

Provided by the Middle Level Commissioners		Item No:	9
Meeting:	HADDENHAM LEVEL DRAINAGE COMMISSIONERS (Hereafter referred to as the Board)	Subject:	CONSULTING ENGINEERS REPORT: CHIEF ENGINEER'S SUMMARY, TECHNICAL SERVICES, M&E & CAPITAL PROGRAMME
Date:	Thursday 24th April 2025	Officer Responsible:	Nicola Oldfield

RECOMMENDATIONS

The Board is asked to:

- A. **Acknowledge the proposed approach to introduce interim charges for responding to applicant's questions.**
- B. **Confirm whether it wishes to create, adopt and issue standing advice notes for its district and instruct the Consulting Engineer accordingly.**
- C. **The Board is advised to consider what funding is needed from next year for submission to the Environment Agency.**

1. Technical Services

- 1.1 Since Chris Bailey started as our new Head of Technical Services, we have been updating the catalogue of services which MLC could provide. Given the increasing frequency of complex cases where Boards consider there may be a need for regulation and enforcement dependent on the costs and benefits, we are reviewing and updating training, policies, and capacity to undertake enforcement and compliance regulation on behalf of the Boards we represent.

We are receiving an increased number of questions from developers ahead of planning applications/consent applications, with an expectation that we can provide the information freely. We have completed the review of our charging model and we will be introducing a new charging model for answering these questions if applicants do not enter into a pre-app agreement.

Please refer to item 4 in the Clerks report.

The Board is asked to acknowledge this approach.

- 1.2 **Update on outstanding abstraction licences for Commissioners' inlets off the Old West River**

The abstraction licence applications for the outstanding inlets off the Old West River are almost complete and the engineer is obtaining the latest information following a colleague's leave and will report back to the Chairman.

- 1.3 **Update on Willow Hall Farm irrigation reservoirs**

The MLC Engineer has continued to liaise with the Chairman and Vice Chairman regarding the agreement between the Board and Mick George Ltd (MG Ltd) in respect of Willow Hall Farm irrigation reservoirs (MLC Ref No 356/PL/008). The Chairman, Vice Chairman, District Officer

and MLC Engineer continue to liaise with MG Ltd to monitor the reservoir construction on a day-to-day basis.

Dewatering of the working area and first of the reservoirs has been ongoing throughout the year. An invoice for volumes discharged between October 2023 to the end of March 2024 has been paid. Invoices for dewatering volumes will be issued every 6 months based on readings provided by the Chairman.

The variation to planning permission (Cambridgeshire County Council Ref: CCC/22/075/VAR, MLC Ref No 356/PL/015) has been reopened on the Cambridgeshire County Council planning portal and at the time of writing the status of the application is "pending consideration". A year-round abstraction licence was issued to the quarry operator, MG Ltd, in July 2023 by the Environment Agency.

A site meeting was planned for early April to check the installed recharge trenches, discuss measures for managing the recharge of groundwater until the missing section of trench is installed, and discuss a proposed additional dewatering discharge location to the south of the site. However, MG Ltd have not yet organised this meeting. Proposals for a second dewatering consent to the front of the site have not progressed further and appear unlikely to be required. The District Officer is monitoring the site and the Chairman is in regular contact with MG Ltd.

2. Summary of key planning issues

We will, when possible, seek the Board's input, rather than wait for Board meetings. This will be done via correspondence with the Chair, Vice Chair, District Officer and any appropriate sub-committees.

2.1 Proposed reforms to the National Planning Policy Framework and other changes to the planning system - Open consultation

Following the change of government in July an open consultation was held between 30th July and 24th September 2024 on proposed reforms to the National Planning Policy Framework (NPPF) and other changes to the planning system.

As the NPPF sets out government's planning policies for England and how these are expected to be applied, it is therefore a significant driver and influence on development related planning policy, and it was essential that a suitable response be made.

During August the Boards' Chairs were given the opportunity to comment on the issues raised within the draft consultation document and provide comments and any other related items of unease that the Boards had.

A response, which was primarily providing answers to specific questions, was submitted before the deadline.

