

RSS EXAMINATION IN PUBLIC SOUTH EAST

STATEMENT BY CPRE KENT: PARTICIPANT 7150

MATTER 8Ciii – THAMES GATEWAY: INFRASTRUCTURE & IMPLEMENTATION

8Ciii.1 Have the water supply and waste water treatment, and transport implications of the growth proposals been adequately considered (paras 2.25-27)?

Paragraphs 2.25-27 outline the need for transport, water supply and other infrastructure to be put in place in time to serve new developments, but the specific requirements in that regard have not been identified in the draft RSS. *Creating sustainable Communities: Delivering the Thames Gateway* (ODPM, March 2005) states that:

[The Government's] key principles are to... ensure that infrastructure and local services are in place when the community needs them' (page 7)

and that:

'Across the Gateway, growth and new development will be focused initially on areas with good existing or planned transport links.' (Page 27)

Our recommendation in respect of this issue is similar in principle to that in response to Matter 8Ci.1 which addresses travel patterns. We believe that RSS should explicitly link the specific infrastructure enhancement projects identified in the implementation plan to planned growth in specific locations, both in respect of housing and employment land allocations. Policy KTG1 should then be linked to those tables, establishing the identified infrastructure as a pre-requisite for housing growth in specified locations.

Policy KTG12 appears also to support this basic concept in respect of transport infrastructure, although it leaves the exercise to a later stage (the Sub-Regional Investment Framework). Policy KTG12 does not, however, state that growth in particular locations should be contingent upon specific transport infrastructure projects being put in place. Moreover, the Sub-Regional Investment Framework will not constitute policy that LDFs will be required to observe in the same way as the RSS.

In respect of water resources, specifically, we have indicated in our response to Matter 1E that the likely shortfall in water supply capacity across the region has not been adequately addressed in the draft RSS and is therefore not properly reflected in the proposed housebuilding rates.

8Ciii.2 Is the sub-regional development policy sufficiently robust to respond to the outcome of the strategic flood risk assessments as required by Policy KTG9?

The “sub-regional development policy” is taken to mean the collective Policies affecting development in the sub-region. Policy KTG1 allows the rate of development to be less than that proposed if ‘infrastructure’ is delayed. ‘Infrastructure’ here might include measures to reduce flood risk to satisfactory levels, but not necessarily. Policy KTG1 does not, therefore, necessarily respond to a flood risk assessment that suggests that development would be inappropriate. We therefore recommend that Policy KTG1 makes satisfactory mitigation of flood risk a pre-requisite of the proposed build rates.

Policy KTG9 itself requires development to be planned to ‘avoid’ the risk of flooding. The term ‘avoid’ is too restrictive and should be replaced with ‘manage’: flood risk can be managed so as to reduce the likelihood of flooding and also to reduce the likely impact of flooding - should it occur - to acceptable levels. Indeed, the first indent of Policy KTG9 mentions ‘acceptable’ risk, which is different to ‘avoiding’ risk.

Policy KTG9 also requires LDFs to ‘guide categories of development away from flood risk areas’. There are several problems with this wording. Firstly, the categories of development to which it refers should be specified so as to avoid uncertainty. Secondly, as indicated above, flood risk and impact mitigation measures can make development entirely acceptable in ‘flood risk areas’ and this needs to be recognised in Policy KTG9. Thirdly, the Policy should be clearer as to whether it is referring to absolute risk - which ignores the protection provided by flood defences - and *residual* risk, which takes account of flood defences. It is the latter (residual risk) that is relevant in assessing the likelihood and severity of a flood event.

8Ciii.3 Are the proposals in the Implementation Plan¹ (including for social and green infrastructure) clear, justified and well related to the spatial strategy (KTG12)? What are the priorities and is the organisational structure adequate?

Green Infrastructure - It should be made clearer that ‘Greening The Gateway’ refers to the ‘Greening The Gateway Implementation Plan: *Creating Sustainable Communities: Greening the Gateway Implementation Plan* (ODPM/DEFRA, February 2005).

This section should also refer to the Thames Estuary Parklands initiative (and associated delivery plans) being taken forward through the Thames Gateway Strategic Framework (unpublished and in draft at the time of writing).

Utilities - As we have indicated elsewhere (in our submissions to matter 1E), the proposed water supply enhancement is insufficient to meet demands arising out of the proposed rate of housing growth.

¹ Updated by SEERA prior to EiP and available online at:
<http://www.southeast-ra.gov.uk/southeastplan/key/infrastructure.html>