

Item C3

Installation of Ferric Dosing Kiosk at Ashford Wastewater Treatment Works & Sludge Treatment Centre, Kinneys Lane, Canterbury Road, Ashford, Kent, TN24 9QB – AS/17/1054 (KCC/AS/0192/2017)

A report by Head of Planning Applications Group to Planning Applications Committee on 13 September 2017,

Application by Southern Water Services Limited for Installation of 1 Ferric Dosing Kiosk at Ashford Wastewater Treatment Works & Sludge Treatment Centre, Kinneys Lane, Canterbury Road, Ashford, Kent, TN24 9QB - AS/17/1054 (KCC/AS/0192/2017).

Recommendation: Permission be GRANTED subject to conditions

Local Member: Mr Paul Bartlett

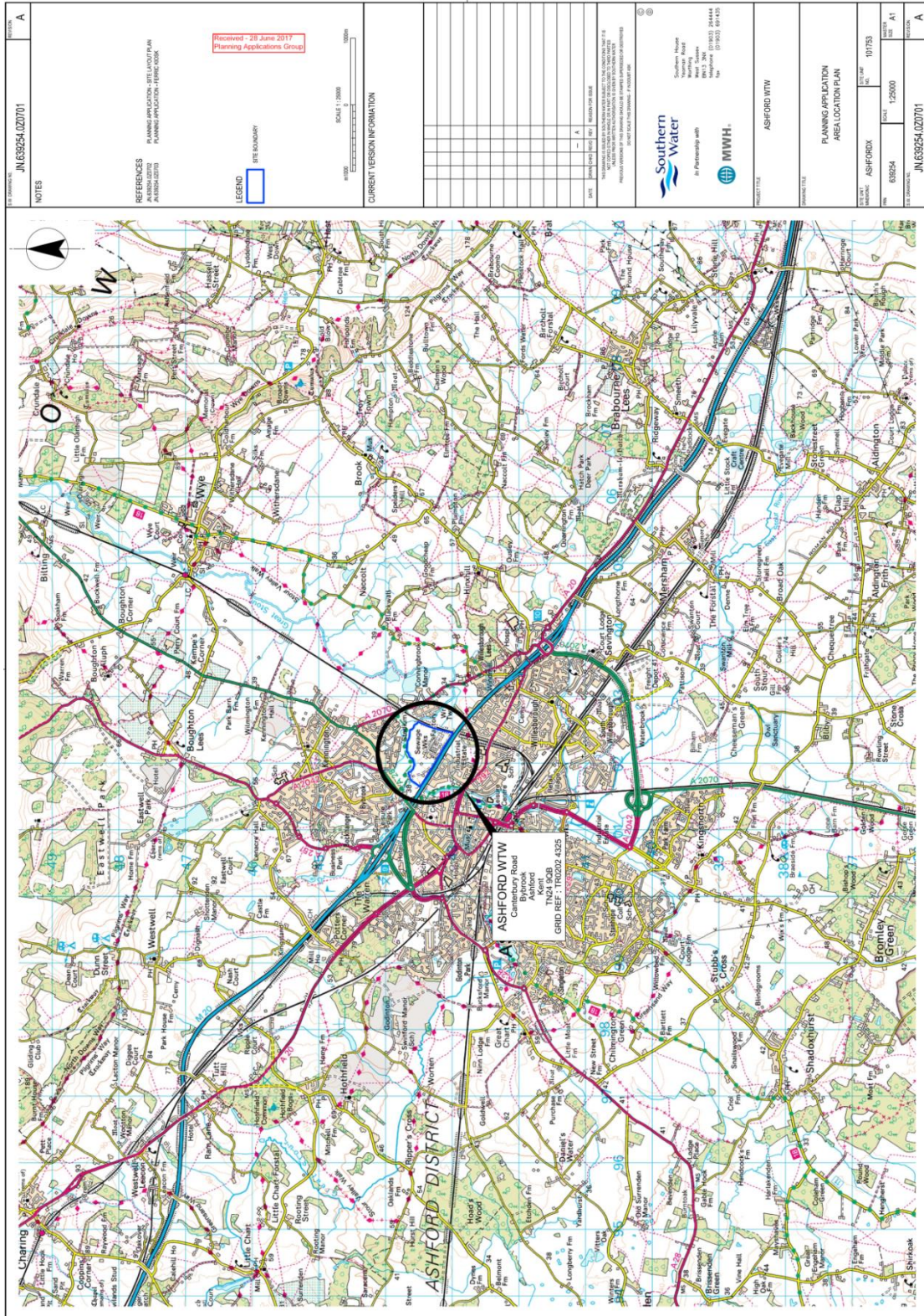
Classification: Unrestricted

Site and Surroundings

1. The site is located at Ashford Wastewater Treatment Works (WWTW) & Sludge Treatment Centre, Canterbury Road, Ashford. It 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 Great Stour river is designated a Local Wildlife Site and forms the northern and western boundary of the WWTW site, however the proposed development is some distance from this site boundary.
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 provides access to 4 residential properties and to the rugby club. The access road is also a 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.
