms) direct to the applicant rather than rely on the LPA sending it. This will promote early contact with, and should assist, the customer. All appropriate Informatives should also be sent to the LPA as part of the NRA response. This must however be subject to each LPA agreement;
- x)* Implement a series of workshops to promote better understanding between all those involved in the consultation process (including HMIP and WRA staff as appropriate). In addition appropriate training to be given to visitors such that a consistent approach is practised throughout the Region;
- xi) Set a target of a 25% reduction in the number of responses written at NRA, ie. more to be written at the LPA. If achieved this will release staff resources especially in the internal consultee functions. Reference recommendations i, ii, iii, iv, vii, x;
- xii)* Any freed resources should be directed towards more proactive development control matters such as Development Plans and early liaison with developers, and, effectiveness monitoring [reference point v) above];
- xiii)* Develop accurate and robust costs for planning application liaison. This will provide a sound base from which future quantification of planning liaison can be achieved;
- xiv) In the short term promote the Area planning sections as being the point of customer contact for all development planning matters. It is envisaged customer service will be improved and would help to reduce the possibility of conflicting comments being made to the customer;
- xv) In the long term, subject to Environment Agency requirements, the Region works towards developing a 'One Stop Shop' which would combine the customer contact for the main authorisation sections (Land Drainage Consents, Water Resource Licences, Discharge Consents) with those of the planning applications procedures. Benefits from economies of scale, customer care and internal efficiency are envisaged.
- xvi) The process of implementing the above recommendations to be managed through Regional Planning Group forum.

Those recommendations asterisked are similar in content to recommendations made in a recently published (December 1995) NRA Internal Audit Report entitled "Review of Planning Liaison", reference NAT/295.

EFFICIENCY REVIEW OF PLANNING LIAISON
(Planning Application Procedures)

1. PREAMBLE

- 1.1** The review was commissioned as part of the Region's policy to continually monitor and, as appropriate, improve procedures and methods of working, to achieve a more efficient and effective organisation.
- 1.2** A small group was formed which included members from each of the functions that contribute to both the internal and external planning liaison consultation process ie. Flood Defence, Water Quality, Water Resources, Fisheries, Conservation, Recreation and Navigation, together with representatives from each Area Planning Section.
- 1.3** The Group's brief is summarised below with the full brief and membership details given in Appendix A. The project outline plan is given in Appendix A(ii).

"Undertake a review of the present planning application procedure with a view to improving the delivery of service and, if possible, to identify resources which can be alternatively utilised".

2. INTRODUCTION

- 2.1** Planning liaison within Anglian Region falls into two main categories both of which arise because the NRA is a statutory consultee of the Local Planning Authorities (LPA). They are,

- a) Liaison concerning Development Plans
- and b) Liaison concerning planning applications (including pre-planning enquiries).

The review brief was to concentrate on the second category (b). This process involves not only planning staff but often involves all of the other main NRA functions where applications require internal consultation.

2.2 Needs and Objectives

2.2.1 The NRA's participation in planning liaison is to:

- **Protect the water environment from adverse effects of all types of development;**
- **Advise planning authorities on the protection of the public on matters of concern to the NRA;**
- **Identify demands on its services including flood protection, pollution prevention, water resource management, conservation, recreation, navigation and fisheries.**

2.2.2 The objectives are to:

- **Advise planning authorities of the NRA's views on proposed development, including matters for which those authorities have an obligation by statute, or order, to consult with the NRA, or are advised to do so by DoE Circular or Planning policy Guidance Notes;**
- **Protect water resources, surface and underground, including watercourses, aquifers, licensed and unlicensed wells, boreholes and other sources from pollution and derogation arising from development;**
- **Protect the NRA's plant and installations (including pumping stations and reservoirs) from encroachment and other hazards arising from development;**
- **Protect requirements of Statutory Main Rivers, the channels and banks of watercourses, flood protection works, floodplain and washlands from obstruction, deposition, erosion, unauthorised alteration or run-off in excess of capacity, arising as a result of development;**
- **Consider the impact of development upon land drainage and flood prevention measures in respect of existing or proposed developments and redevelopment;**
- **Consider the impact of development upon recreation associated with water space.**

2.3 The types of planning applications which the NRA considers of interest are shown in Appendix B. It is important to note that the list is not in order of importance nor is it weighted to indicate levels of concern.

3. PRESENT ARRANGEMENTS FOR PLANNING APPLICATION LIAISON

3.1 Planning authorities are responsible, under Town and Country Planning Legislation, for informing the NRA of all relevant planning applications and development plans, and have discretionary powers regarding the referral of other matters. However, LPA staff have little knowledge of, or concern with, matters affecting the NRA and cannot be relied upon to forward all relevant applications

3.2 Anglian Region have however adopted a visitor system whereby Area Planning Staff visit LPA on a regular basis. On these visits they inspect all applications and respond at the LPA to as many as possible. Visits are not usually made to LPA which have very few planning applications within Anglian NRA borders. A postal system is used where visits are not made.

3.3 The postal system is not favoured by Anglian planning sections as it relies on the LPA to initially enact a search, submitting only those applications they consider relevant, and, it reduces the personal contact between LPA and NRA officers. In addition, many LPA would now be reluctant to change to a postal system. The advantages and disadvantages of each of the two systems will be discussed later in the report.

3.4 There are four main categories of response made by the NRA;

- | | |
|------------------|--|
| ■ Not Applicable | Those applications that are of no interest to the NRA. |
| ■ No Comment | Applications that do not include potential or significant NRA interest and on examination are deemed to require no comment. |
| ■ Written at LPA | This set are relatively easy to assess and trained visitors are able to compose a response at the LPA office. Standard paragraphs and pro-forma sheets are used. |
| ■ Written at NRA | This set tend to be more complex applications which require further consultation usually involving other NRA functions. |

It is the last group that involves the most amount of work and hence attracts the greatest cost.

3.5 It proved difficult to determine reliable costs for the planning application liaison process. Cost information is presented in this report but it is stressed that comparisons between Functions and Areas should not be attempted as interpretation of what constitutes planning application liaison is suspect. Function and Area cost data has been presented purely to indicate the build-up to arrive at the totals. However, planning section costs are considered to be relatively accurate. As an accurate cost of planning application liaison is still not readily available, it is recommended that this matter is addressed to provide accurate and robust cost monitoring information. Such information will enable quantification of the planning liaison process. Staff time recording data is available to assist in this quest.

- 3.6 Planning application liaison within the Region is estimated to involve a total of 21 full time equivalents (FTE) across all functions, at a cost of £700K (includes overheads). The unit cost for responses written at NRA offices (£8,500 per annum) is calculated to be approximately £75. More detailed FTE and costs information is given in Appendix C.
- 3.7 Other statistics are presented in Appendix D. These illustrate planning section hours & costs, and the percentage of time visitors spend dealing with planning applications. However, due to the availability of data, different information has been compiled for each Area.
- 3.8 Planning liaison monitoring is currently achieved by collecting monthly data which report the number of applications processed (under various headings) and the time taken to respond. Targets for response times are:

1-14 Days	50% of applications
1-21 Days	75% of applications
1-28 Days	95% of applications

Monitoring results of the twelve month period June 1994 to May 1995 are summarised below:

	Written	% Completed in 14 days	% Completed in > 28 days
Northern	5188	79	3.5
Central	4078	51	6.5
Eastern	3246	50	7.5

It can be seen that targets are being achieved albeit the numbers do not reflect the amount of work required to complete an application response or the quality/effectiveness of the response.

