Monks Horton Parish Meeting from [redacted]. Councillor, Vice Chairman

SUBMISSION TO CSR. FHDC. JULY 2020.

This document, published some 18 months ago has been reviewed to account for weather conditions over the past year.

POTABLE WATER SUPPLY.

I would begin by prefacing this document with a brief description of where we are now in terms of water scarcity and potable water supply for a growing community.

The South East of England has always been, in relation to the rest of the UK, water stressed. With a growing local population, certainly over the past 30 years, measures have been taken to try to limit water usage which has, for the most part, been successful. Metering has played a big part in the water intake of households, made compulsory by the designation of our local water company, Affinity Water, of having 'Water Scarcity Status'. Some 90% of supplies are now metered.

Over recent years we have seen drought measures instigated by way of hose pipe bans, car washing facilities restricted or shut down and so forth. Affinity Water has persuaded us to use hippo bags in WC Cisterns, and even today are promoting (FOC) water saving shower heads and similar products to save water. There was even a plan to import water through the channel tunnel fire hydrant system and tow water filled barges across the North from Scandinavia in the mid nineties given the local drought situation. The scenario of severe drought has not yet fully been experienced, but with a growing local population, would the attempted measures of resilience being mooted be enough to alleviate and reduce such a situation happening in the near future?

Migration from cities is definitely not one of them and would only serve to exacerbate the water scarcity situation even further.

The Folkestone and Dover area is known as the Dour region (WRZ 7) and is the most water stressed area in the UK. Formerly known as the Folkestone and Dover Water Company, then Veolia, and now Affinity Water, it is reliant mostly (some 90%) on groundwater supply.

Unlike other water companies, there are no sizable reservoirs as such, which means we are dependent on rainfall to recharge aquifers in the Dover area through predominantly chalk and greensand aquifers to supply our villages and towns.

We often hear from hydrologists and water industry experts that should we experience two dry Winters, we're in trouble. It should be noted that recharge to our aquifers only occurs during the winter months, irrespective of rainfall during Spring, Summer and some Autumn months.

For the most part in my submission, I make reference to documents within the Otterpool Park planning application, Outline Water Cycle Study (WCS) and the Core Strategy Review 19.

ENVIRONMENT AGENCY AND WATER RESOURCE

The Environment Agency reports that the chalk and greensand aquifers in Kent are suffering from diffuse pollution from nitrate. *'The Environment Agency has developed 11 safeguard zones to focus efforts where groundwater is abstracted for public water supply in a bid to improve water quality.*
With the exception of pollution arising from agricultural activities, any new development associated with Shepway's growth proposals could pose a direct or indirect threat to water quantity or quality for any of the above reasons. However, of particular interest, in terms of this document, are point source pollution from sewage treatment works, water abstraction and issues relating to saline intrusion, relevant because of the sensitivity of the European designated wildlife sites in Dungeness. There are concerns about the condition of aquifers that underlie Shepway, both in
terms of water quality and quantity and so it is important that new development does not place additional undue pressure on natural water reserves'.

LOCAL HOUSING NEEDS.

The document 'Healthier Housing Strategy 2018-2023' produced by Folkestone & Hythe District Council (FHDC) states at 4.11
'The evidence base document, the Strategic Housing Market Assessment (SHMA), has indicated that there is an Objectively Assessed Need (OAN) of 14,560 dwellings over the period 2014- 2037'.
What the document omitted to state was that a document produced for Shepway District Council (now FHDC) by Peter Brett Associates, EB 03.20 SHMA Part 1 OAN, March 2017, stated this:
The OAN for Shepway is 633 dpa over the period (14,560 dwellings). This number has been revised upwards to reflect a market signals adjustment. Furthermore, working with Experian, we have tested whether this number of homes provides sufficient labour to meet economic needs and concluded that there is no need for any adjustment. Additionally, we have concluded that this OAN is sufficient to meet needs flowing from London to Shepway district.
The FHDC mantra has always been along the lines of local homes for local people. Moreover, they tell us that '*This is the housing provision within the district which meets the needs of the local community and also contributes towards the district to fully meet its economic and regeneration objectives*'.
Of course, no one should have the temerity to tell people where they can or can't move to, but, in terms of water resource, London is very well served by huge reservoirs to the West of London and even has a desalination plant, alongside the river Thames at Beckton. To encourage the movement of people into an area already suffering water shortages is, environmentally, totally irresponsible.