3. Part of the larger WWTW site to the north of the main works (largely the site of the old reed beds) lie within Flood Zone 2 area, land assessed as having between a 1 in 100 and 1 in 1,000 annual probability of river flooding. Flood Zones are used to determine the probability of land experiencing flooding from a river or the sea, with 1 being the lowest and 3 being the highest. The aim of national flood policy is to steer development towards area with the lowest probability of flooding. Development proposals located within area prone to flooding must be accompanied by a suitable Flood Risk Assessment. The location of the proposed kiosk falls outside of this flood area and there is therefore no further assessment required in this case.

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General Location Plan



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Background and Site History

4. Ashford WWTW currently provides sewage treatment to a population of circa 105,000 which is predicted to grow to 119,252 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).
 - 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).
 - Domestic Tankered Waste from private residences (septic tank waste and cess).

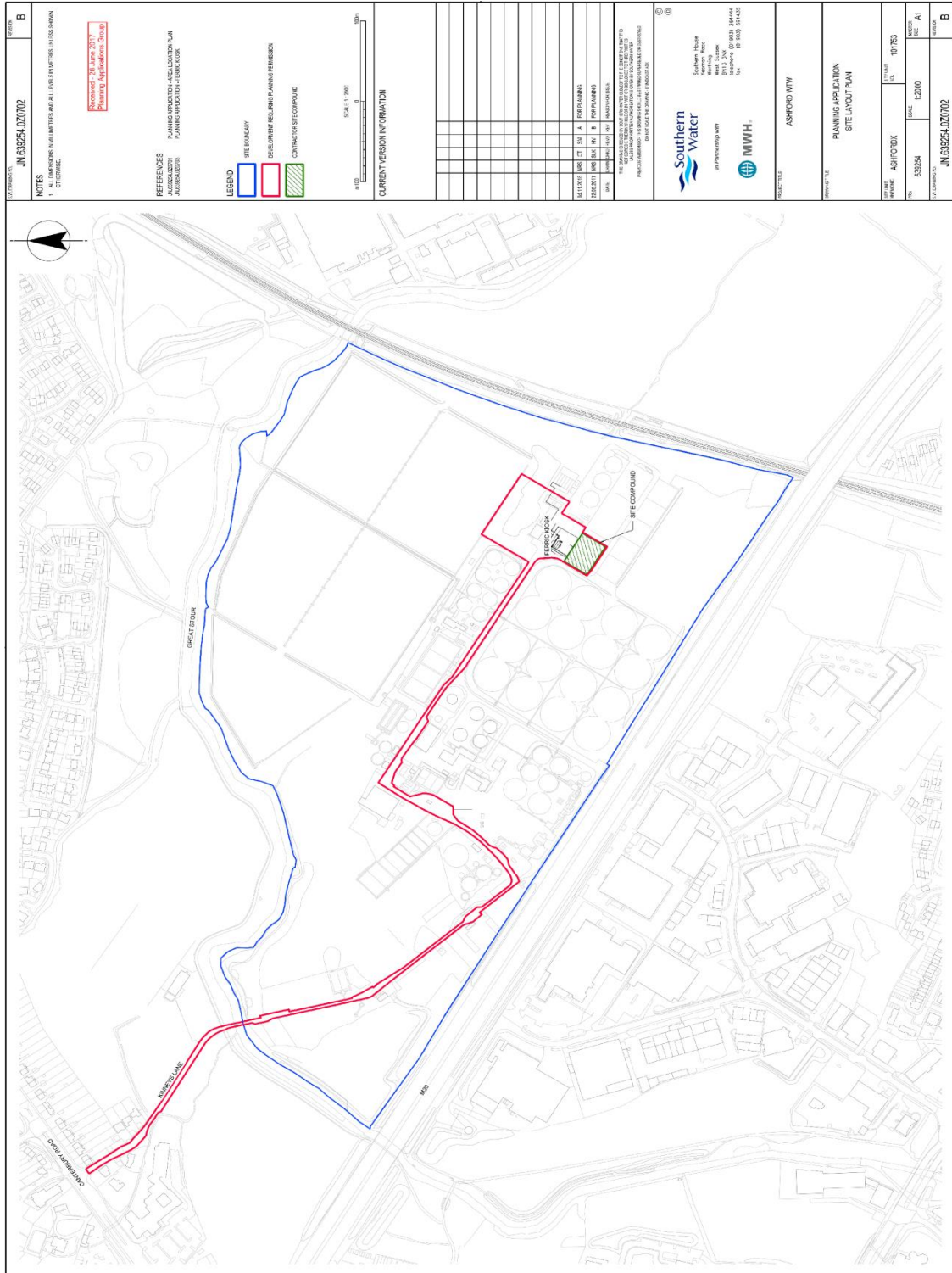
5. The wider WWTW has an area of approximately 36 ha and currently includes the following operational infrastructure:
 - 6 x Storm Tanks
 - 16 x Filter Beds
 - 3 x Primary Settlement Tanks
 - 6 x Sedimentation Tanks
 - 4 x Nitrating Trickling Filters
 - 8 x Humus Tanks
 - 6 x Deep Bed Sand Filters

