Charing Neighbourhood Plan

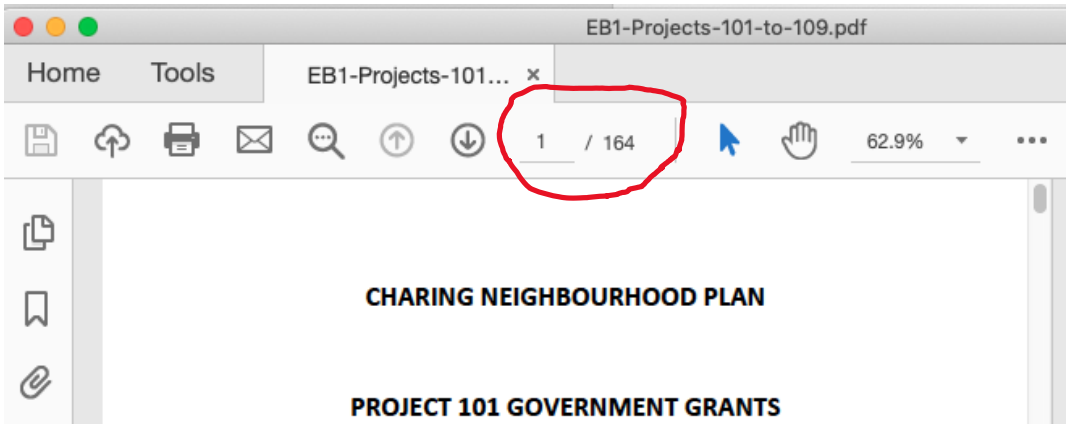
Evidence Book 4

Projects 129 - 131

This is one of eight volumes of evidence gathered to form and support the Neighbourhood Plan.

Explanation of the page numbering in these online documents:

Each volume contains the evidence for particular projects mentioned in the Plan. These online evidence books are identical to the paper copies.
The contents lists each specific evidence document, and it's page number in this 'pdf' file.



This diagram shows the online plan viewed in Adobe Acrobat Reader which looks like this icon:

The page numbers referred to in the contents are the numbers on each page of the Evidence Book, as seen inside the red outline in the picture above.

These page numbers should appear on computer screens, tablets and mobile phones when viewing the Evidence Books, and they should show the page you are viewing as well as the total number of pages in the Evidence Book e.g. Pg 1 of 164.

On different Internet Browsers, such as :
Internet Explorer,
Safari,
Google Chrome etc.
the numbers may appear in slightly different places.

Some of the documents and reports in the Evidence Books have page numbers on the print copy for that specific piece of evidence, these are not the page numbers referred to in the contents of these online documents.

Contents

Gmail Hugh Billot

NP redraft

1 message

Bain Smith <[redacted]> Wed, Jan 9, 2019 at 9:41 AM
To: Hugh Billot
C[redacted]om>,

Dear Hugh,

Yet another 13 paragraphs of objection from DM:- The alleged inaccuracies may derive from different interpretations.

As Dawne has made clear, the three from cpc, " from" is not the same as members, were at the Starter Group meeting as facilitators. These three could not agree a remit on behalf of cpc, nor could they make an agreement as cpc with the Starter Group which was not a corporate body. The cpc decision to appoint TR and myself to represent cpc on CAPP was not made until until cpc meeting 13 Sept 16. As Dawne has also stated, as a parish council we have to remain neutral in the project. There was at this meeting no potential conflict of interests as it was presumed that CAPP would be working with ST, not vice versa, and therefore that ST would be purchasing the site, as agreed in the option agreement. I was, personally, acting as an individual, the others may see it differently.

The question of the rival project, take-over proposal, did not arise until the project team meeting on 2 Nov 16, when the team decided to aim to purchase the entire site, in the full knowledge that this might lose them the ST involvement. I had advised KA 24 Oct 16 that ST had told me in a meeting on 21 Oct 16 that ST do not, and would not, work in partnership, or as contractors, with other groups or organisations. If CAPP were to purchase the entire site, ST would have to walk away. The CAPP minutes of meeting 7 Dec 16 show that CAPP at this date were still assuming that the deadline for ST to take up their option was June 2018, this having been in the Colliers report. At that date it must therefore be assumed that neither Collier nor CAPP had realised this option was renewable. It has been renewed.

In a letter 17 Feb 2017 from ST to KA, cced to cpc, Oliver confirmed that the ST trustees had decided they did not feel it would be sensible to sell CAPP an option at that stage. In an email 15 Sept 17 to cpc as an update, ST confirm they have started on the gatehouse which they expected to take the next 2 years, "After that time we expect to go on to the next phase of repair to the Palace complex under the terms of the option we have over the whole site" In an email 5 Nov 18, to KA, Patrick Streeter wrote "We do not have the power to create any new option"

The legality of seeking donations to purchase the Palace without the permission or agreement of the owner, or disclosing lack of any legal interest, or disclosing the option, is an issue best dealt with by Douglas Gibb, who has the requisite knowledge.

ST do not agree that the letter written by P Streeter of14.04.17 is a letter of understanding and have stated this in a letter to HLF. I asked P Streeter if he had given permission for his letter to be used as a letter of understanding in CPT's HLF application. He replied in an email to me 10 May 18 "I did not give permission for my letter to be so used. I've no objection to its being made public but not to be misinterpreted. The said letter of 14.04.17 did not contain any words to suggest ST would consider transferring their option to CAPP.

There is one interesting new suggestion in para 4, that ST undertakes all the restoration and then sells the completed building/s to CPT. This is a possibility which is worth exploring.

From: Alison Rogers <
Sent: 01 January 2019 17:58
To: Jill Leyland
Cc: Hugh Billot; Corry and Tim Bain-Smith; Dawne Austen; David Bennett; simon south; David Mortlock; Douglas Gibb; Nick Blunt;
Subject: Re: Redraft of Archbishop's Palace section of draft NP

[Quoted text hidden]

David Mortlock Thu, Jan 3, 2019 at 5:51 PM
To: Douglas Gibb

Dear All

Sincere apologies for the delay in replying to the various emails about the NP sent to me in December / January. I have been away for much of the time and then had family commitments and then computer problems over the last few days.

I agree with the comments of Alison and Doug that Jill has covered all the issues relating to the Archbishops Palace in an even handed way. The only point I would suggest be added is the point I made at the meeting on 8th December that reference be made to the remit that was agreed on 1st September 2016 by CPC (Corrie Bain Smith, Jill Leyland, Tylden Reed) and the Charing Palace Project Group when the Group was first set up. It is this remit that CPT has been following in developing proposals and as you will see one of the main deliverables that was agreed is 'Purchasing the Palace Site'. For ease of reference I attach the draft terms of reference dated 11th August 2016 and Notes of the Starter Group meeting attended by CPC on 1st September 2016.

I am bemused by the comments made about the CPT website and the legitimacy of seeking donations to purchase the Palace, because this is one of the key deliverables that is set out in the Terms of Reference that the CPC agreed back in September 2016. The justification for CPT's appeal for donations is that they are raising funds to fulfil their charitable objects - the means to achieving this are summarised on their website so that people understand the many ways in which their donation might be used. There is nothing misleading, inappropriate or illegal about this.

Reference was also made by Corrie Bain Smith in her email of 1st January to the lack of details given at the CPC meeting on 13th November on the CPT proposals. The main aim of the work that has been completed recently was to assess the viability of the project and to provide a scoping report for the next stage. The main stages for the whole project are:

Stage 1 - CONCEPT & VIABILITY (Refining the initial concept and establishing what is viable) – This is the stage that has now been reached

Stage 2 - DEVELOPMENT (Employing professionals to develop the concept into more detailed plans – see below)

Stage 3 - DELIVERY (Actually carrying out the work including detailed costing, construction and post completion)

As was said at that meeting the further detail would be provided at the next stage (the Development Stage) when the following would be produced

- Structural surveys

- Mechanical &Electrical Surveys
- QS
- Architectural Drawings
- Conservation Plan
- Management &Maintenance Plan
- Activity Plan
- Business Plan
- Interpretation Plan
- Funds Identified
- Costs Identified

This stage by stage approach is a well-trod path to achieving successful outcomes for heritage projects and securing grants from key funders like Heritage Lottery. The process is rigorous and that is why, once Heritage Lottery Funding is secured, it is then easier to attract funding from other Heritage Grant providers.

For information – Marianne and I joined the NP Steering Committee when it was first set-up and have taken an active part in the work of the Steering Group since then.

Kind regards

David

[Quoted text hidden]

[Quoted text hidden]

2 attachments

Notes - Starter Group (2016).pdf
1062K

Terms of Reference.docx
20K

Gmail Hugh Billo

draft AP section NP

3 messages

Bain Smith <
To: Hugh Billot

Tue, Jan 1, 2019 at 4:54 PM

Dear Hugh,

At our Dec 8th meeting, Jill suggested she could draft some amendments to the section on the AP. These were received c. 6.30 pm on New Year's Eve. As comments have been requested by 2 Jan, I have not had time to clarify certain matters nor dig out references, as I would normally do.