A district wide Water Cycle Report has been produced for the CSR19, alongside an Outline WCS for the proposed Otterpool Park new town which I will be commenting on, within this document.

As well as serving the Folkestone and Hythe District, Affinity Water will also be serving the communities of Dover and a smaller area in Thanet. The cumulative effect of providing water

to the Whitfield (Dover) Urbanisation project will only serve to compound the water scarcity situation in relation to providing potable Water to each and every home.
Moreover, commercial water usage is difficult to gauge, assess and make provision for. I note that at this present time no water usage figures have been given for Dungeness Power Station coming on stream.

Whitfield has been identified as a strategic allocation in Dover District Council's Adopted Core Strategy 2010 (Policy CP11) for the provision of at least 5,750 homes supported by transport, primary education, primary health and social care, utility services and green infrastructure together with retail, financial and professional offices, eating and drinking establishments.

A minimum proposed development figure for the WRZ7, Dour (Affinity Water) Region is around 24,000 dwellings, without taking into account the proposed Otterpool Park new town or housing set out at CSD9 – Quinn Estates.
The proposal to build a 8,500 -10,000 dwelling Town in the region has clearly not been thought through in terms of water resources and, in any event, is surplus to the local housing requirement.

The very fact that our local water company is not a Statutory Consultee in development matters is absurd and needs legislative input to reverse the situation. This, I believe, is scandalous and has to be challenged at every level within the UK where water scarcity is a factor. The so-disant duty to co-operate simply means that a water company must tick the 'YES' box to any development that it's confronted with.

OTTERPOOL PARK NEW TOWN

As already stated, the additional proposed 8,500-10,000 dwellings being foisted upon the area, in addition to the local plan assessed needs at the behest of FHDC via an 'Expression of Interest', was a 'head in the sand' moment for the CEO, Leader and Cabinet of FHDC pertaining to water supply infrastructure and capacity.
The Housing Infrastructure fund of £281,000,000 that FHDC were hoping to secure to support the development has now not been realised.

In a document: Notes of Meeting Affinity Water Offices 23rd February, 2018 it states that *'capacity exists for the first (Otterpool)1000 properties, but then infrastructure upgrades will be needed after that'*. I note that most recently, this figure of 1000 has been increased to 1,500.

In that same document, [redacted], KCC Water Resource Manager pointed out that *SDC's water consumption figure of 90 litres per person per day (lpd) was aspirational, with Mike Pocock and Patrick Campbell of Affinity Water stating that the planning figure of **155 lpd** will be used.* This is a more realistic figure, given that the average Affinity Water area consumption is between 160-141 lpd.

It is clear that the Affinity Water South East region has neither the infrastructure or water resource to support a Town, which in effect, would be twice the size of Hythe.

The recent statement within the outline WCS states that an 11km 560mm diameter supply will be installed from Paddlesworth reservoir to serve the 8,500 dwellings at Ottepool Park

after the first 1,500 houses are built, but if the reservoir can't be filled from the depleted groundwater, there would be no real point in installing a new water supply pipe.
In various documents (meetings and email exchanges) obtained through FOI requests, the theme of water scarcity is continuous.

- *'The Affinity WRZ7 (Folkestone and Dover) had the largest gap between forecast demand and planned supply'.*
- *The AF SE Zone is highly dependent on groundwater and the low levels of recharge last winter are an ongoing concern for the company.*
- *The SE Zone will need at least 120% of long term average rainfall during the coming winter to bring groundwater levels back to their long term average.*
- *We have very little water resource available in the area, so significant reinforcements are required, which will of course take time.*
- *We face substantial future challenges from population and household growth, and a reduction in resource base as we seek to restore sustainable abstractions in ecologically sensitive chalk stream habitats.*

BUILDING RESILIENCE.

Emails and documentation between FHDC and Albion Water, relating to Otterpool Park, show a dialogue opening up to build water supply resilience, using Rainwater Harvesting (RWH) and Effluent Reuse to reduce potable water usage. I believe this to be a disingenuous and cynical attempt to persuade a planning inspector to approve a development that would or could not deliver the proposed lpd objective.

