



B O S T O N B O R O U G H C O U N C I L

REPORT TO:	Planning Committee
DATE:	15 January 2019
SUBJECT:	Planning Application Validation Checklist
PORTFOLIO HOLDER:	Councillor Michael Cooper
REPORT AUTHOR:	Lisa Hughes
EXEMPT REPORT?	No

SUMMARY

The Planning Committee agreed at its meeting on 16th October 2018 for a consultation to be undertaken on a proposed Planning Application Validation Checklist for 'Planning and Other Applications' and also for 'Householder Applications'.

Planning applications require information to be provided by the applicant in order for the proposal to be considered against national and local plan policies as well as other material considerations. The Government sets out within the National Planning Practice Guidance (Paragraph: 016 Reference ID: 14-016-20140306) the information required to be submitted for an application to be valid (includes application form, fee, site and location plans). However, other information is more often than not required, such as floor and elevation plans, flood risk assessments, planning statements etc. This information is not statutorily required to make an application valid and is currently requested by the Council, if not submitted with the application, after the application is notified to neighbours and Councillors on the weekly list.

This can cause delay in the determination of the application. The Growth and Infrastructure Act 2013 enables local planning authorities to adopt a 'local list' of requirements. This, the National Planning Policy Framework 2018 and Planning Practice Guidance requires Local Planning Authorities to only request information that is relevant, necessary and material to the development proposed and to review their validation checklist every 2 years in order to be able to rely on information requirements within their local list.

A local list was prepared for planning applications detailing the information required for the differing types of proposals that might be submitted to the Council as well as detailing when the relevant information will be required. A shortened, and simpler, version has been created for householders. Consultation took place for 6 weeks between 22nd October and 30th November 2018. This report provides details of the responses as well as updates the respective checklists to take account of comments.

RECOMMENDATIONS

That Planning Committee agree for the 'Planning and Other Applications' and 'Householder Applications' Planning Application Validation Checklists to be used to validate all planning and associated applications from the 14th January 2019. Those applications received before the 14th January but are invalid in accordance with the National List will be subject to the local list where additional information is received after business hours on the 11th January 2019.

REASONS FOR RECOMMENDATIONS

To enable the Council to adopt a local list of planning application validation requirements. This will assist applicants by knowing the information required to be submitted with an application in order for it to be determined, thus speeding up the planning process. It should assist parties interested in the application in having all information available from the outset enabling comprehensive comments on a development proposal.

ALTERNATIVES CONSIDERED

Not adopting a local planning application validation checklist.

REPORT

1. Planning Application Validation Checklist

- 1.1 Information is required to determine a planning application. The Government introduced on 6 April 2008, a national list of documents and information necessary in order to validate planning applications. These comprise:
 - Completed application form
 - Fee
 - Site Location Plan (showing the site in relation to the surrounding area)
 - Ownership Certificate and Agricultural Land Declaration
- 1.2 In addition, a Design & Access Statement is required for certain planning applications. There are also specific requirements set out for Outline planning applications which requires an indication of the area or areas where access points to the development will be provided to be shown, even if access is a reserved matter. Applications subject to Environmental Impact Assessment also require an Environmental Statement.
- 1.3 Any other information required such as elevations or floor plans of the proposal, statements such as flood risk are not included within the national list and therefore cannot be currently requested in order to make the application valid. As a consequence, the Council will consult on planning applications, sometimes with very limited information for the public, consultees and Councillors to view. Any additional information required to enable a proposal to be properly considered is requested during the course of the application. This has a number of drawbacks for all concerned.
- 1.4 The public are keen to take part in the planning process but having insufficient information provides frustration and many responses to planning applications address this issue. When the information is received, further notification is sent out. For residents, in particular, it is anticipated that they do not wish to spend their time in needing to repeatedly make comments on planning proposals and is likely to lead to frustration and dissatisfaction with the planning process. For statutory consultees, their workloads will be increased by needing to review the initial information as well as any additional information submitted. For the applicant, it leads to a delay in decision making due to the time needed to prepare the information as well as time necessary for additional consultations to take place. Sending more than one letter also increases the cost for the Council in terms of printing and postage.
- 1.5 It also has an impact upon the reputation of the Council. The public, quite understandably, do not understand that there is only limited information that can be requested. Many response letters are critical that the application has been accepted and validated without the necessary information, inferring the Council has not undertaken its duty.

