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PROJECT	Littlebourne Evenhill Littlebourne, Canterbury		CLIENT	Gladman		
TITLE	Response to Natural England Comments		REFERENCE	21045-NUT-TN-01	P01	
AUTHOR		CHECKER		APPROVER		
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REV	COMMENTS		DATE	AUTH	CHKR	APPR
P01	First issue		27/06/2023	CMG	GS	GL
P02	2 nd Draft		27/07/2023	CMG	GS	GL

1 Summary

- 1.1 On the 2nd of June 2023, Natural England (NE) issued their advice¹ to the planning consultation submitted by Canterbury City Council (CCC) regarding the proposed development for up to 300 dwellings in Littlebourne, Canterbury, planning reference number CA/23/00484.
- 1.2 This letter was based on the evidence submitted in Water Environment’s Nutrient Neutrality Assessment and Mitigation Strategy (NNAMS) dated 14th of February 2023².
- 1.3 The conclusion of NE’s advice was that the application could have potential significant effects on the Stodmarsh Habitats Sites, and that the following further information is required to determine the significance of the impacts and the scope for mitigation:
 - It is NE’s opinion that all foul water should connect to the mains sewage network in the first instance.
 - A Habitats Regulations Assessment should be undertaken by the authority to demonstrate no likely significant effect on Stodmarsh.
- 1.4 The final point is the responsibility of CCC, and so it will not be addressed in this technical note. The other two points are addressed below.

2 Detailed Response

- 2.1 It is understood that the only objection to this proposal is the use of onsite wastewater treatment with subsequent discharge to watercourse, and that if this can be resolved, then a nutrient impact can be ruled out.

¹ Natural England (2 June 2023) Ref: 430903

² Water Environment Limited (14th February 2023) Nutrient Neutrality Assessment and Mitigation Strategy Ref: 21045-NUT-RP-01 C01

- 2.2 It should be noted that the proposed treatment system is not a “package treatment plant” but rather an onsite wastewater treatment works (WwTW) that will be adopted by Severn Trent Connect (STC) – a New Appointments and Variations (NAV) company that is registered under Ofwat.
- 2.3 STC will require an EA permit to discharge treated wastewater to the environment. Without the permit, the operation of the onsite WwTW and thus discharge of the final effluent will not commence. STC will be obligated to monitor and provide annual evidence that the characteristics of the final effluent do not breach the consented EA permit.
- 2.4 NE should take comfort that the new, separate system, solely for the conveyance and treatment of foul water, will be routinely monitored and maintained in perpetuity as a conventional adopted foul system under a section 104 agreement under the Water Industry Act. The new foul sewers within the site will therefore become public assets.
- 2.5 STC have sent a similar response to the Environment Agency (EA) regarding their consultation advice.
- 2.6 It is acknowledged that a connection to the existing WwTW at Newnham Valley Preston would be possible, if a link with Stodmarsh could be ruled out under the Dover Connectivity Study. However, given the evidence for somewhat regular flooding of the foul sewers in the region, and the fact that excess sewage is sometimes tankered to Canterbury WwTW, this is not possible, until such time as the sewerage is upgraded to cope with the excess flows.