

SECTION C
MINERALS AND WASTE DISPOSAL

Background Documents - the deposited documents; views and representations received as referred to in the reports and included in the development proposals dossier for each case; and also as might be additionally indicated.

Item C1

Applications for: (i) variation of condition 11 of planning permission AS/97/829 (as also varied by planning permission AS/17/1317) to allow additional HGV movements on Bank and Public Holidays - AS/25/0584 (KCC/AS/0153/2024); and (ii) variation of condition 8 of planning permission AS/06/24 (as also varied by planning permission AS/17/1317) to allow additional HGV movements on Bank and Public Holidays - AS/25/0586 (KCC/AS/0172/2024) at Ashford Wastewater Treatment Works & Sludge Treatment Centre, Kinneys Lane, Canterbury Road, Ashford, Kent, TN24 9QB.

A report by Head of Planning Applications Group to Planning Applications Committee on 9 July 2025.

Applications by Southern Water Services Limited:

- (i) the variation of condition 11 of planning permission AS/97/829 (as also varied by planning permission AS/17/1317) to allow additional HGV movements on Bank and Public Holidays - AS/25/0584 (KCC/AS/0153/2024); and
- (ii) the variation of condition 8 of planning permission AS/06/24 (as also varied by planning permission AS/17/1317) to allow additional HGV movements on Bank and Public Holidays - AS/25/0586 (KCC/AS/0172/2024);

at Ashford Wastewater Treatment Works & Sludge Treatment Centre, Kinneys Lane, Canterbury Road, Ashford, Kent, TN24 9QB.

Recommendation: Permission be granted for applications (i) and (ii) subject to conditions.

Local Member: Pamela Williams

Classification: Unrestricted

Site

1. The site is located at Ashford Wastewater Treatment Works (WTW) Canterbury Road, Ashford. It is located to the north of Ashford town centre, immediately to the north of the M20 motorway and to the east of the site is the Canterbury to Ashford railway line. The road and railway are elevated on steep vegetated banks, dominating the edge of the works site. To the north beyond the Great Stour river the land is flat flood plain,

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beyond which is housing. To the north west of the site is Ashford Rugby Club and their playing fields. The Great Stour river is designated a Local Wildlife Site and forms the northern and western boundary of the WTW site.

2. The A28 Canterbury Road to the west is the access and egress point into the site and is approached via Kinneys Lane, a single carriageway road which also provides access to 4 residential properties and to the rugby club. Kinneys Lane varies in width from approximately 5 metres at its narrowest point to over double that at its widest with substantial off road hard surfaced passing areas. Stourfields, the three properties on the north-west side of the access road and Hamilton House to the south-east side were granted planning permission in 2000 and 2003 respectively by Ashford Borough Council. The access road is also part of the Sustrans National Cycle route for part of its length. The A28 Canterbury Road at this point is characterised by ribbon residential development and a number of commercial developments flank the road heading south west towards the motorway. The properties either side of the access road on Canterbury Road also have access to the rear of their properties from Kinneys Lane.
3. Part of the larger WTW site to the north of the main works (largely the site of the old reed beds) lies within Flood Zone 2 area, land assessed as having between a 1 in 100 and 1 in 1,000 annual probability of river flooding.
4. The area of land between the rear of the residential properties and the Hotel on Canterbury Road and the Great Stour river is designated a Green Corridor in the Ashford Local Plan (2030). The green corridor is a network of largely open areas mostly surrounding the rivers that have remained undeveloped mainly due to being in the flood plain. Policies ENV1 and ENV2 of the Ashford Local Plan (2030) seek to protect and enhance these green corridors and land adjacent to them, to provide access for pedestrians and cyclists, and leisure opportunities whilst improving their appearance and nature conservation and biodiversity value.
5. As set out above Kinneys Lane is part of Route 17 of the Sustrans National Cycle Network (a 42 mile route that is intended to run from Kent to the south coast when fully developed). At the end of the lane the cycleway meets with National Route 18 which runs alongside the river and is part of a 61 mile route from Canterbury to Tunbridge Wells (via Ashford).

Background and Site History

6. Ashford WTW currently provides sewage treatment to a population of circa 105,000 which is predicted to grow to circa 119,250 by 2025. The site was historically used purely as a wastewater treatment site having been constructed in 1966 and the addition of sludge processing capacity was added in 1998. The site currently processes waste received from the following sources:
 - Waste received via the sewer network from the Ashford Catchment Area, (Ashford and its surrounding area);

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- Southern Water wastes from other wastewater treatment works, sludge treatment centres (wastewater, sludge, grit and screenings) and water supply works (where Ashford is the nearest regional facility); and
- Domestic Tankered Waste from private residences (septic tank waste and cess pool).

7. The wider WTW has an area of approximately 36 ha and currently includes the following operational infrastructure:

- 6 x Storm Tanks
- 16 x Filter Beds
- 3 x Primary Settlement Tanks
- 6 x Sedimentation Tanks
- 4 x Nitrating Trickling Filters
- 8 x Humus Tanks
- 6 x Deep Bed Sand Filters

8. The most relevant planning history is set out below:

Reference	Description of Development	Decision	Relevant Conditions/Notes
AS/97/829	Extension to sludge treatment facilities to accommodate imported sludge from a wider catchment area.	Granted 14/10/97	(11) After commissioning of the sludge treatment centre, large vehicle traffic movements shall be confined to: 0700-1800 hours Monday to Friday, 0700-1300 hours Saturday, and excluding Sundays, Bank and other Public Holidays with the exception of operational emergencies.
AS/97/1587	Erection of three GRP Kiosks to house monitoring equipment.	Granted 25/02/98	No restriction on working hours/days.
AS/98/775	Temporary non-compliance with condition (8) of planning permission AS/97/829 to allow	Granted 13/08/98	No heavy vehicle movements (construction activities) except between 0700-1800 hours Monday to Friday, 0700-1300 hours Saturday.