6. The treatment works currently have ferric dosing after inlet works that achieve a current phosphorus output of 0.8mg/l. The Environment Agency National Environmental Programme requires the site to meet an annual average of phosphorus level of 0.5mg/l by 31st March 2018. As sewerage undertaker Southern Water is obliged to provide appropriate facilities for the treatment of wastewater to the required standard by the Water Resources Act 1991 and the Urban Wastewater Treatment Regulations 1994.

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Site Plan



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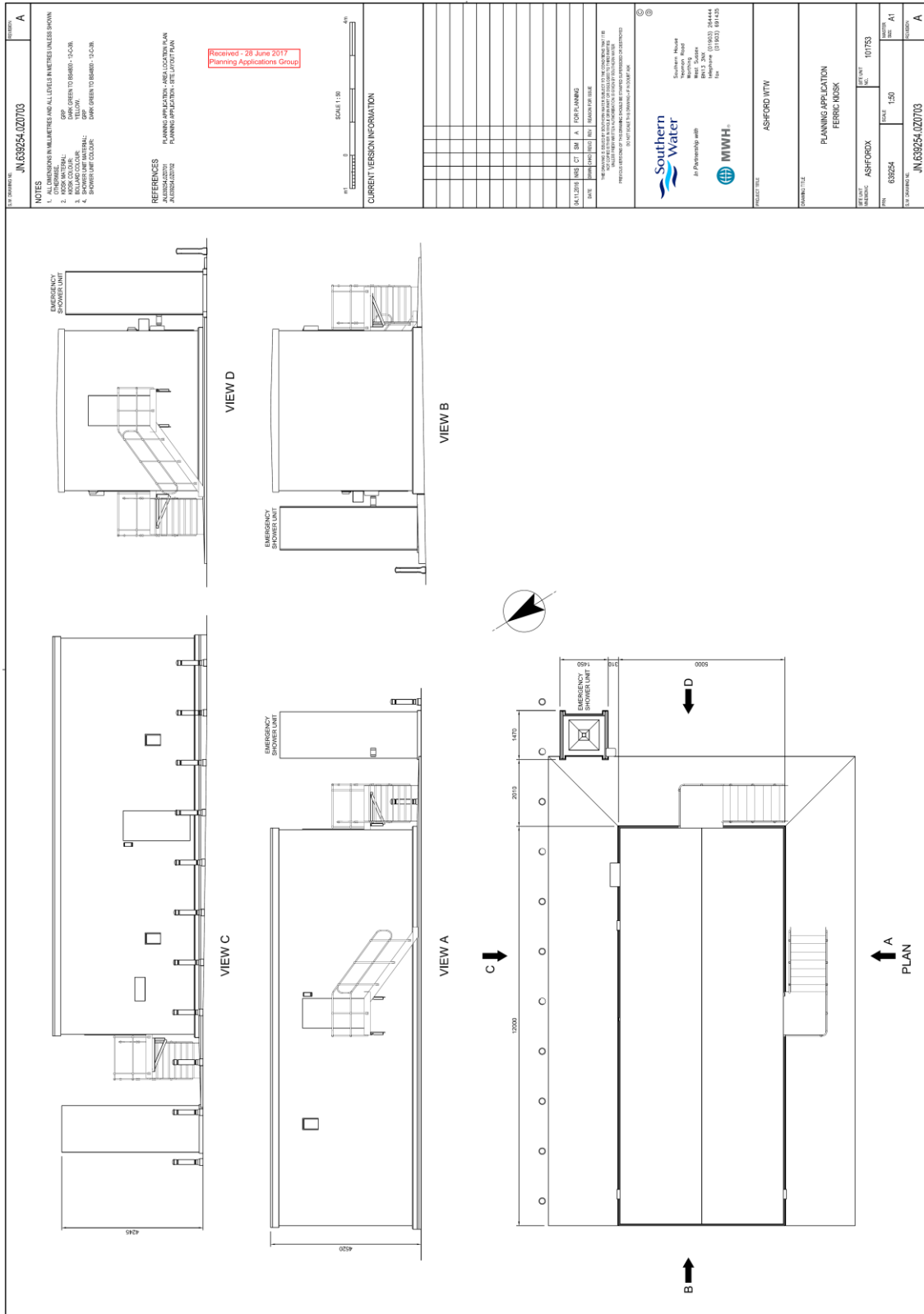
Proposal

7. The proposed works would allow for necessary upgrades to be made to the existing works to ensure the site can continue to operate effectively. The new ferric dosing plant is required to meet Environment Agency National Environmental Programme standards. The following works are proposed:
 - Install new ferric dosing plant and associated works: ferric dosing kiosk (containing storage tanks, dosing pumps and controls), tanker delivery area (bunded) with interceptor chamber, emergency shower, drainage and dosing pipework terminating at dosing point at end of inlet structure. Ferric salts are dosed in the raw sewage to reduce phosphorus levels in the sewage to permissible levels.
 - Existing contractor offices would be used during the construction period, with an additional temporary compound next to the office buildings. This would allow for the appropriate storage of materials and parking of vehicles during the construction phase. This would be constructed on an existing area of hardstanding. The area would be returned to its existing condition upon completion of temporary construction activities.
