



Campaign to Protect
Rural England
KENT

A CPRE Kent report

Greater Ashford: *a vision in peril?*

November 2007



FOREWORD

Ashford, at the heart of a thriving rural area of Kent, has been the focus of much attention since the announcement of the Government's Sustainable Communities Plan in 2003. It is one of the four 'Growth Areas' established by this plan to ease the housing shortages of the South East.

CPRE Kent believes that Ashford has the potential to become an exemplar of the way in which we can build truly sustainable communities for the 21st century. However, Five years into the 30-year period that is proposed for Ashford's transformation we fear that this transformation may be losing its focus. On the face of it, Ashford should be the easiest of the Growth Areas to plan and to deliver: unlike the other areas identified in the Plan, (the Thames Gateway, Milton Keynes/South Midlands and Stansted-Cambridge-Peterborough), it spans only one region, one county and one administrative district. This report details our major concerns regarding the critical balance of infrastructure, jobs and housing. We must push for the creation of a thriving, energetic town, not a commuter dormitory which relies on the job markets of London or beyond. The growth in the number of jobs in Ashford is falling far short of the growth in its homes. Worse still, those jobs that are being created appear to focus heavily on the retail sector, rather than the high-skill, high-value professions that Ashford needs to create a thriving economy. Plans for the new Discovery Centre which was to have been a major deliverable of the development have been abandoned, and we see this as an early symptom of the widening gap between aspiration and achievement.

We have been assured that funding will be forthcoming for the major infrastructure projects that are needed to correct Ashford's existing deficiencies and facilitate the significant growth of the town. We find the assurances unconvincing and believe that more must be done to instil confidence that the plans for the future will not turn into hollow promises.

We were greatly encouraged by the publication of Ashford's Local Development Framework Core Strategy submission document. This mirrors many of our concerns and complements many of our proposed solutions. At the time of writing, the examination of the core strategy is complete, but the issue of whether the core strategy will be found to be sound or unsound remains unresolved. We believe that if the strategy is found unsound, and land allocations are to be revisited, the future and momentum of Ashford as a sustainable community will be called into question.

We hope our report will be helpful in moving forward the necessary momentum to achieve Ashford's growth in an atmosphere of positive, constructive criticism and engagement.

We only have one chance to build a sustainable community in Ashford. We must grasp it now.

Dr Hilary Newport
Director, CPRE Kent.

The Kent Branch of the Campaign to Protect Rural England exists to promote the beauty, tranquillity and diversity of rural England by encouraging the sustainable use of land and other natural resources in town and country.

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Glossary

AAP	Area Action Plan
AFDB	Ashford's Futures Delivery Board
CLG	Communities and Local Government
DEFRA	Department for the Environment, Food and Rural Affairs
GADF	Greater Ashford Development Framework
HomeZone	Pioneered in the Netherlands in early 1970s, HomeZones attempt a balance between vehicular traffic and other street users.
HSRL	High Speed Rail Link
KCC	Kent County Council
LDF	Local Development Framework
LPA	Local Planning Authority
ODPM	Office of Deputy Prime Minister, now superseded by the Department for Communities and Local Government

1 INTRODUCTION

The Borough of Ashford, with 111,200^[1] inhabitants, includes some of the South East's most beautiful and protected countryside. The town itself, home to 57,000 people, lies on the River Stour in the heart of Kent, 60 miles from London. The existing good road and rail links to the capital will be enhanced in 2009 with a reduction in train-travel time to London to 37 minutes once the High Speed Rail Link is fully functioning. High-speed rail links also connect Ashford and its international train station to Continental Europe via the Channel Tunnel. Regrettably, however, the frequency of trains stopping at Ashford has been greatly reduced since north Kent's Ebbsfleet station opened in November 2007.

For the past half century planning guidance at national, regional and local level has identified Ashford as a town suitable for significant expansion. In 2003 the Government concluded that there is substantial scope for further growth at Ashford to provide at least 31,000 new homes and 28,000 new jobs by 2031.

CPRE Kent is generally supportive of the Government's intention to direct growth at Ashford, as we recognise there is need for additional housing in the South East.

Ashford Borough Council has published the Core Strategy, the most important of the development plan documents within its Local Development Framework. At this time the Independent Examination of the Core Strategy by a Government Inspector has just been completed. The Core Strategy sets out the council's overall view of the way Ashford needs to be developed over the years to 2021. It also sets out its vision of what Ashford could become, including how the Government's targets will be met, and what needs to be done to create a sustainable community that will be a good place in which to live, with a high quality of life.

CPRE endorses the views and policies contained in the Core Strategy. However, CPRE believes only some aspects of required developments can be achieved directly by the Borough Council. Many aspects of the infrastructure needed by development are already deficient, and there are potential problems in ensuring sufficient finance will be available to achieve all that will be required to meet the council's vision.

This report sets out CPRE Kent's view of the present situation and how we believe the urban area of Ashford could develop more positively over this period. We analyse the issues that need to be addressed, the potential for development, and the constraints that must be respected. The report aims to be constructively critical.

Sections 2 and 3 of this report set the context: Sections 4 and 5 examine new development to date at Ashford against,

- In brief, the five key infrastructural elements considered vital if a new and successful sustainable community is to be created at the town and,
- in somewhat more depth, against the ODPM's (now CLG's) 'ingredients' for a sustainable community.

^[1] *Mid-year population estimates 2006* Office for National Statistics www.nomisweb.co.uk (August 2007)

2 GENERAL CONTEXT

2.1. Policy background

Regional Planning Guidance for the South East formally identified Ashford as a Growth Area in 2001. In 2001/02 a partnership led by Ashford Borough Council commissioned a detailed study of Ashford's future development potential. The Ashford's Future Study (Greater Ashford Development Framework – GADF), undertaken by Halcrow, was published in December 2002 and formed the basis of Ashford's inclusion in the Government's national planning document 'Sustainable Communities: Building for the future'^[2] which confirmed Ashford's status as one of four national Growth Areas (alongside Milton Keynes/South Midlands, Stansted-Cambridge-Peterborough and the Thames Gateway).