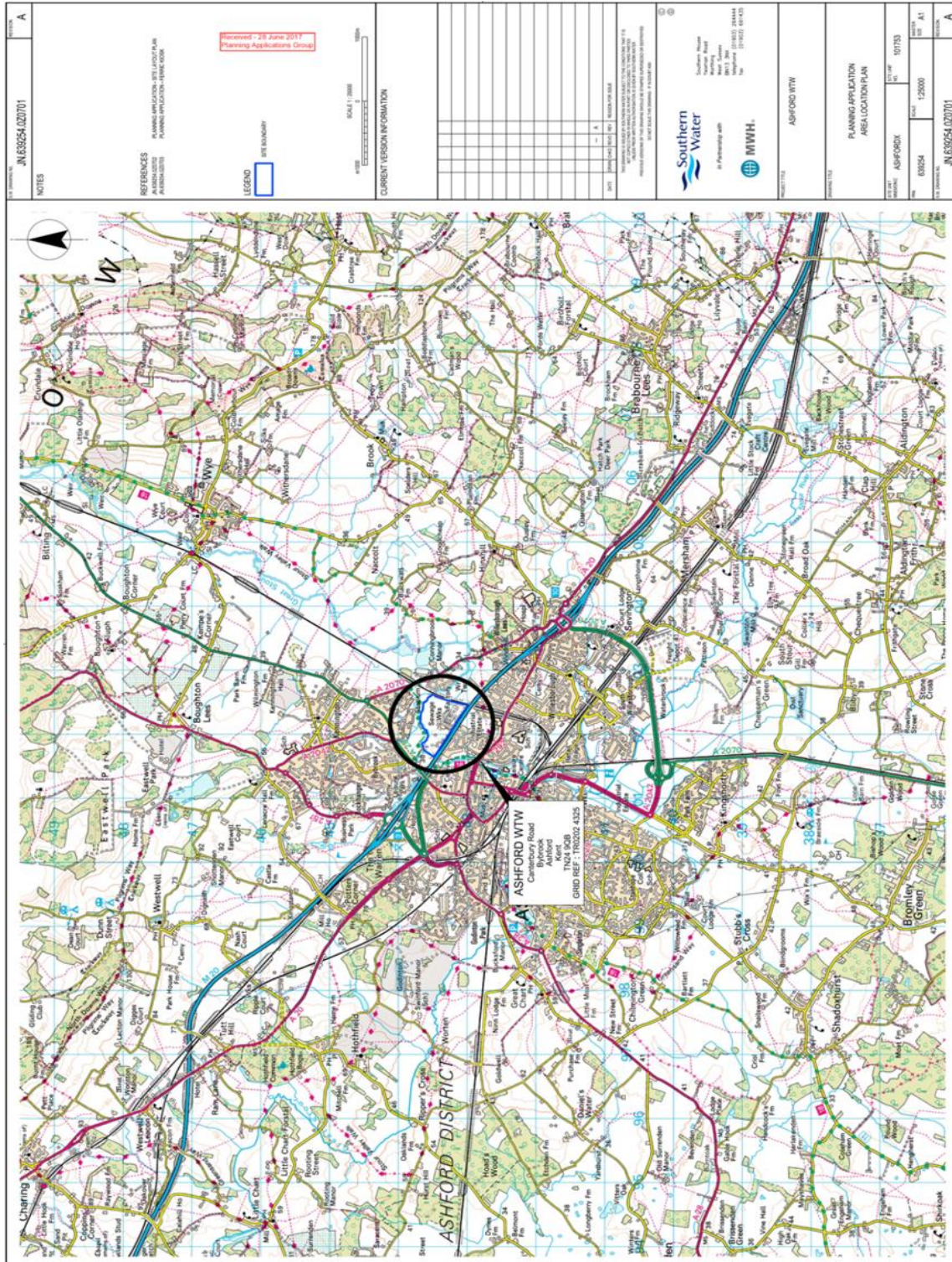
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	relaxation of construction working hours for limited period.		
AS/06/24	Tertiary wastewater treatment facilities and new sludge digestion and drying facilities built alongside the existing treatment facilities.	Granted 02/08/06	8) After commissioning of the new development hereby permitted, HGV movements associated with this development to and from the site shall be confined to: 0700-1800 hours Monday-Friday, 0700-1300 hours Saturday and excluding Sundays, Bank and other Public Holidays with the exception of operational emergencies.
AS/08/953	Installation of a combined heat and power unit to enhance the efficiency and cleanliness of the treatment process and to convert to a sustainable energy resource.	Granted 17/07/08	No restrictions on working hours / days.
AS/17/1317	Section 73 application to vary condition (11) of planning permission AS/97/829 and condition (8) of planning permission AS/06/24 to allow a limited number of large vehicles to access the Wastewater Treatment Works on Bank (Public) Holidays which are currently restricted	Granted 18/12/17	Permitted vehicle movements between 0800-1300 hours on Bank and Public Holidays (subject to a maximum of 6 in-out large vehicle movements;