One of the big issues related to development of the "green belt" and the introduction of the "grey belt" but the consultation also included decision making, climate change, flood risk, and environmental related issues. Responses to specific questions contained within the consultation included:

1. The advantages and disadvantages of restoring the 5-Year Housing Land Supply (5YHLS).

2. Further supporting effective co-operation on cross boundary and strategic planning matters.
3. The LPA's need to understand, consider and acknowledge the impact of new development on their special levy and future funding requests under Defra's Partnership Funding Policy. Under this policy housing built or converted after January 2012 is **not** included in FCERM government grant in aid calculations.
4. The need to consider the adoption of appropriate measures that consider the whole water cycle process such as rainwater harvesting and the re-use of as much water as possible.
5. The need for bodies involved in the planning process but which are not LPAs to be provided with suitable compensation, benefit and other incentives for contributing to and enabling the aspirational growth and local economy.

The opportunity was taken to raise some issues not covered by the reform consultation as a concern by many Boards, in the hope that these points are heard and acted upon. These included:

- A. The Fenland Situation – special requirements needed due to the low-lying topography, the managed flood risk and land drainage systems, the provision of enabling infrastructure to allow life to continue and also accommodate current growth aspirations.
- B. The flawed methodology used by LPAs and poor decisions made by the LPAs when considering and allocating sites often caused by the need to meet government targets.
- C. The impacts of growth and climate change and the need to revise nationally accepted design standards.

It is understood that several thousand responses to the consultation were submitted and, therefore, the implementation of the reforms may be delayed accordingly.

2.2 New developments and the use of SuDS

Analysis of the responses from the last round of meetings revealed that the Board and its members had overwhelming concerns about the uses of SuDS Devices from the design, construction, ownership, management and maintenance phases.

Despite the new government growth agenda, as partly discussed above, it appears unlikely that the previously announced implementation of Schedule 3 of the Flood and Water Management Act and the introduction of the SuDS Approval Board (SAB) will occur in the near future.

2.3 Engagement with the Local Planning Authorities (LPA).

There has been a significant disconnect with the LPA's since the pandemic partly due to the changes of working practices, ever decreasing resources and lack of suitably qualified officers.

Several Council representatives have urged the need to engage with the LPA's and the developers. Where possible efforts have been made to reengage with all members of planning departments but particularly with the Case Officers but this has proved difficult. Despite several requests to engage, discuss and resolve the issues with the relevant parties these remain unanswered and this is considered to be poor partnership working.

There is particular concern about the larger strategic sites which experience has proven will take several years to build out and involve several RMA potentially including the LPA, the Environment Agency, the LLFA, the MLC, the Boards and Anglian Water etc. together with other interested parties with changing staff or representatives being involved. Therefore, it is considered that it is in everyone's interest for development specific "Drainage/Construction/Ecology" Strategy or Strategies to be established.

The documents can:

- A. Identify the key challenges involved and facing the LPA, RMAs, Landowners and Developers, and other parties concerned and identify opportunities and provide a strategic direction to encourage an integrated and sustainable approach in the context of the proposed development.
- B. Advise on how the site will be established, developed and maintained during its lifetime. This will include but will not be limited to the provision of further design detail of the on site surface water disposal systems; any potential improvement works and installation of relevant infrastructure; design, construction and long term maintenance arrangements including relevant open watercourses; ecological protection and enhancement of open watercourses; etc.
- C. Assist any new officers when dealing with the development concerned, provide more certainty and potentially speed up the decision making for all parties.
- D. Strengthen RMA strategic working and if dealt with correctly would speed up decision making, both are being promoted by Government and contained within the latest version of the NPPF and reduce long term costs for all parties including the LPA's.

In respect of an enquiry to an LPA in respect of a Strategic Allocation for a Mixed Use Development comprising residential development up to 1,000 dwellings, employment (B1, B2, & B8), Local Centre (A1, A2, A3, A4 & D1), Primary School and associated infrastructure the Case Officer involved responded as follows:

"As such, the IDB, and their decision to Grant or Refuse land drainage consent is at the discretion of the IDB and covered under legislation separate to planning, and I note your interest in engaging with them to address this matter. As this is separate to the planning system, the LPA will not involve themselves in this matter further, unless changes need to be made to the surface water drainage scheme approved by the LPA as a result of discussion with the IDB."

Planning Conditions

Efforts have also been made to engage with a well-respected local Principal Planning Officer requesting a conversation about the intricacies of imposing planning conditions. The officer concerned has advised that whilst the position is noted and would be a good idea he considers

that it would be inappropriate for him to provide guidance given his status as an Interim Officer. He added that he understood that the authorities Head of Planning and Development Manager would be better placed to deal with the enquiry and would “be in touch”. This approach has not yet been received.

