

8D.iv/MID KENT WATER (8185)

DRAFT SOUTH EAST PLAN - EXAMINATION IN PUBLIC

WRITTEN STATEMENT SUBMITTED ON BEHALF OF

MID KENT WATER

IN RESPECT OF

**MATTER 8D: EAST KENT & ASHFORD SUB-REGION
SUB-MATTER iv: IMPLEMENTATION & FORMAT**

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IN RESPECT OF SUB-MATTER 8Div – EAST KENT & ASHFORD SUB-REGION
IMPLEMENTATION & FORMAT****Introduction**

1. This written statement is submitted by Adams Hendry Consulting Ltd on behalf of Mid Kent Water. It is specifically directed at the questions on the Final List of Matters and Participants in relation to Matter 8 'Sub-regional Strategy', sub-matter 8Div 'East Kent and Ashford, Implementation and Format', questions 8Div.1 and 8Div.2.
2. Mid Kent Water is responsible for providing the people of Kent with clean, safe drinking water. Mid Kent Water is one of three water companies that supply water to the East Kent and Ashford sub-region, the other two being Southern Water and Folkestone and Dover Water.
3. The area served by Mid Kent Water is approximately 2,050 km², and has a population of nearly 600,000, requiring an average of 165 million litres of high quality drinking water per day. 88% of the water Mid Kent Water supplies comes from wells and boreholes owned by the company. The geographical area includes the centres of Ashford, Canterbury and Maidstone. Mid Kent Water's water supply area is illustrated in Appendix 1.
4. Mid Kent Water has a substantial, direct and continuing interest in the development of strategic policy for the East Kent & Ashford Sub-Region, and the South East Region as a whole. It is committed to ensuring that necessary water supply infrastructure is delivered to meet the region's current and future needs.

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

5. Mid Kent Water does not have detailed comments to make on the growth proposals for East Kent and Ashford. Security of supply is a statutory requirement under the Water Industry Act. Each water company has to maintain the security of its water supplies, as well as sufficient headroom to take account of inherent supply and demand variations and uncertainties. Mid Kent Water is committed to delivering necessary water infrastructure to facilitate the delivery of the eventual development strategy for the East Kent and Ashford area. It does, however, look to the Panel to ensure that robust planning policies are in place to assist in the delivery of any required infrastructure.

Water Supply

6. The preparation of the South East Plan (SEP) has been informed by modelling undertaken by the Environment Agency (EA) within the remit of the Water Resources South East (WRSE). The Group also includes representatives of the water companies, Ofwat, SEERA and Natural England. A series of reports

have been prepared, investigating the implications of different scales and distribution of new housing on water supply-demand balance.

7. The most recent report was issued in May 2006 (doc Ar4). This provides a commentary on the housing levels and distribution proposed in Policy H1 and the sub-regional strategies included in the SEP.
8. The May 2006 Report identifies that future water supply to the East Kent & Ashford Sub-Region can be provided across a range of different scenarios, provided that a combination of water efficiency measures and new water resource developments take place.
9. Mid Kent Water is committed to improved levels of water efficiency, and is promoting a number of initiatives, including encouraging customers, developers and planners to adopt water efficient practices.
10. The May 2006 Report makes a series of assumptions about existing and future water resource development and forecasts a range of water efficiency scenarios. Mid Kent Water's written statement in respect of Matter 1, sub-matter 1E Water, identified that higher levels of water efficiency in new build, which are relied upon in the May 2006 Report, would require significant and stepped financial, regulatory and behavioural changes. Such savings may not be achievable and therefore the scenarios carry considerable risk and uncertainty.
11. There is also considerable uncertainty arising from:
 - The final requirements of the Habitats Directive (and the associated review of consents);
 - The Environment Agency's Restoring Sustainable Abstraction Programme;
 - Catchment Abstraction Management Strategies; and
 - The Water Framework Directive (River Basin Management Plans).
12. All of the above factors have the potential to affect current and potential future water resource levels. Of particular note is that the Habitat Review of Consents may result in modifications to existing water abstraction licenses being made by the Environment Agency/DEFRA, where these cannot be shown (either alone or in combination) not to have a significant effect on European sites. This could reduce the availability of existing water supplies, requiring new resources to be identified and developed to meet existing demand, leaving aside additional demand from the growth proposed in the SEP.
13. Notwithstanding these uncertainties, Mid Kent Water has a statutory duty to supply water, and is committed to meeting its responsibilities. Mid Kent Water considers that resource development is needed to support the planned level of growth in East Kent. The additional water resources to meet existing and future demand can be planned and delivered, provided that planning policy support for such provision is given. It is critically important that the SEP and subsequent LDDs recognise that the timely allocation of land, and grant of planning permission and abstraction licenses, will be necessary to facilitate the delivery of this infrastructure. They must also recognise the need to ensure that new

