

RSS EXAMINATION IN PUBLIC SOUTH EAST

STATEMENT BY CPRE KENT: PARTICIPANT 7150

MATTER 8Di – EAST KENT AND ASHFORD: STRATEGY AND ECONOMY

8Di.1 Does the proposed strategy appropriately identify and respond to the differing circumstances within this sub-region, within the context of its environmental attributes?

CPRE Kent believes that the RSS is misguided to view Ashford as the Primary Regional Centre of the sub-region. This does not reflect a realistic view of Ashford and under-estimates the uncertainties and considerable environmental constraints to its rapid growth. The RSS over-estimates the current importance of Ashford within the sub-region. This is due in part to poor connectivity across East Kent, but also the poor quality of Ashford's offer as an economic centre. In short, Ashford currently lacks a credible identity and 'pull' and its offer remains unattractive to investors and discerning consumers alike. The RSS should seize the opportunity to remedy this.

CPRE Kent agrees with the RSS synopsis (2.1) that urban areas throughout the region are under stress from a range of social, economic and environmental constraints and increasingly wide income disparities and unaffordable housing. These have many direct and indirect negative impacts on the surrounding countryside. CPRE Kent notes that Ashford's record for delivering brownfield development¹ is exceptionally poor (1.39% 2002/03) and its target for PDL completions 2005/06 was still only 7%.

The disproportionate attention given to the growth of Ashford in the RSS is likely to prejudice the organic growth and sustainable development of other towns in the sub-region. The coastal towns of Folkestone, Dover and Deal, parts of Canterbury and Sandwich and most notably urban Thanet are all struggling to support some of the most deprived wards in the region. The peripheral areas have naturally vulnerable economies and are the sub-region's areas of greatest need, not Ashford. The former East Kent Coalfield villages are also a special case.

The RSS continues to follow the traditional thinking that employment requires tracts of employment land, whereas it does not give sufficient consideration to the impact of new technology. The RSS should do more to encourage working from home and the growth of self-employment. A more flexible approach to the concept of employment, and particularly knowledge-based work would support the local economy in rural areas and reduce the need to travel to congested areas.

CPRE Kent has presented its case on Water under sub-matter 1E, but re-emphasises the acute problem in East Kent, particularly Romney Marsh, Folkestone and Dover. Aquifers supply some 80% of Kent's drinking water, but the recharge rate² during winter 2005–6 varied between 22% and 56% across Kent. Consequently, current water abstraction rates are already dangerously unsustainable and further development is little better than a gamble on the

¹ Ashford Borough Council Annual Monitoring Report (2004)

² Mid Kent Water aquifer recharge rates (as % long term average 1 October 2005 to May 2006)

degree of future climate instability and all its vagaries. Given the uncertainties and the consequences of failure to provide water, CPRE Kent believes that the RSS should adopt the precautionary principle, which should override other considerations.

CPRE Kent does not consider that the RSS gives sufficient weight to Kent's road congestion problems and the environmental consequences of pollution, noise and CO₂ emissions. The Channel Tunnel and M20 corridor's 'gateway role' is attracting low value haulage and warehousing operations. These are entrenching the low wage economy and degrade the environment. Again, the rapid expansion of Ashford, the M20 corridor and the proposed Dover Lorry Park are all part of the problem, not the solution. The impacts are felt all too keenly within the East Kent and Ashford sub-region, with the frequent implementation of 'Operation Stack' to manage the back-log of freight vehicles in the county whenever cross channel services are disrupted. CPRE Kent finds no justification for the creation of a lorry park within the AONB, as has been proposed. Instead, CPRE Kent urges government to seek a national traffic management solution to the recurring problems caused by over-reliance on road-based freight.

CPRE Kent deplores the tendency throughout the SE Plan for portraying the countryside and rural areas as a consumable resource and a mere buffer to service urban needs. This approach is flawed and most obvious in the case of Ashford. Although at present Ashford town is uninspiring, it is close to the high quality, but fragile landscapes of the North Downs and High Weald AONB. CPRE Kent is concerned that as Ashford and other centres grow, their traffic and other urban influences will continue to encroach and bring negative impacts on biodiversity and increasingly scarce areas of tranquillity.

CPRE Kent supports the East Kent Natural Park initiative (Policy EKA9), provided the emphasis is on the 'Natural'. However, to be meaningful, the Park needs a recognised planning status in the RSS and strong protection, otherwise it could degenerate into nothing more than a marketing label. The Park offers a way to enhance the quality of life and the contribution that the countryside can make to sustainable living, health and wellbeing in East Kent. The need for sensitive land management and habitat creation in the Park offers potentially sustainable diversification options for farmers and integrated rural businesses. But the maintenance of this public good will depend on the availability of sustainable funding streams.

