

Appendix B – responses to consultation on the Task Group's draft recommendations

Text	Suggested by	Comments – Included in recommendations or reason for not including
<p>Highways -The responses on major applications also include extensive descriptions of the application itself which is unnecessary and if removed from these responses would likely reduce the time taken in their preparation.</p>	<p>Cllr Fidler - Fylde</p>	<p>Noted– However, this detail is required to enable the highways response to stand up to scrutiny at all levels. The time taken to describe the development is proportionately very small.</p>
<p>Perhaps a list of these [standardised conditions] could be circulated for discussion/agreement around a group such as the Lancashire Development Control Officer’s Group. It would also be helpful if these were only suggested where they can actually be achieved by the development, e.g. when the required visibility splay is available in the site edged red or the limits of the adopted highway as this can lead to confusion as to whether the development is acceptable or not.</p>	<p>Cllr Fidler - Fylde</p>	<p>Agree – when standard conditions are prepared these can be circulated for comment.</p>
<p>It may be worth considering the publication of ‘Standing Advice’ as is provided by organisations such as the Environment Agency and Natural England. This gives clear guidance in particular circumstances that allow the local planning authority to implement your requirements without taking up highway officer time. An example of this could be the assessment of applications for new access points to minor classified roads, or the assessment of advertisement applications.</p>	<p>Cllr Fidler - Fylde</p>	<p>Agree -Include as recommendation 2 (iv) for smaller applications.</p>
<p>It would be very helpful if your officers were able to identify from the outset applications when these deadlines will not be met so that we can manage our workloads and applicant/neighbour/member expectations over when a particular application mat be determined. It would assist further if target dates for comments to be made could be supplied, and then achieved.</p>	<p>Cllr Fidler - Fylde</p>	<p>Noted – However the time taken is often out of the control of the Highways Authority as it relies on extra information from the developer and district. Recommendation 2(ii) seeks to address this issue at source.</p>
<p>Highways Area Officer to attend the Chair's briefings.</p>	<p>Cllr Lamb - Rossendale</p>	<p>Disagree - In exceptional circumstances the offer is there already. It would create a major resourcing issue if highway officers were to attend each Chair briefing at every district council.</p>
<p>(1) Whilst validation checklists are useful the recent announcement by the Highway Authority that they are not able to respond to pre-application consultations is, however, an area of concern for me and something that I don’t feel would be adequately mitigated by the introduction validation checklists. This move will only serve to delay developments and increase costs, and is a move that is contrary to National Planning Policy Framework which encourages early engagement with developers. Pre-application consultation</p>	<p>Cllr Parkinson - Hyndburn</p>	<p>Noted - There is currently no pre-application service due to resourcing issues. The potential for a chargeable service is being investigated.</p>

<p>provides an extremely valuable means of engaging with the development sector at an early stage and a refusal to engage sends out a very negative message. I would request that this decisions not to respond to pre-application consultations be reconsidered.</p> <p>(2) LCC Highways have unilaterally stopped providing advice on preapps and now have stopped supporting the discharge of planning conditions. The lifecycle of the planning process is about the whole of the process from validation information, preapp responses, timely responses on applications, discharge of conditions, support for S278 and S38 agreements and the adoption of roads.</p>	<p>Paul Whittingham – Chorley DC Manager</p>	
<p>LCC should advise if conditions could be applied to overcome harm.</p>	<p>Paul Whittingham – Chorley DC Manager</p>	<p>Noted – Highways Authority already provide this service.</p>
<p>Supportive of proposal to send comments to LCC Councillor and standardised conditions, provided they have been drafted in conjunction with LPAs.</p>	<p>Paul Whittingham – Chorley DC Manager Alison Kershaw – Director of Development Preston</p>	<p>Noted and will seek joint approach.</p>
<p>Preston and Chorley have consulted on revised validation checklists, but LCC have not responded. Next opportunity will be mid-2017, as they are reviewed every two years.</p>	<p>Paul Whittingham – Chorley DC Manager Alison Kershaw – Director of Development Preston</p>	<p>Noted – To be looked at as part of recommendation 2 (ii)</p>
<p>In considering this point (2(i)), regard must be had to the Development Management Procedure Order which places a statutory duty on LPAs to consult the local highway authority on a number of types of developments.</p>	<p>Alison Kershaw – Director of Development Preston</p>	<p>Agree –Method to be looked at as part of recommendation 2 (i)</p>
<p>The method of identifying applications that districts should not sent to LCC needs to be considered in detail and LCC should accept that if there is a highway issue raised in consultation or the planning officer considers that there is a highway impact that LCC will still provide advice.</p>	<p>Paul Whittingham – Chorley DC Manager</p>	<p>Agree –Method to be looked at as part of recommendation 2 (i)</p>

