

FAO: Mark Niland
South Holland District Council
Planning & Development
Council Offices Priory Road
Spalding
Lincolnshire
PE11 2XE

Our ref: AN/2025/136704/01-L01
Your ref: H16-0515-25
Date: 23 June 2025

Dear Mark Niland

**Residential development of 76 dwellings and associated infrastructure
Land at Horseshoe Road, Spalding, PE11 3JB**

Thank you for consulting us on the above application, on 04 June 2025.

Environment Agency position

We **object** to the proposed development as submitted because it involves the use of a non-mains foul drainage system in circumstances where it may be reasonable for the development to be connected to a public sewer, but inadequate justification has been provided for the use of a non-mains system.

Reasons

The submitted drainage strategy ref: '12887-WMS-ZZ-XX-D-C-39201-S8-P6' and drainage statement dated 25 April 2025 ref: '12887-WMS-ZZ-XX-T-C-39201-S8-P6-DRAINAGE_STATEMENT' propose that plots 1–6 and 71–76 may utilise package treatment plants (PTP).

Private sewage treatment facilities should only be used where it is not reasonable for a development to be connected to a public sewer, because of the greater risk of failures leading to pollution of the water environment posed by private sewerage systems compared to public sewerage systems.

This objection is supported by planning practice guidance on non-mains drainage which advises that the first presumption must be to provide a system of foul drainage discharging into a public sewer (ref ID 34-020-20140306). We acknowledge that the drainage strategy suggests that plots 1-6 and 71-76 could be retrospectively connected to the mains network following construction; however, only where, having taken into account the cost and/or practicability, the local planning authority are satisfied that connection to a public sewer is not feasible, should non-mains foul sewage disposal solutions be considered.

Overcoming our objection

To overcome our objection the applicant should thoroughly investigate the possibility of connecting to the public foul sewer, and either revise their application to propose a mains connection or submit evidence that demonstrates that this is not feasible.

Lack of capacity or plans to improve capacity in the sewer is not a valid reason 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 a public foul sewer. In these cases, if an applicant decides to apply for a water discharge permit for private treatment facilities, we are likely to refuse to grant the permit.

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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