- 1.6 Councils' are able to adopt a local list clarifying the information required to determine an application. The information required will be dependent upon the application type, scale and location. Information within the local list and required when validating the application must be:
- reasonable having regard, in particular, to the nature and scale of the proposed development; and
 - require particulars of, or evidence about, a matter only if it is reasonable to think that the matter will be a material consideration in the determination of the application.
- 1.7 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.
- 1.8 Once adopted, a local list is required to be published on the Councils website and is then reviewed every 2 years.
- 1.9 It is also possible for an applicant, if a Local Planning Authority, determine that additional information is required in order to validate the application, to dispute this by issuing a notice under article 12 of the Town and Country Planning (Development Management Procedure) (England) Order 2015. There is then a process for both the Local Planning Authority and applicant to go through. Very few applications are disputed in terms of the information provided due to the criteria above (paragraph 1.6) being complied with.
- 1.10 Two planning application validation checklists have been prepared. One for householder proposals and the other for all other types. The 'all other', Appendix B, is quite extensive as it caters for every type of application that might be submitted. Householder applications generally require far less information and a simpler checklist has therefore been prepared (Appendix C) to assist with such proposals.
- 1.11 Both of these checklists have been consulted upon for 6-weeks between 22nd October and 30th November. Nine responses have been received which are detailed within Appendix A, together with the Council's response to the comment and whether the checklist(s) will be updated. Where the checklists have been updated, the altered or additional text is shown in red. There has also been a number of responses which do not relate to either of the checklists, but are useful comments in relation to the service the Planning Department provides. These will be implemented in day-to-day working.
- 1.12 A disadvantage of adopting a local list is that applications can take longer from receipt before they become valid. However, local lists have been in existence across many councils for over 10 years and the majority of professional agents are familiar with these. It is not anticipated that it will take long for agents to become familiar with Boston's list. In addition, the consultation proposed will include agents. For householders who submit their own application, the majority are not familiar with the planning process and this requirement would not be perceived as anything different.

CONCLUSION

The Council currently validates planning applications in accordance with the national list. This requires very little information to be submitted in order to make an application valid. This leads to delay in the processing of many applications, frustration for people partaking in the planning process as well as increasing costs for the Council. It is recommended that the two local lists of application requirements is adopted which will overcome this.

FINANCIAL IMPLICATIONS

The introduction of the checklist is likely to have a limited positive financial benefit by reducing the number of letters that are sent to the public regarding planning applications. Additionally, the cost of requesting the information by Planning Support, once they are fully trained, rather than the Planning Officer will result in savings although this will be unseen financial benefit.

LEGAL & EQUALITY IMPLICATIONS

Section 62 (4A) of the Town and Country Planning Act 1990 (inserted by the Growth and Infrastructure Act)

Article 11(3)(c) of the Town and Country Planning (Development Management Procedure) (England) Order 2015

Equality – None

ANY OTHER IMPLICATIONS

The overall reputation of the Council is likely to improve through residents and businesses in the Borough not being notified numerous times due to insufficient information being received at the outset.

Decisions should be made more quickly with the need to request time extensions becoming the exception rather than the rule. Overall performance might therefore not increase as a result but the number of applications that each officer has 'on hand' at any given time should reduce.

CONSULTATION

Consultation has been undertaken with:

- Professional agents
- Neighbours through planning application notification letters
- Consultees
- Councillors
- Parish Councils

In addition, the consultation was advertised on the Council's website for 6-weeks.

APPENDICES

Appendices are listed below and attached to the back of the report: -

APPENDIX A	Responses to Consultation
APPENDIX B	Planning Application Validation Checklist
APPENDIX C	Householder Planning Application Validation Checklist

BACKGROUND PAPERS

No background papers as defined in Section 100D of the Local Government Act 1972 were used in the production of this report.

CHRONOLOGICAL HISTORY OF THIS REPORT

A report was presented to Planning Committee on the 16th October 2018 requesting agreement to undertake a consultation on the two checklists.