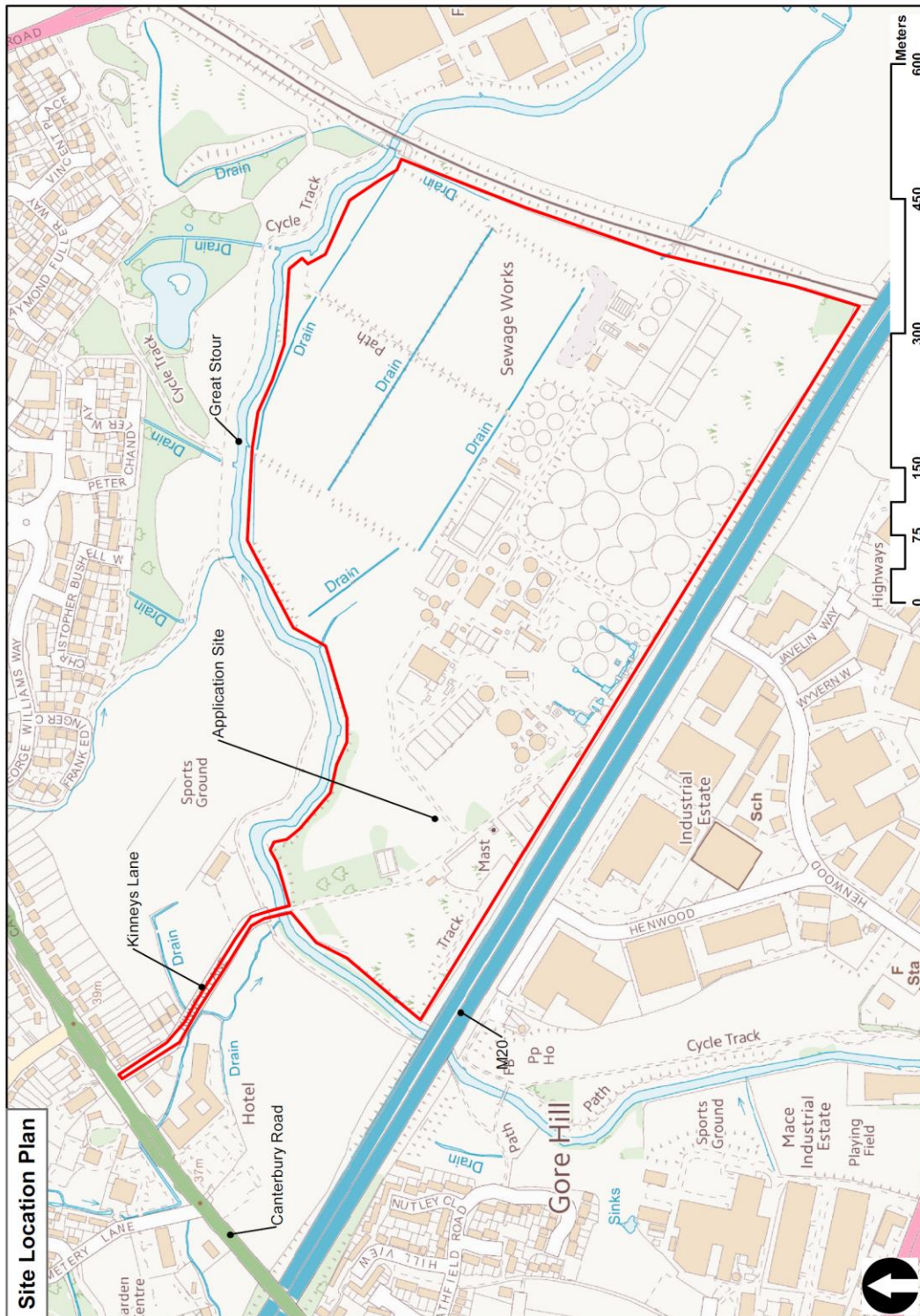
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General Location Plan



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Site Location Plan



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Plan showing entrance from A28 Canterbury Road



Proposal

9. Planning applications AS/25/0584 and AS/25/0586 seek to amend two of the existing conditions pertaining to the sludge treatment centre to allow access for 15 HGVs on bank (and other public holidays), an increase of 9 from the existing planning permissions in order to improve operational efficiency currently restricted by the conditions in place. The currently approved access window on bank/public holidays of 0800-1300 hours would not change.
10. As set out above Permission AS/97/829 Condition (11) reads:

After commissioning of the sludge treatment centre, large vehicle traffic movements shall be confined to 0700 -1800 hours Monday-Friday, 0700-1300 hours Saturdays and 0800-1300 hours on Bank and Public Holidays excluding Sundays and 25th December with the exception of operational emergencies. On Bank and Public Holidays there shall be no more than 6 in-out large vehicle movements.

It is proposed to amend the wording as follows:

After commissioning of the sludge treatment centre, large vehicle traffic movements shall be confined to 0700 -1800 hours Monday-Friday, 0700-1300 hours Saturdays and 0800-1300 hours on Bank and Public Holidays excluding Sundays and 25th December with the exception of operational emergencies. On Bank and Public

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Holidays there shall be no more than 15 in-out large vehicle movements.

11. Planning Permission AS/06/24 Condition (8) currently reads:

After commissioning of the new development hereby permitted, HGV movements associated with this development to and from the site shall be confined to:

*0700-1800 hours Monday to Friday,
0700-1300 hours Saturdays,
0800-1300 hours on Bank and Public Holidays (subject to a maximum of 6 in-out large vehicle movements);*

excluding Sundays and 25th December with the exception of operational emergencies.

It is proposed the wording be amended as follows:

After commissioning of the new development hereby permitted, HGV movements associated with this development to and from the site shall be confined to:

*0700-1800 hours Monday to Friday,
0700-1300 hours Saturdays,
0800-1300 hours on Bank and Public Holidays (subject to a maximum of 15 in-out large vehicle movements);*

excluding Sundays and 25th December with the exception of operational emergencies.

12. There are six permanent bank holidays in England, (New Year's Day, Easter Monday, Early May Bank Holiday, Spring Bank Holiday, August Bank Holiday and Boxing Day) and Good Friday and Christmas Day are Public Holidays. The government may also occasionally agree other additional public holidays such as the Royal Jubilees.

Planning Policy

13. **National Planning Policy Framework (NPPF) (2024)** sets out the Government's planning policies for England and is a material consideration in the determination of planning applications. The Framework does not vary the status of the development plan (included below), which remains the starting point for decision making.

The NPPF contains a presumption in favour of sustainable development, which includes economic, social and environmental dimensions that should be sought jointly and simultaneously through the planning system. In terms of delivering sustainable development in relation to this development proposal, Chapters 6 (Building a strong, competitive economy), 9 (Promoting sustainable transport), 14 (Meeting the challenge of climate change, flooding and coastal change) and 15 (Conserving and enhancing the natural environment).

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The NPPF seeks local planning authorities to look for solutions rather than problems and to approve sustainable development that accords with the development plan, unless material considerations indicate otherwise. Where the development plan is absent, silent or out-of-date, the Framework seeks that permission be granted unless any adverse impacts would significantly and demonstrably outweigh the benefits when assessed against NPPF policies.

National Planning Policy Guidance (NPPG) (updated February 2024) supports the NPPF including guidance on planning for air quality, climate change, environmental impact assessment, flood risk and coastal change, light pollution, natural environment, noise, transport and waste (amongst other matters). The waste section of NPPG advises that the aim should be for each Local Planning Authority to be self-sufficient in dealing with their own waste in the context of the 'proximity principle'. It requires waste planning authorities to plan for sustainable management of waste including wastewater. Adequate water and wastewater infrastructure is needed to support sustainable development. A healthy water environment will also deliver multiple benefits, such as helping to enhance the natural environment generally and adapting to climate change.

National Planning Policy for Waste (NPPW) (October 2014): The NPPW should be read in conjunction with, amongst other matters, the NPPF and Waste Management Plan for England (WMPE) 2013. It recognises the need to drive the management of waste up the 'Waste Hierarchy' and the positive contribution that waste management can bring to the development of sustainable communities.