As I understand it, the NP steering group is separate from cpc, and you are the Chairman. I am not clear whether Jill is responding as an ambassador for CPT, or as a member of the SG. Similarly, I am not clear as to whether members and associates of CPT are there as members of the SG, or members of CPT, so that, when they refer to "we" which "we" is intended. Members of cpc who are also members of the SG have previously agreed to remain neutral on the issues of the AP.

Charing Palace is, as it has always been, a private property. It is currently owned by Mrs Ansell. She began negotiations to ensure its conservation prior to 2001, when TBPT published their Scoping Report. In 2007 ST had their first meeting at the Palace with Alex McLaren of TBP to investigate taking over the project. In June 2014 ST bought from Mrs Ansell the south range together with a sole renewable option to buy the rest of the site. ST confirm in their 2015 on-line statement re 2 Palace Cottages that they intended to take up that option.

In 2016 HE and ABC commissioned the Drury Report. This proposed various options for the Palace, These options are not prescriptive, and were not intended as rigid blueprints, "this is how it could work". It is likely in hindsight that Colliers were not aware of the details of the 2014 agreement, which pre-empted the report. The term "community hub" was not defined. The Drury Report conclusions are advisory, not mandatory. It does not convey any legal rights or a retrospective right of pre-emption to any third party.

CPT were on 13 Nov unable to provide cpc with any evidence to define their project. It appears now to be the Great Hall plus other proposed facilities, rather than the entire remaining site. They were unable to supply even a sketch plan of where the facilities might be located. They have no drawings or plans further than those in the Drury Report to indicate how the buildings and structures might be restored or conserved. They were unable to supply either hard or digital copies of the reports they quote. They were unclear on any pedestrian access through the Gatehouse or churchyard and had no paperwork to show any agreements that this would be achievable. They could not say what evidence HLF would require to demonstrate a legal interest in the Palace. Both Mrs Ansell and ST submitted statements saying she would not sell her Palace to CPT and ST stating they intend to take up their option and do not see any reason to sell it or any part of the site to CPT.

It is questionable whether the NP could or should be dictating what a private owner should do with her property, particularly when she has already made a binding agreement with ST. The NP is backed up with meticulous research and evidence, Hugh's 5 tomes. We cannot currently produced any written evidence to validate the CPT project. It is therefore difficult to see how the NP could, as you put it, market the CPT project.

On 13 Nov, I asked the question which has concerned, and still concerns, many. "For over a year, you have on your website been asking on your website for donations to purchase the Palace, when you do not own the Palace, you do not have a legal interest in it, and you do not have the agreement and permission of the owner to use her property or its name to do so. Could you please explain how this is legally justifiable". They could not explain, but said, quoting Jill to Anita 15 Nov, "They are not fund raising for acquisition since this would be premature". However, they are on their website still asking for donations to purchase the Palace, and the on-line Charity Commission website quotes, under recently registered charity "Charing Palace Trust", aims and activities, "... we are fund raising to buy the palace complex, restore and revive it..." etc. etc. until this is resolved, along with other issues, it would be injudicious for the NP to be marketing the CPT project.

Jill had intended to make as few changes as possible, and it would be wise to stick to this intent. It is not necessary to include large selective chunks of the Drury Report. It would be better to omit this entire section. A possible Plan B could be to quote the summary of the Conservation Statement, and then just give the reference for the Drury Report. In the section on Developments, these cannot be substantiated by any evidence, so the first two paragraphs should be omitted unless such evidence is produced in full, not just quotations

Policy E3, first is fine, second not, we cannot put this in as now it would be seen as supporting the CPT rival project. Those who answered the questionnaire etc were largely not aware that supporting community use/hub would be taken as supporting CPT against ST. this proposal should be omitted.

The Recommendation is fine.

It was agreed at the meeting that, as Hugh said, any further additions to the draft would have to be approved and agreed by Mrs Ansell. The Palace is her private property. ST, Oliver and Paddy, should also be given a chance to review it to ensure their views are correctly reported.

Finally, HM the Queen in her wisdom asked that we respect the views of others. We should respect the rights and views of Mrs Ansell. We might even extend that privilege to me. Happy New Year, everyone,

Corry

PS, I think Sarah Ceawley should be included in this correspondence, she had intended to be at the meeting. Also cannot forward to Alison or Douglas, please can you.

Hugh Billot <hugl Tue, Jan 1, 2019 at 5:16 PM
To: Alison Rogers , Douglas Gibb

As requested by Corry I am forwarding her response on possible adjustments to section 9.5, The Archbishop's Palace.
Regards
Hugh
[Quoted text hidden]

Jill Leyland <" Tue, Jan 1, 2019 at 11:47 PM
To: Bain Smith >, Alison Rogers , Douglas Gibb

ett

Dear Corry

Although you addressed your comments to Hugh I feel I should reply to you to explain why I wrote what I did.

I am including Alison and Doug in my reply since you did not have their emails and they can see your comments on scrolling down. (Thank you Alison for your own email.)

I am puzzled as to why you think I might be responding "as an ambassador for CPT". I am responding as a member of the steering group. It was felt that the section should be redrafted to take account of points made in the meeting and elsewhere (including the evidence that suggests a majority of parishioners would prefer some form of community use). I offered to do this and have tried to do this in as even handed way as possible by sticking to facts.

It is possible that I have written too much about the Drury Report. Hugh felt it was too long and one suggestion would be to remove the paragraphs about the conservation statement and condition surveys and go straight to the options. The first option also need not be mentioned.

It is certainly true that the Drury recommendations were advisory not mandatory and we could tweak the working a little. But I think it is important to say that they were both seen as acceptable from a conservation standpoint. And it is also fair to point out that CPT was formed as a result of the options and the community response to them - ie this was not something that happened out of the blue.

In Developments, I believe both the first two paragraphs are necessary. We can substantiate the first and I can quote eg relevant answers from the questionnaire if people wish. The second is simply intended to show where CPT has got to and their plans just as I have included where ST have got to and their plans..

As to the policy we agreed on December 8th that a second bullet to reflect the community's majority wishes but with caveats was needed and I have attempted to draft something I believe reflected the views of the meeting. Obviously if anyone can suggest better wording that is fine. The wording mentions community use - it does not refer specifically to CPT and I do not think it "markets" their project.

We have of course to respect the fact that Brenda Ansell is the legal owner. But the Palace is a building of both local and national importance and as such there is legitimate public interest in it. The point of a Neighbourhood Plan is to reflect, in so far as we can, the wishes of the community. We are not disputing in any way her right to sell to Spitalfields or the fact that she does not wish to sell to CPT. What Spitalfields decide to do once they have taken ownership will be up to them but it is right that we indicate what the community appears to prefer.

Well, I have tried to reflect the views of the meeting of December 8th and it is up to all of those present to say whether I have done so adequately or whether changes are needed. Others, including members of the Parish Council who were unable to attend, may well have views on what should be said but I would suggest taking this one step at a time and simply trying for the moment to find words that reflect the discussion we had on December 8th.

Despite the limited time I do hope others who were present will be able to comment.

Best wishes

Jill

[Quoted text hidden]

--
Jill Leyland

Tel +
Mob

CHARING PALACE TRUST
RESTORE REVIVE REVITALISE

UPDATE – JANUARY 2019

LATEST NEWS ON OUR WORK TO CREATE A *COMMUNITY HUB* IN THE PALACE

In our October Update we told of how the work sponsored by the Heritage Lottery and Architectural Heritage Funds to explore and develop plans for how a new *Community Hub and Visitor Centre* might be created in Charing's former Archbishop's Palace complex was progressing.

At that time we were able to tell you that Fourth Street Consulting's *Viability Report* had been completed and that it showed that concentration on one of the complex's most 'at risk' structures, the former Great Hall, would be the most effective way to bring Charing Palace Trust's (CPT) vision about and was viable.

Glevum Consulting's sister report, the *Scoping Study,* detailing how the project envisaged might best be brought about, was finalised in November.

These two detailed documents of 32 and 60 pages respectively were created with three purposes:

1. To confirm the viability and feasibility of the *Community Hub* concept and further develop the route map for its achievement
2. To provide Charing Palace Trust with clear proposals that we could explore with Spitalfields Trust (ST). (ST holds an exclusive option to purchase the Archbishop's Palace complex. CPT must engage with them in order to obtain a form of legal interest in the Great Hall, which is essential for the project to be able to attract the major funding required to proceed)

   and

3. To provide a blueprint with which CPT can make a bid to the Heritage Lottery Fund for funding to develop the detailed technical specifications and a comprehensive business plan for the project.

Both studies will shortly be made available on our website so that you can assess their detail for yourselves.

Copies of these reports, proposals for how we envisage our two organisations might cooperate to save the Palace from further decay, together with a request that we be allowed to present our case personally to ST's Trustees was made at the beginning of this month.

Two weeks ago we received the following response:

> *"Our Trustees discussed the reports last night. We are not able to let you have an interest in our option as this would distract from the settled plans that we have for the site."*

We are particularly disappointed at the perfunctory nature of ST's rejection of our approach without giving us the opportunity of presenting our proposals to their Trustees personally, given:

1. Up until the point of their dismissal of our proposal, ST has consistently professed willingness to consider working with us should we develop clear and credible plans.
2. The palace project team, guided by two highly respected expert consultancies in the heritage field, has committed thousands of hours to the palace project in the development of these proposals to ensure that they are both robust and feasible.

