

FAO Anna Hayes

Rochdale Metropolitan Borough Council -
Development Control
Smith Street,
Rochdale,
OL16 1XU

Reference: PA-0010918/01
Customer reference: PL/2026/0738
04 September 2026

Demolition and replacement of community centre to provide Community Sports and Wellbeing Hub (Hybrid Use Class F2/E(d)) comprising community sports and wellbeing facilities; football club training and community pitches; drainage and earthworks; provision of cricket nets; with associated hard and soft landscaping, parking, storage container, lighting, enclosures and boundary treatments.

Bowlee Pavilion and Playing Fields Heywood Old Road Middleton M24 4SD

Dear Anna Hayes,

Thank you for consulting us on the above application, on 19 August 2026.

Environment Agency position

We object to the proposed development as submitted because it involves the potential use of a non-mains foul drainage system in circumstances where it may be feasible for the development to be connected to a public sewer but inadequate justification has been provided for the use of a non-mains system. We recommend that the application should be refused on this basis.

We note that the submitted flood risk assessment (FRA) (dated 29 July 2026, compiled by MAB Consultancy Ltd) section 5.5, indicates that if there is no connection to mains available, the site will utilise non-mains methods of foul water disposal. Section 5.182 of the planning statement (dated 12 August 2026, compiled by Enabl) also indicates that connection to the public foul sewer system will be dependent on capacity of this, as confirmed by United Utilities.

Private sewage treatment facilities should only be used where it is not feasible 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 the PPG for Water Supply, Wastewater and Water Quality (ref ID: 34-020-20140306) which advises that the first presumption must be to provide a system of foul drainage discharging into a public sewer. Only where, having taken into account the cost and/or practicability, it can be shown to the satisfaction of the Local Planning Authority that connection to a public sewer is not feasible, should non-mains foul sewage disposal solutions be considered.

As proposed, we consider the development is contrary to the Rochdale Core Strategy (adopted 2016) (Policy G8), which states 'We will require: (h) Development that does not directly or indirectly lead to pollution of existing water resources such as watercourses and groundwater or the derogation of the quantity of groundwater;'. In addition, Policy DM1 states 'All development proposals... will be expected to demonstrate that they: (l) Have considered the availability of water and wastewater infrastructure'.

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.

We require submission of further information, such as a foul drainage assessment, which demonstrates that connection to the public foul sewer is not feasible before connection to a private treatment solution can be considered for this development.

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, on the basis of the information currently available within the planning application it appears unlikely that we would be able to grant a permit.

If you have any questions regarding our response, please contact spplanning.rfh@environment-agency.gov.uk.

Yours sincerely,

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