Determination deadlines can only be extended with the agreement of the applicant	Alison Kershaw – Director of Development Preston Paul Whittingham – Chorley DC Manager	Noted
Supportive of all Highways proposals	Graeme Thorpe - Burnley	Support noted
Possibly come up with a number of houses per application that didn't require a full application	Cllr Murphy - Wyre	Agree –Method to be looked at as part of recommendation 2 (i)
Education – Member Training session required	Graeme Thorpe - Burnley	Noted - School Provision Planning officers have offered to meet with individual district officers and members.
LCC Education often back down when developers challenge	Cllr Lamb - Rossendale	Noted - This can be looked into outside of this process.
Districts need clear robust evidence before it is satisfied a contribution is justified. It is unclear what this contribution is spent on.	Cllr Parkinson – Hyndburn Alison Kershaw – Director of Development Preston	Noted– Education name the school project that the contribution will be spent on. The methodology also meets the 3 CIL tests.
Flood Risk - It is unclear whether this service offers pre-application advice on planning applications, sometimes responses have been made but in some cases it hasn't. A consistent approach to this would be helpful, hopefully one where pre-application advice is provided. It would also be helpful if the LLFA could provide a check list of the information that they would wish to see from applicants when addressing issues associated with surface water flooding / water management. This would help avoid objections to schemes or the need for further information to be submitted. Planning officers have advised that they are unclear about how this service operates and would benefit from having further guidance and contact details.	Cllr Parkinson - Hyndburn	Noted - There is currently no pre- application service due to resourcing issues. The potential for a chargeable service is being investigated. Also, a validation check list has been provided to each LPA by the LLFA. LLFA officers have also offered to meet with each district. This has been taken up in 8 districts.

Supportive of all Flood Risk proposals	Graeme Thorpe – Burnley Alison Kershaw – Director of Development Preston Cllr Parkinson - Hyndburn	Support noted
Supportive of Flood risk work and training seminar. Suggest that summary paragraph similar to highways would be useful.	Cllr Fidler - Fylde	Support noted. Method to be looked at as part of recommendation 3
Chorley have had an officer working group meeting with LCC flood team and happy that LCC are committed to ongoing dialogue however this must be demonstrated and reductions in the Flood Team are causing delays and lack of communication on planning applications.	Paul Whittingham – Chorley DC Manager	Noted - To be looked at as part of recommendation 1
The method of reporting flooding incidents is not clear and guidance must be provided to all districts urgently.	Paul Whittingham – Chorley DC Manager	Noted - To be looked at as part of recommendation 2
This method (recommendation 3) of providing advice is welcomed as it will provide the evidence for a recommendation and support officers reports.	Paul Whittingham – Chorley DC Manager	Support noted.
LCC Flood Risk change position on EA advice – delays process	Cllr Lamb - Rossendale	Agree –Method to be looked at as part of recommendation 3 (iii)
Other – Dedicated DC enforcement Officer required Review should extend to County Land Agent	Cllr Parkinson – Hyndburn Cllr Fidler - Fylde	Noted. Outside the remit of this review, but will feed back information This non-statutory advisory service will cease to operate in 16/17.