Appendix A – Responses to Consultation

<i>Respondent</i>	<i>Observation</i>	<i>Council Response</i>	<i>Checklist Updated</i>
Councillor	Request that all plans are drawn by a 'professional' and e.g. not by hand	Article 7 of the Town and Country Planning (Development Management Procedure) (England) Order 2015 requires applications to be accompanied by plans which "must be drawn to an identified scale". Section 3327A of the Town and Country Planning Act 1990 states a local planning authority must not entertain an application for planning permission if the application fails to comply with these requirements. Should the drawings submitted be to an identified scale which is shown on the drawing, no matter that the drawing may have been prepared by an 'amateur', the application in respect to the drawings will still be valid	No
Housing Section	Affordable Housing Statement Suggest removal of 'and starter homes from 3 rd and 6 th bullet points)	Starter homes are referenced within the glossary to the National Planning Policy Framework 2018 as being a form of affordable housing. As the latest published planning document and being part of the overall 'development plan' under which planning applications are determined, it is appropriate to retain reference to starter homes.	No

	<p>Insertion of “Applicants should consult the Local Housing Authority regarding the size, type and tenure of the range of homes needed to meet locally identifiable needs.”</p>	<p>Consultation with the Housing Department is appropriate to ensure the right type etc. of houses are provided.</p>	<p>Yes – under Affordable Housing</p>
<p>Environment Agency</p>	<p>Recommend that a link is included to provide further information https://www.gov.uk/guidance/developers-get-environmental-advice-on-your-planning-proposals</p>	<p>It is appropriate to add this</p>	<p>Yes – under Flood Risk Assessment</p>
	<p>Design and Access Statements – suggest an additional bullet point:</p> <ul style="list-style-type: none"> ▪ Demonstrate/acknowledge how other assessments, such as the flood risk assessment, may impact on the design of the development in terms of scale, appearance or layout. 	<p>The design of a building can be significantly affected by matters such as flood risk in order to ensure the health and well-being of future occupiers. This request is therefore reasonable to understand why.</p>	<p>Yes – under Design and Access Statements</p>
	<p>Flood Risk Assessment – in addition to the points listed, suggest additional text:</p> <p>Take account of local and national planning policy and guidance and the best available information on local flood risk;</p> <p>Under Further information/policy background, please consider adding the following, along with the link above under Pre-application discussions: The Environment Agency can provide local flood risk data to assist with the preparation of FRAs and offers a pre-application FRA advice and review service.</p>	<p>These are all reasonable.</p>	<p>Yes– under Flood Risk Assessment</p>

	<p>Sustainable Drainage Assessment The text currently focusses on flood risk management. As well as reducing flood risk, SuDS can promote groundwater recharge, help absorb diffuse pollutants, improve water quality and create habitat. Development proposals will need to consider the scope to provide cross-cutting benefits through making space for water and biodiversity enhancements.</p>	<p>This has been included</p>	<p>Yes – under Sustainable Drainage Assessment</p>
	<p>Utilities Statement and Foul Sewage Assessment We request that an assessment is also required where it is intended to discharge foul sewage to a non-mains drainage system, and that a further bullet point is added:</p> <ul style="list-style-type: none"> ▪ Where disposal of foul sewage is proposed to a non-mains system, a complete FDA1 form. https://www.gov.uk/government/publications/foul-drainage-assessment-form-fda1 <p>Under Further information/policy background, please add: Local Plan Appendix 5: Allocations – Infrastructure requirements, constraints and mitigation</p> <p>We suggest adding that direct pre-application consultation with Anglian Water is recommended, and the outcome included with the application.</p>	<p>The assessment referred to within form FDA1 relates to development that require a permit from the Environment Agency. Legislation that falls outside of the planning remit cannot be considered as part of a planning application.</p> <p>Reference to Policy 5 has been made</p> <p>This has been included</p>	<p>No</p> <p>Yes – Under Utilities Statement and Foul Sewage Assessment</p> <p>Yes Utilities Statement and Foul Sewage Assessment</p>
	<p>Householder Validation List The above observations apply to the householder list although the EA is not a statutory consultee.</p>		<p>Yes – in relation to Flood Risk Assessment</p>

