

## **Item C2**

# **New tertiary wastewater treatment facilities and new sludge digestion and drying facilities built alongside the existing treatment facilities at Ashford Wastewater Treatment Works and Sludge Recycling Centre – AS/06/243**

A report by Head of Planning Applications Unit to Planning Applications Committee on 20 June 2006.

New tertiary wastewater treatment facilities and new sludge digestion and drying facilities built alongside the existing treatment facilities at Ashford Wastewater Treatment Works and Sludge Recycling Centre – AS/06/243

For Permission

Local Member: Mrs. E Tweed

Unrestricted

## **Introduction**

1. The existing Ashford Wastewater Treatment Works (WWTW) (first established in the 1900's) and Sludge Recycling Centre (SRC) provide wastewater treatment (preliminary, primary, secondary biological and tertiary) for Ashford, and sludge recycling facilities for a catchment area comprising most of East Kent; i.e., imports from other smaller treatment works both in liquid and cake form arrive at Ashford for further treatment. The treated effluent is discharged to the River Great Stour, and the digested sludge cake is used as a soil conditioner on agricultural land.

## **The Site**

2. The WWTW is located to the north of Ashford town centre, immediately to the north of the M20 motorway, to the east of the site is the Canterbury 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 the land is flat flood plain, beyond which is housing. To the north west of the site boundary is Ashford Rugby Club and their playing fields. The A28 Canterbury Road to the west is the access and egress point into the site and is approached via the private road (shared with the rugby club for some of its length) into the site. The access road is also a public right of way for part of its length. At the junction with the A28 a number of infill residential properties have been developed and on the main strategic road itself is a ribbon of residential properties. A number of commercial developments flank Canterbury Road heading south west towards the motorway.
3. The works site itself is split into four relatively distinct areas. The core working area consists of a group of tall tanks, a spherical gas-holder, and buildings. The tall digester tanks (approx. 10-15m tall) dominate the site. The area to the east of the site consists of a series of concrete sludge storage bays and one medium sized metal shed. These structures are surrounded by rough grassland with pockets of scrub and tree cover along

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4. the boundaries. To the north, large flat rectangular grass plots and reed beds take up a considerable proportion of the site. A low embankment separates the river, which forms the northern boundary, from the site. Along the eastern boundary a fence and a ditch separate the site from the wooded railway embankments.

## **Background**

5. Southern Water is required to provide improved wastewater and sludge treatment facilities to ensure compliance with current European legislation (Urban Waste Water Treatment Directive – UWWTD) and UK regulations (Urban Wastewater Treatment (England and Wales) Regulations 1994).

## **Proposal**

6. In brief the planning application is for the following:
7. *The Water Quality Scheme* – to improve the treatment of wastewater by installing additional tertiary treatment facilities with nutrient removal (sand filters, four nitrifying filters and interstage pumping stations) in compliance with a modified discharge consent, which has been agreed with the Environment Agency.
8. *The Sludge Recycling Scheme* – new sludge digestion and thermal drying facilities to treat increasing volumes of sludge to produce a dried sludge granule, in accordance with stringent regulations controlling the standard of treatment required for disposal of sludge on agricultural land. Implementation of the Urban Waste Water Treatment Directive and other environmental EU Directives has meant that the amount of sludge produced in the UK has risen, as a greater proportion of wastewater is treated and higher treatment standards are required of that proportion. The existing sludge treatment facilities in Kent are insufficient to meet future needs. The Kent Sludge Strategy has identified three geographic areas where the need for new facilities must be addressed, West Kent, Ashford and Weatherlees Catchments. It is proposed that this application would deal with the increase in sludge arising in both the Ashford and Weatherlees catchments. Aylesford has been identified to deal with sludge arisings in west Kent and is the subject of a separate planning application and will be reported to committee in due course.
9. *The Odour Management Scheme* – preparation and implementation of an Odour Management Plan, including new odour treatment systems for the

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proposed new WWTW and SRC facilities, as well as the existing treatment facilities.