2.4 Cambridgeshire & Peterborough Flood and Water (C&P FloW) Partnership

In addition to the items discussed above, the following issues of interest to the Board have been raised:

A. Cambridgeshire Flood Risk Programme

Given that a year has passed since the workshop and no meaningful correspondence or outcomes appear to have been received, the Commissioners requested an update on this programme. However, it is understood that these sites are included in the Cambridgeshire Flood Risk Management Strategy: 2024 Action Plan Review. See below.

B. Community Flood Action programme

Further copies of the Community Flood and Water newsletter have been issued. You can view previous editions and subscribe to receive the newsletter automatically at [Community flood action programme | Cambridgeshire County Council](#).

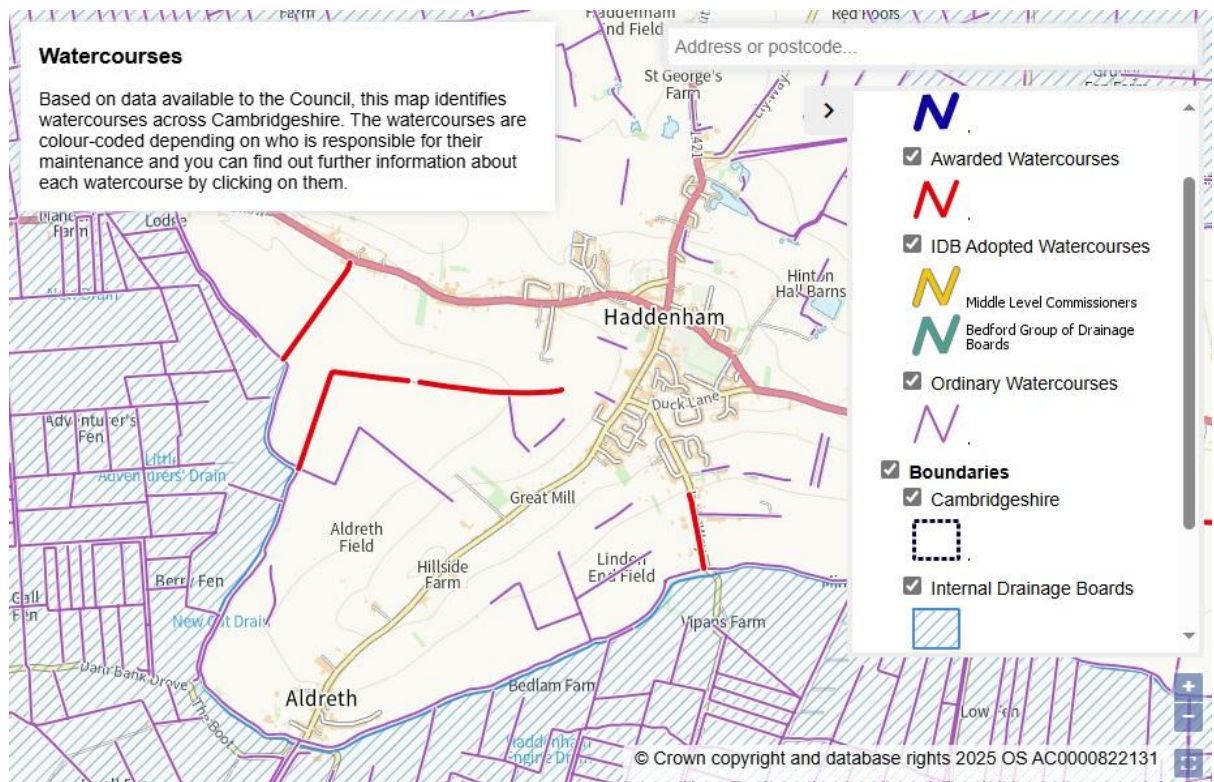
C. Watercourse Mapping Tool

The Flood Risk team has published a Watercourse Mapping Tool - [Watercourse management | Cambridgeshire County Council](#)

The tool was driven by feedback from local communities, landowners, and other stakeholders who wanted to understand more about watercourse responsibilities. It aims to provide a public tool that can be used to identify location of and responsibility for different watercourses. The watercourses are colour-coded depending on type/maintenance obligations and you can find out further information about each watercourse by clicking on them. The map includes the following details in Cambridgeshire:

- Ordinary watercourses
- Awarded watercourses
- Middle Level Commissioners (MLC) Adopted watercourses
- Main rivers
- Internal Drainage Board boundaries

It is acknowledged that there will be some watercourses, particularly the smaller ones, that are not yet included on the map. It is intended to expand on this map, adding more information wherever possible. If there are watercourses in your area that satisfy the definition above but are not currently included in the mapping, please contact the Flood Risk Team so that these can be discussed and added where appropriate.