   Throughout, we have precisely followed the 'route map' set out in the *Options Appraisal Study* sponsored by Historic England (HE) and Ashford Borough Council (ABC) published in 2017 that explored how best the Archbishop's Palace might be given a secure and sustainable future.
3. The strong support given by Charing residents for the creation of a *Community Hub* within the Palace complex as outlined in the *Options Appraisal* and validated by the responses of the majority of residents to the Neighbourhood Plan development questionnaire undertaken in May 2017, and
4. ST's response would appear to run counter to their avowed philosophy to *"save and repair buildings that are at risk of demolition or destruction and that are not going to be tackled by other groups and individuals."* [Our underlining for emphasis.]

Putting our disappointment at this initial 'knock back' aside, our Trustees are resolved that the quest to pursue a resolution to the Palace's plight in conjunction with Spitalfields Trust should go on.

We will not allow this, the third and should we fail most likely final, attempt to save an iconic part of this unique example of England's heritage, to fail without a fight.

We are already contacting the key players, particularly HE and ABC, to see if we can garner more active support for our proposals from them since we believe them to offer:

1. A more timely resolution to the Great Hall's predicament than what we understand to be that currently offered by ST
2. A more obvious public benefit and value to the Charing and wider Ashford communities, and
3. Greater adherence to Ashford Borough Council's recently published *Heritage Strategy*

CHARING PALACE TRUST
RESTORE REVIVE REVITALISE

EDUCATION

While our work on progressing the Community Hub has taken centre stage our efforts to make the Palace's heritage and history better known have continued.

In our October Update we told of how we had partnered with the Kent Downs AONB Unit in their 40th Anniversary celebrations that peaked in the last week of September with a series of events in the *Wye Pilgrimage Festival*.

Our final event of 2018, again in conjunction with the Kent Downs AONB's Anniversary celebrations, was *Pilgrimage – Music and Words* held at St Peter and St Paul Church in Charing on Saturday 1st December at which an audience of 115 people were well entertained by 12 readings from Charing residents and the music and song of CL Scholars and the Pilgrim Pipers on the theme of pilgrimage – both religious and secular – through the ages. The event was free to enter but many of those attending made generous donations, which the Trust shared equally with the Church, in recognition of its kind hosting of the event.

We'd like to thank everyone whose participation contributed so much to the event's success and in particular, Revd Canon Sheila Cox, Revd Jack Bateson and Kevin Moon of St Peter and St Paul Church for hosting the event and Trust volunteers Hilary Adams and Stephen Prickett for its organisation.

Meanwhile, our participation in the Wye Pilgrimage Festival's centrepiece event held at St Gregory and St Martin Church on Saturday 29th September led to a group from Wye Church making a reciprocal 'mini-pilgrimage' to Charing and an invitation to our Trust give a talk to the Wye Historical Society.

On 9th January, Keith Adams spoke to an audience of some 50 Society members emphasising the links that Charing has with Wye through Sir George Wheler who bought the Palace from the Honywood family in 1692 having lived there with his parents throughout his formative years and who through family connections was instrumental in establishing the Lady Joanna Thornhill School in Wye.

On 23rd January, Bob Cameron who leads our Education Working Group gave a talk to the members of the Lenham Heritage Society telling of key episodes from the Palace's 1200-year history and how his involvement in the Palace Project has kindled his interest in local history.

LOOKING FORWARD WITH OUR EDUCATION PROGRAMME

Our activities surrounding local connections with pilgrimage will continue into 2019.

In the last week of April we will be working with Charing School to provide Year 5 students with lessons and activities themed on pilgrimage, including a pilgrimage from the school to St Peter and St Paul Church.

We are also in discussion with the North Downs AONB Unit who have invited our Trust to participate in a visit by 50 delegates drawn from across Europe who

are coming to Kent to discuss how the promotion of pilgrimage can boost tourism and local economies.

Alongside these pilgrimage themed activities we will be working on developing another series of events – provisionally called Charing Beneath The Surface – in which we will be seeking to show the significance of how Charing's location on the spring line beneath the North Downs has led to its development and will be working with Canterbury Archaeological Trust to promote an interest in archaeology as a means to understanding our past.

2019 promises to be another full, exciting and challenging year. The Trust thanks you all for your continuing support.

Gmail

Hugh Billot

Redraft of Archbishop's Palace section of draft NP

5 messages

Jill Leyland <jill.leylar >

Mon, Dec 31, 2018 at 6:32 PM

Dear all

I hope I have included everyone who came to the December 8th meeting but please let me know if I have missed anyone out.

I agreed at that meeting to redraft the section on the Archbishop's Palace to reflect concerns raised. So the first thing for me to do is to apologise for taking so long and having therefore to ask you for comments urgently. Apart from this being crowded out by other things, I found it difficult to address given the senstivities until I had a reasonably quiet time without the usual day to day interruptions.

I had intended to make as few changes as possible. However on reflection it seemed to me essential to include references to the "Drury Report". For several reasons:

- In part as it was the report's findings which led to the establishment of CPT.
- But also since the report was commissioned by Historic England and ABC, two organisations whose views will be decisive in what happens to the Palace in the future and can be expected to give it great weight in any decisions
- The report also sets out the heritage importance of the Palace which I think needs to be included in our NP - not every village has a heritage asset of this importance!
- And finally as I think the report's conclusions which could be paraphrased as "Give the community option a chance but if it doesn't come up with a viable project in a reasonable time frame then revert to Spitalfields" probably gives us the steer for the second bullet in the policy which we were finding difficult in the meeting.

Otherwise I have tried to keep the draft as factual as possible.

By taking so long I have probably messed up Hugh's timetable (sorry Hugh) so can I suggest the following procedure to minimise the damage. I have sent this just to those at the meeting as you will be aware of the discussion. If you can comment asap (by Jan 2nd/3rd if possible) then Hugh can continue with the plan of sending the draft NP to the Planning Consultant.

It was suggested at the meeting that the owner, Mrs Ansell, should be given the opportunity to comment on any new draft. In addition I think both Spitalfields (Patrick Streeter and Oliver) and CPT (David M will obviously comment as an individual) should also be given the chance to review to ensure that their views are correctly reported. And some other members of the Parish Council or Steering Committee may wish to comment as well. But all this (and any further thoughts from us) could be done while the Planning consultant is reviewing the draft.

I hope that is all clear!

I attach the Drury Report summary in case anyone wishes to refer.

Best wishes and Happy New Year

Jill

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Jill Leyland

2 attachments

Draft AP section.docx
20K

CHARING PALACE Strategic Report Final.pdf
1377K

Jill Leyland Mon, Dec 31, 2018 at 6:35 PM

Dear all

I am resending the below as I got Alan's address wrong.

Also can I suggest that anyone commenting does "reply all" ?

Thanks

Jill
[Quoted text hidden]

2 attachments

CHARING PALACE Strategic Report Final.pdf
1377K

Draft AP section.docx
20K

Alison Rogers Tue, Jan 1, 2019 at 5:58 PM
To: Jill Leyland

Good evening,

Thank you for the redraft Jill.
I think you have done very well to accommodate the sensitivities of this issue.
I agree that references to the "Drury Report" are important to be included to enable any parishioners who have not read it to be aware of fundamental issues surrounding the Archbishop's Palace.

Kind regards,

Alison
[Quoted text hidden]

Douglas Gibb Thu, Jan 3, 2019 at 8:52 AM
To: Alison Rogers

Thank you all - I have nothing to add and feel all the issues have been covered

Doug

Archbishops Palace

Market Place

Charing

13.11.2018

Dear Parish Council

It is unfortunate that I am unable to attend your meeting, I understand from your agenda posted outside the Library that the Trust group are attending your meeting tonight.

For some of you who might not know I said in the Parish Magazine some months ago, areas of the Palace are undergoing renovation by The Spitalfields Trust, and I said that I had no plans to sell any options to the Trust Group, now or in the future.

I am still of the same mind set I was in when all this started, the Spitalfields trust has the option on my palace and its buildings, there is no need for any interference from the trust group, they assume to know my palace better than me. I am still annoyed to see photographs advertising my Land and my belongings still on the Trusts Facebook page, even though I have asked for these to be removed.

The Archbishops Palace is my land and my property, no one has the right to tell me what to do with it, I would appreciate going forward if people listened to that. As this would save a lot of distress in the long-term for me and everyone else!

Yours sincerely

Brenda Ansell

THE SPITALFIELDS TRUST

18 Folgate Street, London E1 6BX

11 November 2018

Charing Parish Council

Dear Ms. Austen

The Archbishop's Palace complex, Charing

We have been asked to summarise our plans for this site, but first we feel it appropriate to set out some of our background. The Spitalfields Historic Buildings Trust is a non-profit registered charity, set up in 1976 under then new special legislation which allows us to buy and sell historic real estate with certain privileges as to covenants and with grants governing future use that are, unlike normal legal covenants, enforceable in perpetuity even when we do not own adjoining property. Any surplus proceeds (a rare occurrence, but it can happen) are reinvested in a rolling fund for the benefit of future activities.