In relation to Ashford, the Government's Sustainable Communities Plan sets down five key infrastructural elements on which the delivery of a new sustainable community is dependent:

- *A new junction on the M20*
- *A funding package for town centre redevelopment and regeneration*
- *Water supply and flood management*
- *Education provision*
- *New social and community infrastructure*

CPRE Kent welcomes and supports the intention to create a truly sustainable community at Ashford. Our hope is that Ashford's development will maximise every opportunity to create developments which are well-designed, sustainably constructed, energy and water efficient and which make the best possible use of the land. We also believe a revitalised town centre and improved amenities are crucial to the future growth of Ashford.

CPRE Kent's support for Ashford's Growth Area status is based on the premise that new house building will be focused primarily within Ashford's urban area. We do not, however, accept that there is currently a significant level of unmet need for housing that requires house building in excess of the rate currently proposed in regional planning guidance, despite the more recent calls for yet more additional housing. Nor do we accept that there is the capacity to accommodate additional numbers. The panel report of the inspectors who examined the draft South East Plan in 2006-2007 recommended no increase in housing numbers for Ashford, commenting that it would be unlikely that employment growth in Ashford would be able to keep pace if higher housing numbers were imposed.

2.2. What makes a sustainable community?

Ashford's Core Strategy encompasses the Sustainable Communities Plan, and defines the council's overall vision as "A sustainable safe, healthy and thriving environment that offers an excellent quality of life to all who live, work and visit the Borough. This will be achieved by striving for high quality, sustainable growth and change, and careful management of all that is

^[2] *Sustainable Communities: Building for the future*, ODPM (2003)

best about the Borough.” We welcome and support many of these policies; the overarching policy (CS1: Guiding Principles), is reproduced in full in Annex 1.

Creating a sustainable community is therefore the goal of planning the Ashford Growth Area.

What constitutes both sustainability and a community are, however, notoriously difficult to pin down. Indications of key elements of a sustainable community can be found in the Government’s Sustainable Communities Plan^[4]. These include:

ECONOMY: *A flourishing local economy to provide jobs and wealth*

HOUSING: *A well-integrated mix of decent homes of different types and tenures, to support a range of household sizes, ages and incomes; sufficient size, scale and density and the right layout to support basic amenities in the neighbourhood and minimise use of resources including land.*

ENVIRONMENT: *A safe and healthy local environment with well-designed public and green space and strong and legible links to the wider landscape context beyond the built up areas*

PUBLIC SERVICES: *Good-quality local public services, including education and training opportunities, health care and community facilities*

TRANSPORT AND UTILITIES: *Provision of good public transport and utilities infrastructure both within the community and with good links to urban, rural and regional centres*

A SENSE OF PLACE: *The creation of a development with an attractive and distinctive sense of place.*

STRONG LEADERSHIP AND LOCAL INVOLVEMENT: *Strong leadership to respond positively to change and effective engagement and participation by local people, groups and business, especially in the planning, design and long-term stewardship of their community, and an active voluntary and community sector*

BROADER LINKS: *The right links with the wider regional, national and international community.*

The creation of a sustainable community at Ashford will deliver 31,000 new homes by 2031. CPRE Kent believes that Ashford must become a much more appealing place to live and visit before significant private sector investment will materialise. There is a wealth of excellent planning policy being developed at national and strategic level, including such initiatives as HomeZones for example, and a considerable range of emerging evidence of best practice to refer to across the country, and indeed from continental Europe. However, it is evident that development of a far inferior nature is proceeding apace in Ashford. This problem needs to be addressed immediately. It is simply not acceptable to speak of improvements in development

^[4] *Building houses or creating communities?* Sustainable Development Commission report (May 2007)

standards occurring at some point in the future while major building is taking place now. CPRE Kent has seen little evidence that the grand promises for Ashford over the coming decades have a realistic chance of becoming reality.

3 LANDSCAPE CONTEXT

The Sustainable Communities Plan acknowledges that one of the key challenges of sustainable growth is:

To ensure that the built environment in new and expanded communities is of a high quality, and the surrounding countryside is protected and enhanced.^[5]

The town of Ashford enjoys some of the most attractive countryside in the South East on its doorstep. This surrounding landscape is a vitally important asset to Ashford and any harm done to it will reduce its amenity value, and damage the attractiveness of the town. It would be actively opposed by CPRE Kent.

The Kent Downs Area of Outstanding Natural Beauty (AONB), which borders the town to the north, is a nationally protected landscape, one of only 37 such areas in the country. The Countryside and Rights of Way Act 2000 enhanced the status of AONBs so that designation now provides one of the highest levels of protection within the statutory planning system. Public bodies, statutory undertakers, government agencies and utility companies are now bound by a legal duty of regard to take account of the need to conserve and enhance the natural beauty of AONB landscapes. The policies in the Core Strategy must clearly endorse the level of protection which is afforded to the landscape of the Kent Downs AONB. CPRE is concerned that they will fail to do so. There is an urgent need for unequivocal endorsement in the suite of LDF documents of the extraordinary asset to the town of Ashford that landscape of this calibre on its doorstep offers. It is the responsibility of local adopted planning policies to conserve and enhance such nationally protected landscapes for the common good.

To the south east of the town, where much of the development is proposed, land is categorised as Agricultural Grade 3, but many areas of significant landscape and nature conservation importance, as well as large areas of floodplain, are present in this area. These include areas classified as falling within Biodiversity Group 1, Sites of Special Scientific Interest, Nature Reserves, the South Willesborough Dykes, Local Wildlife Sites (LWSs), Ancient Woodland and Special Landscape Areas. It is also Government policy that the countryside should be protected in its own right.

CPRE is concerned over the delay in the publication of the Ashford Rural Impact Study jointly commissioned by Ashford Borough Council, Kent Downs AONB Unit, the Countryside Agency (as it was then) and Kent County Council. This document is referred to in the draft South East Plan and we consider it important both in regard to the importance of the sensitive landscape setting of the town and as a core document behind the Ashford Core Strategy.