<p>Anonymous</p>	<p>Householder and non-householder – Roof plans. Not required for simple roof forms. Officers will be able to interpret from floor plans and elevations.</p>	<p>Whilst the local planning authority determine the application, the plans are not just for the benefit of the planning authority, but also for residents and other interested parties. Roof plans, even simple ones can be for their benefit. In the instances where the applicant or local planning authority consider that they aren't required, for example, a flat roof for a detached outbuilding, this can be identified and a note attached to the file.</p>	<p>No</p>
	<p>Not helpful to show within the requirements that something may be required. It should be stated when it is required, a pre-assessment checklist should be provided if necessary. Examples listed are contamination assessment, biodiversity survey and report, Transport Statement/Assessment and Travel Plan</p>	<p>The checklist within the Introduction states "but the requirements for each individual application will depend on the proposal, its scale, size and its location" to take account of the matters raised. Should pre-application advice be sought, information on what is required will be included as part of the advice. Alternatively, an applicant may contact the Development Management prior to submitting their application for clarification. Should an application be submitted without either of these two actions being taken, the proposal would be assessed at that time and further information requested if necessary.</p>	<p>No.</p>

	<p>Daylight / sunlight assessment – will a plot by plot assessment be required for every major scheme? Consider a JR would be likely if it is not submitted. Suggest refusal if there is no assessment and the development causes serious concerns.</p>	<p>The Daylight/Sunlight Assessment does not refer to major developments. If a development is likely to have significant impact in relation to day/sunlight, an assessment will be required for those buildings likely to be affected (whether existing or proposed). If the development would not have a significant impact, this information would not be required.</p>	<p>No</p>
	<p>Heads of Terms – if pre-application advice is not sought, it is not possible to establish what obligations are required.</p>	<p>Policy 6 details the ‘heads’ required in terms of obligations. If the information requested is not submitted, it will likely delay the determination of the application due to not being able to commence the drafting of a Planning Obligation.</p>	<p>No However, an additional requirement of provision of solicitors details etc. is recommended.</p>
	<p>Statement of Community Involvement – applicants should be able to choose to submit responses to consultations</p> <p>Statement of Community Involvement – can understand this can be to the applicants benefit. However, it can open a can of worms over who said what...</p>	<p>The supporting text details that where consultation takes place, a statement should be submitted. This has therefore already been addressed.</p> <p>If there is dispute between parties over what has been said or not said, this would be raised as part of the planning application’s consideration. E.g. if a developer was to advise that all neighbours welcomed the proposal, neighbours would be able to object and say that they do not.</p>	<p>No</p>

	Tourism – this should perhaps read Tourism Statement	Agreed	Yes - Under Tourism Statement
	Transport Statement/Assessment – requirement for all major developments is unnecessarily broad, notwithstanding paragraph 111 of the NPPF.	Agreed	This has been amended to “Major developments that would have significant transport implications” – Under Transport Statement/Assessment
	Details of vents etc. It is not always possible to provide these details at planning application stage, or provision could result in abortive costs.	The supporting text states should be submitted. If a proposal is not submitted with such details and the resulting appearance of the building is affected, it is likely that a further planning application will be required in order to have the details assessed.	No
	Biodiversity Survey and Report – description is too vague. Householders will not know if there are protected species. Such reports/surveys can be sought unnecessarily.	Details are provided within the supporting text of the types of developments, locations and buildings that are most likely to comprise habitats for ecology. Any further information can be provide on a case-by-case basis.	No
	A flood risk assessment should not be required for householder applications as this is a substantial cost for applicants. Why is the scope of definitions provided within the householder checklist?	Government guidance in relation to flood risk assessment (https://www.gov.uk/guidance/flood-risk-assessment-for-planning-applications) includes the requirement for an FRA to be submitted for householder extensions within flood zones 2 or 3. This guidance states that for householder developments “...but	Yes – Under Flood Risk Assessment

		<p>you may be able to do it yourself if it's for a simple, low risk development, for example a house extension." This information has been referred to within the householder checklist</p> <p>The scope of definitions has been removed.</p>	
	<p>Planning Statement – criteria is meaningless. Should state when it is required.</p>	<p>It is not possible to be prescriptive as there will always be circumstances which are not listed when one is required. The supporting text detailing what a Planning Statement might contain provides context</p>	No
<p>Society for the Protection of Ancient Buildings</p>	<p>We feel it is increasingly important that good quality photographs are submitted with applications. Countless heritage statements for important listed buildings are submitted with no photograph of the building or parts of the building to be changed or altered..... It is not possible for the amenity societies to visit all buildings, therefore high quality photographs (not B&W photocopies) are imperative if we are to give accurate advice and comments. We would suggest that photo requirements should include:</p> <ul style="list-style-type: none"> - General image showing the building in context (inc neighbours, streetscene or landscape) - Single image of each elevation where practical - Detailed images of items/areas to be altered/removed/demolished. This is especially relevant to window replacement applications. 	<p>This is considered reasonable</p>	<p>Yes – Under Historic Assessment</p>