The Trust employs its own highly skilled core workforce. We are thus able to tackle cases flexibly and, where necessary, expeditiously. Our overheads and running costs are among the lowest of any charity of similar size. For these and other reasons we have been able to build up over the past 40 years substantial assets. Indeed we now have to our credit a catalogue of successful multi-award winning restorations numbering some 80, all listed Grades II, II* or I.

Many of our early projects were in East London where we originated, but in more recent years we have ventured as far afield as Monmouthshire. Recently we have spent a particularly energetic period in North Kent, centred on Rochester and the Isle of Sheppey.

In short, of the many historic buildings trusts now operating in England and Wales, we are the oldest established and by far the most successful. In Charing, our plan is to proceed as we have always done, acquiring the available buildings in a dilapidated state, repairing them appropriately for residential use and selling them, with covenants, to new owners who will live in them as responsible members of the community and, in particular, take responsibility for future maintence. Having entered into a binding option agreement with the existing owner to cover the remainder of the site, we have to date acquired, restored and sold on No. 2 Palace Farm Cottages (formally known as the WI Cottage) and are in the final stages of repair in the adjoining Prior's Lodging, or Gatehouse. The first of these was sold before completion, and the second is already at that stage.

The next step for us is to tackle an urgent project in the Welsh Borders, the freehold of which is in hand, before returning to Charing to exercise the option, take possession of the remainder of the site and start work on the two biggest challenges, the main house and the Great Hall. Concerning both of these we are already in discussions with potential owner-occupiers. During the interval mentioned above, our professional team will have finalised detailed surveys and negotiated Planning, Listed Building and Ancient Monument consents so the work can begin forthwith.

At present, we see no reason to deviate from this carefully orchestrated plan. However, we are always open to outside suggestions, particularly from the community in which a project is located. Our findings to date have always stumbled against questions of capital cost and, in the absence of any worthwhile security or return, financial sustainability. And to be quite clear, we will not be giving up our option or selling any part of the site until its full repair is assured.

With all good wishes

Yours sincerely

Oliver Leigh-Wood

(on behalf of the Trust)

CHARING PALACE TRUST
RESTORE · REVIVE · REVITALISE

Briefing Note for Charing Parish Council - November 2018

1. Purpose

This note has been prepared to:

- Provide Charing Parish Council (CPC) with information on the current status of the restoration aspects of the Charing Palace Project - that is the restoration and adaptation of the former Great Hall for use by the public as a Community Hub and Visitor Centre
- Summarise the key elements of the Viability Report (July 2018) and Project Scoping Document (September 2018). Full details of the project programme, costs, risks, outcomes and project management structure are contained in these documents

2. Background

During 2016 and 2017 two community presentations were held and an 'Options Appraisal' study report produced (commissioned by Historic England and Ashford Borough Council) for the future of Charing's Archbishop's Palace. In June 2017 the Charing Palace Trust (CPT) was established primarily to facilitate the restoration of Charing's Palace for the community in accordance with the outcomes of the 'Options Appraisal' study. Early 2018 a grant of £10k from the Heritage Lottery Fund (HLF) and £5k from the Architectural Heritage Fund (AHF) was received to undertake a viability study to test the long-term sustainability of the complex and to define the scope of work necessary to move the project forward. Two experienced heritage project consultants were appointed in March 2018. Fourth Street undertook the viability study and Glevum Consulting worked with the trustees to develop a Project Scoping Document. Details of the two consultants are in Appendix 1.

The Viability and Scoping studies are now complete. The outcomes have been discussed at productive meetings with HE and ABC. A meeting is now being arranged with the Spitalfields Trust (ST) who have an option to purchase the site from the owner, Mrs Ansell.

3. Scope of Study

The scope was initially intended to embrace the whole Palace complex as this was thought to be the only way sufficient income could be generated to sustain the site and CPT wanted to keep the site as an entity. However, this was subsequently amended to focus on the Great Hall (the barn) after considering: i) the consultants advice that CPT is unlikely to be able to obtain the large grant required for the whole site in the light of recent reductions in HLF funding (ii) at a meeting with the chair of ST it was acknowledged that the restoration of the Great Hall would be a challenge for ST and CPT was asked how it would use it, and (iii) the Great Hall is the most 'at risk' structure on the site, is of significant importance and more appropriate for adaptation for public access and use. This constitutes Phase 1 of the project leaving the potential for incorporating the Archbishop's Apartments into a Phase 2, if that opportunity arises in the future.

The study was also to produce a Project Scoping Document to include sufficient detail to facilitate an application for HLF Round 1 Development Grant.

4. Financial Viability

The viability study found that sufficient funds, capital and revenue, could be generated to restore, adapt and sustain the Great Hall with adjoining land as a Community Hub and Visitor Centre. This to include:

- The village library (incorporating a village archive and an interpretation centre), increased capacity village hall, Café/Restaurant/Bar, function space, boardroom style meeting rooms and short-term overnight accommodation.
- Adjoining land for a themed garden with a children's play area, green car parking, and up-market camping (glamping).

This usage would allow a high level of public access. Public engagement and use of the centre would be maintained through a planned programme of learning and participatory events and activities. Internal space would be flexible to adapt to changing needs and incorporate latest communications technology and energy efficient services to both maximise income and reduce overheads.

5. Costs

£4.9m (Inc. VAT) to deliver the full scope of conservation, fit out and five-year activity programme. This does not include the cost of acquisition.

6. Capital Funding

Potential contributions from local authorities for restoration and conversion work: (i) £800k Capital Receipts from sale of the KCC Library and the Parish Hall and ii) £250k Ashford Borough Section s106 development contributions. Further funding: i) £2.3m HLF major grant and ii) £1.52m from other grant providers.

Informal discussions with both KCC and ABC have indicated their willingness, in principle, to participate: KCC because their wish to reduce operating costs and ABC because of the significance of the Palace in the Ashford area and their Heritage Strategy.

On-site enabling development, which could generate circa £331k capital contribution, is not included at this time as it is unlikely that any such contribution would become available until a later stage in the project.

Reclaiming VAT, if permissible, could release circa £700,000 in match funding towards the capital project. This is to be investigated by CPT.

7. Revenue

Projected net revenue over five years is £73k.

After considering income and expenditure for the key income generating functions (café/restaurant; venue hire; programmed activities; community membership; retail) initial cost projections over a five-year operating period indicated a net deficit of £135k (approx. £27k per year).

An option to reduce this deficit by incorporating the Archbishop's Apartments converted to provide up-market non-serviced short-break holiday lets was considered. Projections indicated this would generate a surplus of £64k over five years (approx. £12k per year). However, this option will not be pursued as it is unlikely to obtain the additional £1.4m (excluding VAT, building cost inflation and delivery costs) capital funding required.

Mitigation of the £27k annual deficit can be achieved: i) by reducing operating costs (use of interns or volunteers rather than some employed staff and use of grant funding in the early years) and ii) by increasing income (short-term overnight accommodation; area for up-market

camping; and on-going fundraising for specific programme costs e.g. education). This leads to the projected operating surplus (£73k over five years) and is the favoured approach at this time.

8. **Management and Governance**
   - CPT will employ a full time manager to administer third party contracts: i.e. café/restaurant, extended library in conjunction with KCC, land and building maintenance, and the co-ordination of volunteers and interns
   - Working with a range of partners, the CPT will directly curate the programme of events and activities running throughout the year to attract visitors to the centre, providing income from its services, and to meet its charitable objectives
   - At some stage the CPT's structure will be revisited to enable trading - legal advice will be sought at the appropriate time

9. **The Next Stage**

The substantial work undertaken by the consultants has given CPT a firm foundation from which to move forward.

The next stage is to apply to the HLF for a Development Grant (£315K). This will enable the Trust to commission professionals to undertake the necessary in-depth work to obtain accurate costs for restoration/adaptation work and produce appropriate drawings and a detailed business plan. The grant will pay for architects, surveyors, conservationists, project manager, fundraisers and administrators. However, before this can happen discussions must now be held with interested parties to resolve outstanding issues: i) obtaining a legal interest in the Great Hall and ii) acquisition. Without a legal interest in The Great Hall it will not be possible to obtain the Development Grant. The future of the Great Hall and the project will rest on the outcome of these crucial discussions and the trust obtaining a formal agreement.

10. **Timetable (Overview)**
   - December 2018 – obtain a legal interest in buildings and grounds
     Following discussions with HE and ABC a meeting will be sought with the trustees of ST to negotiate a legal interest
   - April 2019 - submit HLF Round 1 Application for project development costs: £315k
   - June 2020 - submit HLF Round 2 Application
   - December 2022 – target for completion of restoration and adaptation work

11. **Conclusions**
   - The restoration and adaptation of the dilapidated Great Hall for use by the public as a 'Community Hub and Visitor Centre' is potentially viable
   - To achieve viability land adjacent to the Great Hall would be required for: (i) green car parking, (ii) a themed garden and children's play area, (iii) up-market camping
   - A small area of land may be required for enabling development as a contribution towards capital costs
   - CPT has demonstrated its credibility by arriving at the current stage in just over 12 months from registering the charity and 24 months from initiation of the community initiative. Throughout this period the project team have followed the road-map proposed at the Drury McPherson Partnership public presentations in 2016
   - Productive meetings have been held with Historic England and Ashford Borough Council. These were to confirm their support prior to meeting Spitalfields Trust to resolve two crucial issues: i) obtaining a legal interest in the Great Hall and ii) acquisition.