The application of the Waste Hierarchy is a legal requirement under the Waste (England and Wales) Regulations 2011. It seeks to ensure that waste is managed sustainably and ranks waste management options according to what is best for the environment. In the UK, the waste hierarchy prioritises waste management options as follows:

1. Prevention: Avoid creating waste in the first place.
2. Preparation for re-use: Reuse products and packaging.
3. Recycling: Recycle materials.
4. Other Recovery: Use waste for energy recovery.
5. Disposal: Landfill as last resort

The NPPW also recognises that planning plays a pivotal role in delivering this country's waste ambitions through amongst other matters helping to secure the recovery of waste without endangering human health and without harming the environment.

Waste Management Plan for England (WMPE) 2013: The key aim of the WMPE is to help achieve the Government's objective of moving towards a zero waste economy as part of the transition towards a sustainable economy. Amongst other matters, one of its objectives is to conserve water quality by reducing harmful emissions to water bodies.

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14. Development Plan Policies:

Kent Minerals and Waste Local Plan 2024-39 (Adopted March 2025) (KMWLP): As set out in the NPPF the purpose of the planning system is to contribute to the achievement of sustainable development. The NPPF requires that policies in local plans should follow the approach of the presumption in favour of sustainable development. The KMWLP is therefore founded on this principle. Policy CSW 1 gives support where, when considering waste development proposals, the Council will take a positive approach that reflects the presumption in favour of sustainable development as set out and supported by National Policy. Policy CSW2 of the KMWLP requires developments to help drive waste to ascend the Waste Hierarchy whenever possible to aid the delivery of sustainable waste management solutions for Kent.

The Plan recognises that some modifications to existing facilities will require planning permission. Whilst Policy CSW 15 relates primarily to new wastewater treatment works it recognises the need to locate and connect to the existing wastewater network. Policy CSW16 seeks to safeguard sites that have permanent planning permission for waste management, or are allocated in the Waste Sites Plan from being developed for non-waste management uses.

There are also a number of Development Management Policies included in the Plan relevant to the consideration of the proposed development: Policy DM1 (Sustainable Design), DM3 (Ecological Impact Assessment), DM8 (Safeguarding Minerals Management, Transportation Production & Waste Management Facilities), DM10 (Water Environment), DM11 (Health and Amenity), DM12 (Cumulative Impact), DM13 (Transportation of Minerals and Waste) and DM15 (Safeguarding of Transport Infrastructure).

Ashford Local Plan 2030: Policies ENV1 (Biodiversity), ENV2 (The Ashford Green Corridor), TRA6 (Provision for Cycling), IMP1 (Infrastructure Provision), TRA7 (The Road Network and Development) and TRA9 (Planning for HGV Movement).

Consultations

Application (i) - the variation of condition 11 of planning permission AS/97/829 (as also varied by planning permission AS/17/1317) to allow additional HGV movements on Bank and Public Holidays - AS/25/0584 (KCC/AS/0153/2024)

15. **Ashford Borough Council** – No objections.
16. **Kennington Community Council** – No comments received.
17. **Transportation Planning** - No objections.
18. **Environment Agency** – No comments received.
19. **Public Rights of Way (East Kent PROW Team)** – No comments to make.

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Application (ii) - the variation of condition 8 of planning permission AS/06/24 (as also varied by planning permission AS/17/1317) to allow additional HGV movements on Bank and Public Holidays - AS/25/0586 (KCC/AS/0172/2024);

20. **Ashford Borough Council** – No objections.
21. **Kennington Community Council** – No comments received.
22. **Transportation Planning** - No objections.
23. **Environment Agency** – No comments received.
24. **Public Rights of Way (East Kent PROW Team)** – No comments received.

Local Member

25. The previous local County Member Paul Bartlett (and neighbouring Members Clair Bell and Steve Campkin) were notified of the applications, no views were received.
26. Following the County Council elections in May 2025 a further round of consultations with the newly elected Members was carried out.
27. The new local County Member Pamela Williams (and neighbouring Members Brian Collins and Dean Burns) were notified of the applications on 30 May 2025 to date no comments have been received.

Publicity

28. The application was publicised by the posting of site notices, an advertisement in a local newspaper, and the individual notification of 8 residential properties adjacent to the access road.

Representations

29. Fifteen letters of objection have been received across both applications, with the same residents mostly commenting on both applications, and the main points of objection can be summarised as follows:

Amenity

- Foul smells emanate from the vehicles
- There are already frequent tanker deliveries outside of the permitted hours from early morning to late at night and including Sundays and Bank Holidays.
- Local residents cannot sit and enjoy their back gardens already, movements as proposed would make matters even worse.
- The delivery vehicles contaminate the environment with noise, vibration,

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diesel fumes, obnoxious smells and debris on the road, especially those removing the waste.

- Lorry drivers fouling the area.
- Lorries crashing over the speed bumps is very noisy.

Access/Traffic

- Increase in vehicle numbers unacceptable 15 vehicle movements actually equates to 30 vehicles passing our properties, which is one every 10 minutes in the 5 hours of Bank Holiday operation.
- The Lane is barely wide enough for a single HGV at points and is widely used by disabled, dog walkers, commuters, cyclists and children walking to school.
- The access road is damaged by the large vehicles with pot holes and cracks in the surface which the lorries clatter over at speed putting pedestrians at severe risk of injury.
- The traffic and associated noise, dust and odour are contrary to the Local Plan Policies which are supposed to safeguard against such impacts.
- Speeding lorries and we have never seen any monitoring of vehicle speed despite assurances they were being carried out.
- Southern Water (SW) should look at finding an alternative access for this site as the current one is no longer fit for purpose, particularly if they are to take up the permitted capacity at the works.

Operations

- SW do not stick to the rules now so why would they in the future.
- Is the import of sludge on a Bank Holiday the only way to solve the problem?
- Is there not enough sludge from the wastewater arriving at the site through the sewerage network to feed the digesters, if not directly then sucked out from the storage tanks and cannot the sludge be stockpiled to cover the three day weekends?
- Build more storage sheds to store the waste in advance of Bank Holidays.

Discussion

30. Section 38(6) of the Planning and Compulsory Purchase Act (2004) requires that applications are determined in accordance with the development plan, unless material considerations indicate otherwise. Therefore the proposal needs to be considered in the context of the Development Plan Policies, the National Planning Policy Framework, National Planning Policy for Waste and other Government Policy and any other material planning considerations. In considering this proposal the planning policies outlined in paragraphs 13 and 14 above are particularly relevant. The key planning considerations in this case include:

- Need and sustainability;
- Traffic;

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- Noise; and
- Air Quality and odour.