10. The proposed development is expected to generate on average an additional 25 (19 HGV) vehicle visits (50 (38) movements) per day on weekdays and 9 (3 HGV) vehicle visits (18 (6) movements) on Saturdays.
11. The entire construction phase would take approximately 24 months, incorporating a 16-week commissioning period. Normal hours of working for the construction period would be 7am to 6pm weekday and 7am to 1pm on Saturdays.
12. The application is accompanied by an Environmental Statement which considers the environmental effects of the proposal and also details as required the main alternative disposal options and site locations considered.
13. *The Master Plan* - In the longer term the volume of wastewater generated in Ashford is set to rise significantly with the implementation of Government strategic growth plans for Ashford. The strategy for how the volumes of wastewater generated by the Ashford Growth Area are to be treated and where the facilities would be located has yet to be determined. One option is that the wastewater should be treated at the existing Ashford WWTW. Therefore Southern Water has prepared a Master Plan, which addresses the following potential phases of development at the site:
  - Phase One – development required prior to 2015 (the current planning application),
  - Phase Two - development potentially required prior to 2030, and
  - Phase Three - development potentially required after 2030.
14. In order to enable the County Council to determine the planning application, with the full knowledge of the totality of the development that might take place at the site in the future, the Environmental Statement considers the environmental impacts of the Master Plan as a whole.

#### **Main Planning Policy Designations**

15. The Ashford WWTW discharges treated effluent into the Great Stour River. At the point of discharge the Stour forms part of a Site of Nature Conservation Interest (SNCI). Further downstream the Stour flows through the wetlands of Stodmarsh and eventually into Pegwell Bay. Stodmarsh and Pegwell Bay are protected under the following nature conservation designations:
  - Stodmarsh Special Protection Area (SPA) and Ramsar site

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- Stodmarsh Special Area of Conservation (SAC)
  - Thanet Coast and Sandwich Bay SPA and Ramsar site
  - Sandwich Bay SAC
16. *Appropriate Assessment* – Where a project is likely to have a significant effect on the conservation objectives of a European designated site (either alone or in combination with other plans or projects), and it is not directly connected with or necessary to the management of the site, the Conservation (Natural Habitats, & c.) Regulations 1994 (The Habitat Regulations) require that an appropriate assessment must be undertaken in respect of the SPA, SAC and Ramsar sites. However English Nature have confirmed that it does not consider the planning application proposals would result in significant effect and therefore it is not necessary to carry out an appropriate assessment.
17. The site is partially located within the indicative fluvial floodplain of the Stour. (The works has been designed to ensure that all SRC buildings are outside the flood risk area, of have floor levels above predicted flood levels). The River and areas of public open space on its northern bank form part of a Green Corridor, which follows the river through Ashford, and includes cycleways, footpaths and the Ashford Rugby Club.

### **Planning Policy Context**

18. There is a range of planning policy implications relating to the proposed scheme. The Environmental Statement provides an overview of the key policies and guidance at European, national, regional and local levels, a summary of the relevant policies follows:

### **Government Guidance**

Circular 17/91 – Water Industry Investment: Planning Considerations

Circular 06/05 – Biodiversity and Geological Conservation

Planning Policy Statement 1: Delivering Sustainable Development

Planning Policy Statement 9: Biodiversity and Geological Conservation

Planning Policy Statement 10: Planning for Sustainable Waste Management

Planning Policy Guidance Note 13: Transport

Planning Policy Guidance Note 17: Planning for Open Space, Sport and Recreation

Planning Policy Statement 23: Planning and Pollution Control

Planning Policy Guidance Note 24: Planning and Noise

Planning Policy Guidance Note 25: Development and Flood Risk

Planning Policy Statement 25: Development and Flood Risk (consultation draft)

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Communities Plan 2003, Sustainable Communities: Building for the Future

*Circular 17/91 – Water Industry Investment: Planning Considerations* – acknowledges that local planning authorities have a key role in facilitating water industry development proposals. It confirms a presumption in favour of the expansion of wastewater treatment facilities in the interests of long term wastewater management, providing the need for such facilities outweighs any adverse land use or environmental impact, and that any such adverse impact is minimised. The circular advises, “*in considering development proposals expeditiously, local planning authorities should nevertheless assess and weigh thoroughly all material considerations and any conflicting demands*”.

*Circular 06/05 – Biodiversity and Geological Conservation* - supports PPS9, it gives guidance to local planning authorities on how to deal with proposals that may affect internationally and nationally designated sites, conservation habitats, and conservation of species protected by law, including the requirement for appropriate assessment under the Habitat Regulations.