8. The proposed ferric dosing kiosk would measure 5.0m x 12.0m and 4.2m in height and the emergency shower unit would be sited eastern end of the kiosk and itself would measure 1.5m x 1.5m and 4.2m in height. Both structures would be finished in a drak green Glass Reinforced Plastic (GRP), and would be set within the existing built development of the the works.
9. The construction programme is expected to take six - eight months to complete with activities limited to 0700 -1800 hours Monday to Friday and 0730-1300 on Saturdays. Temporary lighting to assist during the construction period would be used as required but only during the hours of construction. Permanent lighting would be low level task lighting only used when necessary during shorter winter days and turned off when not in use. Lighting would be selcted to ensure limited light spill and in accordance with the Institution of Lighting Engineers Guidance Notes (GN01 - ILE 2011).
10. During the first two weeks of construction there is expected to be approximately 20-25 movements of HGV's for equipment and materials deliveries, and approximately 20-30 light van/car movements for construction staff. It is anticipated there would be 10 HGV movements per week during the main construction phase (circa 30 weeks). There would be one load required to deliver the large ferric unit which would include the need for crane works to lift the unit over the narrow bridge across the river. Wheel washing facilities would be provided within the site. There would be no increase in operational traffic following completeion of the proposed installation.
11. All areas temporarily impacted by the proposed development would be reinstated to their existing condition upon completion of the development.