^[5] *Sustainable Communities: building for the future*, ODPM, Chapter 5 (2003)

4 PROGRESS REPORT

Delivery of infrastructure essentials for Ashford

The Sustainable Communities Plan deems Ashford's successful growth to be dependent on the deliver of five elements of infrastructure. Current progress on each of these elements is as follows:

NEW JUNCTION ON M20	The new junction at 10A is scheduled for 2012-2013 subject to funding. Improvement works to the existing junction 10 of M20 have improved capacity and eased local delays.
FUNDING PACKAGE FOR TOWN CENTRE REDEVELOPMENT AND REGENERATION	<p>Work to transform ring road into series of two-way streets started January 2007. Due for completion July 2008.</p> <p>Work underway on County Square retail extension. Due for completion March 2008.</p> <p>No public finance has been secured for improvements to public realm and regeneration packages to date; rather a tariff on new employment and retail proposals in the town centre is proposed.</p>
WATER SUPPLY AND FLOOD MANAGEMENT	£24.4 million investment by Mid Kent Water in improving water supply to mid Kent area including new water main between Bewl Water and Ashford. This is being put in place at the moment.
EDUCATION PROVISION	<p>Planning application lodged February 2007 for 20,845m² of higher education floor space at Victoria Rd.</p> <p>Delivery of new secondary and primary schools planned to be progressed as part of master planning for each of the three urban villages.</p>
NEW SOCIAL AND COMMUNITY INFRASTRUCTURE	<p>Stour Leisure Centre modernisation completed in summer 2007.</p> <p>Discussions ongoing with agencies including primary health care trust to work to ensure early delivery of infrastructure.</p>

5 ELEMENTS COMMON TO ALL SUSTAINABLE COMMUNITIES

This section details progress at Ashford in terms of the delivery of the infrastructure ingredients common to all sustainable communities, as indicated by the (then) Office of the Deputy Prime Minister (ODPM) in their publication *Sustainable Communities: Building for the Future*.

5.1. **ECONOMY:** *A flourishing local economy to provide jobs and wealth.*

5.1.1. Employment

It is generally agreed that a strong and sustained increase in employment opportunities at Ashford must accompany the housing growth assigned for the town. Employment growth and infrastructure provision have, however, so far failed dismally to keep pace with the housing growth already achieved. Delivery by 2021 of the 16,700 additional jobs specified in the Core Strategy will represent, at best, a considerable challenge. Given the consistent failure of this sector to keep pace with housing delivery over past decades, CPRE Kent remains concerned about delivery of additional employment at Ashford. We believe housing figures should be revised downwards if local employment growth continues to fall short of targets.

5.1.2. Land

Employment land has long been readily available at Ashford, reinforcing previous concerns raised by CPRE that land may not be the principal consideration for most firms.

In some areas, no amount of land supply will encourage a rush to development, and a perceived locational disadvantage can only be overcome by offering other attractions (as well as land)^[8].

The availability of ample land for employment at Ashford is reflected in the latest KCC Employment Land Supply Monitoring Statistics which show an existing oversupply of A2/B1 land (when compared to established Structure Plan targets) and 90% of the required A2/B1-B8 land supply for the period to 2011 already in place and allocated, in Ashford Borough.

5.1.3. Incentives

CPRE remains concerned at the perpetuation of national and regional ambiguity in relation to the promotion of Ashford as a destination for new commercial investment. While Ashford has historically been asked to accept a disproportionate share of the county's housing allocation, the town has never benefited from the principal tool of regional economic policy operated in this country, namely regional financial incentives. Although Ashford has long been classified as a regional Growth Centre, government and other agencies have traditionally funded businesses to locate twenty miles away in East Kent districts such as Thanet, which have been designated Development Areas and classified therefore as priority areas for economic regeneration. Politically, there has not been the will to date to wholeheartedly promote Ashford as the key

^[8]A Campaign Briefing: *Towards Sustainable Economic Development – Employment Land and the Countryside*, CPRE, p.11 (1999).

economic investment centre for the sub-region and it is this contradiction that has contributed to the past expansion of Ashford being housing-led, rather than employment-led. It is therefore crucial for the creation of a new sustainable community at Ashford that this situation does not continue.

In this regard, CPRE welcomes the fact that new employment development is excluded from contributions to the proposed Strategic Tariff (Core Strategy policy CS8). With the exception of sites in the town centre, the tariff will be imposed to fund much needed improvements in the public realm, in order not to impose barriers to new inward investment in this, the cornerstone of a balanced, rather than housing-dominated, community.

5.2. HOUSING: A well-integrated mix of decent homes of different types and tenures, to support a range of household sizes, ages and incomes. Sufficient size, scale and density and the right layout to support basic amenities in the neighbourhood and minimise use of resources including land.

5.2.1. Use of brownfield land

Ashford's Growth Area status plans for the provision of 31,000 new homes centred on the town, rather than the borough, of Ashford by 2031. CPRE Kent's support for the creation of a sustainable community at Ashford is based on the understanding that new house building will be focused primarily within the town's urban area. The results of the latest Urban Capacity Study carried out for Ashford Borough Council^[9] identify a potential yield of 10,251 new homes from previously developed land, including empty homes, in the Ashford urban area. CPRE believes that it is critical that development of available and suitable brownfield sites is brought forward early in the growth of the town to ensure that such expansion is as sustainable in its location as possible. The approach of 'mend before extend' as endorsed in the GADF is promoted in the Core Strategy (Policy CS1 paragraph F, reproduced in full in Annex 1) acknowledging that

by focusing development where it can enable key improvements to the quality of the urban area and its infrastructure from an early stage and improving connections between proposed and existing development areas, the town will be better placed to support major peripheral growth.^[10]

This policy approach is, however, being pursued in tandem with the promotion of the development of three new 'urban villages' by 2031 on the edge of the town on greenfield land. While the concept of comprehensive mixed-use developments is generally supported, CPRE is concerned that there exists no strong policy promotion to ensure the implementation and delivery of developments based on the 'mend before extend' principle and to prevent the perpetuation of greenfield expansion of the town at the expense of vital, real and immediate improvements in the land use mix and public realm of the run-down town centre.

Since the town's designation as a Growth Area, housing completions at Ashford have been running at an average of 788 new dwellings a year,^[11] roughly in line with regional planning-

^[9] *Urban Capacity Study*, Halcrow for Ashford Borough Council, para 4.1.1 (2006).