- 3.9 In addition to the above a recent initiative requires that LPA decision notices, contained in their response to the application, are to be examined. The objective is to determine how successful the NRA have been in having their comments included in the LPA decision notices. This will provide some measure of the degree of success there has been for the effort involved in the liaison process. The data has yet to be reported from this initiative hence the Region does not know, on an objective basis, its effectiveness concerning planning applications. However, subjectively, we have an idea of success due to feedback/approaches from developers/consultants. Some planning staff have expressed concern that it will be difficult to obtain such information from some LPA and may incur a cost.
- 3.10 It should be recognised that whatever changes are ultimately implemented following this review this should not undermine the partnership/goodwill that has been established between the NRA, LPA and IDB. It is also stressed that regardless of the needs of the NRA the other organisations involved may not wish to amend their current practices.
- 3.11 Although the emphasis in this report has been in dealing with the LPA there is also a great deal of work associated with the applicant/customer direct. In many instances recommendations are made and agreements reached to ensure NRA interests are upheld. This work is often recorded as part of the planning application liaison process and can lead to a distortion of unit cost information.

4. REVIEW DETAIL

- 4.1** Existing arrangements were examined to determine how each Area Planning Section operated. It was immediately clear that although the process was the same there were significant differences as to the procedures, documentation and level of service adopted by the three Areas. Added to this is the differing relationships that exist with the other functions concerning the internal consultee process.
- 4.2** The variations arise from a combination of historical practice, natural differences, previous consultation with LPA, existing staffing, the experience of planning staff and the availability of IS equipment.
- 4.3** National initiatives also impact onto this arena. In particular a set of standard paragraphs was issued in 1994 with a view to providing a consistent approach to planning application responses. Each Area have adopted these but also incorporate their own paragraphs where they consider them to be more appropriate. Examples of existing standard letters and paragraphs used by each Area are given in Appendix E.
- 4.4** In summary three 'overlapping' procedures exist within the Region which all aspire to be an effective means of achieving the planning application liaison objectives.
- 4.5** The variations were compared and, following discussion, recommendations made under the following headings:
- Visitor Guidelines;
 - Response Format;
 - Standard/Level of Service;
 - IS Equipment;
 - IDB Involvement;
 - Visitor/Postal system;
 - Letters direct/indirect to applicant;
 - Future training;
 - One Stop Shop.

4.6 Visitor Guidelines

- 4.6.1 The planning officers (visitors) that visit the LPA already hold information that they use to assist them in the process of assessing each planning application. This supplements their own experiences and together enables each visitor to achieve the objective of dealing with as many applications as possible at the LPA ie. restricting the number which are bought back to NRA offices for attention.
- 4.6.2 Some of the information used in the assessment is provided by the internal consultee functions but, across the Region, the amount and type varies. An indication that Regional variance exists is provided by the monitoring data available. The data below compares the number of written responses at NRA offices with the number of applications received by the LPA.

	(a) No. Rec'd <u>at LPA</u>	(b) No. Written <u>at NRA Offices</u>	(c) <u>(b) as % (a)</u>
Northern	17,735	3,023	17
Central	20,788	2,691	13
Eastern	31,378	2,727	9

- 4.6.3 Information shown in Appendix D indicates that of those staff involved in planning application liaison 85% of their time is spent dealing with written responses at NRA offices. This equates to 11 FTE across the Region. In addition there is the time spent by other functions, equating to a further 9 FTE. If the number of these written responses is reduced by 25% then a workload equating to 4 FTE can be diverted to other work.

[25% of (11+9) = 5 FTE, minus additional work for visitors = 4 FTE]

- 4.6.4 If more data is made available to the visitor, possibly accompanied by training, then it should be possible for them to process more applications at the LPA. To this end, functional representatives on the group were invited to examine the criteria they use when making responses to planning applications. Initial results were encouraging suggesting new criteria can be given to the visitors thereby enabling them to achieve the above objective.
- 4.6.5 Another advantage of reducing the number of responses written at NRA offices concerns the length of time this process takes. LPA require that responses are actioned and returned as soon as possible as they have a procedural deadline to meet. Consultation is expected to be completed within 28 days after which time a formal request for an extension of time must be made. However, some LPA do not wait even the 28 days and, as a consequence, the response may be too late to be included in the decision notice. It follows that the NRA's interests will be better achieved if more responses can be made during the visits.

4.6.6 To increase the opportunity for more applications to be dealt with at the LPA the following recommendations are made:

- Each function to critically examine their assessment criteria. This has been partially completed by members of the group but further examination should be undertaken, especially to ensure Regional consistency;
- Establish a set of Anglian Region Guidelines which contain all relevant details for the visitor such that they may be as effective as possible;
- Appropriate training is given to visitors such that a consistent approach is practised throughout the Region.

If the recommendations above are implemented then target a 25% reduction in the number of responses written at NRA. The group propose that any freed staff resources should be directed to more proactive planning development work eg. development plans, early/on-going contact with developers, and examining LPA decision notices to monitor effectiveness.

4.7 Response Format

4.7.1 This particular topic was discussed at great length by the group. The importance of the topic arises because if the response is not in a form acceptable to the LPA, it is unlikely the LPA will include the NRA comments in their decision notices. In principle the NRA are using the Town and Country Planning Act (T & CPA) to communicate their interests to the LPA and the applicant. Whereas the NRA may not have legislative powers to enforce certain of its regulations, it can achieve its objectives if planning decisions contain appropriate NRA comments which are then embodied in the conditions of the application when approved.

4.7.2 Responses can be:

- **CONSULTEE ONLY**, where NRA gives advice to the LPA even though the NRA has no direct concern.
- **NO COMMENT**, where the NRA has no objection or does not wish to provide comments/conditions against the application;
- **An OBJECTION**, where the NRA wishes to object to the development on grounds that it will be detrimental to NRA interests;
- **CONDITIONAL**, where the NRA requests that a condition(s) is included in the decision notice, again to protect NRA interests.

It is the last of these that form the majority of the written responses either at the LPA or NRA offices.

4.7.3 National and Regional standard paragraphs have been developed to simplify the responses to the LPA but these do not address the real issue, ie. that responses must be in such a form as to permit the LPA to enforce the NRA objection or condition. In addition the response should also be written in "planning speak" which relates to planning issues and not, for example, NRA byelaw regulations.

4.7.4 Obviously the NRA has had some success with its responses to date and many LPA have discussed with the planning staff how the process can be improved. However, Central Area Planning Staff have recently completed a review of their approach to responses and have developed a format which has met with much acclaim by the LPA they have used to "test" it. This not only incorporates a simplified set of standard phrases but links these to form a letter which reads well rather than containing disjointed standard paragraphs. Details of the standard phrases and examples of the format are given in Appendix F, but in essence the format consists of:

- **Preamble** References and general introductory information;
- **Comment** The objections/conditions that are requested to be included within the decision notice. A reason for the comment is also clearly stated;
- **Informatives** These contain the relevant data which detail NRA regulatory or technical information. This would be expected to be appended to the decision notice itself;
- **Advice** Additional advice is also offered, mainly for the applicant, which would not be included in the decision notice. Some LPA pass on this advice to the applicant on behalf of the NRA;
- **Sign-off** Offer of further assistance if required and signature.

4.7.5 The main innovation used in Central's format is to limit the 'comment' element to a relatively few standard paragraphs which provide the LPA with an enforceable planning condition. The 'informative' element contains the NRA regulatory and or technical details that hitherto were often included in the 'comment' element.

4.7.6 The Group endorse the format being used in Central Area and recommend that it is adopted as the Regional standard. It is believed this approach will have the dual benefit of simplifying the response process (thereby speeding up the process) and improving the chances of NRA comments being contained within the LPA decision notice. A third benefit would be that LPA with shared Area boundaries will receive a common style of response from all Anglian planning sections.