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Elevations and Plan Drawing



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Planning Policy

12. **National Planning Policy and Guidance** – the most relevant National planning policies and policy guidance are set out within the following documents:

National Planning Policy Framework (NPPF) (March 2012) 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 1 (Building a strong, competitive economy), 3 (Supporting a prosperous rural economy), 4 (Promoting sustainable transport), 10 (Meeting the challenge of climate change, flooding and coastal change), 11 (Conserving and enhancing the natural environment), and 13 (Facilitating the sustainable use of minerals) are of particular relevance.

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) (March 2014 (as updated)) supports the NPPF including guidance on planning for air quality, climate change, environmental impact assessment, flood risk and coastal change, light pollution, minerals, 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. It 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

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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.

13. Development Plan Policies:

Kent Minerals and Waste Local Plan (KMWLP) 2013 – 2030 (July 2016): 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.

The plan recognises that some modifications to existing facilities will require planning permission. Whilst Policy CSW 15 relates primarily to new 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), and DM13 (Transportation of Minerals and Waste).

Ashford Borough Council Core Strategy July 2008: Policy CS19 (Development and Flood Risk)

Ashford Local Plan 2030 (Draft) - Ashford Integrated Water Management Strategy July 2007 and Ashford Borough Council Water Cycle Study 2016: Policy documents feeding into the Local Plan and recognise the need for wastewater infrastructure to serve future growth.

Consultations

14. **Ashford Borough Council** – No objection.
15. **Environment Agency** – No objection providing the environmental management permit is adhered to.
16. **Amey – Dust and Odour** – No objection subject to the development being carried out in accordance with the good management practice commitment within the application, and are satisfied that there is no risk to amenity from odour emissions.

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17. **Amey – Noise** – No objection, accept that the noise impact would be minimal with no adverse effect on any nearby noise sensitive receptors.
18. **Transportation Planning** – No objection subject to a condition for a Construction Management Plan to include routing of construction/delivery vehicles visiting the site, parking and turning area for construction and delivery vehicles and site personnel, timing of delivery vehicles, provision of wheel washing facilities and temporary traffic management/signage. Also suggest informative advising need to obtain all necessary highway approvals and consents, including appropriate contact regarding management of possible abnormal loads.
19. **Biodiversity** – Satisfied that there would be no significant impact on protected/notable species and that no additional surveys or mitigation strategies are required.
20. **County Archaeological Officer** – No views received

Local Member

21. The local County Member for Ashford Central Mr Paul Bartlett was consulted on 6 July 2017; no views have been received to date.

Publicity

22. The application was publicised by the posting of a site notice, an advertisement in a local newspaper, and the notification of nearby residential properties.

Representations

23. One letter of objection has been received, and whilst they have no objections to the installation of the ferric dosing kiosk, they do object to construction work taking place outside the usual operating hours as lorry movements are already intrusive. The following comments are made:
 - There are six properties that access Kinneys Lane, not four as stated in the application. The two properties at the top of the lane either side of the access road have a right of access to backs of their properties.
 - Vehicle movement numbers are unclear and could be even higher than stated. Kinneys Lane surface is already poor in a number of places with no provision for pedestrians or cyclists even though it is a sign-posted cycle route.
 - Most drivers completely ignore the recent sign-posted 10 mph speed limit and continue to hit the speed bumps at high speed. We have never witnessed anyone carrying out speed checks, despite assurances from Southern Water.
 - Whilst we recognise the proposed development is not expected to cause odour problems itself, the whole site has odour problems to the extent there have been public meetings with other residents to the north of the site. The odour coming from lorries travelling both ways on Kinneys Lane is intrusive.