^[10] *Ashford Borough Local Development Framework: Core Strategy Submission DPD*, para 4.7 (2006).

^[11] Data provided by Strategic Planning Intelligence Group, Kent County Council

guidance levels¹ (RPG9, as amended in 2004). The majority of these new homes have been erected on greenfield sites to the south of the town and at density levels which fail to take advantage of the range currently advocated in national guidance (developments at densities as low as 21 dwellings per hectare were permitted during 2000–03, for example).

CPRE Kent believes this to be unacceptable, and regrets, in this regard, that quantifiable targets for securing appropriate levels of housing development density in the urban area are not included in the Core Strategy.

5.2.2. Type of development

To deliver a genuine step change in the form and functioning of new residential development at Ashford, it is crucially important that the lessons from recent housing developments are learnt. Recent research for the Ashford Transport Strategy^[12] has revealed that the occupant profile of new housing at Park Farm, Kingsnorth is markedly different from that of the town as a whole (only 7% of homes are occupied by pensioners, for example, as opposed to 20% of the town's households). This Study has found that the resultant characteristics of Park Farm households result in more trip making, and a dominance of travel by car, with significantly higher numbers of car trips and significantly lower bus, walk and cycle trips. The Transport Study concludes by identifying the key challenge as 'reversing any trend towards a continuation of this type of new development as this would lead to very car-dominated areas.'

CPRE Kent agrees that this form of development must not continue. We believe it is important that housing developments at Ashford provide for a wide range of housing types and tenures suitable for a range of income groups. Ideally it should not be possible to distinguish between different tenures within a housing area. Good design and mixing can help to achieve this. Sufficient housing should be provided in Ashford that is attractive to higher income earners in order to help promote the economic regeneration of the area. Local Planning Authorities and developers have been encouraged to work together so that an appropriate mix of housing can be constructed for the community.^[13]

CPRE Kent acknowledges that there is a significant nationwide shortfall in the provision of social housing compared to need, and a significant shortfall in the funding available.^[14] We recognise and welcome the increases in the Government's investment in affordable housing since 2003. Nevertheless, while this is clearly a big step in the right direction, it remains unclear whether the totality of anticipated Government expenditure in Ashford is sufficient to meet requirements for key workers and others in need of affordable housing.

¹ RPG9, amended chapter 12: Ashford Growth Area (2004)

^[12] *Ashford Transport Strategy*, KCC Regeneration and Projects Division (2006)

^[13] *Planning For Mixed Communities*, ODPM News Release 2005/0008 (2005)

^[14] For example: *Building for the Future – 2004 Update. A Report of the Shelter Housing Investment Project*. Shelter (March 2004); and *Review of Housing Supply: Delivering Stability: Securing our Future Housing Needs. Final Report – Recommendations* (2004).

5.2.3. Design Quality

PPS1 *Delivering Sustainable Communities* requires LPAs to reject applications for poorly designed developments and CPRE Kent has strongly welcomed this, advocating that the principles of both the higher levels of the *Code for Sustainable Homes* and the *Kent Design Guide* (2006) be adopted across all new developments. We also welcome the Government's promotion of the Design Champion model among public agencies and LPAs. PPS3 '*Housing*' places a considerable emphasis on securing well-designed residential developments of the highest standard. It would be desirable for CLG to establish some form of quality threshold for Ashford, along the lines of that which has been indicated in the Thames Gateway. Although Policy CS1 strongly endorses high quality design, and Policy CS9 (Appendix 2) emphasises the elements to be considered, CPRE has great concern over the means by which this is to be achieved. Aspiration alone is not enough. We propose the creation of a formal Design Advisory Panel with advice from the Kent Architecture Centre, which would have statutory consultee status and which would be required to offer an opinion on the design quality of every significant development proposal at Ashford, including at the early stages of plans being drawn up.

It is important for the long-term attractiveness of Ashford that new housing is not provided through large, monolithic housing estates with no amenities, that engender no sense of community, have no facilities and no sense of place. Too much development of the recent past has been of this type. The Government acknowledges the importance of improving 'liveability' in urban areas (as set out, for example, in *Living Places: Powers, Rights, Responsibilities*^[18] and its approach to 'sustainable communities'), and yet public-sector funding to ensure the emergence of a sustainable community at Ashford, rather than a 'dormitory' community, has been lamentably slow to arrive.

5.2.4. Environmental standards

We welcome the inclusion in the Core Strategy of Policy CS10 (Appendix 3) on standards for sustainable design and construction.

Despite the welcome aspirations of the Core Strategy, house building in Ashford is still nevertheless continuing relentlessly to standards that fall far short of what is needed to deliver the required levels of sustainability. Greatly improved minimum standards for sustainable building must be imposed as a matter of urgency, with in-built provision to review both standards and implementation timetables as part of the annual monitoring report of the LDF.

CPRE Kent urges the Government to support Ashford Borough Council in its aims to require minimum standards of Level 3 / 4 of the Code for Sustainable Homes.

Increasing housing in Ashford will inevitably place additional demands on natural resources, including water, land, minerals and the need for waste and waste-water management capacity. The principles of sustainable construction will help to minimise this impact. Research undertaken by WWF-UK^[15] and others has indicated that, in terms of personal expenditure and

^[18] *Living Places: Powers, Rights, Responsibilities*, DEFRA (2003)

^[15] *One Planet Living in the Thames Gateway*, WWF, BioRegional and SEI, (2003).

capital costs, developing homes to high environmental standards could be cheaper than building to the standards demanded by current building regulations.

5.3. ENVIRONMENT: *A safe and healthy local environment with well-designed public and green space, and strong and legible links to the wider landscape context beyond the built up areas.*

CPRE Kent welcomes the concepts introduced in the GADF of The Green Grid, Green Corridors, Green Edges, the Green Necklace and Primary Green Spaces, together with the need for quality, protection and resource management. Planning Policy must give the maintenance and improvement of the quality of Ashford's landscapes far more priority than it does at present. It is absolutely vital that these concepts become commitments to improve the attractiveness and cohesion of Ashford and its surrounding area. The lack of specific policies in the Core Strategy to promote the delivery of what represents a significant step change in the natural environment of the town is worrying; we consider that merely to mention non-specific 'green links' in the borough-wide strategy is not sufficient to afford these issues the importance that they warrant.