These proposals are not evident in any other development across the District. To highlight this, the current Taylor Wimpey, 250 dwelling development in Sellindge known as 'The Lees' is an example where building for profit is a priority. At a recent community engagement the question was asked "Are you installing rainwater harvesting at any of the properties" Yes was the answer, "We are installing water butts in every home". Whilst it's encouraging to know that a 90 litre water butt is installed, it's hardly a serious attempt to reduce potable water usage. Sadly, during a recent inspection of newly constructed houses at The Lees site, not one newly built property has had a water butt installed. This is indicative of promises made and promises broken, exposing the cynical attempts to build with little or no regard for the environment, long term. A cynical attempt to hoodwink any Planning Inspector.

If FHDC was serious about Integrated Water Management (IWM), RWH or grey water recycling (effluent reuse), these proposals would be a feature on all new dwellings across the District. It should be noted that retrofitting water saving devices such as RWH or water reuse is extremely expensive. Mention has been made within the Infrastructure Delivery Plan that a retrofit of WC's could be carried out. This is an attempt to reduce the flush capacity to 6 litres as opposed to between 9 and 13 litres. This would mean that both the pan and cistern would need to be replaced. Not only would the cost be prohibitive, but an army of Plumbers would be needed which simply aren't available.

Mention has also been made that existing properties within the district could be retrofitted with water saving devices such as Spray taps and Aerated shower heads. For the reasons given above, this is an unrealistic long term venture in a domestic property, and even if properties were to be retrofitted, the chances of conversion back to conventional fitments is

extremely high. And, as Affinity Water state, be converted back to realise a lpd equivalent of 140-160 lpd.
Affinity Water has already stated that some 24,000 properties will be built in the Dour region, excluding Otterpool Park new town which, in time, will amount to 10,000 houses. They also state that existing residential demand is some 16.14Ml/d and the additional demand from projected residential growth is estimated to be just 3.85 Ml/d. This is clearly not the case given that Affinity Water has stated that a realistic figure of 600 lpd per household could be used to estimate future water usage. With 34,000 new houses expected to be built in the future, that would equate to 20.4Ml/d. Even if a figure was used (as stated by Affinity Water) of 400 lpd, that would equate to 13.6Ml/d. Somewhat different to 3.85 lpd as stated at 5.3.6 of the Infrastructure Delivery Plan and Otterpool WCS.

Let's not forget that this is for residential use only. If we are to believe the claims from FHDC that Commerce and Industry would be flocking to the area, the water consumption would be far greater.

Commenting on: OUTLINE WATER CYCLE STUDY – OTTERPOOL PARK.

The Water Resource Management Plan (2.3 Page 22) clearly sets out the challenges in the WRMP 14 and WRMP (draft) in providing potable water to the Dour WRZ7 region. Whilst Affinity Water can provide water transfer among most of its own regions, it can not do so at WRZ7. The only transfer, as already mentioned would be a very limited transfer from Southern Water and South East Water, but only if it was available at the time. It should be noted that the license is limited in both cases.

The WRMP assessment concluded that the South East Regions do not have sufficient water for the whole of the 25 year planning period to meet customers' needs for water. The claim (4.1 Development Impacts) that Affinity Water has sufficient water resources to serve the whole of the Otterpool framework masterplan is a spurious one and borders on blatant deception. At the cost of repeating myself, no amount of infrastructure will pump water from the ground if it doesn't rain.

At the present time, claims made by Albion Water that water usage can be restricted to 80-100 litres per day (lpd) per person is one that would need to be proven. Noevidence has been presented within the WCS to show an area or town where water usage is anywhere near the 80-100 lpd. This figure is aspirational and should be viewed with caution.

Granted, there are sanitary fitments that could be used to reduce water usage, but if FHDC were serious about limiting water usage across the district, they would have insisted that developers adopt a serious water reuse/recycling regime in all new builds, which they haven't.

Looking at some of the measures to be adopted to reduce potable water usage: 4.2 Water Efficient Technologies:

Spray taps in bathrooms. These taps are only used in a hand rinse application, usually in conjunction with percussion heads (time limited) They are NEVER used domestically on wash basins or sinks where a bowl has to be filled.

Slimline Baths have been adopted in the past to save water. They quickly went out of favour

for two reasons. Firstly, the water quickly lost the heat due to limited mass of water and secondly, as the nation becomes heavier (obese) the need for deeper and wider baths increase. Limiting shower heads to 9 litres per minute is another aspirational claim. Aerated heads are available but many choose to install full flow heads. It is encouraging to see that body jets within shower rooms/cubicles have mostly been eliminated but that is as far as clients would go. Full rainwater drench heads are still very popular with clients being offered by companies such as Aqualisa and MIRA. Two top selling brands in the UK.