The East Kent Natural Park would bring obvious benefits for residents of the urban coastal towns and biodiversity. However, we retain concerns about the erosion of tranquillity that would result if the Park is developed beyond an appropriate scale into a mass market destination. We note the inconsistency of approach between the South Downs AONB, which receives some 30m visitors per year and is moving towards National Park status, and the East Kent Natural Park initiative, which has no planning status and appears to be stalled by a lack of funding and commitment.

CPRE Kent proposes that the RSS contains a policy objective that seeks National Park status for the North Kent Downs AONB.

CPRE Kent is concerned about the variable quality of the built environment in towns across the county. Construction methods and materials rarely exceed, and too often do not meet, minimum building regulations standards. While there are aspirations to improve this situation the results are at best unremarkable.

8Di.2 Does draft RSS make appropriate provision for significant growth in economic activity (Policies EKA3-7, RE5)?

CPRE Kent anticipates that over-emphasis on the RSS target of 3% GVA risks damaging the environment of East Kent and in particular, eroding the quality of the Downland scarp landscape along the M20 around Dover and Folkestone. This is the first landscape that millions of visitors to Britain see, but it is being disfigured by commercial over-development, attracted by the proximity of the motorway and Channel Tunnel.

A recent article³ reported news of an organisation in search of 400,000 sq ft (37,160 sq m) of industrial space and comments that 'Plenty of available land, reasonable rents and proximity to the M20 and the Channel Tunnel could soon turn east Kent into big shed territory'. It asserts that 'plentiful supplies of land, which can cater for large distribution requirements at lower prices than other areas, have turned the M20, which bisects the 'garden of England', into an extension of the M25.'

The article continues by quoting Michael Pain, senior partner at Oliver Pain, the sole agent at the 120 acre (49 ha) Link Park near Hythe: 'Given the absence of suitably large sites near the M25 corridor, there is a noticeable increase in the number of requirements for very large, high-bay distribution warehouses of 150,000 sq ft (13,935 sq m) or larger, especially where the occupiers concerned will consider locations further down the M20 corridor.' He added that 'There is a shortage of large sites with planning consent for warehouse developments - this makes this requirement rather significant.' Furthermore, the availability of land and favourable average rents of £4.50/sq ft (£48.44/sq m) are all factors that Pain believes will be attractive for industrial developers.

Large warehousing operations located in the M20 corridor may well help support the regional and national economy and protect the environment of more discerning districts elsewhere. However, CPRE Kent believes that the economic attractiveness of low cost B8 land in the M20 corridor will only provide a few low wage jobs per hectare, at disproportionate expense to East Kent's sensitive landscape and its rural economy. CPRE Kent would like the RSS to recognise these undesirable consequences and include appropriate environmental safeguards.

Policy EKA 3 'Core Economic Strategy' discusses fostering economic growth and providing for the growth of new economic activity. Distinct economic roles of Ashford, the coastal towns and Canterbury have been set. There is no mention of how economic growth will be attracted, nor the mechanisms available to foster sustainable growth. CPRE Kent believes that this is a fundamental weakness as the presumption of a consistently high rate of economic growth underpins the entire SE Plan.

Policy EKA4 iv encourages economic impetus at specified locations. CPRE Kent acknowledges the importance of Dover as a port, but considers that the town also needs a diversified investment from industry sectors other than freight handling.

Regeneration of existing urban areas should be stated as a priority for investment since the need is identified and existing communities will benefit. CPRE Kent supports the specific mention of mixed-use expansion at Aylesham (EKA4 vi), for this reason.

³ 'East Kent's X Factor', Property Week Brasse, J. April 2005

CPRE Kent supports the policy (AK4 vii) of local service and mixed employment development at Deal, Faversham, Herne Bay and Whitstable, of a scale and character suitable to their size. The sensitive implementation of this policy will reduce the need for residents to travel to larger centres. Any development in these small towns needs to respect their character and identity.

CPRE Kent is concerned that the two Dungeness power stations are by far the largest employer on Romney Marsh (EKA4 viii). Consequently, measures to provide alternative and more diverse sources of employment are very important locally, but they should be appropriate to the rural context and not damage the distinctive open landscape and tranquillity of the marsh and its habitats.

The local application of regional policy by local authorities is problematic: many lack the required resources, such as adequate funding. Policy EKA 7 specifies that 'local development frameworks should confirm the broad scale of new business and related developments'. No guidance is given as to how the location for new employment is linked with economic growth.

Although the RSS states that 'priority will be given to their [urban areas] regeneration through the use of previously developed land' CPRE Kent urges that the policy is strengthened to ensure that the re-development of the urban areas and brownfield land takes place before further incursions are made onto greenfield land.

CPRE Kent objects to the inclusion of the Imperial College campus at Wye (EKA7), as this is reliant on enabling development on green field AONB land and both inappropriate and unsustainable. Since the SE Plan was published the applicant has withdrawn their proposal. CPRE Kent assumes that since this policy has been removed from Ashford's LDF Core Strategy it will also be removed from the RSS and the Implementation Plan, as the project is undeliverable. References to a road link from J10a to Wye are therefore redundant and should also be removed from the Implementation Plan.