4.7.7 The results of a questionnaire, recently conducted by Northern Area planning section, supports the need to revise the response format. When asked "What changes would you like to see the NRA make in the near future?", of the fourteen LPA who replied, 5 stated they would wish to see the standard paragraphs simplified/revised, and four requested that conditions are limited to planning issues that are enforceable. Appendix G contains the relevant questionnaire extract.

4.8 Standard/Level of Service

4.8.1 It was established that the three planning sections provide a different standard/level of service. Whereas complete standardisation may not be desirable it is considered that any variations should be strategically planned and not be as a result of historical practices, staffing levels or the expertise of the present incumbents.

4.8.2 It is recommended that further consideration is given to establishing a Regional approach to the service provided by the planning sections, relative to application responses. This should address the following:

- Establish/agree a Regional ethos (mission statement) for planning liaison which should embody the important contribution that planning section's can make when communicating with LPA, the general public (applicant) and internal consultees;
- Should planning officers be unpaid consultants to developers? Central Area currently provide a service whereby they provide balancing reservoir attenuation calculations free of charge. They consider this ensures that they get what they want as expediently and efficiently as possible;
- Degree to which internal consultees are informed of applications that may affect their particular function and the level of work that planning staff undertake on their behalf. The background of an individual planning officer impacts onto the type of service currently provided;
- One planning office dealing with one LPA. An opportunity to ensure this occurs will arise during the 'Boundary Review' following vesting day.
- Confirm that what is done is necessary, eg. is there a need to comment on all septic tank and soakaway arrangements;
- Should more work be undertaken to check construction details. If we do not check why comment on it?;
- Availability of information generally;
- The planning sections becoming a 'one stop shop' relative to development planning matters. At least ensure that responses to LPA are co-ordinated via the planning sections;
- The question of undertaking liaison work on behalf of Internal Drainage Boards's (IDB's). This point will be further discussed later in the report.

4.8.3 Implementation of some or all of the above recommendations in paragraph 8.2.3 may lead to the formation of mini centres of excellence for planning liaison. Particular skills and resources could be located at specific Area offices to provide a Regional service.

4.9 Information Systems (IS) Equipment

4.9.1 It is apparent that existing Technology could assist the planning liaison process more. In view of the volume of data collected and the need to maintain files, quick and easy data manipulation will improve the efficiency of the service. Planning sections have endeavoured to acquire appropriate technology but this does vary across the Region.

4.9.2 Three main IS applications are used at present:

- Word processor, used to access the set of standard paragraphs and pro-forma letters when responding to the LPA;
- A Fox Pro computer program used to record application details;
- A Graphical Information System (GIS), used in conjunction with the computer program to plot application details and to examine relevant site features.

These are broadly used in the same way by the three planning sections except that Eastern Area have the added advantage of access to a Document Image Processing (DIP) facility, see below.

4.9.3 The GIS is relatively new and has been shown to be useful in some ways but unfortunately there are still some inherent problems eg. to avoid 'scaling' problems, and hence improve the accuracy when plotting development sites, digital mapping should be used. A further problem is the length of time it takes to access archive plot details from GIS; it is often quicker and more reliable to access hard copy reference material. Speed of retrieval is being examined by National IS personnel but existing equipment and software limitations are prime factors.

4.9.4 Currently only Eastern Area planning section have a DIP facility. DIP enables hard copy data to be digitised and then filed onto computer media. The benefit of this facility is that planning application records, including drawings, can be easily stored and retrieved and, where appropriate, readily incorporated into word processor text. The ability to search and cross reference data quickly is a crucial feature when dealing with planning applications. Consistency in response to similar applications in the same vicinity is paramount. In addition the storage/filing area required is a fraction of that required in the other two Areas.

4.9.5 The group recommends that a technical appraisal is undertaken to assess how IS can be incorporated into the liaison procedures to improve effectiveness. Clearly access to DIP for all sections is desirable and this could perhaps be achieved by the use of Networking the existing Eastern Area equipment. The appraisal should also address the availability of information to all participants in the consultation process, including those based at catchment and sub catchment offices and, the longer term eg. communication with LPA could be by fax machine which would be directly linked to the DIP facility.

4.10 IDB Involvement

- 4.10.1** Currently the planning sections in Northern and Eastern Area's undertake work on behalf of a number of IDB's ie. Northern 10, Eastern 36. The IDB's affected are listed in Appendix H. This work constitutes the NRA vetting planning applications on behalf of the IDB's. The IDB's are then invited to comment, in effect extending the internal consultee procedure. The other IDB's in Anglian Region make their own visits to the LPA. It should be noted that IDB's are not statutory consultees under development planning legislation but are still consulted by the LPA.
- 4.10.2** The group affirmed that this practice is 'Ultra Vires' and as such should be terminated as soon as possible. (This matter was previously debated resulting in Dr Kevin Bond, whilst Regional General Manager, requesting such work for IDB's should cease) It is therefore recommended that discussions should be held with the appropriate IDB's with a view to effecting changes by 1st April 1996.
- 4.10.3** Implementation of the above recommendation is estimated to release 0.5 FTE across two Areas (Northern and Eastern).

4.11 Visitor/Postal System

- 4.11.1** Anglian Region have adopted a visitor system in preference to a postal system for the following reasons:
- All planning applications are vetted by the visitor not just those 'sent' by the LPA;
 - Personal contact can be made between NRA and LPA planning staff improving the understanding of each others needs;
 - Particular problems can be more easily resolved whilst at the LPA;
 - Appropriate data is readily available at the LPA, not reliant upon the LPA posting all the relevant documentation;
 - Postal delays are eliminated.
- 4.11.2** A disadvantage of the visitor system is that it does cost more to operate ie. vehicle travel costs and staff journey time.
- 4.11.3** Although the emphasis is to enact a visitor policy there remains some LPA for which a postal system is used. This occurs where it has been assessed that very few applications arise eg. where Anglian have a minor geographical share of an LPA with an adjacent NRA Region.
- 4.11.4** The visitor system works very well and the Group recommend it should continue. However, once the consultation process has been consolidated with a particular LPA then the position should be reviewed and the merits of postal versus visitor for that LPA evaluated. Should a postal system be adopted then it is recommended that regular formal contact should be made with the LPA to ensure the interests of both parties are being met. Three meetings per year is suggested. Proposals to mutually benefit from IS could be debated at such a forum eg. the use of FAX equipment directly connected to document readers thereby eliminating the manual data capture process.

4.12 Letters Direct/Indirect to Applicant

4.12.1 An important benefit of the planning application process is that the NRA obtains the name and address of the applicant and this provides an opportunity to supply to them all the relevant NRA regulatory information together with appropriate application forms etc. In some cases this data is supplied direct to the applicant but in other cases the formal response to the LPA contains the data which the LPA is requested to pass on.

4.12.2 The advantages and disadvantages of the two options are seen to be:

Advantages of using LPA

- Via the LPA the data will be received by the applicant at the same time as the LPA decision notice. It is considered that this will imply the NRA interests are inherent in the decision notice.
- The applicant is likely to be less confused as they would be dealing with only one 'Authority' initially.
- LPA are aware of the correspondence to the applicant.
- If co-ordinated through the response to the LPA there is less chance of functions communicating directly with the applicant and providing conflicting responses from the NRA. This has occurred in the past.
- Applicant may deny receiving NRA mail. To deny receiving LPA mail would deny having received development approval.