CPRE urges the council not merely to show where such areas may be, but also how they can be financed and progressed. Without strong project management they are unlikely to be achieved; this important strategy must not be allowed to suffer the same fate as the Discovery Centre.

5.4. PUBLIC SERVICES: *Good-quality local public services, including education and training opportunities, health care and community facilities.*

"Growth areas must not be dormitories; they must be communities. That also depends on providing good-quality community infrastructure." Yvette Cooper, Minister for Housing^[16]

5.4.1. Finance

The current estimate of the cost of providing appropriate levels of additional public-service infrastructure at Ashford to serve the additional population is £950 million. CPRE Kent questions whether this money will become available, particularly *in advance* of housing growth. Previous developments within Ashford, for example at Westhawk and Brisley Farm, have failed to include appropriate community infrastructure. This significant problem has been highlighted recently by the Sustainable Development Commission:

Sustainable communities require local public services to include good public and private transport links, education and training opportunities, healthcare, sports and community facilities. Communities need easy access to a varied range of these services, and these need to be provided holistically and, in the case of a new development, at the same time as the housing is being built.^[17]

These services are provided in the main by agencies other than Ashford Borough Council, and CPRE questions whether inclusion in the Core Strategy will do anything to ensure that the

^[16] Yvette Cooper MP, *Parliamentary Under-Secretary of State at ODPM*, Official Report Col. 760, (2003).

^[17] *Building houses or creating communities?* Sustainable Development Commission report (May 2007)

required infrastructure is developed at the right time, if at all. CPRE Kent is in full support of the widespread recognition that the full range of infrastructure should be put in place before, or concurrent with, housing. There is additionally a widespread recognition that the existing infrastructure deficit must be addressed and certainly not be exacerbated. It is essential that the full infrastructure needs are properly identified at the planning stage, and every effort made to ensure that whatever agencies are responsible carry out this work on time, and that finance, including that required to overcome the existing infrastructure deficit, is made available.

5.4.2. Education and skills

In the Ashford area employment skills have tended to be weak, and in recent years the town has experienced a marked out-migration of younger people. A key element of achieving a thriving mixed-use new community here, therefore, is the availability of a locally based skilled workforce. The Learning Campus and the Discovery Centre as proposed in the GADF thus formed an important part of the proposals for Ashford, seeking to place a new emphasis on learning. However, with the Discovery Centre now scrapped, we question the extent to which a skills-improvement programme will materialise.

Current deficiencies in infrastructure detract from the attractiveness of Ashford, and make it more difficult to attract employment growth. The planning system does have little scope to allow for such past deficiencies to be made good by the granting of future permissions. Monitoring the plans and ensuring that infrastructure needs are met at the correct time will be thus crucial to the future emergence of a balanced mixed use sustainable community at Ashford.

5.5 TRANSPORT AND UTILITIES: *Provision of good public transport and utilities infrastructure, both within the community and with good link to urban, rural and regional centres.*

5.5.1. Transport links

We welcome Policy CS15 (reproduced in full in Appendix 1) in the Core Strategy, but wish to see this policy implemented throughout Ashford and not applied only to new developments.

It is vitally important for the sustainability of any expansion at Ashford that the development of public transport should not lag behind housing and employment growth, because it will be difficult to change established movement and behaviour patterns. This implies a need for a substantial initial subsidy, possibly from direct taxation or S106 income.

We share the widespread concern that the Government has proved extremely reluctant to provide special funding for the Growth Areas. The Government told the (then) ODPM Select Committee that there will not be any special funding for public transport provision in the Growth Areas.^[19] If that were to remain the case, Ashford's growth would be severely disrupted and excessive car use would be encouraged. The Core Strategy acknowledges that the delivery of a new public transport system for Ashford is a fundamental element of achieving sustainable growth. This

^[19] *Planning for Sustainable Housing and Communities: Sustainable Communities in the South East*, ODPM Housing, Planning, Local Government and the Regions Committee, Eighth Report of Session. Paragraph 129. (2002–03).

cannot happen however without the right direction, as well as the right level and system of funding. Moreover, funding must be secured in the early phases so that new behaviours are encouraged from the outset in new developments. CPRE Kent has a major concern that should adequate funding not become available, a scaled down version of the current proposals for a SMARTLINK service will be accepted. Worse still, there is a risk that enabling development will be used, which runs contrary to the principles of effective spatial planning, leading to adhoc creeping expansion, and which fails to comprehensively address the investment needed *per capita* for sustainable public transport. The current proposal for the Warren Park & Ride, where revenue from house sales will fund the parking provision, illustrates this risk well.

A sustainable community clearly needs a sustainable Transport Strategy as its over-riding focus. Fundamental to this is a requirement to minimise people's need to use their cars, particularly within the town. The planning of a comprehensive school-bus network serving both secondary and primary schools will be of further help in this respect, while quality bus, cycle and pedestrian networks will be essential to the achievement of a high non-car modal split. Such measures are facilitated by the fact that Ashford is largely flat, which makes for easier travel on foot and by bicycle. As such, CPRE broadly supports on the 10 point Transport Strategy developed by Kent County Council and partners for Ashford (apart from our reservations on over-reliance on Park & Ride schemes, which risk undermining the viability of bus services in the surrounding area). This strategy proposes:

- Improved public transport, including a new SMARTLINK express transit system.
- Park & Ride services.
- A Car Parking Strategy managing supply and cost to promote demand management.
- A car park relocation policy to areas outside of the existing Ring Road.
- A comprehensive quality cycling and walking network.
- A limited programme of highway improvements, but including motorway junction improvements, a new Victoria Way and the dualling of Chart Road.
- A programme of public realm improvements, including modifying the Ring Road into a series of quality two-way streets.
- A Public Art Strategy for the town centre integrated with public realm improvements.
- A step improvement in transport information and communications.
- An underlying strategy of personal security and mobility for all.

CPRE also welcomes the continued promotion of a new station at Park Farm in the Core Strategy, particularly given the evidence from the Transport Study, as set out on page 10 and the conclusions of the Sustainable Development Commission that:

current developments such as the developments on the outskirts of Ashford, the market towns around Bath and Bristol, are heavily dependent on motorized, fossil-fuel driven transport^[20].

