

**RSS EXAMINATION IN PUBLIC SOUTH EAST**

**STATEMENT BY CPRE KENT: PARTICIPANT 7150**

**MATTER 8Div – EAST KENT AND ASHFORD: IMPLEMENTATION AND FORMAT**

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**8Div.1 Have the water supply and waste water treatment, flood risk, and transport implications of the growth proposals been adequately considered?**

CPRE Kent urges a far more cautious approach towards housing development throughout East Kent. Climate change predictions of an increasingly unstable climate have particular implications for East Kent, especially the low lying coastal areas and flood plains. If winter storms become more frequent this would lead to high run off and flooding episodes, but not enable effective aquifer recharge. This problem could be compounded by higher summer temperatures and evaporation rates from water storage bodies.

SEERA<sup>1</sup> summarises the predicted effects of climate change on the South East as follows:

- Warmer, wetter winters;
- Hotter, drier summers;
- Increased incidence of extreme events (including severe storms);
- Sea level rise and storm surges.’

CPRE Kent contends that the Draft RSS has barely begun to address the profound impacts that climate change is predicted to have on every economic, social and environmental aspect of life in the region.

Regarding the long term security and quality of potable water supplies, the RSS fails to address the risks adequately. CPRE Kent refers to its submission to Matter 1E and its own publication ‘A Water Resource Strategy for Kent’ (2006).<sup>2</sup> In summary, CPRE Kent contends that demand from the present population and existing housing stock already abstracts virtually all of the available resource across the county. This situation pertains in average recharge years, and leaves little safety margin. The situation is far worse in the drought years that we are currently experiencing. The RSS must factor in global warming and anticipate severe and prolonged droughts occurring with increasing frequency.

CPRE Kent has serious doubts that the proposed water infrastructure additions will deliver the resource needed to supply the number of new homes proposed for the sub-region. Worse still, the delivery of houses built to the improved standards of water efficiency demanded by policy NRM1 is yet to begin in any meaningful way. Even where new houses are fitted with demand management devices, the planning system cannot prevent their replacement or the profligate use of water. Relying on a twin track approach of demand management and resource enhancement appears an

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<sup>1</sup> SEERA Written Statement (2006) Sub-matter 1C Climate Change

<sup>2</sup> A Water Resource Strategy for Kent Warren, G. (2006) CPRE Kent

increasingly unsteady prospect when neither of the twin tracks appears able to deliver their contribution savings needed. It is our contention that waste-water re-use must be given serious consideration within the strategy for resource management, if only to protect the integrity of supplies available to the existing users.

On the issue of transport, we retain reservations about the apparent over-reliance on park and ride schemes in Canterbury and Ashford. While they undoubtedly ease congestion within urban centres they run the risk of undermining the success of direct bus services from outlying areas into towns. This is a vicious circle which reinforces reliance on private cars, marginalises public transport and isolates those people living in rural areas who have no other option.

**8Div.2 Are the proposals in the Implementation Plan<sup>3</sup> (including for social and green infrastructure clear), justified and well related to the spatial strategy? What are the priorities?**

CPRE Kent is concerned that the Implementation Plan concentrates on the provision of built infrastructure and physical assets. The role of the voluntary sector in underpinning community development is barely acknowledged and its important contribution to cohesiveness and the quality of life is overlooked.

Many of Kent's community halls date from the inter-war period and are now at the end of their life. The problem of replacement is acute in many rural settlements. Compliance with DDA, Health and Safety, and Fire Regulations adds to the burden of routine maintenance. CPRE Kent regrets that the RSS does not address the age, condition and suitability of the existing facilities and their capacity to meet increased demand. Nor does the Implementation Plan consider the ongoing revenue costs of maintaining community facilities and who will bear these costs.

Annex 4 sets out the local infrastructure costs. CPRE Kent welcomes this breakdown by sub-region. The total cost (2006-2026) of providing infrastructure for East Kent and Ashford amounts to £1,057,541,695. Again, all of these items of infrastructure must materialise for the community to be sustainable.

We notice that Annex 4 excludes supported accommodation, gypsy and traveller sites, waste treatment, waste recycling and local electricity and gas supply infrastructure. The latter three of these are crucial infrastructure provision, and must be factored into any costings. Although it is fully understood that cost estimation is difficult, CPRE Kent believes it is more important to have identified committed funding sources, such as those tabulated in annex 3.

Costing the infrastructure is meaningless unless the funding source exists for the facility to be developed. In a number of places the Implementation Plan calls for additional public sector investment, and this must be committed if the required infrastructure is to come forward as planned. A local tariff is proposed for Ashford to facilitate private sector contribution for infrastructure, but this cannot be relied upon as the key monetary source. Instead Government must commit substantial funds to ensure that adequate infrastructure is provided to create sustainable communities.

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<sup>3</sup> Updated by SEERA prior to EiP <http://www.southeast-ra.gov.uk/southeastplan/key/infrastructure.html>