Advantages of direct communication

- NRA profile raised with applicants who are often developers.
- Applicant would receive the data more quickly as the decision notice takes time to process. This may assist the applicant if it is necessary for NRA Consents/Applications to be approved prior to the development proceeding, regardless of any LPA conditions.
- Simplify the amount of data contained in the response to the LPA.

4.12.3 The Group recommend that the NRA should contact the applicant direct (subject to agreement with the LPA) to supply informatives/advice and Consent/Application forms as appropriate. To placate any LPA concerns an appropriate reference should be included, and identical information contained, in the response to the LPA. In addition the planning sections are to act as the NRA post box for responses to the applicant. This will provide an opportunity for the interests of the NRA to be consistent.

4.13 Future Training

4.13.1 The Group recommend that a series of workshop training sessions are arranged so that all NRA officers involved in the consultation process understand each others needs. It will provide an opportunity to:

- Examine the various criteria used to determine application responses;
- Enable the recommended approach to the response format to be discussed;
- Examine the interaction between the planning sections and internal consultee functions with a view to establishing a system of 'best practice';
- Commence the compilation of a set of guidelines for visitors;
- Discuss the merits of IS equipment and associated interaction;
- Examine the documentation in use and consider standardisation where appropriate;
- Incorporate any changes due to the effect of the formation of the Environment Agency eg. boundary, legislation.

4.13.2 It is proposed that these workshops commence early in 1996 and are to include personnel from the Waste Regulatory and HMIP bodies as appropriate.

4.13.3 Regular 'formal' contact between planning teams and internal consultees is also recommended to maintain needs awareness and promote further efficiencies.

4.14 One Stop Shop

4.14.1 The concept of a 'One Stop Shop' has been debated previously in many forms. The latest published material in the Region is the report produced by one of the AIMS Groups in February 1995. This report promotes the idea that the three main authorisation sections (Land Drainage Consents, Water Resource Licences and Discharge Consents) should be amalgamated.

4.14.2 The Planning Review Group supports this concept but would add that planning applications should be included. This would create a fully integrated section dealing with similar, and often inter-related processes. It should provide benefits in customer care and internal efficiency, however, a detailed appraisal of the relative implications is required before it can be fully endorsed. An opportunity will arise to address this issue with the formation of the Environment Agency and the need to integrate all three constituent bodies.

4.14.3 A combined structure, as outlined above, should provide economies of scale which should assist a business case for IS equipment.

- 4.14.4** Although meritorious it is unlikely that such a major change will occur in the near future. To provide a partial system in the short term the Group recommend that the planning sections are promoted as the customer contact point for all development planning matters. It is envisaged that unless specific officers in other functions are requested by name the first contact should be to the planning section. This concept will be further enhanced if the recommendation in paragraph 4.8.2 is implemented ie. that all responses to the LPA are co-ordinated through the planning section.
- 4.15** In making the above points and recommendations the Group acknowledge the impact these may/will have on the relationship between the NRA (Environment Agency) and its customers, whether LPA, IDB or the general public. The management of changes must ensure that 'customer service' is not impaired, therefore, this task should not be under resourced or undervalued.

5. SUMMARY OF RECOMMENDATIONS

5.1 The following recommendations have been made within the report:

- i) Each function to critically examine their assessment criteria used during responses to planning applications. This has been partially completed by members of the group but further examination should be undertaken, especially to ensure Regional consistency. It is anticipated this will lead to less responses requiring internal consultation;**
- ii)* Establish a set of Anglian Region Guidelines which contain all relevant details for the visitor, such that they may be as effective as possible, and to provide a reference for training new visitors/planning staff;**
- iii)* Subject to proof of effectiveness, adopt the response format currently used in Central Area as the Regional standard, ie. Preamble, Comment, Informatives, Advice, Sign-off. This simplifies the response and uses planning 'language';**
- iv)* Examine the planning liaison standards/levels of services currently deployed in the Region and agree a Regional level of service albeit strategically planned variances may be allowed. This may lead to mini centres of excellence ie. particular skills/resources being located at specific Area Offices;**
- v)* Monitor the effectiveness of NRA responses by examining the LPA decision notices;**
- vi)* Commission a review of the IS needs both for the short and long term, with a view to improving the effectiveness of the liaison procedures;**
- vii) Cease the consultee work currently being undertaken on behalf of some IDB's, with effect from 1st April 1996;**
- viii)* Maintain the visitor system but review this option once the consultation procedure has been consolidated with an LPA. If a decision is taken to revert to a postal system at that time, then contact with the LPA should be maintained via regular formal meetings. Objective would be to reduce costs but maintain effectiveness;**
- ix) Adopt a direct approach with applicants ie. send NRA information (Informatives/Advice, Consent and Licence Application forms) direct to the applicant rather than rely on the LPA sending it. This will promote early contact with, and should assist, the customer. All appropriate informatives should still be sent to the LPA as part of the NRA response. This recommendation must however be subject to each LPA agreement;**
- x)* Implement a series of workshops to promote better understanding between all those involved in the consultation process (including HMIP and WRA staff as appropriate). In addition appropriate training to be given to visitors such that a consistent approach is practised throughout the Region;**
- xi) Set a target of a 25% reduction in the number of responses written at NRA, ie. more to be written at the LPA. If achieved this will release staff resources especially in the internal consultee functions. Reference recommendations i, ii, iii, iv, vii, x;**

- xii)* Any freed resources should be directed towards more proactive development control matters such as Development Plans and early liaison with developers, and, effectiveness monitoring [reference point v) above];
- xiii)* Develop accurate and robust costs for planning application liaison. This will provide a sound base from which future quantification of planning liaison can be achieved;
- xiv) In the short term promote the Area planning sections as being the point of customer contact for all development planning matters. It is envisaged customer service will be improved and would help to reduce the possibility of conflicting comments being made to the customer;
- xv) In the long term, subject to Environment Agency requirements, the Region works towards developing a 'One Stop Shop' which would combine the customer contact for the main authorisation sections (Land Drainage Consents, Water Resource Licences, Discharge Consents) with those of the planning applications procedures. Benefits from economies of scale, customer care and internal efficiency are envisaged.
- xvi) The process of implementing the above recommendations to be managed through the forum of the Regional Planning Group.

5.2 Those recommendations asterisked are similar in content to recommendations made in a recently published (December 1996) NRA Internal Audit Report entitled " Review of Planning Liaison", reference NAT/295.

EFFICIENCY REVIEW BRIEF
PLANNING APPLICATION PROCEDURES

Undertake a review of the present planning application procedures with a view to improving the delivery of service and, if possible, to identify resources which can be alternatively utilised.

Review to :

- a) Establish present practice:
 - i) Identify Area variances;
 - ii) Comment on documentation used;
 - iii) Critically examine reporting requirements;
 - iv) Identify staffing numbers involved;
 - v) Provide statistics on delivery of service;
 - vi) establish costs.
- b) Examine alternative methods and procedures.
- c) Consider implications of Envage.
- d) Recommend improved methods and procedures:
 - i) Provide delivery and cost comparisons;
 - ii) Identify method and time frame for implementation of any recommendations.
- e) Report to Management Team.

Review team consisted of

Ian Ripley, Regional Finance Manager, Peterborough.
Dave Warren, Productivity Services Manager, Peterborough
David Fisher, Senior Engineer (Planning), Lincoln.
Alan Rich, Assistant Engineer (Planning), Brampton.
Andrew Rose, Senior Engineer (Planning), Ipswich.
Melanie Pask, Quality Planning Officer, Lincoln.
Philip Kerridge, Technician (Flood Defence), Ely.
Giles Bryan, Hydrogeologist, Ipswich.
Andrea Shaftoe, Assistant Conservation Officer, Ipswich.

