



8Div/ DTZ for Church Commissioners for England (7548)

South East Plan - Regional Spatial Strategy Examination

December 2006

8Div – Implementation and Format

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

INTRODUCTION

Generally speaking, the Church Commissioners consider that the infrastructure implications of the growth proposals have been adequately considered in terms of the general scale and nature of the infrastructure required to accommodate the growth, but there is concern that the policies lay inadequate stress on the issue of delivery mechanisms, given the high level of dependence which the growth proposals have on delivery of the infrastructure.

The cross-cutting policy CC5 deals with infrastructure and implementation, and recognises the need for infrastructure provision to meet the needs of new development. Sub-section (i) of policy CC5 states

The Assembly expects all the relevant infrastructure agencies and providers to align their investment programmes to help deliver the proposals in the Plan.

This recognises the issue of aligning investment programmes to help deliver the Plan, but finance is only one part (albeit a significant one) of the implementation equation required to ensure delivery. There are many other fundamental issues, such as statutory approvals (i.e. planning permissions, Highway Orders etc.), land acquisition, management prioritisation, etc., which have to be co-ordinated and put in place before infrastructure is implemented.

Sub-paragraph (iii) of policy CC5 is worded as follows:

Development shall not proceed until the relevant planning authorities are satisfied that the necessary infrastructure required to serve the development is available or will be provided in time.

This makes it clear that failure to implement necessary infrastructure in a timely manner, consistent with the development programme, will delay the roll-forward of that programme, and thereby slow growth.

It is the concern of the Church Commissioners that the policies in the Plan do not give sufficient emphasis to all of the issues associated with implementation of essential infrastructure. In the absence of sufficient commitment by public sector agencies to driving forward the delivery programme by grasping these issues, the programme will almost inevitably slow, with delivery falling below the levels required to meet the targets in the Plan.

Clearly, it would be inappropriate to allow development to come forward significantly in advance of essential infrastructure, required to service that development. Accordingly, we consider that the Plan should adopt a more positive approach to highlighting the urgency and importance of identifying potential delaying factors, and underlining the need for the relevant agencies to ensure that these are resolved in a timely manner.



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The following sections of these representations examine transport and utilities related issues in more detail, to demonstrate the points summarised above.

TRANSPORT

The Implementation Plan document identifies transport infrastructure requirements together with the responsible agencies, funding sources, a commentary on timetable requirements for implementation, and current status of the proposals (i.e. ref. Annexe 3.3: East Kent & Ashford for the Ashford area transport requirements). However, these tables are necessarily summary in nature and fail to reflect lead in times, and other such issues which can delay implementation. In part, that may be reflected in the timetable shown in the Annexes where, for instance, the motorway junction 10A on the M20 is shown extending throughout the period from 2006 to 2016. The table shows that this is required prior to development, and that it is a committed proposal, so that, therefore, on the face of it the Plan would seem to be making adequate provision.

However, the reality is rather different. The published Core Strategy for the Ashford LDF incorporating the various transport study background documents, makes it abundantly clear that a new motorway junction is fundamental to achieving the growth strategy. Indeed, existing Borough Local Plan development commitments are significantly constrained by the absence of this junction, and approximately 40% of the developments proposed for South Ashford in the existing Borough Local Plan are unable to come forward until the new junction is in place. Clearly, therefore, the new developments envisaged as part of the Ashford growth area must all be constrained by that factor.

Whilst the Implementation Plan schedules show this junction to be committed, no details of the proposal (such as its location and connecting link road routes) have been published at present. In other words, whilst it is understood that the Highways Agency are working on such proposals, nothing has yet come forward and, therefore, this vital piece of infrastructure which unlocks a major part of the proposed Ashford growth has still to commence the extensive statutory and other procedures required before it can be implemented. These procedures include the need for Highway Orders and land acquisition, and it is likely that a Public Inquiry will be required.

Experience indicates that, historically, implementation of major highway infrastructure schemes of this nature takes at least seven years from the beginning of the processes to opening for traffic. On that basis, this junction is unlikely to be open before 2014 unless there is a commitment by the public sector agencies concerned to accelerate the normal procedures and timescales.

An opening date of 2014 is several years into the proposed growth programme, but large parts of that programme are constrained by not being able to come forward until the motorway junction is open to traffic. Any delays in this element, therefore, will be likely to frustrate the achievement of the housing numbers during these early years of the Plan and delivery will fall below target.

