



Objection Comments re Housing Density & Odour Assessment

OVERVIEW

Two subjects which do not seem to have been raised by previous objectors are introduced below for consideration.

With regard to Housing Density, the analysis below leads to a conclusion that 25 units (approx. 12 dph) would be more appropriate.

Whilst Southern Water have a statutory obligation to accommodate new development, with the 2nd worst sewage discharge record for the Beult (EA data), any new loads at Smarden WWTW will aggravate an already serious pollution source; discharges to the watercourse are ignored as potential source for Odours and perhaps the Surveyors should come back on more revelatory occasions?

HOUSING DENSITY

The Planning Statement claims that *"the scale of development (35 dwellings) is clearly proportionate to the size of the settlement of Smarder"*; however, it totally ignores prevailing practice across similar 'rural settlements' with regard to Development Density. The PS refers to several recent schemes, notably in rural Biddenden and urban Tenterden; as the following table demonstrates, neither of these support the density proposed in this case.

Location	No of Houses	Site Area ha	Density dph	Planning ref
SMARDEN	35	2.11	16.6	PA/2025/0824
BIDDENDEN	50	6.87	7.23	21/01361/AS
BETHERSDEN	32	3.98	8	PA/2024/1442
HAM STREET	140	14.39	9.7	PA/2024/1908
SHADOXHURST	13	1.58	8.2	21/01688/AS
TENTERDEN	145	12.35	11.7	21/00790/AS
WOODCHURCH	22	1.84	11.95	PA/2023/2051

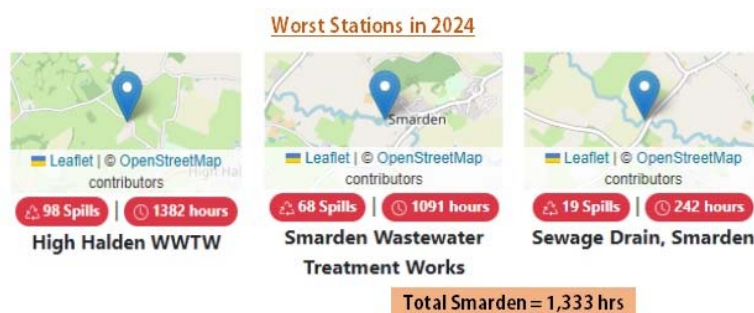
ABC appears to have no clearly defined policy on densities; however some guidelines were issued in the development of South Ashford Community strategies which recognise transition from urban to rural, with the latter targeting low density as circa 10 dph; this is bourne out by the current / recent example above.