*Communities Plan 2003* – sets out a long-term programme of action for delivering sustainable communities in both urban and rural areas, and identifies Ashford as a key growth area with substantial scope for further growth, including at least 31,000 new homes and 28,000 new jobs by 2031.

## **Regional Policy**

### **RPG 9 – Regional Planning Guidance for the South East 2001**

The regional context for the proposed scheme is set out in RPG9, which identifies the following key development principles for the region:

- Urban areas should be the main focus for development,
- Greenfield development should normally take place only after other alternatives have been considered,
- Protection and enhancement of the region’s biodiversity, landscape and built and historic heritage.

RPG 9 calls for local authorities to establish or maintain ongoing liaison with the Environment Agency and sewage statutory undertakers in order to ensure timely and sustainable provision of infrastructure for the supply of water, sewage treatment and discharge systems.

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RPG 9 outlines the specific timetables, housing and employment requirements, and methods for achieving the required growth levels in Ashford.

RPG 9 acknowledges that *“Water related issues such as water supply, trunk sewers and waste water treatment as well as drainage and flooding are of special importance, given Ashford’s location in an area of relative deficiency for water supply and local river system’s vulnerability to flood. Investment will therefore be needed to both augment the water supply and increase the capacity of the waste water treatment works, including the possibility of a new Waste Water Treatment Works as an alternative to expansion of the existing works”*.

### **The South East Plan (Regional Spatial Strategy)**

19. The Planning and Compulsory Purchase Act 2004 sets out the statutory basis for a new system of spatial planning, based on Regional Spatial Strategies (RSS) and Local Development Frameworks. The South East England Regional Assembly (SEERA) is the responsible body charged with undertaking the preparation of the RSS for South East England, ‘The South East Plan’, which will set out the development framework for the period to 2026.

The Draft South East Plan was published for consultation in January 2005 and on 29 July 2005 the Draft South East Plan Part 1: Core Regional Policies was handed to Government. The full plan, to include Part 2 – sub-regional details was submitted for Government approval on 31 March 2006, with a view to the Final Plan being issued by Government in Spring 2008.

The RSS takes forward the proposals for the Ashford Growth Area, which were approved in principle in RPG 9.

RSS acknowledges the increasing demands arising from existing and new development on water resources in the South East and through Policy NRM1 seeks the timely provision of wastewater treatment infrastructure. Policy CC5 notes *“The scale and pace of development will be dependent on their being sufficient capacity in the existing infrastructure to meet the area’s current needs and the provision of new infrastructure to meet the needs of new development...”*

## **Draft Regional Economic Strategy for South East England, 2002-2012**

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20. Effective infrastructure and the sustainable use of natural resources are key objectives of the Regional Economic Strategy (RES). Priority 18 of the RES calls for sustainable management of water, waste and energy.

#### **The Kent Structure Plan 1996**

21. The following policies are relevant to this proposal:

S1 – Seeks to promote sustainable forms of development.

S2 – Seeks to conserve and enhance the quality of Kent's environment.

S9 – Highlights the need for co-ordinated implementation, and the relationship between infrastructure provision and land availability.

ENV2 – Seeks to conserve and enhance Kent's landscape and wildlife (flora and fauna) habitats.

ENV5 – Seeks to protect designated sites.

ENV6 – Seeks to discourage development that would harm the scientific or wildlife interests of Local Nature Reserves, or Sites of Nature Conservation Interest.

ENV20 – Seeks to ensure that development is planned and designed so as to avoid or minimise any potential pollution impacts.

ENV22 – Proposals for the treatment, storage, transfer, processing or disposal of waste will only be permitted where the need overrides material land use or environmental concerns.

NR2 – Supports the development or expansion of wastewater treatment facilities subject to the need outweighing any environmental impact and that any such adverse impact is minimised.

NR3 – Aims to protect groundwater from development that would have an unacceptable effect on groundwater quality or the yield of water.

The Structure Plan emphasises the importance of sustainable planning of water and wastewater. It states that, of the services needed to sustain new and existing development, water supply, sewerage and wastewater treatment 'deserve particular consideration', in view of the cost of using remote supply sources or treatment facilities and possible environmental implications.

The Structure Plan acknowledges that significant improvements have been made to the quality of effluent discharged to watercourses, estuaries and the sea, and the Government's advice to local authorities to support water industry development proposals. It notes that new or expanded sewerage and wastewater treatment facilities will be needed and that their provision can have significant implications for local environments, but that their location will often be constrained by geology and topography.