Similar concerns exist regarding other major elements of the transport infrastructure. The backbone of the transport strategy for the Ashford growth area is the SMARTLINK public transport proposal which is described in the Implementation Plan as essential public transport network to provide alternative to the car and to enable high density growth area. Clearly, developers are able to provide the necessary infrastructure to facilitate this public transport strategy within their developments, and



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developer contributions towards the SMARTLINK can also be required to assist with its funding. However, this strategy will only work if it is provided on a comprehensive basis, operating across-town between the proposed urban extensions and the town centre, to give the high-quality, high-frequency service envisaged. That necessarily requires co-ordination by a number of public sector agencies in order to provide key parts of highway infrastructure, together with the supply and operation of the buses themselves. This is another prime example of where funding is only one part of the total requirements for implementation, and the majority of the other elements require commitments by public sector agencies.

It is also important that SMARTLINK is available from early on in the development of the proposed growth, to avoid the development of car based cultures in the new housing areas. The implementation plan shows that SMARTLINK is currently “under investigation” but if it is to be up and running from early in the growth programme then an early commitment and implementation will be essential.

Similar comments can be made with regard to other elements of transport infrastructure provision, but, in addition, there is the issue of policy initiatives designed to support the physical provision of infrastructure. One example of this is car parking policy.

The Ashford Transport Strategy is promulgated on the basis of significant reductions in vehicle trip rates from the proposed new housing areas, compared with historic trip rates, and these are to be achieved by a combination of new infrastructure provision (such as SMARTLINK) and policy initiatives. One such initiative is a proposal to significantly reduce the amount of longstay car parking available in the town centre so as to discourage commuting by car.

This is a fundamental element in the transport strategy for the Ashford growth area and it is vital, therefore, that the relevant policies emphasise this requirement, and set out unequivocally the relevant agencies’ clear commitment to introducing those policy initiatives. However, this type of initiative does not appear in the Implementation Plan schedules.

UTILITIES

The Church Commissioners consider Policy NRM1 - Sustainable Water Resources, Groundwater and River Water Quality Management unfairly targets new developments to incorporate measures to achieve high levels of water efficiency without placing any requirements upon improving water efficiency in existing developments. NRM1 should therefore include definite targets for metering all existing consumers and measures that will encourage water efficiency in existing homes."

The South East Plan embraces a twin-track approach to water management: Firstly, demand management needs to be increased, and secondly, sustainable new water resources and wastewater infrastructure needs to be planned and provided in step with the development they serve. This is an approach which has been widely adopted across the UK. A key point that the South East Plan has not high-lighted however, is that water resources are already stretched and even without further development it is expected that water shortages will occur. The greatest benefit can be achieved by imposing water efficiency targets on existing housing (which is the primary water consumer). However, even though the South East Plan intimates at the need for water efficiency to apply across the region, Policy NRM1 only applies measures upon new developments. The requirement for



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measures to apply only to new developments unfairly places the major share of meeting water efficiency targets on new developments.

Policy NRM2: Strategic Water Resources Development does not support Policy NRM1 strongly enough. Policy NRM2 should make the provision of new water resources a definite requirement, instead of being an option. Without such requirements, existing water resources will be stretched making population growth in the region unsustainable."

In explanation of this criticism, Policy NRM2 states that 'there is demonstrable need for new water resource schemes and demand management over the period of the Plan', however it goes on to say that the provision of strategic water resources only 'may be required' over the period of the Plan. Clearly the wording of the Policy is self defeating and potentially leaves the existing water resources to support increases in population. As previously stated, because NRM1 does apply demand management to existing housing it must be questioned where the water will come from for new developments, and consequently what limited effect applying strict efficiency measures upon the new houses will achieve?

SUMMARY

In summary, the Commissioners are concerned that whilst the infrastructure implications of the growth proposals appear to have been adequately considered in terms of the range of infrastructure requirements necessary to accommodate that growth, there is inadequate emphasis on the urgent need to ensure implementation of significant elements, and associated policy initiatives, which form key parts of the strategy associated with accommodating the growth. Unless there is a clear commitment to early implementation of the identified requirements, particularly where that requires statutory processes and/or other such approvals, then the growth programme will not be achieved and the delivery will fall well below the programme.

It is considered that greater emphasis needs to be given in the policies to the need for timely implementation and the commitment of both funding and implementation agencies to achieving that implementation.



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

No Comment.



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8Div.3 – Does the proposed sub-regional policy framework (14 policies) provide an appropriate level of guidance for LDDs?

No Comment.