ODOUR IMPLICATIONS FROM PROXIMITY OF WWTW

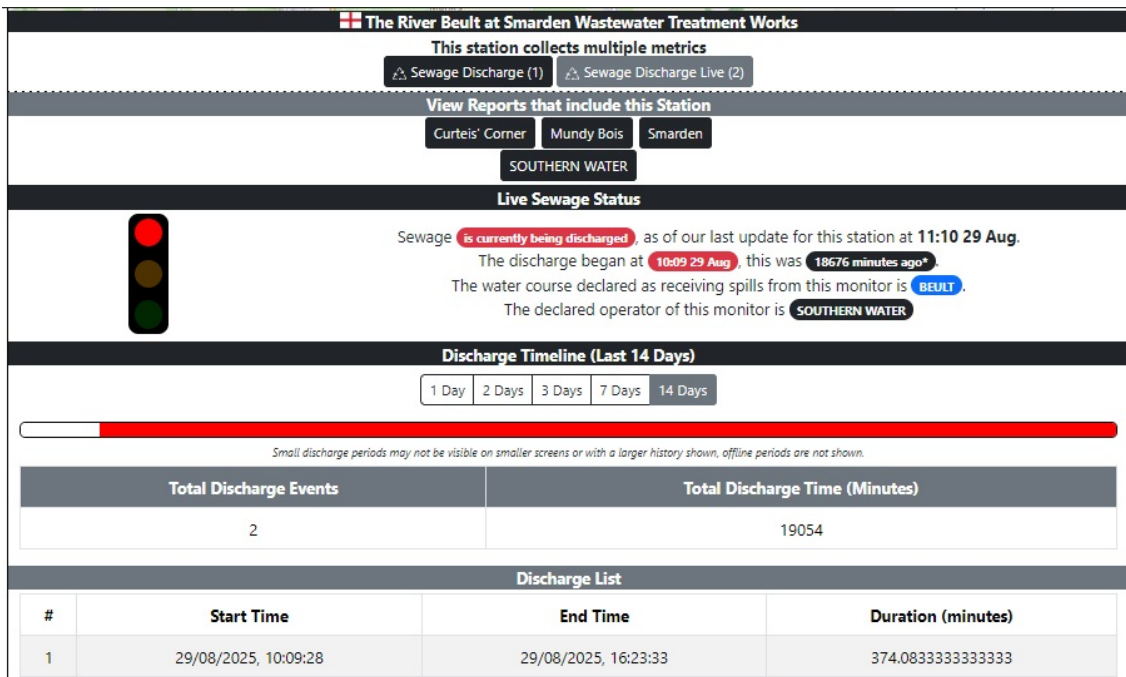
"The proposed residential development is located approximately 20m to the north of Smarden Wastewater Treatment Works (WwTW), which is operated by Southern Water (SW). An odour assessment was required to understand whether odorous emissions from this WwTW could significantly impact the amenity of future users of the proposed development."

'Sniff Tests' taken on 4 separate dates concluded that there are no significant implications for the proposed scheme. However, the applicant's Assessment is of questionable scientific completeness.

Not in itself Material Consideration for a Planning Objection, Smarden holds the dubious honour of 2nd place ranking in the 2024 league table of sewage pollution sources on the Beult. With its total of 1,333 hrs, narrowly behind High Halden at 1,382. In 2024, the Smarden WWTW discharged sewage for a total of circa 1,091 hrs, the separate downstream Storm Drain discharged a further 242 hrs.



Seemingly, the 'sniff surveys' managed to avoid these events? The only Summer 'dry' period survey was in June and the recent long-awaited arrival of rains at end August has triggered immediate spillages; just one example below. We respectfully suggest that the previous static watercourse might yield some unwelcome fragrances.



Our Team, together with South East Rivers Trust have been monitoring the Beult flow, or rather lack of, conditions throughout this summer for a separate pollution project; the nearest survey location just upstream of this site at Cage lane was characterised through August by no measurable flows (pictures below). Results of the surveys are available online via the CrowdWater application run by University of Zurich.



For the current Odour Assessment to be considered credible, it needs to be extended to consider the WWTW discharge; however, the highest potential for odours will have been from the current sewage dumps to minimal post-dry-season flows in the watercourse. Evidence of eutrophication is available generally on this section of the river and the potential exists for the generation of significant odours in the river adjacent to the site.

CONCLUSIONS

There are good precedents to justify a challenge to the proposed Housing Density, in addition to the widely responded separate concerns regarding the suitability of the site's location and access.

The realities of Smarden's sewage management and its treated / untreated discharges to the adjacent River Beult perhaps warrant the label of 'Caveat Emptor' on any property located in the proximity, as the published statistics for pollution demonstrate. The currently published Odour Assessment & Addendum present only a partial picture and require more comprehensive studies.

Peter Finnis, Team Leader | 11/09/2025


Smarden - Sewage Summary





Live Report

Historical

Summary for Smarden 2021-2024

 **414 Spills**

 **5565.9 hours**

 How are spills calculated?

In the period we have records for, 2021-2024, sewage has been discharged in, or near (~3mi.), Smarden 414 time(s).

Sewage has been discharged for a total of 5565.9 hour(s).

In total: 0.63 year(s)* of elapsed time.

ROMDEN ROAD BRIDGES UPSTREAM OF SMARDEN WEST ON BETHERSDEN BRANCH | EAST ON PLUCKLEY BRANCH

