

Canterbury City Council
Development Control
Council Offices Military Road
Canterbury
Kent
CT1 1YW

Our ref: KT/2023/130653/02-L01
Your ref: CA/23/00484
Date: 08 September 2023

Dear Sir/Madam

Outline planning application for up to 300 residential dwellings (including affordable housing and older person accommodation), a new community hub, introduction of structural planting and landscaping, informal public open space and children's play area and surface water flood mitigation and attenuation. All matters reserved except for access.

Land At The Hill Bekesbourne Lane, East Of Bekesbourne Hill, Bekesbourne, Canterbury, CT4 5EA

Thank you for consulting us on the above application.

Based on the submitted information we must **maintain our objection** as the concerns outlined in our letter ref KT/2023/130653/01-L01 dated 12 May 2023 have not been addressed. Please see below for additional information

Objection

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. We recommend that the application should be refused on this basis.

Reason

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).

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.

In this instance the justification provided by the applicant for non-connection to the mains sewerage system is deficient in the following respects:

- We will not normally grant a permit for a private sewage treatment system based on lack of capacity in the closest public foul sewer.
- The nearest foul sewer is less than 30m away from the site boundary
- There are no obvious physical barriers that would prevent connection to the foul sewer

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.

Additionally, the proposed discharge point is the Nailbourne. The Nailbourne is considered a seasonally dry watercourse as it generally only has flow during the winter. We will not usually grant a permit to discharge to a seasonally dry watercourse due to the lack of dilution for half of the year and therefore a higher risk of environmental harm.

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

Yours faithfully

Mr Adam Blake
Planning Advisor

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