Need and Sustainability

31. Southern Water as a sewerage undertaker are obliged to provide the appropriate facilities for the treatment of wastewater to the standard required by the Water Resources Act 1991 and the Urban Wastewater Treatment Regulations 1994. The site operates under a number of extant planning permissions, outlined earlier in the report and also an Environmental Permit (EPR/BP3296SB), administered by the Environment Agency, which allows for 690,000 tonnes per annum of imported waste to be processed. At present only c.271,000 tonnes per annum is being processed under the permit. In addition, the site currently processes c.3,560,000 tonnes per annum of waste via the sewer network (i.e. delivered to the site by the sewer pipe network).
32. As a result of the operational issues that result from the current restrictions to HGV movements (i.e. a maximum of 6 movements on Bank and Public Holidays), it is proposed that condition 11 of AS/97/829 and condition 8 of AS/06/24 are varied to allow for a maximum of 15 HGV movements on Bank and Public Holidays. The proposed increase takes into account the site maximising its existing storage in preparation for the bank holiday periods, as well as slowing the digestion process as far as is practicable to reduce the quantity needed. The benefits of the proposed additional HGV movements and steady operation through the digestion process are in summary:
- Reduced risk to the effectiveness of the sludge digestion process and consequent operational difficulties;
 - Optimal Bio-gas generation and use to power Ashford Wastewater Treatment Works (WTW) and supply to the grid;
 - Reduced risk of non-compliance with environmental and operating permits at other WTWs, as sludge can be moved off on a timely manner;
 - The amount of sludge that can be treated through the digestion process will be maximised with reduced need for use of critical landfill capacity; and
 - Optimal plan delivered to reduce the carbon footprint of haulage operations.
33. The applicant has set out that from an operational efficiency standpoint that importing sludge to the site seven days per week would be desirable however the amenity impact this would have is acknowledged and therefore not considered a possibility. Therefore, they have determined that the proposed increase in HGV movements on Bank Holidays is a pragmatic and reasonable approach to ensuring the efficient and effective ongoing operation of the WTW whilst keeping the overall number of movements to a minimum. The established weekend restrictions would continue to be adhered to.
34. As set out above, the proposed variation of condition 11 would allow for the more consistent importation of liquid sludge necessary to maintain effective operation of the sludge digestion process at the site. This would improve the operational efficiency and

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resilience of the site and would minimise the risk of amenity and odour issues associated with the storage of sludge. Allowing for additional imports of liquid sludge on Bank and Public Holidays would also reduce the likelihood of sludge backups and resilience issues at other wastewater treatment sites in Kent.

Operations

35. The site has operated as wastewater treatment works since 1966 with the addition of sludge processing capacity being added in 1998. As set out above there are two separate waste streams into the site; the wastewater which comes in from the Ashford Sewerage Catchment (direct through sewer pipes) and sludge imports in cake and liquid form from other treatment works. A smaller element of waste imports relates to tankered in liquid waste from commercial waste collection companies. Additional wastewater treatment and sludge digestion facilities were granted permission in 2006.
36. The wastewater treatment processes produces a treated effluent which is discharged to the Great Stour River. Vehicle movements associated with this side of the process are limited to the screenings and grit removed by the preliminary treatment which is taken to appropriate waste disposal facilities and vehicles used by operatives and maintenance personnel. There are no restrictions in relation to these operations, so Members should note that these movements could take place at any time, including bank/public holidays.
37. Sludge imports are blended with indigenous sludge arisings from the wastewater treatment process and treated by screening, thickening, anaerobic digestion (producing a biogas to feed a combined heat and power unit supplying the site), and then dewatered to produce an agricultural soil conditioner and fertiliser. Liquors arising from the sludge treatment are returned back to the wastewater treatment process. It is the vehicles associated with the importation of the sludge that are controlled by conditions in terms of the times they can travel to and from the site.
38. The processes described above need to operate on a permanent basis (24 hours a day, 7 days a week) in order to effectively manage all the waste types coming into the site.

The digestion process

39. To expand further; the digestion process is complex and consists of 3 phases of biological action reducing the amount of volatile solids and generating mainly water, methane and carbon dioxide in the process. To keep these processes steady the plant requires a stable feed in terms of sludge quantity (strength and volume), as well as sludge quality (freshness and calorific value). If this is not achieved the plant becomes unstable and the health of the digesters deteriorates rapidly with a subsequent loss of the destruction rate of the solids and a reduction in the volume and quality of biogas produced. Once the digesters are destabilised in this way it can take a number of days or even weeks to return to steady and healthy operation.

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40. The Applicant has developed a region-wide sludge plan which identifies which Sludge Treatment Centre (STC) receives sludge from which wastewater treatment works (WTW) for optimal sludge operations. Southern Water has 16 STCs across the Southern Water region (Kent, Sussex and Hampshire) serving the smaller WTWs. In Kent these are at Gravesend, Ham Hill (Snodland), Aylesford, Motney Hill (Gillingham), Queenborough, Canterbury and Ashford. Ashford is the largest of these, serving the majority of the south Kent area and is the only one in Kent able to import sludge cake (other STCs are smaller and their digesters can operate only being fed by indigenous sludge arisings). The feed requirements of the digesters at Ashford exceed the production capacity of indigenous sludge. Ashford is the closest STC for Weatherlees (Richborough near Ramsgate) and Broomfield Bank (near Dover) where 80% of their sludge cake imports come from. Edenbridge and Tunbridge Wells also produce cake but as they are to the west of the county Southern Water has the option to take some of this into Sussex if required.
41. There is limited storage capacity at each site, including Ashford, to provide some flexibility to smooth out any fluctuations in the feed volumes to the digesters and this is typically used at Ashford over a normal two day weekend. However the storage is not sufficient to allow for the longer bank holiday periods, where there are two days in a row when sludge cannot be imported to the site. The satellite works clearly continue to generate volumes of sludge that require treatment and they too often have limited storage capacity. Furthermore storing sludge for longer periods of time can reduce its effectiveness during the digestion process as well as potentially leading to an increase in odour problems, so it is not simply a case of extending the storage facilities.
42. The need for this development is therefore driven by a technical requirement to ensure that the digesters and wider processes at Ashford continue to work effectively. Being unable to import sludge over a bank/public holiday weekend results in a destabilising of part of the system which can have a significant impact on the wider treatment process. Storing greater quantities of sludge on site does not provide an environmentally sound solution to the problem and is dismissed as an appropriate or reasonable option.
43. Southern Water has a statutory responsibility to deal with the treatment of wastewater in accordance with national legislation and environmental regulations and have deemed importing a limited but sufficient amount of sludge into the site on bank/public holidays to be the most appropriate way to address the problem. When the planning permissions were initially varied in 2017 to allow 6 HGV movements on bank/public holidays it was considered that this figure was the minimum amount needed. In the intervening time it has become clear that this number is insufficient and it has been determined that 15 is a more realistic amount, that would keep the number of movements to the minimum without compromising on the effective operation of the digesters. On this basis and following the presumption in favour of sustainable development in the NPPF and national waste policy, the proposals accord with Policy CSW1 of the Kent Minerals & Waste Local Plan (KMWLP) and the NPPW.