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Discussion

24. 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 proposals need 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 12 and 13 above are particularly relevant. The key planning considerations in this case include:
- Need and sustainability
 - Traffic
 - Odour
 - Other amenity impacts

Need and Sustainability

25. As set out earlier in my report 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. This scheme forms part of Southern Water's Asset Management Plan (AMP 6) Programme. This is a major programme of refurbishment and upgrading of various existing wastewater treatment works and associated sewer infrastructure required by the water industry regulator OFWAT (Office of Water Services), and the Environment Agency, to be put in place between 2015 and 2020. Each of the schemes must be completed by dates specified by the Environment Agency and OFWAT.
26. The levels of phosphorus entering a water body can lead to high levels of inorganic plant nutrient, with excessive growth of algae which in turn affects the oxygen levels in the water, this is known as eutrophication. Subsequently the quality of the receiving water environment is depleted. In simple terms this application seeks to improve the dilution levels of phosphorus from 0.8mg/l to 0.5mg/l by adding ferric salts to reduce phosphorus levels in the sewage to levels required by the Environment Agency National Environmental Programme standards.
27. It is proposed to install a new ferric dosing kiosk (containing storage tanks, dosing pumps and controls), a tanker delivery area (bunded) with interceptor chamber, emergency shower, drainage and dosing pipework terminating at dosing point at the end of the inlet structure.
28. The need for this development is therefore driven by regulatory requirements to improve the treatment levels of the sewage. This in turn would further mitigate the environmental effects of the discharge on the River Stour. On this basis and following the presumption in favour of sustainable development in the NPPF and national waste policy, the proposal accords with Policy CSW1 of the KMWLP.

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Traffic

29. The levels of traffic associated with this development once operational will not increase above current levels, as existing operatives will monitor and maintain the additional infrastructure. However there is clearly a need for an increased level of traffic during the construction of the proposed new facility and this is of concern to the neighbour who has made representations.
30. It is proposed there would be 20-25 movements of HGV's for equipment and materials deliveries during the initial mobilisation works which is expected to last around two weeks. These figures are not per week as suggested by the neighbour. In the construction phase (circa thirty weeks) there would be an average of 10 movements per week of HGV's which would include the delivery of the kiosk itself. There are expected to be around 30 movements per week of light van/cars during this period. Construction traffic would enter and leave the site from the existing access off the A28 Canterbury Road along Kinneys Lane into the WWTW. A practical approach to vehicles visiting the site would be taken by the contractor to avoid any delays occurring outside the site. The necessary authorisations would be obtained for any traffic management that would occur outside the site (and this would include arrangements for the use of a crane to avoid the narrow point along Kinneys Lane).
31. It is stated there would be no construction traffic associated with the scheme on Saturday afternoons or Sundays (unless otherwise agreed first with the County Council, as an exception) or Bank Holidays. Week day construction activities would be restricted to between 0700 and 1800 hours. Traffic movements would be managed in accordance with best practice and incorporated within the contractor's project environmental plan. The Applicant has stated that parking for all vehicles would take place within the treatment works site where sufficient space could be provided for loading, storage and turning along with parking for site operatives and visitors.
32. The Highways Officer raises no objection to the proposal but has also suggested that a condition securing the submission of a construction management plan detailing arrangements for routeing, parking and turning, timing of deliveries, wheel washing and temporary traffic management/signage. This is the kind of information which is normally be included in the contractors own documentation and would therefore ensure appropriate measures are in place to manage the traffic associated with the construction activities. I would suggest that details of the measures to control the speed of construction vehicles visiting during this time should also be required.
33. The level of operational traffic will not increase as a result of this proposal. Furthermore it is considered that it is possible to manage the temporary impacts of the construction traffic by the addition of appropriate conditions and on that basis any potential impacts are considered to be reduced to an acceptable level.

Odour

34. As set out above this proposal is for the installation of an additional piece of infrastructure to meet regulatory standards for the discharge of wastewater. The proposed kiosk is not odour generating and therefore will not of itself cause any odour nuisance.

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35. However it is acknowledged that there have been a number of complaints regarding odour issues from the site more generally. This is a point made in the representations and with specific reference to the vehicles visiting the site. Southern Water has acknowledged that the level of odour complaint has increased and has been carrying out their own investigations into what could be causing increased odour. Currently two potential sources have been identified and odour suppression units have been installed to address the odours, the effectiveness of these is currently being monitored. An additional odour assessment of the site has been carried out recently to identify any further potential sources and is currently being processed. Furthermore the Environment Agency, who are responsible for pollution control in relation to the permit for sludge imports, the combined heat and power plant and the discharge consent, are working with Southern Water and the Borough Council Environmental Health Officer to resolve odour issues from the site.
36. Odour issues arising from vehicles transporting sludge to the site again fall outside of this specific proposal however these could be mitigated by proper containment and ensuring vehicles are kept clean and free of debris, as well as driving at appropriate speeds onto the site. This is a matter of good management practice and ensuring their drivers are instructed appropriately and the matter will be raised with the applicant.