CHARING PALACE TRUST
RESTORE · REVIVE · REVITALISE

Appendix 1 – Consultants' Details

CPT are working with Simon Hawkins, Director of Glevum Consulting, who since 2002 have helped secure £70M of HLF and private donor funding, and directly helped deliver £40M of capital projects and activity plans. He comes highly recommended by the Sheerness Dockyard Trust and Tessa Hilder of the Architectural Heritage Fund. The portfolio of projects with which they have been involved includes:

- The Sheerness Dockyard Church – Budget £8m – Glevum are project managers and have successfully secured £4.75m of HLF funding
- Turner's House – Budget £2.3m - Glevum project managed the Round 1 and Round 2 development periods leading to a successful Round 2 HLF award in September 2014 and are now project managing the delivery.
- Orleans House Gallery – Budget £3.5m - Glevum project managed the Round 1 and Round 2 development, secured £1.8m of HLF grant and project managed the delivery.

Fourth Street have worked on a wide range of projects with developers, operators, funders and stakeholders across all stages of a project, from the creation of new concepts and visions, through feasibility and funding, to delivery and operations. Jim Roberts of Fourth Street has successfully worked with Glevum Consulting on a range of heritage projects. David Geddes, who carried out the original market / financial analysis for Colliers International that was commissioned by HE/ABC is now a member of the Fourth Street team

More details about the Consultants and their involvement with heritage projects can be found at http://fourth-street.com and https://glevumconsulting.co.uk/

Jill Quinn

Neighbourhood Plan – redraft of section 9.5 on Archishop's Palace

First two paras (covering history) as in original

The Archbishop's Palace now features prominently, with much of it graded Priority Category A, on Historic England's Heritage at Risk Register.

The Drury McPherson (and others) Strategic Review

In 2014 Spitalfields Trust (ST), a Building Preservation Trust, bought No. 2 Palace Cottages and the Gatehouse from the owner and acquired an option to purchase the rest of the site. No. 2 Palace Cottages has been restored and sold for residential use while restoration of the Gatehouse is currently (December 2018) nearing completion.

In January 2016 Historic England and Ashford Borough Council commissioned the Drury McPherson Partnership (DMP) in conjunction with other organisations to undertake a three part study to inform decisions about the Palace's future. This consisted of: a Conservation Statement to provide an overview of its significance and importance and set strategic policies for its conservation; a Buildings Condition survey with an estimate of repairs cost; and an Options Appraisal for future use.

The Conservation Statement highlighted the importance of the Palace declaring it of "*exceptional significance*:

- As a surviving medieval episcopal palace whose form and plan (including the unbuilt areas of the precinct) and townscape and landscape contexts remain legible despite attrition since the 18th century
- For its archaeological potential to take the story of the palace back from the late 13th century visible remains to at least the eighth century for the site and much earlier origins of the manor"

And of "*considerable significance*:

- For the fragmentary surviving medieval and early modern buildings, to 1600
- For the early 18th century structures built within and around them
- For its historical associations with successive archbishops of Canterbury
- For the picturesque quality of the site, arising from accretive change using a largely sympathetic palette of natural materials, and ruinous elements colonised by plants and domestic fowl"

The Statement also set out policies for sustaining the significance of the Palace, notably:

> *Conservation and repair of the palace and its setting should as far as possible preserve all of the fabric, features and spaces identified as being of exceptional or considerable heritage significance, and avoid harm to that setting.*

It concluded "that the way in which Charing illustrates the form and character of an episcopal residence that had reached its zenith by around the end of the 14th century, and was seemingly subject to little major alteration thereafter, is a key aspect of its *exceptional* significance."

The Condition survey (which did not include the elements in the south range owned at that time by ST) found that inherent structural problems, particularly in the former Great Hall (Barn), had

progressed to the point of structural failure with a number of issues needing to be addressed urgently to achieve structural stability and make the complex wind and weather tight.

The Options Report, after considering and eliminating a range of possibilities, considered a shortlist in detail:

Option 1: the sale of the whole complex (with the exception of the buildings already undergoing restoration by ST) to a single "white knight" purchaser;

Option 2: a "cathedral close" option of converting the buildings into a number of houses;

Option 3: A combination of a "community hub" (the Hall/Barn and possibly other adjoining elements) with the rest of the complex converted to houses.

Option 1 was ruled out due to the low probability of a single purchaser appearing. Both options 2 and 3, if appropriately carried out, were considered potentially acceptable from a conservation standpoint.

Two public meetings held while the study was progressing found public support for both these options with a preference for Option 3. A group of residents came forward to investigate further the community hub possibility. The final DMP report, published in March 2017, said:

> "It is therefore desirable that the Spitalfields Trust maintains its option to purchase, and if current community initiatives move forward to the point of credibility, perhaps grant a nascent trust a (say) two year option on the barn and associated land. If at that stage they have a scheme and a round 1 pass from the Heritage Lottery Fund (or a large capital sum through other means), Spitalfields would be obliged to offer a building agreement such that a long lease (or even freehold) is transferred once the building is complete in carcass (structure and external envelope). Meanwhile Spitalfields could progress the gatehouse and buildings on the west side of the site, as well as taking general care of the whole. If the community trust fails to reach its milestone, their option expires and Option 2 is built out across the site as a whole."

Developments since the DMP Report

Workshops carried out during preparation of the Neighbourhood Plan and results from the Neighbourhood Plan questionnaire also indicated majority community support for some form of community hub/access in the complex.

The group of residents investigating the possibility of community use established the Charing Palace Trust (CPT) with charitable status in June 2017. They obtained grants totalling £15,000 in early 2018 from the Heritage Lottery Fund and the Architectural Heritage Fund to undertake initial viability and scoping studies. These studies were completed in early Autumn. While CPT had initially considered the possibility of purchasing the entire complex (minus the part already owned by ST) the consultants' advice and other considerations has now led it to focus on the Hall/Barn and some adjacent land with a possible extension at a later stage to the farmhouse (formerly the Archbishop's residence). CPT now hopes to obtain a £315,000 Development Grant from the Heritage Lottery Fund to finance in-depth work for restoration proposals and costs and a detailed business plan for future

running. However it needs to obtain a legal interest in that part of the Palace before it can apply for the Grant.

The owner of the Palace has made it very clear that she intends to maintain the option granted to Spitalfields Trust and has no intention of selling any part of it to CPT.

ST's current plan once the Gatehouse is finalised, is to move to a project in the Welsh Borders. Once this is completed they intend to move back to Charing exercise their option and start work to restore the Great Hall and Farmhouse for residential use, having undertaken the necessary planning work in the meantime. ST has stated that they are open to outside suggestions particularly from the community but they would not give up their option or sell any part of the site unless its full repair is assured.

Policy E3 THE ARCHISHOP'S PALACE

- Proposals for ongoing restoration will be supported
- Proposals which include some form of community use will be preferred to those for full residential use provided they give acceptable evidence of future financial viability and do not involve a delay in restoration which would risk further deterioration

RECOMMENDATION

- ST AND CPT FIND WAYS OF WORKING IN HARMONY WHICH WILL ENABLE BOTH THEIR OBJECTIVES TO BE ACHIEVED TO SATISFY THE CURRENT OWNER AND LEAD TO FULL RESTORATION

References:

Charing Palace, Charing, Kent: Strategic Review of Options, Drury McPherson Partnership and Others, March 2017

Briefing Note for the Parish Council, Charing Palace Trust, November 2018

Letters to the Parish Council from Mrs Brenda Ansell and Spitalfields Trust, November 2018

Gmail Hugh Billot

Palace

3 messages

Hugh Billot
To: Tim & Corrie Bain-Smith

Tue, Dec 4, 2018 at 12:36 PM

Corry
I say on page 110 of the NP Draft 2 that ST has backing of HE. CPT challenge that. Do we have anything anywhere in writing to support that statement, if not I think I may need to withdraw it.
Hugh

Bain Smith
To: Hugh Billot

Tue, Dec 4, 2018 at 12:49 PM

No, you do not need to withdraw it. At the 2nd consultation meeting in 2016, Peter Kendall, senior KE representative present, told the audience that ST were the best, and probably the only, organisation who could deal with the palace, I have some notes taken at the time, will see if I can find them, have certainly written several letters making this point. Am not sure of the exact wording, so would put it not necessarily exact wording.

Will check it later, had heavy fall on uneven paving in Market Place and feeling a bit bruised and shaken.

Corry

From: Hugh Billot
Sent: 04 December 2018 12:36
To: Tim & Corrie Bain-Smith
Subject: Palace

Corry

I say on page 110 of the NP Draft 2 that ST has backing of HE. CPT challenge that. Do we have anything anywhere in writing to support that statement, if not I think I may need to withdraw it.