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Traffic

44. Policy DM13 of the KMWLP requires waste development to demonstrate that emissions associated with road transport movements are minimised as far as practicable and that the highway network can accommodate the traffic flows that would be generated. The traffic generated by developments should not have an unacceptable impact on the environment or local community. Ashford Local Plan Policy TRA9 sets out that proposals which generate significant HGV movements will be supported where the use is acceptable in planning terms and movements are limited to appropriate times of operation given the context of the site.
45. The nature of the current HGV movement restrictions should be viewed in the context of operations at the treatment works. Treatment of wastewater and associated waste arisings from the process necessarily takes place on a 24 hours/7 days a week basis. The majority of traffic movements from the sewage treatment process arise as a result of the need to move quantities of sludge arisings from the network of wastewater treatment works across the region. Southern Water has developed and invested in a strategic network of Sludge Treatment Sites (STC). These sites offer an additional level of treatment to produce a waste product that can be recycled as an agricultural fertiliser whilst at the same time utilising the biogas, produced as a by-product of the digestion process, to provide heat power back to the treatment works.
46. These strategic arrangements necessarily require the movement of the sludge from the works where they arise to an appropriate STC. Planning conditions restricting vehicle movements have only been imposed at sites where there has been the potential for impacts upon residential amenity as a result of the vehicles visiting the site. At Ashford WTW such conditions have been attached to planning permissions relating to the sludge treatment centre in order to control when large vehicles may visit the site. It is noted that only 2 of the other 16 STCs in Southern Water's region have restrictions on Bank Holiday movements (Gravesend and Motney Hill) and 10 of the remaining 14 have no time restrictions at all.
47. Currently large vehicles are only permitted to visit the site 0700-1800 hours Monday to Friday; 0700-1300 hours on Saturdays; and 0800-1300 hours on Public/Bank Holidays but with a limit of 6 in/out large vehicle movements. No such visits are permitted on Sundays or on Christmas Day.
48. Since the conditions were initially varied in 2017, it has become evident that the figure of 6 in/out movements was insufficient and as such Southern Water have assessed the minimum requirements to keep the digesters at a healthy and sustainable level and now consider that the proposed 15 large vehicles is necessary to maintain the appropriate balance over the three day weekend. Consideration has been given to the type and size of vehicle so as to minimise the number of trips that may be required. Furthermore it is proposed to continue to maximise the sludge storage capacity in the run up to a bank/public holiday so that importation is kept at a minimum. It is also noted that Bank Holiday operations are already over a reduced window of working from 0800-1300 hours. Delaying access to an hour later than normal weekend

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(Saturday) visits still gives sufficient time for the vehicles travelling from the more remote satellite works to unload and exit within the shorter window of time.

49. Whilst it would have been desirable for the applicant to have provided quantifiable calculations to justify the proposed increase from 6 to 15 large vehicle movements, I am also mindful that this figure has been born out as a result of the applicant being unable to satisfactorily operate over bank/public holidays in the intervening period and has at times brought in higher numbers of vehicles to the site over these periods, as such I am satisfied that the proposed increase can be relied upon as a result of real world operations. However, should it be necessary to consider future vehicle increases, this will require significant and comprehensive empirical justification.
50. Sludge from smaller wastewater treatment works is brought in by either tanker or skip lorry for full treatment through the Sludge Treatment Centre (STC) and this provides an essential part of the wider treatment programme. The sludge imported to Ashford wastewater treatment works (WTW) primarily comes from the Weatherlees WTW (East Kent) and Broomfield WTW (near Leeds Castle) sites. The deliveries on bank holidays would come from other WTWs across Kent, depending on the circumstances at the time. If the sludge was not treated at Ashford WTW, vehicles would be required to travel past the Ashford site, and into Sussex for processing at other sites. The proposed variation of condition 11 of AS/97/829 and condition 8 of AS/06/24 would result in a relatively minor increase, in highways terms, in the overall numbers of HGVs accessing Ashford WTW, from a maximum of 6 to maximum of 15 on bank/public holidays. The overall number of HGV movements to the WTW during weekdays would remain unchanged, as would the limitations on the permitted hours of operation for vehicle movements at weekends. The relatively minor increase in vehicle movements is considered unlikely to have any significant impact on the capacity of the highway network. It is therefore considered that the proposed variation of conditions is in accordance with Development Plan Policies DM13 and TRA9.
51. Kinneys Lane is a private road owned by Ashford Rugby Club. The applicant has previously identified a number of measures put in place to manage the traffic on the access road. This has included new signage and removing speed bumps at the request of local residents who expressed concerns about the noise associated with vehicles slowing down, driving over it and then speeding up again. However others have argued that taking it away encourages drivers to speed. To date there are 6 speed bumps on Kinneys Lane between Canterbury Road and the bridge at the site entrance with 1 further speed bump on the bridge itself. The applicant state they have also carried out regular speed checks to ensure vehicles are adhering to the 10mph speed limit. Drivers caught speeding are reported and disciplined by the respective vehicle operating companies.
52. I consider that the applicant has acknowledged the potential impacts upon the six properties on Kinneys Lane and at the junction with Canterbury Road and made proportionate efforts to minimise the number of vehicle movements associated with this proposal. I am also mindful that the applicant has, by way of sending letters to the closest local residents, taken steps to notify residents when they are expecting to have to make additional bank/public holiday vehicle movements. The proposed increase in

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vehicle movements sought by these planning applications is expected to provide sufficient headroom to operate effectively over three day weekends whilst balancing the residential amenity in the locality. This along with the measures to control and monitor the speed of vehicles approaching the site would minimise the potential impacts from those additional movements. In addition the applicant has loggers which register time and volume of discharge of liquid tankers and on-site telemetry to show discharge of cake bins and therefore are able to monitor that discharge hours are being adhered to.