Other amenity matters

37. Ecology - An ecological appraisal of the site was carried out as part of the application preparation. It acknowledged that the site is a large WWTW located within the centre of Ashford and that the majority of the site is operational and contains concrete, brick structures and areas of hardstanding and managed grassland. The northern and western part of the site contains a mixture of scattered scrub, rough unmanaged grassland and tall ruderal habitat mainly consisting of thick nettle beds. Considerations were given to potential impacts upon habitats and protected species. The site and proposed working area is not subject to any nature conservation designations and none would be affected by the proposed works. No rare or habitats of principle importance have been identified within the site perimeter and none would be affected by the proposed development. It is concluded that provided the works are confined to the existing hardstanding and operational areas, the potential for the works to impact on protected species is low. My biodiversity officer concurs with this conclusion and raises no objections to the proposals.
38. Landscape and Visual Impact - The proposed location of the kiosk, to the eastern boundary of the site is adjacent to existing operational plant. The views from which the kiosk could be seen would be very limited and it is not considered the kiosk would have any detrimental impact in visual terms and no adverse impact upon the landscape.
39. Noise - There are no residential properties within 200m of the proposed works, although the only access road to the site passes by a number of residential receptors. The M20 borders the south of the site and a railway line lies to the east. The proposed kiosk would not generate any notable level of noise; the switchgear would all be enclosed within the kiosk itself and would not have any impact on surrounding

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receptors by virtue of the low level of noise generated and the distance of the nearest properties.

40. Controlled Waters – Part of the wider site is located in a flood risk area, however the location of the proposed kiosk falls outside of this flood zone area so there is not considered to be any flood risk. Appropriate management measures would be followed by the applicant to ensure no pollutants enter the groundwater system and all surface water would be channelled in to the existing drainage system on the site, which in turn is returned to the head of the works for treatment.

Conclusions

41. The NPPF states that where development accords with the Development Plan planning permission should be granted without delay. It also states that where the Development Plan is absent, silent or relevant policies are out of date, then permission should be granted unless adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF when taken as a whole.
42. This is a large existing works within the centre of Ashford treating wastewater arising from within the catchment and providing sludge treatment to a wider area. The proposed development is required to enable the works to comply within the Environment Agency National Environmental Programme which requires the site to meet an annual average phosphorus level of 0.5mg/l by 31/03/2018. The development of the kiosk and associated infrastructure represent a small scale project within the confines of the much larger works.
43. The main impacts from the proposed development arise during the construction period and would be of a temporary nature. I am satisfied that with appropriate conditions controlling those impacts alongside good management practices that the impacts could be kept to a minimum. The kiosk once operational would have little impact beyond the confines of the existing operational area. I am satisfied the proposed development complies in all relevant aspects with the NPPF to which the presumption in favour sustainable development therefore applies. It is concluded that the proposals comply with the adopted KMWLP 2016 and the relevant policies of the Ashford Borough Council Core Strategy 2008 and Draft Ashford Local Plan 2030.
44. I recommend that planning permission should be granted for these proposals.

Recommendation

45. I RECOMMEND that PLANNING PERMISSION BE GRANTED SUBJECT TO the imposition of conditions covering (amongst other matters) the following:
 - Submission of a Construction Management Plan detailing arrangements for routing, speed of vehicles on site, parking and turning, timing of deliveries, wheel washing and temporary traffic management/signage.
 - Limits on the number of HGV's as set out in the application.

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- Limits to the hours of construction activities.
 - Appropriate handling and storage of fuel, oil and lubricants,
 - Access Road to be kept free of mud and debris,
46. An informative relating to need to obtain necessary highway approvals and consents, including appropriate contact regarding management of abnormal loads BE ADDED.

Case Officer: Andrea Hopkins	Tel. no: 0300 413394
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Background Documents: see section heading