Hugh

Bain Smith
To: Hugh Billot

Tue, Dec 4, 2018 at 4:02 PM

Having looked back a bit at the endless paperwork:- The second public consultation meeting took place at the school on 16 May 2016, attended by some 50 people, including ourselves. At that meeting Peter Kendall, Team Leader, Kent, Historic England said words to the effect that he thought that ST were the best team to tackle the

historic structures and probably the only one that would be able to take the Palace on. The Drury team agreed, I quote that in an email to cpc 8 Jan 2017 sent 10.58. Tim agrees that is what he also remembers. You say on p 110 that ST have backing from HE to save the palace buildings, structures and precinct. This statement is justifiable. You do not use the word support which might imply HE were taking sides.

Interestingly, in their recent Briefing Paper to cpc, page 3, final para, CPT write "Productive meetings have been held with Historic England and Ashford Borough Council. These were to confirm their support before meeting" ST ... . As they told us they had a meeting with ST 2 Nov, the implication is that they have support from HE and ABC. When we questioned them on this, they had to say that neither HE nor ABC can support them at this stage, having, like cpc, to remain neutral. The pot should not be calling the kettle black.

I have an email from HE Alice Brockway 21 Nov, in which HE confirm they feel they must be open and talk to any interested parties , adding later "we do not support take over bids" I will give you a copy.

I do not feel we should allow DM or CPT undue influence over our Plan. DM should be acting as a member of the steering group, not as a Trustee for CPT. If and when they come up with an actual scheme/project, or whatever, then we listen to them, without prejudice. They can not, or will not, certainly did not, tell us what their proposal is, the only work beyond the Drury report is on obtaining money, they do not know what is required by HLF etc to demonstrate ownership qualifications, neither the owner nor ST are prepared to sell to them. They have no project.

Look forward to seeing you tomorrow.

Corry

From: Hugh Billot
Sent: 04 December 2018 12:36
To: Tim & Corrie Bain-Smith
Subject: Palace

Corry

I say on page 110 of the NP Draft 2 that ST has backing of HE. CPT challenge that. Do we have anything anywhere in writing to support that statement, if not I think I may need to withdraw it.

Hugh

MINUTES

Tuesday 13th November 2018
7.30pm
Top Room Parish Hall

1.	**Apologies:** Borough Cllr C Bell Cllrs M Weekes & A Gudge. **In attendance:** Chairman J Leyland; vice chairs C Bain- Smith & S Crawley; B Levermore; D Bennett; S South; N Blunt; H Billott; T Reed; S Hawkins & the clerk.
2.	**Declaration of Interest.** Cllr Reed as a trustee of the CPT.
3.	**Charing Palace Trust:** Mr Adams & Mr Mortlock attended to update the council on the CPT. They are looking at acquiring only the great hall for restoration . The next stage is to get a legal interest in the Palace without this grants will not be able to be applied for to take it to the next stage. At present the Spialfields Trust have the option on the restoration of the site. We explained that we would not be able to sell the parish hall and put the money into the project as we would be losing an asset and this would not be allowed. CPT will be arranging a meeting with the Spitalfields Trust to see if they are able to get a legal interest in the building. Further documentation was received from Both Spitalfields Trust & The owner stated that " the Spitalfields trust has the option " to buy the Palace and its buildings and that she has "no plans to sell any options to the (Charing Palace Trust) now or in the future".The letter from Spitalfields Trust said that once the Gatehouse was finished they planned to work on a project in the Welsh Borders before returning , taking possession of the remainder of the Palace and starting work on the main house and the Great hall. The letter concluded ;"at present we see no reason to deviate from this carefully orchestrated plan. However , we are always open to outside suggestions,particulary from the community in which a project is located. Our findings to date have always stumbled against questions of capital cost and in the absence of any worthwhike security or return, financial sustainability . And to be quite clear, we will not be giving up our option or selling any part of the site until its full repair is assured".
4.	**Ten minute public discussion and question time.** Six members of the public present.
5.	**Six minute Borough Councillor question time:** no one present
6.	**Planning Applications:**
6.1	**18/01585/AS Corner House, Leacon Lane Charing:** The retention of part of an existing annexe outbuilding to be used a annexed accommodation in close association with Corner House(granny annexe) for Mr & Mrs Rigden (unanimous)(recommend support)
6.2	**18/01255/AS Tanglewood, Stalisfield Road, Charing:** Operational development- Engineering alterations. Soil from foundations/ excavations spread and levelled on field(Retrospective) for Mr N Yates (unanimous)(recommend support)
6.3	**18/01531/AS Land rear of Millgarth The Hill Charing:** Erection of 5no dwellings with garages (unanimous)(recommend refusal)
6.4	**18/01482/AS Land adjacent to Tower Lodge, Charing Hill, Charing :**Erection of 8 no dwellings for Mr& Mrs Summerfield (deferred as invalid application)
6.5	**18/01515/AS 56 High Street Charing:** Removal of existing flat roofed finish and application of new insulated felt finished roof along with minor ipstand parapet wall, and new pyramid glazed rooflight. Removal of existing steel framed windows and preparation of new opening to install new painted sw windows to first floor bedroom, to facilitate new roof finish for Mrs J Hackett(unanimous) (recommend support)
6.7	**Planning Decisions:**
6.8	**18/00754/AS Oakdene , Squids Gate Lane , Challock :**Construction of detached garage. Replacement and extension of existing workshop for Mr E Farrent(Granted)*
6.9	**18/00662/AS Millgarth, The Hill Charing:** Demolition of existing dwelling and erection of 2x dwellings for Mr A Ransome (refused)*

6.10	**18/00560/AS & 18/00561/AS 30 High Street Charing:**1, The erection of a single storey garden room to replace existing conservatory and greenhouse 2, Listed building : same for Mr & Mrs Safaty (Granted)
6.11	**18/01145/AS 1 Clearmount Park The Hill Charing:** Proposed side gate in existing Beech hedge (Granted)
6.12	**18/01235/AS & 18/01236/AS Thimble Hall, Leacon Lane Charing:** 1.Proposed link extension between existing building and annexe. 2. Proposed link extension between existing building and annexe with alterations to internal walls, windows and doors within listed building. (Granted)
6.13	**18/0022/TC Clewards Meadow Charing:** Re pollarding of poplar tree for Charing Parish Council (Granted)
7.	**Matters arising:**
7.1	Report from Hall Committee: nothing to report
7.2	Report from Cemetery: The lectern for Ronald N Stuart will be put in place in the next couple of weeks. We have contacted his Grandchildren to arrange a date for the official unveiling.
7.3	Report from Communications Committee: nothing to report.
7.4	Report from Highways & Footpaths Committee: speed surveys will be carried out in Charing Heath.
7.5	Report from Open Spaces Committee: Two benches which were not fixed down have now been, due to the issues where they are being moved.
7.6	Report from Public Conveniences Committee: nothing to report.
7.7	Facilities for Teenagers: Facilities for teenagers especially the 11-16/17 year olds needs to be looked into. Cllr Crawley offered to lead a project to look into possibilities. A possible Idea of a solar powered shelter was suggested .
7.8	Village issues/ CCTV :Cllr South will take the lead on CCTV
7.9	The Oak: Ideas were being looked at to possible ways it could support businesses in the village.
7.10	Grass cutting: Due to the increase in costs areas are being looked at to stop or reduce the cutting. Cllr Crawley will speak to the Cubs/ Scouts regarding their area.
7.11	New Bench/ Plaque: It was agreed for the plaque to be placed on a bench in the Sundial Garden.
7.12	Neighbourhood Plan: 1100 flyers have been printed; a Steering Group meeting is booked for 8th December to review amendments. It is hoped the 3rd draft will be ready in December.
7.13	Donation request Charing Scout Group.(decision required) £105 was agreed for the purchase of a stand .
7.14	Donation request Charing Gardening Group.(decision required) £750 was agreed for the purchase of equipment.
8.	**Finance**
8.1	The following accounts were approved:

Oct	**6203**	**RFO Report**	
13th Nov	**Payee Name**	**Details**	**Amount Paid**
DD	Ashford Borough Council	Rates toilets	£59.00
DD	Ashford Borough Council	Rates cemetery	£61.00
6204	A Van Santen	Sundial Garden Wall	£875.00
6205	Spitalfields Trust	Material for Sundial Wall	£100.00
6206	H Evers	Cemetery clerk fees	£216.50
6207	RD Giles	C heath playing field trees	£1.440.00
Card	Travellers Finds	Poppies	£206.00
Card	Cash	Security	£40.00
Card	BT	DA telephone	£212.13
Transfer	Unity Trust Bank	Monthly t/f Oct	£10.000.00