NB. Unfortunately, for various reasons, Andrea was unable to attend any of the meetings.

PLANNING REVIEW - OUTLINE PROJECT PLAN

1995

1996

	JUL	AUG	SEP	OCT	NOV	DEC	JAN
Examine and Record Existing Practices	—	—	—				
Consider/Develop Options			—	—			
Appraise Options				—	—		
Compile draft Report and Circulate					—	—	
Compile Final Report						—	—
Interim Report to RMT/Planning Managers					■		
Final Report to RMT							■

BASELINE DEVELOPMENT SCHEDULE SUMMARY SHEET

DEVELOPMENTS REQUIRING NRA CONSULTATION

GENERAL

- A Development which departs significantly from published Development Plans.
- B Development within or adjacent to any watercourse, on flood plains including coastal plains and tidal lengths of rivers, washlands and in areas where there may be drainage problems.
- C Development on, under or adjacent to or protected by any flood bank, sea defence or other flood control structures.
- D Development which may affect an aquatic/wetland site of conservation interest.
- E Development of contaminated land.
- F Development involving the disposal of sewage (other than to a public sewer) including the use of septic tanks, cesspools, sewage treatment plants and private sewers.
- G Development which could adversely affect the quantity or quality of water resources in groundwater protection zones.
- H Development which could exacerbate existing surface water and foul water sewerage or sewage disposal problems.

SPECIFIC

- I Storage facilities for petroleum products, chemicals, etc., including petrol filling stations, fertilisers and pesticides (above or below ground).
- J Timber treatment plants.
- K Intensive livestock and poultry units.
- L Kennels, catteries, stables etc.
- M Mineral workings and exploratory works including restoration.
- N Waste disposal operations (including landfill, waste transfer stations, incinerators, scrap yards, baling and recycling plants and solvent recovery plants)
- O Burial grounds
- P Development of water based recreation facilities.
- Q Vehicle parks and plant hire depots, including vehicle and plant washing areas.
- R Major residential, industrial and commercial developments.
- S Fish farming activities including fish stocking or relocation of fish or works which will restrict the movement of fish.
- T Camping and caravan sites, including mobile homes.
- U Golf courses.
- V Swimming pools.
- W Water reservoirs and conservation lakes.
- X Development requiring an environmental assessment, including culverting of watercourses.
- Y Highways, railways, power stations, airports, tunnels and Trunk pipelines (for the transmission of gas, oil and water) and any associated facilities.

SUMMARY OF PLANNING LIAISON COSTS/TIME

Where available time recording data was used, otherwise estimates were obtained for time spent on planning application liaison. The number of FTE's was calculated using the annual hours divided by 1628 (annual working hours)

Costs were calculated using 1994/5 salary including car allowance, subsistence and other overheads and on costs, as applicable.

OVERALL FTE

	<u>Plnng</u>	<u>FRCN</u>	<u>WQ</u>	<u>WR</u>	<u>Fld Def</u>	<u>Tot</u>
NORTHERN	4.9	0.8	0.5	0.1	0.6	6.9
CENTRAL	4.9	0.9	1.3	0.2	2.0	9.3
EASTERN	2.9	0.2	1.0	0.1	0.9	5.1
TOTALS	12.7	1.9	2.8	0.4	3.5	21.3

OVERALL £K COSTS/YR

	<u>Plnng</u>	<u>FRCN</u>	<u>WQ</u>	<u>WR</u>	<u>Fld Def</u>	<u>Tot</u>
NORTHERN	172	21.6	10.7	3.0	22.3	229.6
CENTRAL	142	27.2	48.0	4.5	73.8	295.5
EASTERN	114	4.1	37.2	3.0	32.8	191.1
TOTALS	428	52.9	95.9	10.5	128.9	716.2

FURTHER STATISTICS FOR REGIONAL PLANNING LIAISON% BREAKDOWN VISITORS TIME

(Eastern Area Data only)

	<u>% Time</u>
Responses	13
Tech Assistance	52
Meetings	5
Council Visits	30

OTHER DERIVED DATA FOR PLANNING APPLICATIONS

(Northern Area Planning Section Staff Only)

	<u>% of No</u>	<u>% of Time</u>
Not Applicable	13	1
No Comment	56	8
Written at LPA	12	6
Written at NRA	19	85

PLANNING LIAISON COST COMPARISON (All Functions)

	<u>Northern</u>	<u>Central</u>	<u>Eastern</u>
i) Total Cost/Yr £K*	214 (157)	283 (129)	181 (104)
ii) Total Written Responses	5188	4078	3246
i) / ii) £	41 (30)	69 (32)	56 (32)
	<u>MEAN Cost = £54 (31)</u>		
iii) At NRA Cost /Yr £K#	204 (146)	274 (121)	174 (97)
iv) Written at NRA only	3023	2691	2727
iii) / iv) £	67 (48)	101 (45)	64 (36)

MEAN Cost = £74 (43)

Figures in brackets denote planning section costs only.

* Calculated by taking 91 % of planning section costs plus other function costs. (Ref.App.C)

Calculated by taking 85 % of planning section costs plus other function costs. (Ref.App.C)

Contact: _____



*National Rivers Authority
Anglian Region*

Date: _____

Dear Sirs

PLANNING APPLICATION NO: _____

LOCATION: _____

With reference to the above mentioned application the Authority have no objections to the proposed development but wishes to make the following comments on the attached sheet(s).

Yours faithfully

D S Fisher

MP

MERVYN PETTIFOR
PLANNING MANAGER

Enc.



Awarded for excellence

RON LINFIELD Area Manager (Northern)
GRAINGER DAVIES Regional General Manager

Area Office: Aqua House, Harvey Street, Lincoln, LN1 1TF.
Tel: (01522) 513100 Telefax: (01522) 512927

- ☐ (QC11)
CONDITION: No development approved by this permission shall be commenced until a scheme for the disposal of foul and surface waters has been approved by and implemented to the reasonable satisfaction of the Local Planning Authority.
- REASON: To prevent pollution of the water environment.
- ☐ (Q2D)
CONDITION: Foul drainage from the proposed development shall be discharged to the main foul sewer.
- REASON: To prevent pollution of the water environment.
- ☐ (D37)
CONDITION: Surface water drainage shall be connected to the public surface water sewer.
- REASON: To ensure satisfactory drainage of the site.
- ☐ (QC19)
CONDITION: The foul drainage from the proposed development shall be discharged to a septic tank and soakaway system which meets the requirements of British Standard BS 6297: 1983 and which complies with the following:-
- (a) there is no connection to any watercourse or land drainage system and no part of the soakaway system is situated within 10 metres of any ditch or watercourse.
- (b) porosity tests are carried out to the satisfaction of the Local Planning Authority to demonstrate that suitable subsoil and adequate land area is available for the soakaway (BS 6297: 1983 refers).
- ☐ (QC12)
CONDITION: No development approved by this permission shall be commenced until a scheme for the conveyance of foul drainage to a private treatment plant has been submitted to and approved by the Local Planning Authority. No part of the development shall be brought into use until such treatment plant has been constructed.
- REASON: To prevent pollution of the water environment.
- ☐ (QC28)
CONDITION: All foul sewage or trade effluent, including cooling water containing chemical additives, or vehicle washing water, including steam cleaning effluent shall be discharged to the foul sewer.
- REASON: To prevent pollution of the water environment.
- ☐ (Q40)
CONDITION: All drums and small containers used for oil and other chemicals shall be stored in bunded areas which do not drain to any watercourse, surface water sewer or soakaway.
- REASON: To prevent pollution of the water environment.

