

FAO: Gillian Pinna-Morell
South Holland District Council
Planning & Development
Council Offices Priory Road
Spalding
Lincolnshire
PE11 2XE

Our ref: AN/2025/136678/02-L01
Your ref: H02-0511-25
Date: 10 October 2025

Dear Gillian Pinna-Morell

**Proposed development of 9 dwellings
Land off Postland Road, Crowland**

Thank you for re-consulting us on the above application, on 15 September 2025 and for allowing us additional time in which to respond.

Environment Agency position

The submitted application form states that foul sewage will be disposed of by the existing mains sewerage network. We understand that Anglian Water Services (AWS) previously objected to the discharge of foul water to the mains sewer, due to a lack of capacity in the network and the resultant risk of sewer flooding and pollution.

Following AWS objection to the application, an amended drainage strategy has been submitted. The submitted drainage strategy dated March 2025, ref: '12899-WMS-ZZ-XX-D-C-39200-S8-P5', prepared by William Saunders Consultancy, proposes a private sewage treatment plant for the treatment of foul water, to discharge to the watercourse to the south of the site.

Paragraph 020 of the planning practice guidance section on Water Supply, Wastewater and Water Quality (PPG) outlines that the first presumption must be to provide a system of foul drainage discharging into a mains sewer. We do not consider that a lack of capacity or lack of plans to improve capacity in the sewer are valid reasons for a development to install a private sewerage system. In such cases the developer should explore how a lack of capacity may be overcome so that their development can be connected to the mains sewer.

The AWS mains sewer runs adjacent to the site. We expect any development that is within reasonable distance to the mains sewer to connect to it, unless it can be justified on cost and/or practicality grounds otherwise.

Compliance rates for public and private sewage treatment works regulated by the Environment Agency show that private sewage treatment works do not perform as well

as public ones. Private systems are more likely to fail to comply with their environmental permit and cause pollution. Therefore, whilst we acknowledge the issues raised by AWS, we consider that overall, the use of private sewerage treatment systems is less environmentally sustainable than connection to the mains sewerage system.

Therefore, in line with Policy 4 (g) of the South East Lincolnshire Local Plan 2011-2036, **we object** to this application as we do not consider it demonstrates adequate foul water treatment and disposal.

We advise that consideration should be given to whether the system can be designed to overcome constraints on capacity or whether work can be undertaken off site to provide sewer capacity to accommodate the development.

We also advise that consideration should be given to whether the development can be phased to match to sewer capacity if your Local Planning Authority considers it reasonable to do so. Paragraph 020 of the PPG states: *'The timescales for works to be carried out by the sewerage company do not always fit with development needs. In such cases, local planning authorities will want to consider how new development can be phased, for example so it is not occupied until any necessary improvements to the public sewage system have been carried out.'*

We encourage engagement between your Local Planning Authority, the developer and AWS regarding solutions or aligning the development with improvements to the sewer capacity.

The Environment Agency are unlikely to grant an environmental permit for a private treatment plant in this location.

Should you require any additional information, or wish to discuss these matters further, please do not hesitate to contact me on the number below.

Yours sincerely

Danielle Maclean-Spencer
Sustainable Places Planning Advisor

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