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#### **Kent Waste Local Plan 1998**

22. The Kent Waste Local Plan 1998 recognises that the Urban Waste Water Treatment Directive will require the provision of additional treatment facilities. There are no specific policies for wastewater treatment in the Waste Local Plan. However the text acknowledges the Ashford sewer catchment will need new or enhanced works.

*The Plan correctly predicts, “Compliance with the EU Directives will lead to an increase in the quantity of sewage sludge created within Kent. At present, most sewage sludge within the County is used as a soil enhancer for agricultural land. The future of current agricultural practices is uncertain and it is likely that more advanced treatment will be required prior to applications to the land.”*

The relevant text concludes, *“Proposals for new wastewater treatment and sludge treatment works or extensions to existing works will be supported in principle.”*

Under the new planning system, the Kent Minerals and Waste Development Framework (MWDF) will replace the existing Waste Local Plan. Consultation recently took place on the ‘Issues and Options’ report for the MWDF and ‘Preferred Options’ on the Waste Development Documents are expected to be published in January 2007.

#### **Ashford Borough Local Plan – June 2000**

23. The Ashford Borough Local Plan covers the period up to 2006. However, the introduction of the Planning and Compulsory Purchase Act 2004 has effectively saved all the policies until June 2007, or until replaced by approved Development Plan Documents. The key objective of the plan is to ensure that development happens in a sustainable manner.

The Local Plan recognises that along with population growth, infrastructure improvements are required in Ashford. Policy CF5 states *“The Council will seek the continued concentration of wastewater treatment at existing sites and proposals for the improvement of waste water treatment facilities at Bybrook WwTW in Ashford, and other existing sites will be supported, subject to meeting policy DP2.”*

The following policies are also relevant to the proposed scheme:

- GP1 - Managing development to make the best use of resources.
- GP3 - Protecting and improving the environment.
- GP4 - Limiting the impact of development.

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- GP5 - Ensuring the provision of community facilities and Infrastructure.
  - GP6 - Encouraging high quality design in development.
  - GP8 - Planning within a natural structure for growth.
  - DP1 - Design quality of new development.
  - DP2 - Standard environmental requirements of new development.
  - DP6 - Protection of surrounding areas from noise.
  - DP7 - Protection and enhancement of habitats.
  - DP8 - Development to provide appropriate infrastructure and community facilities.
  - EN1 - Protecting and improving the environment.
  - EN2 - Protection of people's enjoyment of their homes.
  - EN4 - Land contamination.
  - EN13 - Green corridors.
  - EN14 - Land adjoining green corridors.
  - EN29 - Protection of nature conservation sites.
  - EN30 - Protects local nature reserves and Sites of Nature Conservation Interest.
  - TP16 - Development designed to consider existing road network.
  - TP18 - Safety and convenience of access to primary or secondary road network.
  - CF1 - Expanding utility services.
  - CF3 - Development and flooding.
24. The Supplementary Planning Guidance 1 – Ashford Green Corridor Plan 2001, praises Southern Water Services for having *“created a wildlife habitat on their land [at the Ashford WWTW] by increasing the area of reed bed. A wide variety of birds are attracted here. Any paths provided on the north side of the river must complement these proposals to minimise the disturbance to wildlife. The habitat should be managed and the opportunities to make further improvements explored”*.

### **Emerging Planning Policy**

#### **The Kent & Medway Structure Plan – Deposit Plan September 2003**

25. The Deposit Plan notes that water companies are *“investing heavily in upgrading (wastewater) treatment processes provided at coastal sites”*. The proposed policy for wastewater (the equivalent to Structure Plan Policy NR2) is Policy NR8, the relevant part of which states:

*“The development of new or expansion of existing water supply or wastewater facilities will be supported where:*

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*There is a demonstrable need to serve existing and/or development proposed in accordance with the development plan; and  
This represents the best environmental option; and  
Land use and environmental impacts are minimised through appropriate mitigation.”*

The existing Structure Plan policies to protect the environment are largely reaffirmed, with policies to conserve river corridors and habitats.

The principal change in the strategic context since the adoption of the Kent Structure Plan has been the inclusion of Ashford and the Thames Gateway as two of the Government's four growth areas for the South East. The following policies are relevant to the proposed scheme and future growth in Ashford:

SS1 – Spatial priorities for development and investment in Kent.