We also welcome the proposed development of a rapid bus-based expanded SMARTLINK transit system for the enlarged town, building in particular on the findings of the Transport Study that almost 85% of the town's population currently live within 400m of a bus route which

^[20] *Building houses or creating communities?* Sustainable Development Commission (2007)

provides at least an hourly service, revealing considerable potential for many more people to travel by bus.

Ashford is a well-connected town. It is a key junction on the Kent rail network, having lines radiating out to Tonbridge, Maidstone, Canterbury, Folkestone and Hastings. In addition, the High Speed Rail Link passes through the centre of the town with a stop at the International Station. It is essential that Ashford maintains its existing level of comprehensive rail services to remain well-connected (particularly in the case of its Eurostar services, which were cited in the Sustainable Communities Plan as the reason the town was chosen as a Growth Area). However Ashford's international connections have been severely curtailed since Eurostar opened Ebbsfleet station in November 2007. The company forecasts that two thirds of existing Ashford customers will change to the new station. CPRE Kent shares the concern of Ashford Borough Council and many other agencies that this will reduce the attractiveness of Ashford as a business location. Since the infrastructure is already in place, Eurostar's decision is eminently reversible and we strongly urge the company to think again; we also urge that pressure at national level be applied to ensure that such a key component of building a truly sustainable and thriving community at Ashford is retained.

5.5.2. Water supply

Water resources in East Kent are already seriously stretched. It is clear the additional demand that will arise under the Government's growth scenario cannot be met without a significant improvement in water efficiency and a major investment in additional resources. However, neither a comprehensive investment programme nor the necessary regulatory initiatives for water efficiency currently exist.^[21]

CPRE is concerned that no significant new water supply for the Ashford Growth Area is due to come on stream before 2021, two-thirds of the way through the plan period, when the raising of Bewl Water and/or construction of Broadoak reservoir are expected to help supply Ashford. The latter option is highly questionable, since the promotion of Broadoak has failed on two occasions in the last 25 years, and its viability is further challenged by the European Water Framework Directive, which will be fully implemented by 2016. As part of Ashford's growth in Phase 2, a new pipeline is proposed from Broadoak, together with a new 15-megalitre holding tank at Brabourne Lees. This raises serious questions about what is to be done in the intervening 14-year period, where no provision has been made for major new infrastructure. The target for infrastructure by 2021 clearly needs strengthening. There is already an urgent need for improvements in water-supply networks, and work must start on making these improvements now.

'Water neutral' developments are considered essential for the future but CPRE is concerned that there is no ambition for this in the Core Strategy. Kent is in water crisis and will be for the foreseeable future. In order to achieve water neutrality there needs to be a 'can-do' mindset to tackle the challenge. If water efficiency measures are not introduced to all new housing in Ashford as a matter of urgency, it will severely jeopardise our ability to maintain supplies over the coming difficult decades.

^[21] *A Water Resource Strategy for Kent*, CPRE Kent (June 2006)

5.5.3 Sewerage

As far as sewerage and storm-water overflow are concerned in Ashford the ‘combined sewerage system’ – one which takes both foul and storm water – was unable to cope with the flooding in 2000. There has been no construction of combined sewers since the mid 1960s, because of the known risks of storm flooding. If new housing developments continue to connect to the existing combined sewerage system, the likelihood and frequency of sewage-pollution incidents will be exacerbated because the increased normal flow of sewage will be closer to the capacity of the system. We are unable to find any plans to improve this system.

CPRE Kent strongly recommends that no further connections are allowed to the combined sewerage system, and calls for all future developments to be connected to separate foul-water and storm-water overflow systems.

5.5.4. Waste disposal

The planned increase in Ashford’s population will also have major implications for the quantity of household waste generated, while the construction of new homes on the scale anticipated will itself generate large quantities of construction waste. There are significant opportunities to demand better waste-minimisation practices to limit this problem. Site-waste management plans should be a requirement for all new development. Waste-collection and disposal authorities need to be prepared for this and, according to the Environment Agency, a number of additional waste management and disposal facilities will be required. CPRE Kent calls for greatly improved standards to be imposed as a matter of urgency.

5.6. A SENSE OF PLACE: *The creation of a development with an attractive and distinctive sense of place.*

5.6.1. Town centre

CPRE considers that tackling the current poor image of the town centre to be an absolute priority. It is lacking in quality, is throttled by the ring road (still an issue now that it has been changed from one to two-way flow), and appears inaccessible. This current poor image of the urban centre has long been a significant impediment to the attractiveness of Ashford and therefore to the potential for the market to deliver regeneration and redevelopment. Private investment has been discouraged by a poor urban image and a poorly maintained urban environment in the past. Policy CS3 (reproduced in Annex 1) is not strong enough in our view.

Although it may be recognised that development of the town centre needs to be considered as a priority, it is uncertain how this will happen. No timetable has been included to set targets for the completion and phasing of works. Second, there is an outstanding issue of how a higher quality of development will be attracted in order to increase the appeal of the public realm. CPRE Kent welcomes the recognition in the town centre Area Action Plan (AAP)^[22] that:

^[22] *Ashford Town Centre Area Action Plan, Preferred Options Report*, Ashford Borough Council, para 3.2.1(2006)

...the town centre needs to achieve a step change in its economy to enable it to compete with others in Kent. Changing this pattern is fundamental to Ashford's future and the delivery of sustainable development here.

However, it is vital that clear targets are set out in order to monitor progress.

Retail provided the original *raison d'être* of urban centres but the viability of many such smaller commercial centres such as Ashford has been undermined by out-of-town supermarkets and retail parks. Lakeside (Thurrock, in Essex) and Bluewater (Kent) have had a particular impact on Ashford and it is also apparent that the Designer Outlet Village, and the considerable recent expansion of the retail offer at Canterbury and at Maidstone town centres, have directed trade away from Ashford town centre. It is to be hoped that the work in progress on the extension of County Square will put an end to this. Closure of local shops leads to the neglect of the properties, vandalism and graffiti, loss of community spirit and general degeneration. The Core Strategy recognises the importance of attracting major catalyst projects, and furthermore acknowledges the need for development of the town centre to be high quality, ensured through the setting of a benchmark. CPRE Kent believes that the regeneration of Ashford town centre must not be allowed to be threatened by any further edge-of-town retail developments and that it is absolutely essential to enhance and retain the town's historic environment in order to increase the appeal of Ashford.