DD	Sage	Payroll Oct	£7.20
DD	Sage	Payroll Nov	£7.20
DD	HP Ink	Oct (last)	£12.99
DD	Initial	Monthly service	£7.90
DD	Business Stream	Water Hall period Feb – Oct	£88.67
DD	Business Stream	Water Public Toilets Period Feb-Oct	197.34
DD	Southern Electric	Hall period Aug- Sept	£57.19
DD	Southern Electric	Public Toilets July-Oct	£48.59
Card	There but not There	Tommy Silouetes	£65.98
		Nat West Bank	**£13.702.69**
		Unity Trust Bank	
09/10/2018	PHS Group	Supplies	£78.42
1/10/2018	Staples	Supplies	£70.49
18/10/2018	Countrywide	Grass Cutting(sept)	£1.190.00
18/10/2018	Countrywide	Grass Cutting (Oct)	£1.190.00
18/10/2018	Local Public Advisory	Subscription	£100.00
18/10/2018	Henwood Signs	VC Board Charing Cemetery	£361.00
22/10/2018	Lexis Nexis	A Baker Gov admin	£110.99
22/10/2018	DHA	Letter to ABC Junction prof fees	£1.140.00
30/10/2018	Triple 9 Services	Maintenance repairs	£356.80
30/10/2018	Phs Group	Supplies	£33.43
06/11/2018	G Friend	Website	£35.00
	Nov Staples	Shredder /RFO	£66.49
	Nov Phs	Supplies / black bags	£42.30
		UTBank Transfers	**£4.773.92**
		Staff Costs	
Nat West	Payee/NIC	Oct	791.68
577/9X	Nest Pension	Oct	149.11
21/10/2018	Bank Transfer	Staff Costs Sept	3,498.11
			3.435.42
	Income	**Nat West**	
Date	**Received from**	**Details**	
16/10/2018	Cemetery	Fees	505.00
Oct	Hall	Hall fees	72.00
	Total Income	**NAT WEST**	**577.00**
	Income	**UTBank**	
Date	**Received from**	**Details**	
15/09/2018	**Nat West Current Bank A/c**	**Monthly transfer**	**10,000.00**
	Total Income	**UTB**	**10,000.00**

9.	**Minutes of previous meeting:** These were agreed.
10.	**Correspondence:**
10.1	V Crookston re issues in Charing: The clerk will reply.
10.2	Spitalfields Trust re Archbishops Palace: see item 3
10.3	B Ansell re Archbishops Palace: see item 3
10.4	A Gudge re Christmas Lights: it was agreed that the roundabout can go in the Market Place for the Magical Evening.
10.5	G Mickleborough (Bloomfields): It was agreed that we did not need to meet with the agents.
11.	**Information:**
11.1	The clerk will be attending a course on fundraising and grants.
11.2	The waiting time on the traffic lights by the crossroads is over 6 minutes the clerk will report.
11.3	It has been reported that a naked man has been seen in the Pilgrims Way / Arthur seat area.
11.4	Cllr South has had a reply from Stagecoach they will not change the bus time so the children going to Norton Knatchbull arrive on time. The bus is due to arrive at 8.37 school starts at 8.45. However the bus is mainly late.
11.5	The fences at the rear of the new Car Park at Tile Lodge Cottages have not been installed. Talks are ongoing between the residents and Bretts.
11.6	The Swan Street application is now out ofA.B.Cs provisional the confines. The parish council will be setting the definative confines after the NP exhibition.
	Signed ……..Parish Clerk

THE CHARING PALACE PROJECT

RESTORE : REVIVE : REVITALISE

Mrs Brenda Ansell
The Outlook
Little Chart Forstal
Ashford Kent
TN27 0PU

23rd September 2017

Dear Mrs Ansell

Having now read the article in the Kentish Express (KE) I can appreciate why you were annoyed. The article could give the impression that you are prepared to sell your Palace to the trust. It was never our intention in talking to the journalist to mislead people.

As I pointed out in my letter to you (12 June) the trust's aim is to see the full restoration of your Palace and its revival for use by the community. To achieve this we have to raise a considerable amount of money that will, we hope, enable us to work alongside Spitalfields Trust in the purchase and restoration of the site.

Unfortunately, the full story of our involvement and position is not made clear in the brief article published by KE.

As you will be aware the majority of the Charing community are keen to see the Palace restored and available for the benefit of the public. To obtain funding towards this end we are now in discussions with the Heritage Lottery Fund and the Architectural Heritage Fund. However, we also have to raise large amounts of money via donations from the public and local businesses, and this can only be achieved by making the general public more aware of our project.

Once again I apologise on behalf of the trust for any stress we have inadvertently caused. I would also welcome an opportunity to meet you and discuss the project and reassure you of our good intentions.

Yours sincerely,

Keith Adams

Keith Adams
Chair, The Charing Palace Trust

01233 712280
07940 583184

CHARING ARCHBISHOP'S PALACE

DRAFT 'TERMS OF REFERENCE' FOR A PROJECT MANAGEMENT TEAM

1. Background

Historic England recently commissioned a study to identify, and assess options, to restore and ensure the future sustainability of the Archbishops' Palace complex. The study concluded that a 'Community Hub plus Residential Buildings' option was a viable approach. This would involve: i) setting-up a 'Community Trust' to purchase and manage the site, ii) establishing a Community Hub for the village within the site and iii) using a building preservation trust to undertake restoration work on the main historic buildings and to develop other parts in order to provide an income for future maintenance.

This document has been prepared to help Charing Parish Council set-up a core project team to co-ordinate and manage the 'Planning Phase' of the 'Community Hub plus Residential Buildings' option. This document is the team's 'Terms of Reference'.

2. Project Team's Objectives

2.1 Produce a 'Project Initiation Document' – this is a document defining the scope of the 'Archbishop's Palace Project'. This should include the projects boundaries and constraints, communications and reporting channels, general timings and role of the client (Parish Council on behalf of the Community).
2.2 Produce a detailed 'Project Plan' – this to include project timings and resources (people and money) required to execute and complete the project.
2.3 Explore and make recommendations to the Parish Council on the projects 'Main Deliverables' (see Section 3 below).

3. Main Deliverables

The team should identify, explore options, and make recommendations to the Parish Council on the following:

a) The Community Trust – what type of trust should it be, prepare the 'Governing Document' including number of trustees, who should be trustees, method of appointment, etc.
b) Funding the project
c) Purchasing the Palace site
d) The Community Hub options – what should be in the hub and where on the site should it be located
e) Who should undertaking site restoration and site development work (e.g. Spitalfields Trust)
f) Raising income to ensure sustainability of the site

In addition the team should produce:

g) A communications plan
h) Explore and obtain grants to support planning work (Heritage Lottery Fund)
i) Produce a 'Business Plan/Case' to support funding applications
j) Contingency plans to reduce risk of failure

4. Method of Approach

The team would use the expertise within the core group to undertake as much of the planning work as possible. However, the team would need to consult and work with other organisations for specialist's support and advice e.g., Historic England, Spitalfields Trust. These should be brought into the project when required.

The team should also keep the local community involved, and engaged, by asking for help with specific tasks, and seeking specific expertise to see if this is available in the village or close community. Where possible, local groups or societies should be asked to undertake specific tasks to support the project.

5. Reporting

A Communications Plan should be agreed with the Parish Council once the team is formed. The objective of the plan is to ensure that community is kept informed of the projects progress at all stages.

6. Expertise and Skills

The following technical skills and expertise should be available within the team:

a) Project management – knowledge and experience of managing large projects and the use of computer based planning tools.
b) Financial planning and analysis – the ability to produce financial spreadsheets and undertake 'what if' analysis.
c) Report writing – the ability to write business plans and applications for funding.
d) Public Relations – the ability to communicate with the public and media on the project's progress.
e) Researching – the ability to use the internet to explore project options and ideas e.g. sources of funding, income, expertise.
f) Recording – the ability to record information on key decisions taken by the team and the reasons behind these decisions (this is to create historic records). This person may also act as secretary.
g) Team Co-ordinator – the ability to co-ordinate a team of people and to facilitate at meetings. This person would chair meetings.

In addition, for the team to work well together, members should have the following interpersonal skills:

a) To listen and constructively question
b) To work with others to solve problems
c) To be able to cope with conflict and negotiate constructive outcomes
d) To explore and analyse options to make sound decisions
e) To be open to new ideas

At some stage it may be necessary to ask someone with professional expertise in the conservation of ancient buildings to join the team.

7. Initial 'Plan of Work'

Once the team is formed the following should be undertaken:

a) Meet with key parties e.g. Historic England, Spitalfields Trust, etc. to get a more in depth understanding of the project.
b) Produce a project brief defining the scope of the project (Project Initiation Document). This would be carried out in conjunction with the Parish Council. This is to ensure that everyone involved has a common vision of the project.
c) Obtain a small financial grant to start the project. This will be necessary for any early expenditure e.g. travelling costs, stationery, etc. All incurred costs should be recorded.