- (QC02)
CONDITION: Any facilities for the storage of oils, fuels or chemicals shall be sited on impervious bases and surrounded by impervious bund walls. The volume of the bunded compound should be at least equivalent to the capacity of the tank plus 10. If there is multiple tankage, the compound should be at least equivalent to the capacity of the largest tank, or the combined capacity of interconnected tanks, plus 10%. All filling points, vents, gauges and sight glasses must be located within the bund. The drainage system of the bund shall be sealed with no discharge to any watercourse, land or underground strata. Associated pipework should be located above ground and protected from accidental damage. All filling points and tank overflow pipe outlets should be detailed to discharge downwards into the bund.

REASON: To prevent pollution of the water environment.

- (Q20)
CONDITION: Liquid and solid animal/vegetable wastes and associated contaminated waters shall be stored and disposed of in a manner that will not lead to pollution of surface or underground waters.

REASON: To prevent pollution of the water environment.

- (Q23)
CONDITION: Vehicle loading or unloading bays and storage areas involving chemicals, refuse or other polluting matter shall not be connected to the surface water drainage system.

REASON: To prevent pollution of the water environment.

- (QC20)
CONDITION: Notwithstanding the provisions of the Town and Country Planning General Development Order 1988 (or any order revoking or re-enacting that Order) no tank for the storage of oils, fuels or chemicals shall be erected within the curtilage of a dwellinghouse unless it is sited on an impervious base and surrounded by impervious bund walls. The volume of the bunded compound should be at least equivalent to the capacity of the tank plus 10. All filling points, vents, gauges and sight glasses must be sealed with no discharge to any watercourse, land or underground strata. Associated pipework should be located above ground and protected from accidental damage.

REASON: To prevent pollution of the water environment.

The following informatives and recommendations should be included with the decision notice

- (QR03)
 Anglian Water Services Ltd., should be consulted by the Local Planning Authority and be requested to demonstrate that the sewerage and sewage disposal systems serving the development have sufficient capacity to accommodate the additional flows, generated as a result of the development, without causing pollution.

- (QR02)
 An acceptable method of foul drainage disposal would be connection to the foul sewer.

(QD7)

- The applicant is advised (before the septic tank is installed) to obtain professional advice as to whether the tank and its associated soakaway system will work satisfactorily, having regard to sub-soil conditions. If the applicant, after percolation tests have been completed, finds that the ground conditions are unsuitable for soakaway then we must be consulted regarding other methods of foul sewage disposal.

(QI12)

- Only domestic sewage should be discharged to the septic tank.

(QI11)

- Each dwelling should be served by a separate septic tank and soakaway system.

(QI08)

- The applicant should ensure that the existing septic tank is in a good state of repair, regularly desludged and of sufficient capacity to deal with any potential increase in flow and loading which may occur as a result of this proposal.

(QI14)

- Trade effluent shall not be discharged to a septic tank.

(QR01)

- An acceptable method of foul drainage disposal would be the provision of a watertight sealed cesspool designed and constructed to the satisfaction of the Local Planning Authority.

(QI06)

- The foul drainage system should be sited so as not to cause pollution of any watercourse, well, borehole, spring or groundwater.

(QI16)

- Only clean surface water from roofs and paved areas should be discharged to any soakaway.

(QI05)

- The applicant should ensure that the land proposed for the soakaway, for surface water drainage, has adequate permeability in accordance with BS 6297: 1983.

(QI33)

- Prior to being discharged into any watercourse, surface water sewer or soakaway system, all surface water drainage from parking areas and hardstandings shall be passed through an oil interceptor designed and constructed to have a capacity and details compatible with the site being drained. Roof water shall not pass through the interceptor.

(QI34)

- Prior to being discharged into any watercourse, surface water sewer or soakaway system, all surface water drainage from parking areas and hardstandings shall be passed through trapped gullies with an overall capacity compatible with the site being drained.

(D69)

- The watercourse to which surface water from the development will discharge is subject to riparian responsibility and the applicant should provide adequate information to the local planning authority to show that capacity is available in the receiving system for the increased discharge proposed. Such information should thereby satisfy the riparian owners of the watercourse that the development will not increase flood risk elsewhere. Responsibility for the riparian system should be clearly defined.

(QI17)

- Swimming pool filter backwash should be passed to soakaway or the foul drainage system, and not to a surface water sewer or watercourse.

(QI19)

- The applicant may require the written consent of the Authority under the Water Resources Act 1991, to discharge the pool contents to a surface water sewer, direct to a watercourse, to controlled waters or to soakaway and should contact the Authority for advice.

(QCF)

- Facilities should be provided to ensure that waste oil is stored and disposed of in a manner that will not lead to pollution.

(QI10)

- Site operators should ensure that there is no possibility of contaminated water entering and polluting surface or underground waters.

(QI03)

- Any culverting of a watercourse requires the prior written approval of the Local Authority under the terms of the Public Health Act 1936, and the prior written consent of the Authority under the terms of the Land Drainage Act 1991/Water Resources Act 1991. The Authority seeks to avoid culverting, and its consent for such works will not normally be granted except for access crossings.

(QI01)

- Under the terms of the Water Resources Act 1991, the prior written consent of the Authority is normally required for any discharge of sewage or trade effluent into controlled waters, and may be required for any discharge of surface water to such controlled waters or for any discharge of sewage or trade effluent from buildings or fixed plant into or onto ground or into waters which are not controlled waters. Such consent may be withheld. (Controlled waters include rivers, streams, underground waters, reservoirs, estuaries and coastal waters).

(QI25)

- Under the terms of the Control of Pollution (Silage, Slurry and Agricultural Fuel Oils) Regulations 1991, the person who proposes to have control over any relevant storage installation is required to serve notice on the Authority specifying the type of structure to be used and its location at least 14 days before it is to be used for the keeping or storing of any relevant substance.

(QC4)

- Environmentally sympathetic landscaping works should be carried out to complement the character setting of the site and the uses to which it will be put.

Date:.....

Mr R L Barrett, Dip TP, MRTPI, DMS
 Chief Development & Planning Officer
 Braintree District Council
 Causeway House
 Bocking End
 BRAINTREE
 Essex
 CM7 6HB



National Rivers Authority
 Anglian Region

Dear Sir

PLANNING APPLICATION No.....

With regards to the above planning application, this Authority would like to make the following remarks (**ONLY ringed paragraphs apply**) for inclusion within the Decision Notice, as a Condition and/or Advice to the applicant as appropriate:-

QC19 CONDITION: The foul drainage from the proposed development shall be discharged to a septic tank and soakaway system which meets the requirements of British Standard BS 6297: 1983 and which complies with the following:-

(a) there is no connection to any watercourse or land drainage system and no part of the soakaway system is situated within 10 metres of any ditch or watercourse, or within 50 metres of a well, borehole or spring.

(b) porosity tests are carried out to the satisfaction of the Local Planning Authority to demonstrate that suitable subsoil and adequate land area is available for the soakaway (BS 6297: 1983 refers).

REASON: To prevent pollution of the water environment.