development does not proceed ahead of the infrastructure necessary to support it.

14. The East Kent and Ashford strategy provides for new housing at the main urban areas throughout East Kent, and the Ashford Growth Area is a fundamental element of the strategy. It is acknowledged that the strategy “*depends on the provision of infrastructure and services to support growth and balance between jobs and housing*” paragraph 2.8. The water resource infrastructure required to support the growth in the main urban areas and particularly the Ashford Growth Area, is likely to have to be provided outside of those areas.
15. Mid Kent Water will continue to work closely with the other water companies and the EA (in all its roles) to identify, plan for and deliver necessary water resource infrastructure. It is currently working to assess its future water supply options, and is working closely with Southern Water to assess options for shared resource development in North Kent, including the option of a new reservoir at Broad Oak.
16. To conclude Mid Kent Water considers that additional water resources to meet existing and future demand can be planned and delivered, provided that planning policy support for such provision is given.
17. Mid Kent Water will look to LPAs to make allocations of land within LDDs for necessary infrastructure provision, and seek to secure policy commitments to both the timely grant of planning permission for necessary infrastructure, and the phasing of development to match infrastructure capacity. Mid Kent Water has requested that stronger wording be included within the SEP policies to facilitate this, through amendments sought to policies NRM1 and NRM2. Mid Kent Water has also sought stronger wording of Policy EKA10 and the supporting text in the SEP to enable the delivery of new water infrastructure (refer to appendix 2).

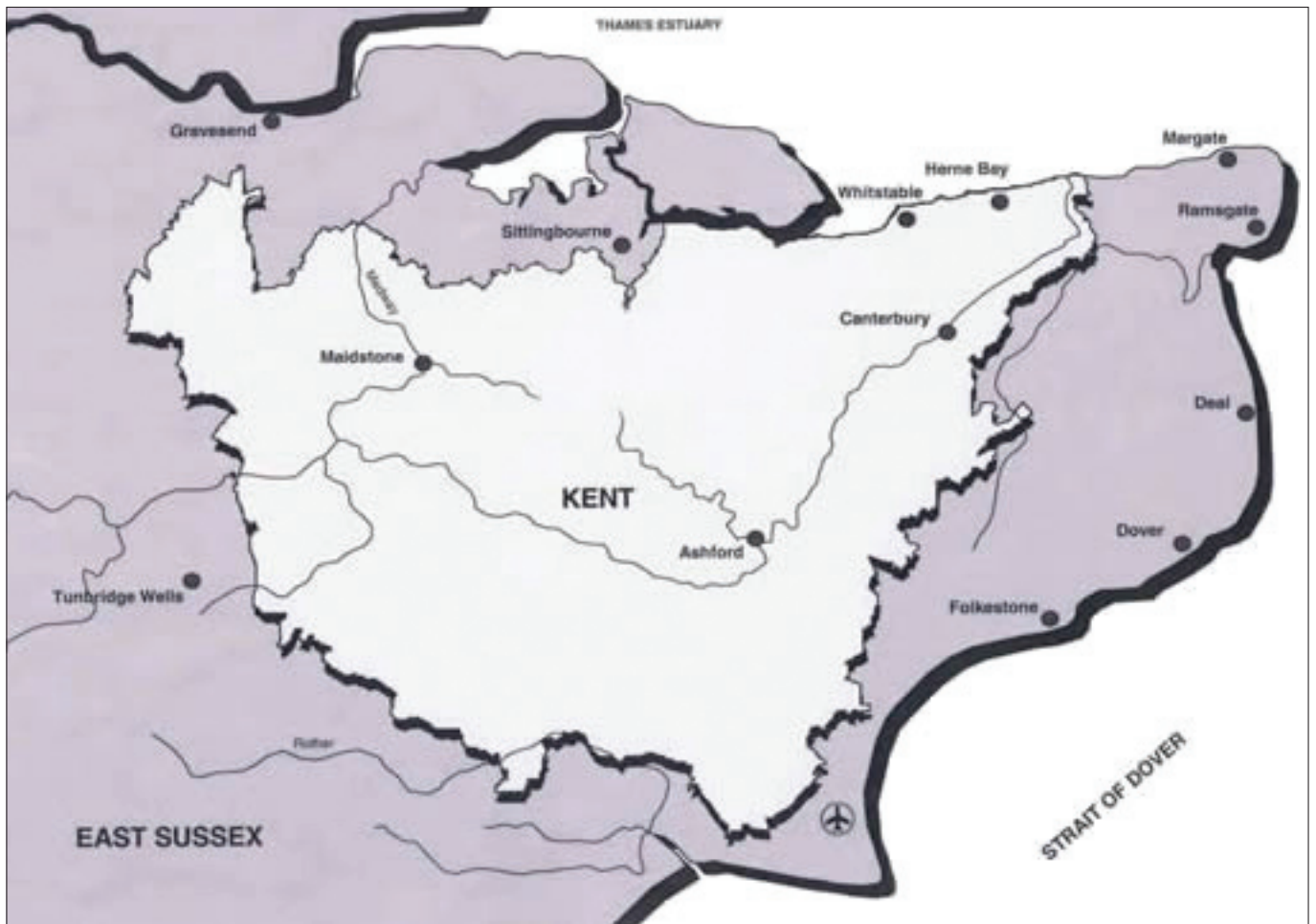
Matter 8Div.2 - Are the proposals in the Implementation Plan (including for social and green infrastructure) clear, justified and well related to the spatial strategy? What are the priorities?