WC's are currently using 6 litres full flush (for solids) alongside a short flush option. The 4/2.6 litre unit, known as ES4, described in the WCS is plausible, but during recent trials the water saving, where the unit is installed, hasn't shown a serious reduction in water usage, moreover, the cost of the unit is extremely high as compared to a standard WC.

Water reuse is a term given to grey water recycling where waste water from basins and baths is treated on site and fed back to fill WC's. Initially used as a water saving unit, in recent years the cost, both initial and long term, of the unit has proved to be too much for the domestic user.

Rainwater Harvesting is now the preferred way of reducing potable water consumption. Collected on site, usually in a 6,000 litre tank and fed to the WC (s) within the property. Also used to supply washing machines if used alongside a simple treatment device. It should be noted that this system also requires a potable water supply to be installed as the collecting tank does invariably run dry, especially in the South East of the UK. Affinity Water is well aware of the above, which is why they base consumer consumption above 150 lpd.

Concern has been expressed by Affinity Water about the claim of water consumption of between 80-100 lpd and has requested that a trial period of between 12-18 months be put in place to monitor the 'on-site water usage or when the first 1,500 houses are built in the first phase of the proposed New Town. This indicates that the main water provider, Affinity Water, has reservations about the claims made by FHDC and Albion Water on household water consumption.

The author of the WCS concedes that:
"Local Groundwater abstraction from new boreholes at a large scale would not be permitted as the local principal aquifer is over abstracted and its Water Framework Directive Quantitative Status is classified as poor."
"The proposed development is situated in a location which is known to have limited groundwater resources and is considered a water stressed area".

It is also worth noting that in the revised Arcadis Water Cycle Study 3.18 dated February 2019, two letters of support for Otterpool Town are documented: Southern Water and Albion Water. **There is no letter of support from Affinity Water, <u>the only provider of potable water.</u>**

PADDLESWORTH RESERVOIR.

Much has been made of the fact that Otterpool Park will be served by a reservoir situated at Paddleworth – this is an area at relatively high altitude, for obvious reasons, to serve an area, which is low lying, within the District. According to the latest Affinity Water figures of December 2017, some 38,000 Residents' water supply is fed from this reservoir. Based on

occupation figures of 2.4 people per dwelling, Otterpool Park would have 24,000 people. Together with the existing (2017) figure of 38.000 and 24,000, some 62,000 people would rely on water from Paddlesworth reservoir. Based upon AW's allowance of 155 lpd per person, the reservoir would have to supply 9.61 megalitres of potable water each and every day. Even if we assume that the aspirational figure of 90 lpd for each and every Resident at Otterpool is met (highly dubious) this would still mean that 5.9 megalitres of potable water would have to be delivered from Paddleworth each day.

The capacity of Paddlesworth reservoir, as far as I am aware, has never been mentioned in the Water Cycle Study produced by FHDC and their consultants. It is a fact that has purposely been ignored to conjure up visions of Bewl Water (31,000megalitres) or similar sized reservoirs across the UK. In actual fact, Paddlesworth reservoir only holds 13.2 megalitres of water as recently confirmed by AW after the additional upgrade of 3 megalitres and relining of the existing reservoir holding 10.2 megalitres. Paddlesworth has been designated as a reservoir, but in actual fact it is a transfer pool to supply 62,000 plus residents between 5.9 and 9.6 megalitres each day.

Equally, the rate of supply into the reservoir has to be equal to that of the output. The question has to be asked: Can the groundwater resource at WRZ7 be guaranteed to deliver that amount of water given the records show (Little Bucket Farm) that December 2017 was extremely low.

To conclude and to put this into perspective: We have 62,000 people that need to be supplied with, on average, 7.75 million litres of potable water each day. The proposed pipeline will be of 560mm diameter (500mm internal diameter) and 11 km in length (from Paddleworth to Otterpool). Ignoring the existing pipeline, this will require 2.16 megalitres to fill before delivering water to the Otterpool properties. If the incoming supply is halted to the reservoir, the reservoir will be empty in less than 35 hours. This demonstrates that the Paddlesworth designation as a reservoir is purely a transfer pool from pumped groundwater boreholes to Residents homes.