QI01

With regard to the proposal to install a sewage treatment plant. Under the terms of the Water Resources Act 1991, the prior written consent of the Authority is normally required for any discharge of sewage or trade effluent into controlled waters, and may be required for any discharge of surface water to such controlled waters or for any discharge of sewage or trade effluent from buildings or fixed plant into or onto ground or into waters which are not controlled waters. Such consent may be withheld. (Controlled waters include rivers, streams, underground waters, reservoirs, estuaries and coastal waters). Application forms are available from the NRA upon request (telephone No: 01473 727712)

DAVID KING Area Manager (Eastern)
 GRAINGER DAVIES Regional General Manager





- QR01** An acceptable method of foul drainage disposal would be the provision of a watertight sealed cesspool designed and constructed to the satisfaction of the Local Planning Authority.
- QI61** Liquid and solid animal/vegetable wastes and associated contaminated waters shall be stored and disposed of in a manner that will not lead to pollution of surface waters.
- QI10** Site operators should ensure that there is no possibility of contaminated water entering and polluting surface or underground waters.
- QI17** Swimming pool filter backwash should be passed to a soakaway or the foul drainage system, and not to a surface water sewer or watercourse.
- QR55** Only clean surface water from roofs and roads should discharge to any soakaway or watercourse, or surface water sewer.
- AR64** If there is no mains water at the site and/or the applicant intends to abstract raw water (ie. non-mains) groundwater or surface water at the site. The applicant is advised to contact the water resources section of the NRA to discuss the proposals at the earliest opportunity. (telephone No. 01473 727712)
- FI03** Any culverting of a watercourse requires the prior written approval of the Local Authority under the terms of the Public Health Act 1936, and the prior written consent of the Authority under the terms of the Land Drainage Act 1991/Water Resources Act 1991. Application forms are available from the NRA upon request. (telephone No 01473 727712)
- SP14** The Authority has no objection to the proposed development.
- SP50** The Authority has no comment.

Yours faithfully

pp Jonathan S Wortley (Dr.)
Planning Manager (Eastern)

N.B Only the ringed paragraphs are relevant to the reply.

Our Ref: 95/2/H/0106

Date: 5 July 1995

The Chief Planning Officer
Huntingdonshire District Council
Pathfinder House
St Mary's Street
HUNTINGDON
Cambs PE18 6TN

Dear Sir

Planning Application No. 95/0631

PROPOSAL: DEPOSIT OF WASTE TO FORM IMPROVED GROUND
CONTOURS AND DRAINAGE CONTROL FOR AGRICULTURAL
USE
LOCATION: BRICKYARD FARM COW LANE GODMANCHESTER
APPLICANT: G W MANCREEF

Thank you for referring the above application which was received on 1 June 1995.

The application, as submitted, fails to explain sufficiently the method of pollution control.

As the site delineated is within an area of environmental concern, where the proximity of existing ground water levels and the impact of potential pollution must be fully considered, we suggest that the following condition is appended to any approvals given:-

CONDITION Prior to the commencement of any development, a description of materials to be used for landfill shall be submitted to and agreed in writing with the Local Authority. The infill works shall be carried out and completed in accordance with the approved plans.

REASON To reduce the risks of pollution to the water environment.

The NRA will be pleased to assist in the assessment of proposals submitted by the applicant to meet these conditions.

Advice to applicant

To assist in the presentation of satisfactory proposals, the following information is offered.

- 2 -

All materials used in landfill or other ground raising shall be inert and incapable of causing pollution to ground waters.

Should you wish to discuss these matters further please do not hesitate to contact us.

Yours faithfully

BRIAN ELSDON
Planning Manager

Please ask for ALAN RICH

3

STANDARD COMMENTS - ADDENDUM (USER NOTES)

A1 We refer to the above mentioned application received at our offices on ***.

SP11 The Authority OBJECTS to the proposed development as submitted on the following grounds:-

FLOODPLAIN

A2 The proposed site lies

- a within
- b partly within

an area liable to flood. In addition to the risk of flooding to the proposal (and its successors) the flood area and volume is part of the established land drainage system.

A3 This Authority wishes to maintain its principle of resisting the loss of flood volume and flow capacity either by demonstrable or incremental amounts. However, subject to promotion by the Council, this Authority may be able to reconsider the proposal if full details are submitted considering the topography, flood development and possible compensation works. Compensation works will be required to take into account both flood capacities and environmental aspects.

A4 The NRA will be pleased to assist in the assessment of proposals submitted by the applicant to develop a scheme to compensate for the loss of floodplains and associated environmental aspects.

CULVERTING

A5 The application, as submitted, infers works to a watercourse which requires the formal consent of the National Rivers Authority under the Land Drainage Act 1991 and possibly the consent of the Local Authority under the Public Health Act 1936. Consent for the works is not implied by these comments.

MAIN RIVER

A6 The application, as submitted, shows proposed works within....

- a lands owned by this Authority and permission to carry out the proposed works has not been given. Permission is not implied by these comments.
- an area controlled by byelaws given under the Water Resources Act 1991. The extent of the byelaw controlled area can be defined as a strip.....
- b 9m wide measured from the top of the channel edge.
- c 9m wide measured from the landward toe of the flood protection embankment.
- d 9m wide measured from the landward toe of the tidal flood defence.

Consent for the works will not be given.

SEA DEFENCES

See Mick D to establish requirements.

POLLUTION

- A7** The application, as submitted, shows works within an area which may be contaminated.
- a** Until the extent of contamination has been defined by a detailed site investigation to assess the degree and nature of the possible contamination present, and to determine its potential for the pollution of the water environment, this Authority is required to maintain an objection in principle.
 - b** The NRA will be pleased to advise on possible methods and the extent of the required investigation.
- A8** The proposal represents an unacceptable risk of pollution to the water environment.
- A9** The application, as submitted, fails to explain sufficiently the method of...
- a** Foul drainage.
 - b** Surface water drainage.
 - c** Foul and surface water drainage.
 - d** Pollution control.
- A10** As the site delineated is within an area of...
- a** unknown sewerage capacity,
 - b** vulnerable aquifer,
 - c** limited drainage capacity,
 - d** environmental concern, where the importance of existing waterlevels and the impact of potential pollution must be fully considered.

we suggest that the following condition is appended to any approvals given:-

(5)

A11 CONDITION

Prior to the commencement of any development, a scheme for the provision and implementation of

- a Foul drainage
- b Surface water drainage
- c Foul and surface water drainage
- d Pollution control

shall be submitted to and agreed in writing with the Local Authority. The drainage works/scheme shall be constructed and completed in accordance with the approved plans.

A12 REASON

- a To ensure an adequate drainage system to reduce the risks of flooding to the water environment.
- b To ensure an adequate drainage system to reduce the risks of flooding and pollution to the water environment.
- c To reduce the risk of pollution to the water environment.

The NRA will be pleased to assist in the assessment of proposals submitted by the applicant to meet these conditions.

A13 Planning Informatives

In order that the applicant is aware of NRA legislation which may effect the proposed development, the following planning informatives should be attached to any approvals.

* any informative can be given here.

A14 Advice to applicant

To assist in the presentation of satisfactory proposals, the following information is offered.

* any advice can be given here.

A15 Should you wish to discuss these matters further please do not hesitate to contact us.

(2)

Suggested 'Cover All' Conditions.

1. **CONDITION:** Prior to the commencement of any development, a scheme for the provision and implementation of *** shall be submitted and agreed in writing with the Local Planning Authority in consultation with the NRA.

- ***c1. foul water drainage
- c2. surface water drainage
- c3. foul and surface water drainage
- c4. trade effluent storage
- c5. trade effluent drainage
- c6. trade effluent treatment
- c7. flood protection
- c8. conserving ***
- c9. fisheries protection
- c10. groundwater protection
- c11. pollution control

2. **REASON:** To prevent the increased risk ***

- ***r1. of flooding.
- r2. of pollution of the water environment.
- r3. of flooding and/or pollution of the water environment.

3. **REASON:** To ensure a satisfactory method of ***

- ***r1. surface water drainage.
- r2. foul water drainage.
- r3. foul and surface water drainage.
- r4. protecting property/lands against an increased risk of flooding.