CPRE is concerned over the abandonment of the Discovery Centre town centre project through lack of funding and commitment. This building was intended as an icon for the regeneration of the town, but now appears emblematic of a worrying failure to attract investment on the scale required for Ashford's successful growth. Every effort must be made to ensure that the uses earmarked for the Discovery Centre are provided for in other ways. Redevelopment of the Library site could go some way to meeting this.

5.7. STRONG LEADERSHIP AND LOCAL INVOLVEMENT: *Strong leadership to respond positively to change and effective engagement and participation by local people, groups and businesses, especially in the planning, design and long-term stewardship of their community, and an active voluntary and community sector.*

CPRE remains concerned that, to date, there has been no delivery vehicle capable of attracting and receiving adequate treasury investment, promoting a clear, definitive master plan and implementing large-scale, phased, mixed-use development with integral public transport systems. It is impossible at this late stage to capture swathes of land at agricultural value, for the purposes of future growth, at a location such as Ashford where substantial development has been scheduled for so long. Nevertheless, in the design of a new approach, the ability to acquire, pool and control land in some form over the course of the expansion remains a critical issue if growth of the nature and quality desired at the town is to be possible within the 30 year period. House-builders and other site developers can not be expected to hold responsibility or interest for the long-term successful interplay of various land uses once buildings are completed and occupied.

CPRE supported the Enquiry by Design process which led to the development of the Strategic Growth Model for Ashford on which the GADF is based. We would welcome the introduction of similarly innovative methods of stakeholder dialogue as part of the wider Local Development

Framework process. The current Statement of Community Involvement for the Borough proposes processes better described as community *information* than involvement, and given the huge range of interactive and consultation methods which have been developed and used in recent years (often by communities themselves) we feel this to be an aspect of the creation of an expanded community at Ashford where more work and innovation is required.

The Sustainable Development Commission in their recent research^[23] also identifies concerns in this regard across many of the new communities being developed across the country

it is notable that the six-monthly monitoring by the Audit Commission fails to distinguish between good engagement and a tick-box approach, and some areas where we believe engagement to be inadequate have received a clear bill of health for this engagement with the communities by the Audit Commission. Focusing simply on delivering the projected outputs, in terms of numbers of homes refurbished or replaced, can, and is, leading to fractured communities in some places. An output focus is failing to deliver the desired outcomes.

5.8. BROADER LINKS: *The right links with the wider regional, national and international community.*

It is important that Ashford establishes itself as a key node and centre of regional importance, as well as a sustainable community in its own right. Ashford's role should be pivotal in the South East and in relation to continental Europe. It is specified as a transport hub in the Regional Transport Strategy with key spokes linking to the north via the M20 and along the south coast. Access to the M20 is to be improved at Junction 9, with progressively increased traffic capacity at Junction 10 - an Interim Improvement has already been achieved – together with a further Highways Agency National TPI (Targeted Programme of Improvements) scheme for a new Junction 10a in 2011/12.

The recent cuts to the Eurostar service referred to in section 5.5 above are a major blow to the town. The international rail link is a core element of Ashford's current appeal, and a key building block for the level of growth envisaged for the future. It is also of concern that the ongoing development at Ebbsfleet may adversely affect High Speed domestic services from Ashford to London and, consequently, Ashford's development.

^[23] *Building houses or creating communities?* Sustainable Development Commission report, p.78 (2007).

6 FUNDING

Evidence is now building of real problems being created by the failure of the Government to ensure that additional funding to those charged with delivering sustainable communities is brought forward in time. In Kent, a shortfall of £300 million for the provision of community infrastructure was identified in 2004 and has been cited as a reason for house-building programmes being delayed^[24]. The then leader of Kent County Council has summarised the situation succinctly:

The failings of the current system for funding community infrastructure are twofold: they do not produce enough infrastructure funding, and they do not produce it at the right time.^[25]

CPRE Kent is very concerned that the necessary funding to local authorities will not be made in a well-planned and timely way. We urge the Government to publish a full assessment of the likely costs associated with growth at Ashford along with clear timetables for the release of public sector funding to allow planning for the town's expansion to be appropriately programmed.

To date (November 07), as part of the Communities and Local Government Growth Area Funding only £14.064 million has been awarded to Ashford, of the £164 million promised over the first 3 years for the growth areas. The result of the next Government spending review is imminent.

Government guidance (circular 5/05) encourages local authorities in growth areas to consider tariff arrangements to respond to the complex infrastructure packages required. The Core Strategy for Ashford includes a proposal for such a tariff which is supported by CPRE with two provisos:

- that the level of the tariff does not stifle non-residential private sector investment in particular at the town centre
- that the tariff does not remove any onus on the national public purse to fund the delivery of national planning policy.

^[24] *Planning* magazine, Sir Sandy Bruce-Lockhart, former leader of Kent County Council, p.3 (October 2004).

^[25] *Funding community infrastructure: a local authority view for sustainable communities*, Sir Sandy Bruce-Lockhart. *Building Sustainable Communities: Capturing land development value for the public realm*, Ed. Peter Bill. Smith Institute, (2004).

7 CONCLUSIONS

CPRE Kent wholeheartedly believes that Ashford still has the potential to grow in an economically and environmentally sustainable way. With every day that passes, however, development is taking place in the town far below the often excellent standards which are promoted in the Sustainable Communities Plan and related documents. If this situation persists – and if Ashford is allowed to expand without significant concurrent job growth and provision of the right kind of infrastructure at the right time – the same old town-planning mistakes of the past risk being repeated. It would be a tragedy if east Kent, with all its economic potential and its beautiful natural and nationally protected environment, was further sullied by ill-considered, poorly executed development on a massive scale. The opportunity to get this right will only come once. It must not be missed.