CC1 – Identifies infrastructure requirements to accommodate the planned growth.

E12 – Protection and conservation of river corridors, biodiversity and the countryside.

NR8 – Supports the expansion of wastewater facilities where they are appropriate.

NR9 – Relates to development prone to flooding or which increases the risk of flooding.

#### **Ashford - Local Development Framework**

26. The Ashford Borough Local Plan is under review and will be replaced with a Local Development Framework (LDF); a portfolio of local development documents which will collectively deliver the spatial planning strategy for the Borough. The local development documents will include development plan documents (DPDs) that are geographical or issue specific, and supplementary planning documents (SDPs) that provide detailed guidance on core policy issues.

The first local development document to be drafted as part of the Ashford LDF is the Core Strategy. This sets out the Council's vision and strategic scene for the future of the Borough up to 2031. The Core Strategy outlines the key planning issues and principles guiding development over three ten year phases. It is anticipated that this document will be adopted in May 2007.

The Core Strategy considers various options for wastewater treatment in the future, including expansion of the current WWTW. However it anticipates that the Ashford Integrated Water Management Study (a document commissioned by the Environment Agency to identify the water and

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wastewater requirements for the future growth period until 2021) will provide more technical input into the LDF.

### **Consultees**

**Ashford Borough Council:** needs reassuring that the proposed modifications can meet the Environment Agency odour exposure standards, awaiting final comments.

**English Nature:** no objection, have also confirmed that an Appropriate Assessment (under the Habitat Regulations) is not required.

**Kent Wildlife Trust:** no objection subject to conditions securing the proposed mitigation.

**Environment Agency:** no objection

**SEEDA:** supports the application

**SEERA:** consider the proposal does not conflict with or prejudice the implementation of the current regional spatial strategy (RPG9) and the Government's Proposed Changes to the Regional Waste Strategy.

**Network Rail:** no views received

**Division Transport Manager:** No objection subject to receipt of a Travel Plan has requested additional information before a full assessment can be made (this has been received and I await further comment).

**Jacobs (noise, dust and odour):** no objection regarding air quality but would wish to ensure that no night-time work take place during the construction phase and that predicted noise levels for plant and equipment once operational are achieved.

**Jacobs (landscaping):** Overall although there would be some slight visual intrusion and adverse landscape character effects as a result of the development, the effects, which are generally slight, can be at least partially mitigated through planting, so that there would be no overriding landscape objection to the proposal.

**PROW:** no views received

**County Archaeologist:** no objection subject to a programme of archaeological works

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### **Local Member**

27. The Local Member, Mrs Elizabeth Tweed was notified of the application on 12 January 2006. Following the Members site visit Mrs. Tweed wrote asking that consideration be given to the following points:
- An alternative access to the site for trucks (rush hours already cause long delays on this road).
  - Improved treatment of discharge entering the River Stour, with the aim of enhancing the quality of the river.
  - A better way of disguising the 16 m high building.

### **Publicity**

28. A neighbour notification exercise has been undertaken, the proposal advertised and several site notices posted in the surrounding areas. Approximately 20 letters of objection have been received along with a 50 signature petition (and supporting letter from local MP Damian Green). The following points are made:
- The unbearable smell forces us to keep our windows closed during the summer months
  - The infestation of insects especially mosquitoes during the summer period is becoming unbearable
  - There is an intolerable level of noise generated by the site at night which causes sleep deprivation for adults and children
  - The volume of traffic onto the Canterbury Road will be unacceptable
  - Previous complaints about odour have gone as far as the European Court
  - The Applicants have complete disregard for local residents

### **Discussion**

29. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications be determined in accordance with the development plan unless material considerations indicate otherwise. There is a significant policy emphasis on supporting the provision of improvements to the wastewater infrastructure. It is acknowledged that the water industry is required to meet the increasingly stringent standards for water quality set out

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in European directives. Particularly at this site it is widely accepted that improvements to public infrastructure are necessary if the government's growth agenda for Ashford is to be realised. However this cannot be at any cost. It is therefore necessary to consider, in accordance with safeguarding policies, the environmental impacts the proposed development will have upon the upon the existing surroundings. The following paragraphs will address the main points in turn.