Extract from the CCC Watercourse Mapping Tool showing part of the Boards area

D. Cambridgeshire Flood Risk Management Strategy (FRMS): 2024 Action Plan Review

A plan review has been prepared to provide an update on the progress of actions listed in the Cambridgeshire FRMS which was adopted in 2022, highlighting contributions, completed work and any risks or challenges.

The contents are currently being reviewed in detail, but it summarises that:

“Progress has already been made against 54 of the 58 actions with 6 actions now having been completed. There are several obstacles that impede progress in some areas, these are outlined below. Despite that and the persisting wet weather conditions, headway has been made across most actions and by multiple partners.

The importance of clear communication remains in focus, whilst the impactful action led by community groups and local landowners continues to provide positive results.

There is still some uncertainty from external factors that influence the work we do. In response to this we take an adaptive approach so we can be prepared for the changing circumstances.”

4. Capital Programme

- 4.1 There is no allocation of funding in the current FCRM Grant-in-Aid (FCRM GiA) programme.

The Board is advised to consider what funding is needed from next year for submission to the Environment Agency.

Author Name: Nicola Oldfield

Role: Chief Engineer

Appendix 1: M&E Report

Appendix 2: List of applications since last meeting

Provided by the Middle Level Commissioners		Item No:	9
Meeting:	HADDENHAM LEVEL DC (Hereafter referred to as the Board)	Subject:	CONSULTING ENGINEERS REPORT: MECHANICAL & ELECTRICAL
Date:	Thursday 24 th April 2025	Officer Responsible:	Dave Bantoft

1. M&E Key Messages

- 1.1 In light of uncertainty of GiA funding the Board is strongly advised to consider the development of an investment plan for asset refurbishment/replacement. The Board is asked to instruct the Consulting Engineer accordingly.

Other than the matters described below, only routine maintenance has been carried out since the last meeting and the pumping plant at each of the stations is mechanically and electrically in a satisfactory condition.

1.2 Minor Works

1.2.1 **Sutton Gault**

The pump slip ring repair has operated well through the pumping season.

The weed screen control system refurbishment has been ordered and will be booked in for installation once all parts are in stock.

1.2.2 **Haddenham**

Only routine inspections have been carried out at Haddenham this period.

1.3 Inspections

- 1.3.1 HSB Engineering annual inspections for insurance were carried out at Haddenham and Sutton Gault Pump Stations on 10th September 2024.
- 1.3.2 EICR Test and Due dates as below. Inspections were successfully completed at Sutton Gault and Haddenham Bungalow in March 2024.

LOCATION		EICR	
Board	Station	EICR Pass Date	EICR Due
Haddenham	Haddenham Bungalow	29-Mar-24	29-Mar-2027
Haddenham	Haddenham PS	19-Mar-21	19-Mar-2026
Haddenham	Sutton Gault	29-Mar-24	29-Mar-2029

1.4 Pumping Station Key Dates

Please review the pumping station key dates below, if there are any discrepancies or you can add any details, please let me know. The key dates are an important reference and will feed into the upcoming Key Health Indicators and District Studies.

Station	Built	Pump	Pump Overhaul	Motor O/H	Thrust Bearing	Controls	Telemetry
Haddenham PS	2011	2011	2011	2011	2011	2011	Y
Sutton Gault	1971	1971	1990	1990	1990	2016	Y

	Weedscreen			
Station	Bars	WSC	WSC O/H	Controls
Haddenham PS	2011	2011	2011	2011
Sutton Gault	1998	1998	1998	1998

Author Name: Dave Bantoft

Role: M&E Engineer

Appendix 2

The following planning applications have been responded to since the last meeting:

<i>MLC Ref.</i>	<i>Council Ref.</i>	<i>Applicant</i>	<i>Type of Development</i>	<i>Location</i>
019	Enquiry	Client of MTC	Conversion (Agricultural to Industrial)	Upper Delph Drove, Haddenham

There have been no Byelaw Consent (to undertake works in and around watercourses) or (to discharge to a watercourse), or infiltration device applications processed since the last meeting.