Annex 1: Policies reproduced from the Ashford Core Strategy

POLICY CS1 - GUIDING PRINCIPLES

Sustainable development and high quality design are at the centre of the Council's approach to plan making and deciding planning applications. Accordingly, the Council will apply the following key planning objectives:

- A. Development that respects the environmental limits that protect the high quality built and natural environment of the Borough, minimises flood risk, provides for adequate water supply, and protects water and air quality standards;
- B. The conservation and enhancement of the historic environment and built heritage of the Borough;
- C. Protection for the countryside, landscape and villages from adverse impacts of growth and the promotion of strong rural communities;
- D. New places - buildings and the spaces around them - that are of high quality design, contain a mixture of uses and adaptable building types, respect the site context and create a positive and distinctive character and a strong sense of place and security;
- E. New buildings and places designed to meet challenging sustainable design and construction standards that work towards achieving zero carbon developments, including minimising the use of resources and waste, and to enhance biodiversity;
- F. The best use of previously developed land and buildings to help regenerate urban areas and the carefully phased release of green field land to make best use of a finite resource;
- G. The timely provision of community services and other local and strategic infrastructure to provide for the needs arising from development;
- H. A general balance between a growing population and the creation of jobs locally and, on large sites, a mix of residential, employment, community and other local services that together help create a well served community, capable of providing locally for many of its needs;
- I. A wider choice of easy to use forms of sustainable transport to serve developments that generate significant demand for movement.
- J. Provision of a commercial environment that is conducive to encouraging new and existing businesses;
- K. The creation of an integrated and connected network of green spaces to provide a framework for growth - helping serve the recreational needs of the community, enhancing biodiversity and providing green routes for pedestrians and cyclists.
- L. Healthy sustainable communities that put human health and well being at their heart – fostering access to amenities, healthier forms of transport, and mixed and cohesive communities designed for social interaction.
- M. Developments that are designed to mitigate and adapt to the effects of climate change.

POLICY CS3 - ASHFORD TOWN CENTRE

Development that will help to revitalise the town centre will be supported in principle and specific site allocations will be made through the Town Centre Area Action Plan. Schemes will need to demonstrate a quality of design that makes a real, and significant, contribution to improving the character of the town centre.

Development of the town centre is a priority and sites will be identified for an additional 8000 jobs and 2500 new dwellings by 2021.

The proposed conversion of the Ring Road to a high quality two-way street and the Victoria Way link road represent key infrastructure projects for the town centre. Development proposals that assist with the delivery of these projects will be supported in principle to help enable the expansion of the town centre.

POLICY CS10 - SUSTAINABLE DESIGN AND CONSTRUCTION

All major development must incorporate sustainable design features to reduce the consumption of natural resources and to help deliver the aim of zero carbon growth in Ashford. Developments must:

A) Achieve the Building Research Establishment’s BREEAM standard as set out below or an equivalent quality assured scheme, with a strong emphasis on energy, water and materials.

These requirements will be met through:

- (a) Energy and water efficiency,
- (b) Sustainable construction materials, and,
- (c) Waste reduction.

B) Reduce carbon dioxide emissions through on-site sustainable energy technologies at a percentage set out below.

C) Be carbon neutral which can be met through a combination of (A) and (B) above, with any shortfall being met by financial contributions to enable residual carbon emissions to be offset elsewhere in the Borough.

Ashford LDF 2007 – 2014					
		(CS3) Town Centre & (CS4) Brownfield Urban Sites	(CS5) Urban Extensions & (CS4) Greenfield Urban Sites	(CS6) Tenterden, the Villages, and (CS7) The Countryside	Existing and refurbishment
(A)	BREEAM/EcoHomes	Very Good	Excellent	Good	Very Good
	Energy Credits	Excellent	Excellent	Excellent	Excellent
	Water Credits	Maximum	Maximum	Excellent	Excellent
	Materials Credits	Excellent	Excellent	Very Good	Very Good
(B)	Minimum Carbon Dioxide Reduction				
		20%	30%	15%	15%

Policy CS10 - continued

Ashford LDF 2015 – 2021

		(CS3) Town Centre & (CS4) Brownfield Urban Sites	(CS5) Urban Extensions & (CS4) Greenfield Urban Sites	(CS6) Tenterden, the Villages, and (CS7) The Countryside	Existing and refurbishment
(A)	BREEAM/EcoHomes	Very Good	Excellent	Very Good	Very Good
	Energy Credits	Excellent	Excellent	Excellent	Excellent
	Water Credits	Maximum	Maximum	Excellent	Excellent
	Materials Credits	Excellent	Excellent	Very Good	Very Good
(B)	Minimum Carbon Dioxide Reduction				
		30%	40%	20%	20%

Where any site is brought forward as two or more separate development schemes of which one or more falls below the relevant threshold for this policy, the Council will require the relevant targets in the above table to be met as though the site had come forward as a single scheme.

POLICY CS15 - TRANSPORT

Development proposals must show how all highway, public transport, walking and cycling needs arising from the development will be satisfied and provide for the timely implementation of all necessary infrastructure or service improvements.

Developments that would generate significant traffic movements must be well related to the primary and secondary road network, and this should have adequate capacity to accommodate the development. New accesses and intensified use of existing accesses onto the primary or secondary road network will not be permitted if an increased risk of road traffic accidents or significant traffic delays would be likely to result.

In rural areas, proposals which would generate levels of traffic, including heavy goods vehicle traffic, beyond that which the rural roads could reasonably accommodate in terms of capacity and road safety will not be permitted.

Where development sites within the Ashford Growth Area include part of the identified SMARTLINK corridor, related Park & Ride facilities or any of the key infrastructure referred to in the supporting text on SMARTLINK, the highway network, parking, cycling and walking above, the land required should be reserved and the scheme designed to accommodate this. Proposals which may prejudice such infrastructure being provided will not be permitted.

The Council's Parking Strategy will be implemented through the designation in DPDs of three Park & Ride facilities at the Warren, Waterbrook and Chilmington Green and three new, multi-storey car parks in Ashford town centre.

Maximum parking standards will accord with national standards (currently those set in PPGs 3 and 13) and the South East Plan, unless superseded by new standards set in DPDs and except where existing SPG6 applies.