<p>NHS England</p>	<p>We require to be able to assess the impact of developments on health provisions are listed below:</p> <ul style="list-style-type: none"> • Number of dwellings • Postcode for the site to be developed (or closest street), as all of the NHS systems work off postcodes <ul style="list-style-type: none"> • Information on the dwelling type being proposed, e.g.- residential house, residential flats, care home, retirement community, accommodation for the over 55's, student accommodation, etc. If the application is for a combination of dwelling types a breakdown showing how many of each is required so that the correct tariffs can be used to calculate the funding being requested • If student accommodation, retirement communities for the over 55's or care/residential homes, etc., are being proposed we need to know if the rooms will be single or double occupancy as this will affect the workload factor applied in the funding calculations • If the application is linked to any previous applications it is extremely useful if we are informed of the previous application numbers so that we can keep track of how many applications have been submitted for a particular project and ensures we adhere to the pooling regulations • Eastings and Northings for the site (or a map with street names that can be used to identify the exact location) 	<p>The majority of these are reasonable to request although there will be applications, such as Outline, where much of the information will not be known.</p>	<p>Yes – Under Heads of Terms</p>
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Anonymous	Main concern is regarding listed building applications. I could not see any reference to the fact that internal alteration should also be included and details provided of any changes to the internal layout. e.g. New doors or staircases. Also that well informed details of these changes will have to be submitted as part of the application such as drawings of new doors or windows.	This is reasonable.	Yes - Under Historic Assessment
JMAD	Flood Risk Assessments for Householder Applications? This will create a lot more work and expense and could result in the Environment Agency objecting.	Government guidance in relation to flood risk assessment (https://www.gov.uk/guidance/flood-risk-assessment-for-planning-applications) includes the requirement for an FRA to be submitted for householder extensions within flood zones 2 or 3. This guidance states that for householder developments "...but you may be able to do it yourself if it's for a simple, low risk development, for example a house extension." This information has been referred to within the householder checklist The scope of definitions has been removed.	No
Black Sluice Internal Drainage Board	Pre-Application – we would like to see more of these, regardless of how trivial they may seem. The earlier applicants are made aware of the need to deal with surface water disposal and flood risk matters the better, even if the site is in Flood Zone 1. There may be no flood risk in Zone 1, but we still need to know how the	This falls outside of the planning application validation requirements. However, consultation with the IDB can take place subject to the applicant agreeing to this.	No

	applicant intends to deal with rainfall run-off. This should also be reflected in any subsequent applications.		
	Outline – as above, it is more vital than ever to get an idea of how surface water from a site is going to be dealt with as early as possible within the application process. Whilst I appreciate that within current planning regulations an FRA or drainage scheme may not be required, I would encourage planning officers to encourage applicants to provide such information as early as possible, just to make the applicant aware that they need to be thinking about schemes now, rather than leave it until Reserved Matters or Full application.	Legislation permits a local planning authority to only request information that is required for the determination of the application. The IDB acknowledge this within their response. It is not possible to update the checklist to require submission at Outline stage.	No
	Reserved Matters – ideally we would like to see firm plans for drainage schemes at this point, or at least a condition stating the requirement to have something in place before Full Application.	At reserved matters stage, either information would be submitted or a condition imposed. This does not require a change to the checklist. There is no ‘full application’ following determination of a reserved matters application.	No
	Full Applications – more often than not, this tends to be the start point for most developments, particularly smaller sites. Provided that planning officers make applicants aware of their responsibilities regarding providing information regarding surface water disposal, and that such information is submitted by the applicant before validation of the application, then this will help the entire process go a lot smoother than is perhaps the case at the present time.	Surface water disposal would be addressed at this stage, either having been submitted for consideration or, where requested, a condition being imposed. It would not fall within the criteria of being reasonably required for the determination of the application.	No