### Ecology

30. The impact of the construction and operation of the proposed development on the ecology and habitats of both the development site and the surrounding area is addressed in the Environmental Statement. The site includes areas of species poor semi improved grassland, with areas of coarse grass with potential for reptiles and breeding birds. It is not considered that this application would result in significant impact upon these habitats but in order to further limit any impacts construction will take place outside of appropriate breeding seasons. English Nature have commented that they are content with the survey information and proposed mitigation measures to be provided during construction and operation. They also support the proposed creation/enhancement of habitat for reptiles and acknowledge this offers the opportunity for a net gain in on-site biodiversity as a result of the proposed works in line with the principles of PPS9.
31. Of more significance perhaps is the potential to impact upon European and internationally designated sites downstream on the River Great Stour. The Environment Agency has however already agreed modified discharge consent to meet population growth and the requirements of the Urban Waste Water Treatment Directive. Under these regulations the Ashford WWTW is required to provide tertiary treatment with nutrient removal. The water quality improvement element of this application has to be carried out if Southern Water is to meet the modified discharge consent. There is therefore no proposal to amend the discharge consent beyond that which has already been approved. The sludge recycling scheme part of the application has no effect upon the discharge to the Stour as all sludge liquors would continue to be treated through the wastewater treatment works and thus subject to the discharge consent. The planning proposals do not therefore have any significant effect upon the European designated sites. English Nature in commenting upon this particular element of the scheme defers to the Environment Agency and the Agency does not object to the proposal.

### Odour

32. The potential for odour nuisance from this site is not surprisingly a major concern amongst local residents. In response to complaints about odour from the site Southern Water undertook odour assessments in 2001 and

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2004 to identify the source of odour emissions and appropriate mitigation measures. The 2001 assessment concluded that the complaints were attributable to the trade waste reception, sludge cake storage and the Sequence Batch Reactor (SBR) process employed for liquors balancing. As a consequence the SBR process was taken off-line. The 2004 assessment recommended a series of key actions. The odour control scheme that forms part of this application would implement these actions. The Sludge Recycling process itself includes a thermal dryer which results in the production of a dried granule which is stored in one tonne bags on the site, thereby replacing the need for sludge cake drying/storage bays. It is proposed that the Applicant submits an Odour Management Plan for the whole site and that this be conditioned as part of any permission that may be granted. This plan would need to be approved prior to the importation of any additional sludge. The Odour Management Plan would cover the proposed new WWTW and SRC facilities as well as the following existing plant:

- the inlet works
- imported sludge cake reception building, and
- Liquor balancing tank;

and would consider the potential odour generation at all stages of the treatment process. It would include a range of measures designed to minimise, control and monitor emissions, including:

*Odour control and abatement* – odorous air from all the processes identified as potentially having high-medium strength categories would be collected and treated at one of the two proposed odour control units; and

*Monitoring of odour emissions* – performance standards would be set out and the methods by which compliance with them would be monitored at the point of emission.

33. These measures would be prepared in accordance with the Code of Practice on Odour Nuisance from Sewage Treatment Works (DEFRA 2006) which suggest a practical approach for sewage treatment works operators. It requires that all works should incorporate a minimum level of odour management and control measures, with enhanced measures available for application to those sites where statutory nuisance is to be addressed. Ashford Borough Council Environmental Health Officers have been particularly interested in ensuring that appropriate mechanisms for measuring and monitoring levels of odour. Indeed a paper setting out the scope of the Odour Management Plan has been drawn up in consultation with them.
34. I am satisfied that with the measures referred to that the Applicants have taken positive steps to addressing current odour problems and are putting in place appropriate mechanisms for measuring and monitoring odour levels

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from the site in the future.