30 September 1993

The Chief Planning Officer
South Cambridgeshire District Council
South Cambridgeshire Hall
9/11 Hills Road
Cambridge
CB2 1PB



NRA

*National Rivers Authority
Anglian Region*

Our Ref: ADR/93/2/SC/0171

Dear Sir

Planning Application No. S/0917/93

**PROPOSAL : CHANGE OF USE OF LAND TO ROWING LAKE, AND COUNTRY
PARK INCLUDING ROADS, CANAL, BRIDGES AND BOATHOUSE.**

LOCATION : MILTON AND WATERBEACH

APPLICANT : THE CAMBRIDGE ROWING TRUST

Please be advised that we have been in recent discussion with the applicant in respect of the provision of technical information for the above proposal. We have been informed that the applicant is unable to gain access to all of the lands to carry out a detailed survey. A detailed survey is fundamental to considering the proposal as submitted.

Accordingly, to ensure the proper control of the proposal and protection of both the groundwater resource and flood defence requirements, we suggest that the following conditions are appended to any approvals that may be given:-

CONDITION

Prior to the commencement of any development a scheme for the method of working for all excavations and structures shall be submitted and agreed in writing with the Local Planning Authority.

REASON

To maintain the groundwater and flood defence status quo

CONDITION

Prior to the commencement of any development a scheme for the protection of groundwater shall be submitted and agreed in writing with the Local Planning Authority.

REASON

To reduce the risks of derogation or pollution of existing water resources.

cont/d...



Awarded for excellence

GEOFF BEEL Area Manager (Central)
GRAINGER DAVIES Regional General Manager

Area Office: Bromholme Lane, Brompton, Huntingdon, Cambs, PE18 8NE.

Tel: (01480) 414581 GTN: 6230 Telefax: (01480) 413381 Direct Dial: (01733) 46 - ext. no.



-2-

CONDITION

Prior to the commencement of any development a scheme for the continued effective operation of existing watercourses and ditches shall be submitted and agreed in writing with the Local Planning Authority.

REASON

To maintain the Land Drainage status quo

CONDITION

Prior to the commencement of any development a scheme for the protection of main river fish and fish stocks shall be submitted and agreed in writing with the Local Planning Authority.

REASON

To provide protection and enhancement of the water environment.

The following planning informatives should be attached to any planning permission granted:-

Planning Informatives

Under the terms of the Water Resources Act 1991 and the Land Drainage Byelaws, the prior written consent of the NRA is required for any proposed works or structures in, over, or under or within 9 metres byelaw distance of the main river Cam.

Any culverting or realigning of a watercourse requires the prior written approval of the Local Authority under the terms of the Public Health Act 1936, and the prior written consent of the NRA under the terms of the Land Drainage Act 1991/Water Resources Act 1991.

Under the terms of the Water Resources Act 1991, an Abstraction Licence will be required from the NRA for the abstraction of water from any inland waters or underground strata. This is dependant on water resource availability and other factors and may not be granted.

Under the terms of the Water Resources Act 1991, an Impounding Licence may be required from the NRA for the impounding of any watercourse, ditch or stream (e.g. by dam, weir etc.)

Under the terms of the Water Resources Act 1991, it is the responsibility of the developer to check with the NRA as to the acceptability of any groundwater control measures (e.g. dewatering), and a conservation notice may be applicable.

cont/d...

-3-

Advice to Planning Authority

The proposed railway underpass and culvert is the most complex part of the proposed development. It is most probable that a failure to install the underpass correctly will require an abandonment of the structure to ensure the continued operation of the railway line.

Accordingly, to ensure that this essential element is correctly in place and pertinent to the remainder of the development, we suggest that it would be prudent to require that this structure is complete and correct prior to any other part of the works commencing.

At present we are not persuaded that the proposal to form a perimeter ditch will prove adequate to provide an outfall for the 'Award Drains' indeed, we are concerned that such a ditch will derogate existing water abstraction rights and be detrimental to agricultural groundwater requirements.

We cannot accept the current method of working as providing the necessary protection for existing groundwaters and drainage regimes. We have suggested alternative methods to the applicant in order that a fully engineered system is adopted that will be able to be monitored during construction and tested for adequacy after.

We assume that any monetary Bonding of the works will encompass all associated matters to ensure that the determination of responsibility will not become an issue that may delay the prompt correction of any problems requiring the use of the Bond.

We will be pleased to assist in the assessment of proposals submitted by the applicant to meet the suggested conditions. Similarly, should the Council wish to discuss the matters as the proposal develops further, we will be pleased to comply.

Yours faithfully,

Brian Elsdon
Planning Manager

Please ask for Mr Alan Rich

EXTRACT FROM NORTHERN AREA QUESTIONNAIRE

It can be seen that the majority indicate that standard paragraphs need addressing (marked with *) or that comments should be confined to planning issues (marked with @).

8a. What changes would you like to see NRA make in the near future?

- | | | |
|---------|---|---|
| P | - | Issue a sheet of standard paragraphs to attach to the Decision Notice. |
| R-DC | - | Tailor comments to planning and make direct contact with Developer. |
| R-LP | - | Agree replies with Anglian Water, more succinct replies, confine comments to essential for land use planning, improve information base. |
| NKDC | - | Use questionnaire presently being trailed to tailor response to the proposal. |
| Glan | - | Reduce the amount of detailed comments on minor developments. |
| WLDC | - | Look again at standard conditions/paragraphs to see if they are enforceable by: <ol style="list-style-type: none"> 1. NRA - Government guidance is clear that planning conditions should not be imposed if covered by other legislation. 2. LPA. 3. Other. |
| | - | We should all be clear of legal position with regard to a recommended condition/informative. |
| Clee | - | A detailed breakdown of the responsibilities of NRA, IDB's and Anglian Water would be very helpful. |
| Well | - | None. |
| Gr | - | Quicker replies, cover for NRA visit, standard paragraphs. |
| Kett | - | None. |
| NBC | - | Enforcing pollution control measures. |
| SKDC-LP | - | None. |
| SKDC-DC | - | Requested conditions that are relevant, enforceable and responsibility for compliance. |
| Clee | - | Resolve confusion over responsibilities, revise standard paragraphs. |

NORTHERN AREA IDB LISTING

Witham Fourth IDB

Black Sluice IDB

Welland and Deeping IDB

South Holland IDB

North East Lindsey IDB

Louth IDB

Ancholme IDB

Upper Witham IDB

Witham Third IDB

Witham First IDB

EASTERN AREA IDB LISTING

Alderton, Hollesley & Bawdsey IDB

Burgh Castle & District IDB

Happisburgh to Winterton IDB

Langley, Chedgrave & Toft Monks IDB

Lothingland IDB

Blundeston, Flixton & Oulton IDB

Fromus, Alde & Thorpeness IDB

Holme Common IDB

Limpenhoe & Reedham IDB

Lower Alde IDB

Lower Bure IDB

Lower Waveney Second IDB

Lower Yare First IDB

Lower Yare Third IDB

Middle Alde IDB

River Deben Lower IDB

River Wensum IDB

River Stiffkey IDB

Minsmere IDB

Oulton, Carlton Colville & Barnby IDB

Repps, Martham & Thurne IDB

Lower Waveney IDB

Lower Waveney Third IDB

Lower Yare Second IDB

Lower Yare Fourth IDB

Middle Bure IDB

River Gipping IDB

Smallburgh IDB

Upper Alde IDB

Muckfleet & South Flegg IDB

River Blyth IDB

River Burn IDB

Upper Bure IDB

Waveney Valley IDB

River Deben Upper IDB

Upper Yare & Tas IDB