<u>Latest update to Groundwater situation (July, 2020)</u>

Taken from Affinity Water latest (7th February 2020) update.

The three years of dry weather also affected the local environment with low flows in the region's globally rare chalk streams, which in some places had dried up posing a risk to local wildlife.

"The effects of an environmental drought can in some cases be felt much sooner than an impact on public water supply, and at times can take longer to recover", said Affinity Water's Director of Corporate Affairs, [redacted]

He continued: "Climate change is making periods of prolonged dry weather more intense in Southeast England.

"At Affinity Water, we recognise the responsibility we have to protect and nurture the environment and we need our customers to join with us on this important journey. Within our catchment area we have some of the rarest habitats in the world – chalk streams, often described as England's Amazon.

"Centuries of historical river alterations, prolonged periods of dry weather and the demand for water all play their part in how these habitats fare. We need to treasure and protect them and we can all do that by using less water.

The extremely wet winter, the wettest on record, was followed by an extremely dry Spring. At the moment there is no recharge to the aquifers, nor will there be until late October. The fragility of the water environment in terms of building supply resilience is a precarious one, relying solely on rainfall. It stands to reason that the more Commerce, Industry and Residential areas requiring water will deplete the groundwater supplies to dangerous or perilous levels.

DESALINATION.

Desalination has the advantage of an effectively unlimited resource, but is very energy intensive and produces highly polluting waste. It is well documented that desalination is power hungry and marine polluting that should be avoided at all costs. Unfortunately many, including Government Ministers, Local Councillors and developers are not aware of the potential environmental dangers that will unfold if developed.

Hansard recorded the following on the 13th July 2006:

'Folkestone and Dover Water plan a small desalination plant at Hythe in 2019 and Southern Water propose the development of a desalination plant in the 2020s'

In the summer of 2018, the leader of FHDC, [redacted] attended his last Otterpool Park public meeting in Hythe where he stated that a desalination plant could be built in the area, and if the water company couldn't fully fund it, FHDC could help financially.

The Residents opprobrium against the Leaders position moved Councillor [redacted] to say that he would never meet with the public again when debating Otterpool Park. Deputy FHDC Leader [redacted] had already made her position clear not to meet with the public well over 4 years ago.

In an AECOM document, Kent Water for Sustainable Growth Study, KCC, May, 2017 it states, pertaining to a shortfall of over 4 Ml/d in supply, at 4.3.2.2. *'Additional schemes included: two desalination options, two effluent reuse schemes, a number of potential reservoir schemes and improvements to network schemes and improvement to network size and remove constraints'.*

The very fact that Affinity Water has not included the above options in their Water Resource Management Plan (WRMP19) indicates that the advantages do not outweigh the disadvantages that these schemes offer. Affinity Water has already stated that desalination and water reuse plants are out of the question due to the environmental impact: Here are the results of the Strategic Environmental Assessment

(SEA) Affinity Water Technical Report 4.11.

Significant negative effects predicted during construction in WRZ 7:

• SEA Objective 4 (consumption / waste): Options 0309 (Full Desalination Scheme) and 0396 (HYTW RO Desalination) would result in a significant level of new infrastructure which would not reduce material consumption.

• SEA Objective 5 (biodiversity): Options 0301 (BARI Import Increase), 0396 (HYTW RO Desalination) and 0605 (HYWW Effluent Reuse Scheme) propose new infrastructure that could result in the loss of a number of priority habitats

• SEA Objective 6 (landscape): Options identified in the table above as having a moderate negative effect propose new infrastructure within or in close proximity to the Kent Downs AONB.

• SEA Objective 8 (carbon footprint): Options 0909 (BARI Continuation), 0309 (Full Desalination Scheme) and 0605 (HYWW Effluent Reuse Scheme) propose a significant level of new infrastructure that is likely to increase Affinity Water's carbon footprint.

SEA Objective 13 (historic environment): Options 0842 (Adlington to SALT Import Increase), 0309 (Full Desalination Scheme), 0396 (HYTW RO Desalination) and 0605 (HYWW Effluent Reuse Scheme) propose new infrastructure in close proximity to designated heritage assets, potential for a temporary short term negative effect during construction.