	<p>Permitted Development – this tends to be the IDB’s biggest bug-bear within the planning process, as the IDBs are not consulted at all for these applications. Planning or Building Control officers need to be aware that these applications can have a significant impact on not only drainage, but also on the IDB’s ability to carry out its statutory duties, especially where the proposals are close to watercourses. If a process could be included to either consult the IDBs if there are any known watercourses, or instruct the applicant to consult the IDBs direct, then this would be much appreciated.</p> <p>For reference, the IDBs regard the discharge of ANY water, including treated effluent discharges, as having a significant impact on its managed drainage systems, and not just rainfall run-off. Assume any references to surface water and /or rainfall run-off includes treated water as well.</p>	<p>The majority of developments that are permitted development are not submitted to the Local Planning Authority for confirmation of their lawfulness. Additionally, such developments cannot have additional conditions imposed upon them. A review of the Council’s website will be undertaken to assess whether advice can be provided as well as notification of this request to Building Control, also acknowledging a number of developments will be via an Approved Inspector.</p>	<p>No</p>
	<p><u>Flood Risk Assessments</u> All too often, FRAs do not include any indication of how surface water from any proposed development, particularly small or single developments, is to be dealt with. If an FRA is not required, then some sort of drainage statement should be provided.</p>	<p>Acknowledging that surface water can affect flooding, a FRA is aimed at addressing risk, impact and mitigation of flood water. It is therefore unlikely that a FRA will include details of surface water.</p>	<p>No</p>
	<p><u>IDB Byelaws & the Land Drainage Act 1991 (LDA 91)</u> Whilst it is appreciated that this is not a planning consideration, it would be useful for all planning officers to make themselves aware of IDB requirements and to advise applicant’s accordingly. We don’t expect officers to know</p>	<p>Advice can be provided by planning officers if pre-application advice is sought. Should this not occur, it is more likely that the advice for applicants would be provided as part of the IDBs response to a planning application.</p>	<p>No</p>

	<p>precisely where IDB maintained drains are or what the relevant byelaws may be, but we would expect officers to make applicants aware, as early as possible within the planning process, that if there are watercourses in the vicinity of the proposed development, regardless of how large or small, then they must contact the relevant IDB to find out what will be required of them. This is particularly important where an applicant submits a Full application to start with, without receiving the benefit of advice at Pre-App or Outline.</p>		
	<p><u>Surface Water Disposal</u> As per current policy, SUDs are expected to be used for surface water disposal, particularly for developments over 10 houses. It's good to see that conditions are being included stating these requirements, as well referring to the greenfield rate of 1.4 l/sec/ha. In an ideal world, we would like to see all developments, regardless of size, adopting SUDs, but we know that this cannot always be achieved. We believe that it would be good practice for the planning authorities to encourage sustainable drainage for all developments going forward, to get the message out there such that SUDs becomes the norm.</p> <p>It would be particularly useful if, within any surface water planning condition, a reference could be made which advises the applicant to contact the relevant IDB to seek guidance regarding discharge into any watercourse and any byelaw restrictions. If this is not possible, then it would be good practice to include a standard "Informative" at the end of every</p>	<p>It is not possible to amend legislation at a local level and request SuDs are provided on minor developments. If pre-application advice is sought, encouragement towards SuDs could be provided.</p> <p>A condition cannot be worded as requested, as it would fail the 'tests' within the NPPF. However, an informative could be attached where appropriate. In a number of cases, this already occurs.</p>	<p>No</p>

	<p>planning permission to contact the relevant IDB for their requirements, or at least to refer the applicant to the IDB response letter if one has been received by the planning authority, especially if it is clear that watercourses will be affected by the application.</p>		
	<p><u>Soakaways</u> We have noticed that in the majority of cases surface water discharge is to soakaway, particularly for small or single dwelling developments. However, the IDBs have also become aware that planning officers are not ensuring that suitable proof that soakaways are viable is submitted and checked prior to the issue of planning permission. It is the Boards understanding that if planning officers are not confident with assessing and approving any soakaway percolation test results, or any other surface water schemes, then they should be referring the information to the officers at the LLFA for their approval. It would appear that sometimes this is not the case, and officers are simply allowing soakaways to be used without proof that they will work.</p>	<p>The LLFA deal only with major developments and therefore, whilst advice might sometimes be given on smaller residential schemes, this is not the norm,</p> <p>As noted before surface water drainage can be addressed either as part of the consideration of the application if information is submitted or can reasonably be addressed, when required, via the imposition of a planning condition.</p>	<p>No</p>