### Traffic

35. Another key area of concern for the neighbours of this site is the amount of traffic generated by the proposal. The traffic impacts for both the construction and the operation of the Ashford WWTW and SRC are addressed in Chapter 13 of the Environmental Statement.
36. The site is accessed from the A28 Canterbury Road via Stourfields, a long established route into the site. The plant would continue to operate 24 hours a day for 365 days of the year. However the current planning permission, granted June 1997 (AS/97/829) restricts operational vehicle movements to the hours of 0700-1800 Monday to Friday and 0700-1300 hours Saturday. It is proposed that a similar condition should be attached to control operational vehicles associated with these proposals. The upgraded WWTW and SRC are forecast to generate on average an additional 19 HGV visits (38 movements) per day on weekdays and 3 HGV vehicle visits (6 movements) on Saturdays. This increase in traffic is not likely to cause any significant problems at the junction of Stourfields with the A28.
37. Of more concern is the increase in traffic during the construction period associated with these proposals. It is expected that the construction phase will take about 24 months in total. Foundation excavation and piling to support the new structures would be undertaken within the first twelve weeks of construction, and 48% of vehicle movements associated with this activity would be HGV's. At 85 movements per day, this would be the highest level of HGV movement at any time during the construction period, although total peak vehicle movements are expected to occur in construction months nine and ten. The Divisional Transport Manager does not object to the proposal subject to the site operatives vehicle movements being managed in accordance with a travel plan and the HGV movements being managed in accordance with a Site Management Plan (SMP). In addition to the requirement for an SMP it is proposed to condition a total number of HGV movements during the morning and afternoon peak period to minimise impacts during these busy periods. With the above measures in place it is considered that the traffic impacts can be adequately managed.

### Landscape Impact

38. The landscape and visual impacts resulting from the application site have been assessed from surrounding recreational facilities and residential areas. During preparation of the Environmental Statement officers expressed concerns regarding the potential impact from the proposed sludge dryer



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building (16.3 metres high). Whilst not the tallest building it is certainly the bulkiest and would have the most significant visual impact as it is large enough to be seen from a distance. However in response to these concerns the Applicant has agreed to sink the building into the ground by 5 metres to minimise the impacts. My landscape adviser comments that the new structures would be added to a view that already contains significant industrial features and represent a relatively small intensification of the site. It is also acknowledged that the proposed planting belts would screen the views in the longer term. An appropriate choice of materials and colours for the structures and buildings would also help to dissolve the impact of the proposed development into the existing landscape. I therefore suggest that such details be required by condition.

#### Noise

39. Local residents have expressed concern at the noise levels generated at the site. Detailed noise projections for the construction and operational phases of the proposal have been undertaken. My noise consultant has advised that subject to an hours of operation restriction during construction and the noise parameters for the proposed plant and equipment being adhered to, there would be no objection to the proposal. The Applicants have further offered to carry out another background level survey and post commissioning level survey to ensure that predicted levels are achieved.

#### **Conclusion**

40. The site has been used for treating wastewater since the early 1900's, and has expanded over the years to meet the needs of the area. The proposed additional tertiary treatment units are required as part of an essential upgrade of the wastewater treatment in order to achieve improvements in water quality to meet the modified discharge consent which has already been approved by the Environment Agency.
41. The existing sludge treatment facilities in Kent are insufficient to meet future needs resulting from more stringent standards and population growth. The Applicants in reviewing their Sludge Strategy for Kent have identified a need to extend treatment capacity and capability for both east and west Kent. 'Doing nothing' is not an option because it would lead to significant volumes of sludge either not being treated to the required standard for recycling to agricultural land, or not being treated at all. The Ashford SRC is designed to deal with the increase in sludge arising in both the Ashford and Weatherlees (including the new Margate and Broadstairs works) catchments. This site has been chosen following a comprehensive sustainability appraisal of alternative treatment and location options.

## Item C2

### **New tertiary wastewater treatment facilities and new sludge digestion and drying facilities built alongside the existing treatment facilities at Ashford Wastewater Treatment Works and Sludge Recycling Centre – AS/06/243**

42. There is considerable policy support for the provision of improvements to the wastewater infrastructure. It is acknowledged that the water industry is required to meet the increasingly stringent standards for water quality and recycling of sludge set out in European directives. The need for the development is outlined above and given the policy support for such infrastructure improvements is considered in principle to be in accordance with the development plan. There is of course, always the potential for significant environmental impact resulting from such proposals and the choice of site. However I am satisfied that with appropriate mitigation as discussed above the proposed improvements are both necessary and acceptable and hence recommend that planning permission be granted.

#### **Recommendation**

43. I RECOMMEND that PLANNING PERMISSION BE GRANTED subject to conditions covering amongst other matters, time limit, details of materials, hours of operation for vehicle movements, pre and post operation noise level surveys, submissions of a travel plan, submission of a site management plan, submission of a code of construction practice, submission of an Odour Management Plan and its prior approval, limits to the number of HGV's accessing the site during peak periods, mitigation measures for ecological interests and landscaping details.

Case Officer: Andrea Hopkins

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Background Documents - see section heading