18. Annex 2 of the Implementation Plan identifies Broad Oak as National, Inter-Regional and Regionally Significant Infrastructure. Annex 3 of the Implementation Plan identifies utilities infrastructure in East Kent and Ashford, which includes works to the main in the Weald and Ashford areas, including Bewl to Ashford transfer main.
19. The appropriate assessment of the draft SEP Implementation Plan (Nov 2006) comments that a reservoir at Broad Oak “*may be hydraulically connected to Stodmarsh SAC, SPA and Ramsar site*” and advises that a full appropriate assessment should be carried out and abstraction points and rates should be targeted to avoid insufficient water being retained within the Stodmarsh site.
20. Mid Kent Water will work closely with other water companies, the EA, and LPAs to identify and technically evaluate infrastructure requirements. This will be undertaken alongside the LPA’s preparation of LDDs to identify specific scales

and locations for development within the sub-region. It is at this level that detailed technical solutions to local infrastructure constraints and the need for appropriate assessment can most appropriately be identified and evaluated.

21. The appropriate assessment of the draft SEP Implementation Plan comments that there is insufficient information available concerning the Bewl to Ashford Transfer Main to make an assessment and that during full investigation a full appropriate assessment will have to be undertaken. The proposals for the Bewl to Ashford Transfer Main are well advanced; an environmental impact assessment has been undertaken. The proposals do not affect any European Sites and the relevant competent authorities have advised that an appropriate assessment is not required.

Appendix 1 : Mid Kent Water Coverage



Appendix 2 Suggested Amendments to the SEP

Amend paragraph 2.32 to read:

“...and that new water supplies will be needed, ~~such as including the suggested a new~~ reservoir at Broad Oak near Canterbury. It is ...”

Add new sentence at the end of paragraph 2.32 as follows:

“Local Authorities must make the necessary commitment through the allocation of sites and inclusion of policies in Local Development Documents to facilitate the provision of necessary infrastructure.”

Amend the wording of Policy EKA10 to include an additional paragraph, the additional text to read:

“Local Planning Authorities will allocate sites and include policies in Local Development Documents to facilitate the provision of necessary infrastructure, and phase housing and other development until such time as the necessary improvements are delivered.”