• SEA Objective 14 (soil): Option 0309 (Full Desalination Scheme) propose new infrastructure in an area identified as best and most versatile agricultural land

Significant positive effects predicted during construction in WRZ 7:

• None predicted.

Significant negative effects predicted during operation in WRZ 7:

• SEA Objective 8 (carbon footprint): Option 0839 (Dover Docks Reservoir) proposes a significant level of new infrastructure that is likely to increase Affinity Water's carbon footprint during its operation

• SEA Objective 10 (water body status): Options 0396 (HYTW RO Desalination) and 0605 (HYWW Effluent Reuse Scheme) proposes groundwater abstraction that could impact on Romney Marshes groundwater body.

At 20.19 of the draft WRMP19, Natural England commented on desalination plants: '*These potential impacts have not been discussed or assessed. These schemes were not selected for either the preferred or alternative plan in the dWRMP. However, Affinity Water should ensure that the assessments are completed in case the plan options are reviewed'.*

In response, Affinity water said: *'We will provide further detail in terms of potential impacts and effects within the revised dWRMP. Summary of any change to our revised dWRMP to be updated as per Our Response'.*

It is my view that with an ever increasing population exacerbated by a migrant population, whether from within the UK or other parts of the world, desalination plants would become the 'norm'. This flies in the face of central Governments policy for a net environmental gain to all developments.

WATER TRANSFER

The current situation of importing water into the WRZ 7, Dour region is an arrangement between Affinity Water, Southern Water (SW) and South East Water. (SEW) The current licence allows Affinity Water to import 2 megalitres from SEW and .0714 megalitres from SW per day. This is only allowable if SEW and SW have a surplus of water. It stands to reason that during drought conditions, where Affinity Water is suffering a deficit, SEW and SW will also be suffering a water shortage. Water import from neighbouring water companies can not be relied upon to supplement the WRZ 7 region during drought conditions, moreover, given the high level of development in both regions (SEW and SW), any surplus water that was available at present may not be forthcoming in the future.

CLIMATE CHANGE.

The document: 'Preparing for a drier future' includes the opening statement:

'A reliable water supply is usually taken for granted but, despite its reputation for rain, England risks water shortages. Climate change, an increasing population (especially in the drier south and east) and the need to protect the environment bring further challenges. The water supply system is already strained and the pressure will only rise over the coming decades'. The document can be viewed here:

https://www.nic.org.uk/publications/preparing-for-a-drier-future-englands-water-infrastructure-needs/

Climate change is regularly mentioned in the Affinity Water WRMP19 documentwith allowances being made to assessments in their water supply programmes/projections.
The National Infrastructure Commission has predicted that there is a 1 in 4 chance of a serious drought between 2018 and 2050, and that the cost of relying on emergency options such as road and ship tankers to supply potable water to households could be as high as 40 billion pounds.

This prediction was made prior to the ever escalating house building programme in the WRZ7, Dour region of the South East.
With global temperatures rising and water tables lowering, population movement from the equator northward is inevitable; moreover, and in the shorter term, economic migration exacerbates the population explosion in the South East of England, whether it be from London or other countries.

NET ENVIRONMENTAL GAIN

The recent pledge from our Government to improve our environment through their 25 year Environment Plan is encouraging but bewildering as the same Government is supporting, through the 'Expression of Interest' to build a New Town in an area of high water stress.

One of the targets from the Governments Environmental Plan include ‘Clean and Plentiful Water’ which includes reducing the damaging abstraction of water from rivers and groundwater, reaching or exceeding objectives for rivers, lakes, coastal and ground waters that are specially protected, whether for biodiversity or drinking water as per River Basin Management Plans.

It is a matter of record that the Environment Agency recorded an incident of over abstraction by our local Water Company in the Denge area, causing the lowering of water course levels to the detriment of local wildlife.

It is not inconceivable that over abstraction, whether it be purposely carried out or not due to demand, may take place in the future. Needless to say, a desalination plant would be at the opposite end of the spectrum when considering environmental gain.

LITTLE BUCKET FARM.

Little Bucket farm is a well which is used to measure water level in the Holywell Nodular Chalk Formation. This well measures water levels in the Chalk aquifer of Kent.

From a meeting that was convened by the Sellindge & District Residents Association, which included members of Monks Horton Parish, Lympne Parish, Shepway Environment and Community Network, CPRE and a local political party member with Affinity Water in February 2108, it was revealed that during the latter months of 2017, senior members of Affinity Water were extremely anxious as to the levels of Groundwater within the district. By mid December, with very little rainfall, the levels were at an extremely low level.

