

Planning Policy Team
South Kesteven District Council
Land Use Planning
Council Offices
The Picture House
St Catherine's Road
Grantham
NG31 6TT

Our ref:
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Date: 13 March 2026

Dear Planning Policy Team

Hough on the Hill Neighbourhood Plan Review Consultation

Thank you for consulting us on the Hough on the Hill Neighbourhood Plan.

A key principle of the planning system is to promote sustainable development. Sustainable development meets our needs for housing, employment and recreation while protecting the environment. It ensures that the right development, is built in the right place at the right time.

To assist in the preparation of any document towards achieving sustainable development we have identified the key environmental issues within our remit that are relevant to this area and have provided guidance on any actions you need to undertake.

We aim to reduce flood risk, while protecting and enhancing the water environment. Our comments on this matter are therefore made solely from these points of view.

Environmental Constraints

Flood risk

We encourage all proposed development to be outside of Flood Zone 2 and Flood Zone 3. However, if there is no other choice other than to build in Flood Zone 2 or Flood Zone 3, then you will need to undertake and pass both the Sequential Test and Exception Test and carry out appropriate flood risk assessments.

If Essential Infrastructure is necessary within Flood Zone 3 then the application must be referred to the Environment Agency together with a supporting Flood Risk Assessment, which demonstrates that the proposal will remain operational during a 0.1% event (2115 scenario) and that appropriate mitigation measures/flood resilient construction techniques have been incorporated into the development.

Water quality and foul drainage

The Neighbourhood Plan states in section 40 (page 14) "Hough on the Hill drains into the River Brant catchment, with the village being served by a small Anglian Water Sewage Treatment Works. The Upper Brant is failing good status due to elevated levels of phosphate. The lower River Brant is also at poor ecological status."

Environment Agency



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We can confirm that that the Hough on the Hill sewage treatment works does discharge to the Upper Brant (Water Framework Directive (WFD) waterbody ID GB105030056110) and that the failure is due to phosphate. One of the confirmed reasons for this is the continuous discharge from the water company sewage treatment works.

Further details can be found here: [Brant - Upper | Catchment Data Explorer | Catchment Data Explorer](#)

The Neighbourhood Plan does not include a drainage strategy. We would expect, and recommend, one of these to be included to outline how new developments will ensure that the surface water and foul flows from their sites will not cause deterioration to any WFD waterbodies.

We would also advise you to consult and liaise with Anglian Water regarding the capacity of the Hough on the Hill sewage treatment works to take on additional flows from new developments without causing deterioration in the receiving watercourse.

It should also be noted that there are two other WFD catchments in the Hough on the Hill Parish boundary: Honington Beck (GB105030056750) and Sand Beck (GB105030056160). How the Plan can protect these waterbodies should also be considered, particularly if development is proposed within them.

Paragraph 42 (page 14) states that “The majority of properties (and all properties within Brandon and Gelston) are not on mains drainage”. One of the Environment Agency's principle concerns regarding foul water management is to prevent the proliferation of non-mains treatment solutions wherever possible. We advise that the Plan should encourage developments to connect to the mains wherever practicable. We would suggest some wording is included in the Plan to advise of the following:

The Building Regulations 2010 and Government Guidance contained within the [PPG for Water Supply, Wastewater and Water Quality](#) (paragraph 020 ID: 34-020-20140306) sets out a hierarchy of drainage options that must be considered and discounted in the following order:

1. Connection to the public sewer
2. Connection to a private sewer that drains to a public sewer
3. Package sewage treatment plant or septic tank
4. Cesspool

Foul drainage should be connected to the main sewer whenever it is feasible to do so. Where this is not possible, under the Environmental Permitting (England and Wales) Regulations 2016 any discharge of sewage or trade effluent made to either surface water or groundwater will need to either comply with [General Binding Rules for Small Sewage Discharges](#) or comply with a permit issued by the Environment Agency, additional to any planning permission that may be required. This applies to any discharge to ground, inland freshwaters, coastal waters or relevant territorial waters. Further information about the permitting process can be found at [Septic tanks and sewage treatment plants: what you need to do](#).

Further advice is available at: [Septic tanks and treatment plants: permits and general binding rules](#)

Any future developments should also look at including measures for improving and enhancing the water environment where possible.

Biodiversity

We support the inclusion of the 'Green Spaces: Protecting Greenspace and Support Nature Conservation and Biodiversity' section and Neighbourhood Plan objective.

We note that Green Infrastructure is also mentioned in the plan. We would suggest that the water environment / blue infrastructure is also included as it is important to consider blue and green infrastructure together as water is vital to the health of greenspaces and biodiversity.

Groundwater and contaminated land

National Planning Policy Framework (NPPF) paragraph 187 states that the planning system should contribute to and enhance the natural and local environment by preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of water pollution. Government policy also states that planning policies and decisions should also ensure that adequate site investigation information, prepared by a competent person, is presented (NPPF, paragraph 196).

With this in mind we recommend adding the following to section 41 of the Plan on the topic of 'Flood Risk, Water Quality and Geology':

The western part of the parish is also underlain by superficial geology comprising the Fulbeck Sand and Gravel Member, which is also classified as a secondary A aquifer.

These aquifers can support local abstractions and baseflow to streams and rivers. The use (or potential use) of groundwater in the area makes parts of the area vulnerable to pollution from certain types of development. Best practice to ensure groundwater is protected from pollution and as a resource is contained within guidance document 'The Environment Agency's approach to groundwater protection' available [Groundwater protection position statements - GOV.UK](#).

This publication sets out our position for a wide range of activities and developments, including:

- Waste management
- Discharge of liquid effluents
- Land contamination
- Ground source heat pumps
- Cemetery developments
- Drainage

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

Yours sincerely

[Redacted signature]

[Redacted contact details]