

APPENDIX 3.1
A SUMMARY OF THE RPG9 ALTERATIONS
PANEL REPORT

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1 SUSTAINABILITY

The Panel recognised that the impact of the growth area proposals on the availability of water raises issues of sustainability, and agreed with the Environment Agency (EA) that this would require more efficient use to be made of water resources. Measures to improve efficiency may include metering, use of 'grey water' and new storage systems.(Chapter 2). The Panel recommended adding an additional element to the list in Policy 2 relating to resource efficiency and making more efficient use of resources, particularly energy, waste and water. (Chapter 2)

2 SCALE OF EMPLOYMENT AND HOUSING

On the issue of the trajectory of growth, the Panel was convinced by the careful work of the Ashford's Future Study that provision should be made for an accelerating rate of growth. This would allow time for action to be taken to increase capacity in the town's physical and social infrastructure (including waste water).

Hence the Panel recommended that an early section of the Alterations should quote the expected levels of growth to be accommodated by 2031, and also refer to the accelerated rate of building assumed over the period and the actions necessary to pre-plan for this, e.g. in relation to the long-term infrastructure such as water supply. (Chapter 3)

3 INFRASTRUCTURE

The Panel recommended that there should be separate references to water supply, trunk sewers and wastewater treatment, as well as drainage and flooding. In addition there should be a reference to the possibility of a new location for a wastewater treatment works as an alternative to expansion of the existing works, plus added stress on the importance of improving river quality in the Stour catchment.

Water

Water-related issues are acknowledged to be of special importance to Ashford's growth in the Proposed Alterations, and investment will be required to augment water supply and the capacity of the waste water treatment works. The Panel agreed that it can only be through the forthcoming masterplanning activities that the full extent of service needs can be identified. It is for the Greater Ashford Development Framework and the subsequent LDF to establish the proper phasing of development in relation to the provision of infrastructure.

The Panel also strongly endorsed the view that the growth area delivery vehicle should work closely with the infrastructure providers, to ensure that infrastructure does not present a constraint on the implementation of residential and employment development.

The Panel noted the consensus that in the case of water supply whatever the location of growth, enhanced capacity is essential to ensure that the quantum of development proposed is provided in a sustainable manner. The Panel also agrees that the shortage of water in Ashford has implications for the existing urban areas as well as new development. The costs of such 'retrofitting' must therefore be included if potential solutions to water supply problems are not to be compromised.

¹ SEERA, 2004. *Proposed Alterations to Regional Planning Guidance for the South East, RPG9 – Ashford Growth Area, Public Examination Panel Report* SEERA, February 2004

The Panel noted that on the basis of the Ashford growth area forecasts spare water supply capacity is likely to be exceeded by 2017. Thus, depending on the levels of demand reduction which can be achieved, new water infrastructure will be required between 2016 and 2021. At peak demand the water supply is already close to the capacity of both the resources available to the Ashford zone and the infrastructure to make supply available.

Storage proposals close to Ashford could compete with potential locations for development.

The need to identify and evaluate options for water supply emphasises the importance of pre-planning of all infrastructure if the growth strategy is to be delivered within the proposed timescale.

The Panel further noted that the cost of additional water supply infrastructure will have to be met through increased water prices to consumers in the wider area.

Wastewater

The Panel agreed with the Agency that the treatment of the extra wastewater generated by new development in Ashford presents two particular problems. First, the biological quality of the river Stour between Ashford and Rye is already rated as "worse than target" due to existing high nutrient loadings. Second, the costs associated with waste water infrastructure provision are likely to be exacerbated because all of the defined development areas of search to 2016 lie on the 'wrong side' of the main transportation corridor from the wastewater treatment works at Bybrook.

The Panel noted that Southern Water (SWS) estimates the capacity of Bybrook WWTW to be an additional 3,500 dwellings only before capacity improvements will be necessary. The nature of future waste water capacity improvements will be dependent not only on levels of proposed growth, but also on the water quality standards set by the EA. The latter in turn reflect European Directives which are about to require even higher standards. The impact of Ashford's wastewater on the quality of local watercourses is one of the potentially damaging aspects of the town's expansion. Accordingly revised RPG 9 should refer to the importance of improving river quality in the Stour catchment.

EA needs to define a long term environmental strategy for Ashford that must identify the preferred location of future WWTW discharges to the Stour catchment and define the effluent quality standards to be met. If a new WWTW site is required the Panel accepts that it should be allocated as part of the Local Development Framework.

In addition to the major infrastructure, the Panel agreed that there is potential for other smaller, site specific measures to reduce stress on water quality, such as reed beds or attenuation ponds which could supplement base flows in the Stour, and the scope for Sustainable Urban Drainage Systems. The Panel also acknowledges the Agency's compelling case for strategic planning of surface water management to minimise flood risk.

The Ashford's Future Study estimated that the costs associated with the provision of a new WWTW could be in the region of £60 million. To avoid piecemeal development a mechanism for forward funding is needed to finance the provision of trunk infrastructure in advance and recover costs from developers as development progresses.

Southern Water have included water infrastructure at Ashford as one of their top five strategic objectives in their Business Plan for 2005-10. Although, given a favourable response from OFWAT, this should mean that improvements to supply capacity can be delivered within the timeframe, there appears to be a bottleneck in wastewater treatment capacity. This is because capacity at Bybrook is likely to be exceeded by 2005 whereas 2007 is the earliest date by which improvements might be in place. Although the resolution of this problem is not a matter for the RPG the Panel was acutely aware that this bottleneck has implications not only for water quality in the Stour but also for the pace of housing development.

The Panel noted the Agency's emphasis on the extensive lead times for the major water infrastructure projects needed in Ashford. The immediate task is to examine future growth in the context of an integrated strategy for the Stour catchment, which includes considering water supply and waste water alongside flooding, water quality, climate change and environmental issues. The results of such a study should be made available to feed into masterplanning work and the LDF.

The Panel accepted that if development were to proceed in the absence of enhanced water infrastructure the implications would include water shortages and deterioration of effluent quality. In these circumstances the Panel agreed that water supply and waste water treatment are in effect absolute constraints to growth and that development could not be considered as sustainable. The development would not therefore meet the objectives of the Communities Plan. Conversely the Panel acknowledged that if development is delayed Ashford will be unable to fulfil its function in contributing to housing needs. This aspect of sustainability was stressed in the Select Committee report and the Panel is therefore seeking GOSE's assurance that they are working closely with Government departments to ensure that their investment programmes take account of growth proposals. (Chapter 4)

4 SPATIAL FRAMEWORK

The Panel considered that firmer conclusions over the development areas of search will be drawn following conclusion of traffic modelling studies that are currently under way. Accordingly at this stage the question of whether or not the south west quadrant is a suitable development area is as much a matter of phasing as hard and fast decisions about whether to include or exclude the area.

The Panel recommended amendments to the base layer of the diagram including marking and labelling the Bybrook waste water treatment works. The Panel also agreed with the Environment Agency that the river system (Great Stour, Stour, and East Stour) should be added onto the diagram. One way of depicting the broad areas of search would also recognise the importance of the river corridors south of Ashford.

The Panel also recommended indicating the broad area of search for development to 2016 by a diagonal line, and exclude floodplain areas. (Chapter 5)

5 DELIVERY

The Panel acknowledged that one source of funding relevant to some infrastructure deficiencies is via utility companies themselves with the costs ultimately passed on to the consumer. This is relevant to funding water supply increases and additional wastewater treatment capacity. (Chapter 6)