53. KCC Highways and Transportation have no objections to the proposed increase in HGV movements. Members should also be mindful that the junction of Kinneys Lane with Canterbury Road has provision of a right turn lane and adequate visibility splays and the proposed limited increase in the number of vehicles proposed is therefore unlikely to create a highway safety issue.
54. I note that objections have been received from local residents about traffic issues as a result of the proposed development, however, as stated above during the assessment of the planning application and consultee responses received from KCC Highways & Transportation, I am satisfied that there is no justification on highways grounds to warrant refusal of the application. I am satisfied that the proposed development would not have an unacceptable impact on the highway network and would accord with the NPPF, KMWLP Policies DM12, DM13, DM15 and Ashford Local Plan Policy TRA9. relating to highway and transport matters.

Noise

55. Local residents have expressed concerns in relation to the noise of the vehicles that visit the site and the potential for this noise intrusion to increase as a result of the increase in bank/public holiday movements. There are currently a range of types of vehicle that visit the site and the suggestion is that the main noise impact comes from the vehicles 'clattering' as they go over the speed humps along Kinneys Lane. As set out above and following discussion with local residents Southern Water have taken away one of the speed humps which was immediately adjacent to the properties at Stourfields. However this has not satisfied all of the residents, some of whom prefer the humps to remain in place to control the speed of the vehicles using the access road. The current situation is that 6 speed bumps remain in place on Kinneys Lane between Canterbury Road and the bridge at the site entrance, and one on the bridge itself. It is my view that this represents the best compromise between controlling the traffic speeds and the potential disturbance of vehicles crossing over the humps.
56. I am satisfied that the cumulative effect of the additional vehicle movements on road traffic noise is likely to be negligible due to nearby proximity of the A28 and M20. I am also mindful that the hours of working on bank/public holidays would remain the same (08:00-13:00) and Members should note Christmas Day movements are already prevented, although this means that the site has to take sludge in each day either side i.e. Christmas Eve and Boxing Day. This is the only period in the normal calendar where two consecutive bank/public holidays occur and given the added sensitivity, I

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am satisfied that it remains entirely appropriate to maintain this additional restriction and that Christmas Day remains excluded from the Bank/Public holiday operations.

57. Policy DM11 of KMWLP sets out that waste development will be permitted if there will be no unacceptable adverse impacts to amenity, including from noise, dust, vibration, odour, emissions, traffic or exposure to health risks. The proposed variation of condition 11 of AS/97/829 and condition 8 of AS/06/24 would allow for an appropriate import of liquid sludge to Ashford WTW that would enable the effective operation of the digesters. This would reduce the risk of amenity and odour issues associated with the storage of sewage sludge at the site and at other WTWs in Kent. Allowing for increased HGV movements on Bank and Public Holidays would also improve the resilience of those WTWs for which Ashford is the Sludge Treatment Centre and minimise the risk of amenity and environmental issues associated with non-compliance with environmental and operating permits.
58. It is accepted that an increase in HGV movements has the potential to affect the amenity of residential properties along the access route to the site, and in particular in Kinneys Lane. This impact needs to be balanced against the wider benefits of improved wastewater management at the Ashford WTW and other WTW across the county. The proposed increase in HGV movements has been kept to the minimum necessary to ensure the effective operation of the digesters and it is proposed that the current restrictions on HGV movements at weekends in terms of the hours of operation, would remain in place, rather than an expansion of operating hours. To minimise impact to amenity for residents there are speed restrictions and speed bumps in Kinneys Lane and all other operational controls would remain in place. It is considered that the proposed variation to conditions would not have an unacceptable adverse impact on residential amenity and the proposals are therefore in accordance with Development Plan Policy DM11.
59. I am aware of the applicant breaching its permitted operating hours on a number of recent bank holidays. Whilst not condoning this activity and the operator has been instructed to operate within the terms of its planning permission, it is illustrative of the practical difficulty of operating a sustainable wastewater facility in this location within the limits of the existing planning permissions, over the longer bank holiday weekends.
60. In the absence of any objections from technical consultees, I am satisfied that an increase in HGV movements does not present an unacceptable risk in terms of noise impacts and I accept that there would be no significant adverse impact on amenity or the environment subject to the continued imposition of hours of operation and the adherence to the 15 in/out HGV movements as proposed. The NPPF makes it clear that the focus of planning decisions should be on whether the proposed development is an acceptable use of land, rather than the control of processes or emissions (where these are subject to separate pollution control regimes – which is the case in this instance with an Environmental Permit regulated by the Environment Agency). The proposed development is therefore in accordance with the NPPF, NPPW and KMWLP Policies DM11 and DM12 with regards to noise.