With ongoing construction work in the area and expanding development, it stands to reason that water levels will probably never return to the heights of 2014 unless we have the wettest Winter on record in the near or distant future.

More information about Groundwater levels can be found here:
https://www.bgs.ac.uk/research/groundwater/datainfo/levels/sites/LittleBucketFarm.html

TO CONCLUDE

The overriding concern in our area is to ensure that a potable water supply is madesecure for our local Residents, both now and in the future. Building resilience in the local water supply is a major concern for Affinity Water as previous documentation has highlighted little or no headroom (spare water capacity). With over 24,000 (as stated by Affinity Water) dwellings planned over the next 19 years and more into the future, it is essential that water security should be placed at the very top of requirements when planning for the future. Any idea that a New Town should be included within any plan over the coming years is, frankly, ridiculous and flies in the face of the Government's Environmental Plan.
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The WRMP19 draft document is an extensive and comprehensive document produced by Affinity Water via stakeholder and customer engagements. The document can be accessed here: https://stakeholder.affinitywater.co.uk/water-resources.aspx

There is no doubt that changes over time, in terms of potable water usage reduction, have been impressive in terms of efficiency and reducing waste, with metering being a single, one off aid to reducing domestic water consumption; but it must be stated that here in the South East our daily usage of water as compared to the rest of the UK is high. The aspirational claims of 90 lpd per person for Otterpool Park, through Albion Water, a New appointment and Variation (NAV) is totally unrealistic. And what of the 14,560 homes in the local plan? Surely it would be just as, or even more environmentally prudent to install RWH or Reuse schemes in those developments.

The assertion at 7.14 in the Infrastructure Delivery Plan that the WRMP19 has accounted for growth across the District is a spurious one. The WRMP19 is still in draft form, due to be published this spring. The claim that potable water can be delivered to Otterpool Park after the initial 1000-1,500 in 2025/6 is absurd.

Even if the upgraded infrastructure is installed, as stated at 7.12 of the Water Cycle Study, and then the resource is depleted, no amount of infrastructure will deliver water anywhere. I will state again that 90% of our water comes from aquifers. If these aquifers are not replenished during winter months, our drinking water will be limited.

This is what it says within the CSR19 Water Cycle Study.

CHAPTER 5. WATER RESOURCES & WASTEWATER TREATMENT

5.1.1 In the context of integrated research of the hydrology of the district, water supply is perhaps the single most pressing concern in the eyes of many people.
Wastewater treatment is critical to human life and the natural environment, but can be planned for over time (notwithstanding budgetary constraints and other practical issues). This process is made easier with the certainty of adopted policy and the knowledge of where housing growth will be directed, and hence it is still critical this report influences the planning policy approach.
5.1.2 Water supply contrasts somewhat, arguably being less an issue of engineering and delivering an infrastructure solution, and more directly sensitive to aggregate levels of development (especially residential) as there is ultimately a finite amount of drinking water available to supply new development.

The claim that Folkestone and Hythe District Council (FHDC) make as to the long term housing and commercial growth of the area, coupled with the resilience being built into the water supply is disingenuous. In my discussions with [redacted], Head of Strategic Developments, [redacted] has repeatedly stated that there is no problem in supplying Otterpool Town. Questioned further, it was revealing that [redacted] grip or understanding of Hydrology or the local water infrastructure was limited. FHDC had over 3 years to produce a water cycle study for the proposed Garden Settlement and the best that they could come up with is purely ‘outine’. Frankly, this isn’t good enough for an area where the local population is teetering on the edge of an environmental catastrophe if the population expands to unsustainable levels. It is documented that, per capita, we have less potable water than Morocco.

I have spent my working life, some 47 years, in the water industry at every level and have recently retired. Based on my experience, working and technical knowledge, I believe my comments to be sound. Given the opportunity, I would like to give evidence at any Judicial review or public inquiry pertaining to the planning application of the proposed garden settlement described as Otterpool Park.

I would respectfully ask any planning inspector to look at the evidence which I have submitted, along with the links shown to realise that our precious resource of water should be taken into consideration at every planning level.

[redacted] Councillor, Vice Chairman, Monks Horton Parish Meeting.