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Air Quality and Odour

61. Exhaust fumes from vehicles visiting the site have the potential to impact upon air quality in the vicinity. However given that the proposed increase is a relatively small number of vehicles, less than 2 more per hour of operation, it is considered unlikely to be a source of sufficient exhaust gas pollutant or raised dust that could impact on human health or amenity, such as to justify refusing planning permission. Vehicles passing Ashford Rugby Club on Kinneys Lane are unlikely to be noticeable and human exposure at a community leisure facility is likely to be minimal at this location.
62. There have been concerns expressed about odours arising from vehicles transporting sludge to the site. It is not always clear whether these odours are experienced when vehicles arrive at site or when they are leaving having deposited the sludge, however these should be mitigated by proper containment and ensuring vehicles are kept clean and free of debris. Liquid sludge is transferred from tankers into one of three sludge reception tank (each 100m³ capacity). The sludge reception tanks are covered and extracted to an Odour Control Unit (OCU) to ensure capture of odorous air for treatment. A traffic light system in place for use by tankers, which ensures odorous air is not vented to atmosphere but instead discharged into the covered system. Sludge cake is imported to be treated at the Sludge Treatment Centre from nearby wastewater treatment works. Sludge cake arrives on site via Roll On, Roll Off (RO-RO) sealed skips where it is unloaded into a sludge cake reception tank. The sludge cake reception area is enclosed within a building maintained under negative pressure and air is extracted for treatment by the OCU. Tankers and RO-Ros leave the site empty after unloading and cleaning.
63. It is not possible to apply conditions regarding measurable odour levels to transitory vehicles, however good management practice and ensuring that drivers are instructed appropriately would minimise potential odour impacts. Vehicle movements associated with the wastewater treatment element carried out at the works are not subject to specific planning controls but should also be managed appropriately so that amenity impacts are minimised. Furthermore Southern Water has undertaken a scheme to install chemical dosing at a number of their sites which help reduce the odour from the material being transported to Ashford.
64. I am satisfied that the changes to permitted hours alone does not produce a significant impact on air quality or amenity because the sensitivity of the receptors or likelihood of receptors does not change. I am therefore of the view that because the increase in traffic on bank/public holidays is not significant there is limited risk to air quality amenity from emissions resulting from the application. Should Members be minded to approve the applications, I recommend the inclusion of an informative on the planning permissions to remind the applicant that appropriate good practice management measures are rigorously applied to the cleanliness of the vehicles importing the sludge to the site. Both in general cleanliness terms and after the vehicles have emptied and before they leave the facility. On this basis, I am satisfied that the proposed development would be in accordance with the NPPF, KMWLP Policies DM1, DM11

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and DM12 relating to air quality and odour and would not warrant refusal on these grounds.

Other Issues

65. Local residents have suggested that the applicant should find an alternative access into the site. Southern Water has historically looked into using a direct access point from the M20 motorway but this is unlikely to be supported by National Highways. They continue to look at other options for an alternative solution in the future however in order to secure the effective and efficient function of the site in the short term considers utilising the existing access is the only viable option.

Conclusion

66. This application seeks to amend two conditions to allow a maximum of 15 vehicles to visit the treatment works within the limited time of 0800-1300 hours on bank/public holidays (excluding Christmas Day) to import sludge to ensure stable operation of the on-site digesters.
67. The site has been an operational wastewater treatment works since the 1960s for the Ashford catchment area and provides a regional treatment facility for sludge arisings from the smaller satellite treatment works. It offers the only location for treating sludge cake and is the main facility for the south of Kent, forming an important facility in Southern Water's sludge strategy for their area. The operations at the treatment works take place 24 hours a day, 7 days a week but vehicle movements associated with the importation of the sludge are restricted to Monday-Friday, Saturday mornings and Bank and Public Holidays. There is a recognised need to ensure the stability of the digesters, and the operation ensures that the principles of the waste hierarchy are adhered to, on this basis and following the presumption in favour of sustainable development in the NPPF and national waste policy, the proposals accord with Policies CSW1 and CSW2 of the Kent MWLP.
68. The proposed variation of condition 11 of AS/97/829 and condition 8 of AS/06/24 is necessary to enable a stable flow of sewage sludge to optimise the ongoing effective operation of the sludge digestion process at the site. It is acknowledged that the proposals would reduce the risk of amenity and odour issues associated with sludge storage at Ashford WTW and other WTWs in Kent and on balance this amenity improvement outweighs the potential amenity impact of an increase in HGV movements, which effectively amounts to less than two additional vehicles per hour of operation (0800-1300 hours on Bank/Public Holidays) . The proposed development would also increase the resilience of those WTWs for which Ashford is the Sludge Treatment Centre and reduce the risk of environmental issues associated with non-compliance with operating permits at these sites. The additional number of HGV movements would be relatively minor in the context of the overall operation of the WTW and would occur only on the seven bank/public holidays (excluding Christmas day) per year. I am mindful that the applicant could spread the 15 movements out across the day by seeking to extend the working hours, however, on balance, I

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consider it to be preferable to keep the five hour bank/public holiday working hours and consolidate the vehicle movements into this shorter period rather than extending it across a longer period of the day.

69. The additional vehicle movements would have no significant impact on the capacity of the highway network. The proposed numbers and types of vehicles have been demonstrated as the minimum to ensure a steady supply of sludge over the longer bank/public holiday weekends and there is no objection from a traffic safety perspective to the proposals. The main amenity impacts are minimal, very localised and largely confined to those residential properties that share the western end of the access road. I am satisfied that the applicant has made every effort to minimise the number of vehicles and timeframe within which they could visit the site and I note these vehicle movement activities are already precluded on Christmas Day and Sundays, and providing Southern Water ensure the appropriate management of the drivers and their vehicles, the impacts would be kept to a minimum.
70. The proposed variation of conditions 11 of AS/97/829 and condition 8 of AS/06/24 are accepted as necessary to facilitate the ongoing effective operation of Ashford WTW, which provides essential wastewater treatment services to Ashford and the surrounding area of East and South Kent. The proposals are consistent with the policies of the Development Plan, and it is considered that planning permission should be granted. On balance I consider the proposal allows for a sustainable management solution to dealing with the sludge arisings that are served by the Sludge Treatment Centre at Ashford Wastewater Treatment Works and these benefits outweigh the localised amenity impacts.
71. Members will note that the impact of the increase in vehicle movements over the bank/public holiday operating hours of 0800-1300 amounts to less than 2 additional vehicles per hour and on the basis of the assessment carried out above in terms of the impacts associated with noise, air quality/odour and in highways terms, I do not consider there to be justifiable reasons to recommend the applications be refused.

Recommendation

72. I RECOMMEND that PLANNING PERMISSION BE GRANTED TO:
- (i) vary condition 11 of planning permission AS/97/829 (as also varied by planning permission AS/17/1317) to allow no more than 15 HGV vehicles to access the site between 0800-1300 hours on Bank/Public Holidays (excluding Christmas Day); and to
 - (ii) vary condition 8 of planning permission AS/06/24 (as also varied by planning permission AS/17/1317) to allow no more than 15 HGV vehicles to access the site between 0800-1300 hours on Bank/Public Holidays (excluding Christmas Day).

SUBJECT TO the reimposition of all other conditions on the extant permissions and

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(i) the following informative:

- the applicant is reminded that appropriate good practice management measures are included and applied to the cleanliness of the vehicles importing the sludge to the site and prior to exiting the facility.

Case Officer: Adam Tomaszewski

Tel. no: 03000 410434

Background Documents: see section heading