MINUTES

Tuesday 13th September 2016
7.30pm
Top Room, Charing Parish Hall

1.	**Apologies:** Borough Cllr C Bell; Cllrs M Weekes; S Heuch; & S Hallam **In attendance :**Chair J Leyland; Vice Chair C Bain- Smith; T Reed; S Hawkins; C Prinn ; H Billott; A Gudge; N Blunt; The Clerk; J Emblem (for items 9.2 and 9.5)
2.	**Declaration of Interest.** none
3.	**Ten minute public discussion and question time.** none
4.	**Six minute Borough Councillor question time:** none
5.	**Orbit Housing:** The Architect attended and showed the council the proposed new plans. They had met with A.B.C. The number of dwellings has reduced to 51 with added car parking (now to 51 spaces). The site is now two storeys instead of three. There will not be a hairdressers or café. The council will be, meeting with Clive Astall of Orbit next week.
6.	**Planning Applications:**
6.1	**16/01264/AS 2 Barnfield Cottages, Barnfield Rd Charing Heath:** Part two storey/part single storey extension for Mr B Pemble (unanimous)(recommend support)
6.2	**16/01312/AS High Banks, Field Mill Egerton:** Erection of a single storey detached open car barn for Mr B Hayes(unanimous) (recommend support)
6.3	**16/01219/AS Wilks Farm, Lenham Heath Rd Lenham:** Prior approval application for proposed change of use of agricultural buildings 1no dwelling house for Mr & Mrs D Froud(CP(withdrawn prior approval not required)
6.4	**16/01231/AS Land adjoining Kenmore Wind Hill Lane Charing Heath:** Laying of additional hardstanding and access track (retrospective) (revision to planning permission 15/01340/AS) for Mrs Kelland (unanimous)(recommend support)
6.5	**16/01227/AS Kenmore, Wind Hill Lane Charing Heath:** Proposed two storey side extension for Mr Davidson(unanimous)(recommend support)
6.6	**16/01135/AS Harvey House, 18 High Street Charing**; New stud wall to rear room to form a new WC with lobby accessed through a new opening, changes to exterior colour scheme and signage for Mr Graham Austen(MW)(withdrawn further info required)
6.7	**AS/15/206 Charing Quarry/ Burleigh Farm, Hook Lane Charing:** Request for partial discharge of condition 44 (written specification and timetable for a program or archaeological work) of planning permission AS/15/206 for the County Planning Authority. Observations required.(unanimous) (recommend support)
7.	**Planning Decisions:**
7.1	**16/01082/AS 12 Sayer Road Charing:** Proposed front extension, raising of eaves and replacement of roof to existing rear extension for Mr & Mrs Darryl Spicer (granted)*
7.2	**16/00656/AS The Charing Stores , 4 High Street Charing:** Formation of internal doorways between No4s & 6a at ground and first level for Mr A Dixon (granted)*
7.3	**16/01100/AS 28 Sayer Rd Charing:** To erect PVCU Conservatory to the rear of the property for Mr J Marriott (granted)*
7.4	**16/00939/AS Wilks Farmhouse, Lenham Heath Rd :**Change of use of, and alterations to , existing detached garage into 2 bedroom holiday let for Mr C Allen

	(granted)*
8	**Minutes of previous meeting:** These were agreed and signed**.**
9.	**Matters Arising:**
9.1	Archbishops Palace: A good meeting was held with the starter group; a core team is required to run the project. Keith Adams will be coordinating to start with; there is still work to do in forming the team. A vote was taken and it was agreed that C Bain-Smith and T Reed would represent the parish council.
9.2	Website: It was agreed to train Jane Emblem to do both NP updates and routine updates on the website, N Blunt would also be trained.
9.3	Noticeboard For Cemetery (decision required): This was agreed.
9.4	Encouraging Tourism: deferred until next full meeting.
9.5	Neighbourhood Plan and Parish Meetings: There will be a leaflet drop,incerrtain roads. Andrews Estate agents are supplying boards advertising the meetings, posters to go in all windows of businesses in the parish. Tea / coffee & cakes from Rosebuds(Thursday and Saturday mornings) Wine and beer from Westwell wines and Mr G Austen (the applicant of the proposed Micro pub)on Thursday evening. Red Lion catering for Charing Heath meeting. R Carrison has agreed to move the display boards to both venues. Duplicate boards will be on either side of the hall.
10.	**Finance**
10.1	Approval of Accounts: These were agreed and signed.

Expenses: last Cheq July1849			
Payee:		**Details:**	**£**
5844	Staples	Missed from pervious List	96.70
5849	Kitchener (Moat)	Bus Shelter paint	187.00
5850	Staples	General office supplies	17.27
5851	S Hallam	Items for fete	28.00
5852	VOID		
5853	CJA Consulting	Set for RFO laptop	176.50
5854	To 5856	Salary	
5857	N J Austen	Mis repair around village	336.00
5858	Play safety (Play areas)	Annual inspection	491.40
5859	Initial	Public Toilets Dryers/etc.	135.25
5860	Phs Group	Supplies for Toilet	37.46
5861	N Blunt	Councillors allowance	50.00
5862	S Hallam	Balloons	91.93
5863	MCTesting	Hall 2 smoke alarms	60.00
5864	KALC	Employers staff Guide Books	15.20
5865	PKF Littlejohn	Audit cost 2015/2016	480.00
5866	S.E.Water	Period Feb/Aug 2016	27.41
5867	Staples	Office Supplies	126.84
5868	K Giles (Vouchers)	Baskets/tub winners	50.00
5869	Wealden Wheels	Donation	500.00
5870	Charing FC	Youth Football Donation	450.00
5871	VOID		
5873	H Evers	Fees cemetery June/Aug	607.50
5874	J Kitchener (repairs)	Hall/Benches/Paint	75.00

5875	Salary	See September Extra	0000
5876	D Buckett	Internal Audit 2015/2016	459.00
5877	CJA Consulting	Set up Charing PN Laptop	135.00
5878	KALC	Finance GL/JM	144.00
5859	S Thompson	Flowers member of Council	25.00
DD	ABC	Rates for Cemetery July	52.00
DD	ABC	Rates for Cemetery Aug	52.00
DD	ABC	Rates for Toilets July	58.00
DD	ABC	Rates for Toilets August	58.00
DD	Sage	Payroll July	4.80
DD	Sage	Payroll August	4.80
DD	SSE Public Toilets	Period April/July	96.01
DD	SSE Hall	Period April/July	719.29
DC	John Lewis	Laptop/mouse NP	341.94
DC	Ebuyer	Software NP Laptop	169.98
DC	PC World	Norton Security NP	22.00
DC	John Lewis	Laser Printer NP	249.95
DC	CJA Consulting	Setup Computer NP	135.00
DC	Waste Management	4 Skip Bags	663.75
5880	VOID		
5881	D Austen	Keys/toilet seat/pests	48.75
5882	South East Water	Hall period Feb/Aug	33.23
5882	South East Water	Public Toilets Feb/Aug	127.75
DD	ABC	Rates for Cemetery SEP	52.00
DD	ABC	Rates for Toilets SEP	58.00
DD	Sage	Payroll software	4.80
5883	Southern Water	Period Feb/Aug Hall	48.63

Wages & Salaries:			
Employee:		**Details:**	**£**
DC	Nest	Pension July	15.65
	Employee Salaries	July	2560.06
	Employee Salaries	August	2562.15
5856	The Post Office	PAYE & NI period 4	383.09
DC	Nest	Pension August	16.25
5875	The Post Office	PAYE & NI period 5	386.03

Income:			
From:		**Details:**	**£**
	July	Hall	89.60
	Cemetery	August	2225.00
	HMRC	Vat period April/July	1571.14
	August	Hall	79.00

11.	**Information:**
11.1	Brett has started stripping the top soil in Burleigh Farm. The moving in of equipment went well.

11.2	A.B.C ward proposal for 2019 maintain the separation of Charing Heath and Charing with Charing Heath to form part of a new ward called Upper Weald. Meanwhile Boundary Commission proposals would place Charing Heath into a new parliamentary constituency called High Weald with Charing remaining in a reconfigured Ashford constituency.
11.3	Damage has occurred at the Arthur Baker Playing field to fence panels, bins have been uprooted.
11.4	Damage has occurred to the manhole cover in Brenchly Mews.
11.5	Sport England has objected to the application for the primary school, we will write to Sport England.
11.6	Cllr Bain-Smith thanked the council for her flowers.

There being no further business the meeting closed at 10.15pm

Signed…… Parish Clerk

Key points from Archbishop's Palace "Starter Group" meeting

1st September 2016

Present: Keith Adams, Tim Bain-Smith, Pete Burton, Phil Ethelston, Allan Ferries, Allan Hummerson. From CPC: Corry Bain-Smith, Jill Leyland (chairing), Tylden Reed

1. The draft terms of reference for a core group drawn up by Keith Adams were agreed with the additions of:

i) The Core Team would at times need someone with legal knowledge

ii) Assessing potential benefits to the community should be part of the deliverables/plan of work

2. Aims and points to consider. A "round the table" discussion produced the following potential aims for the restoration or points that needed to be considered from the group.

•

-
-
- Conservation and preservation with proper regard to its significance and presence Confine enabling development to points identified by Paul Drury Complete a full survey of the site Look into feasibility of Parish Hall and car park Get the wider community involved Get media interested A new Parish Hall would need to be fit for purpose Is there a tension between conservation and preservation? Placing a "community hub" in the Great Hall could provide tensions between needs of the hub and preservation/conservation requirements for the Hall Project should help to keep High Street alive by attracting some tourists Could help restore Charing's "night-time economy" Having local trades and crafts working on display would be positive Palace should support the village (eg by providing car parking with easy pedestrian access to High Street, encouraging tourism).
-
-

3. Next steps. It was agreed that Keith Adams should act as coordinator. Members of the Starter Group were asked to consider whether they wanted to be part of the core team and what role they could play. Keith would prepare notices (eg for parish magazine) asking for further volunteers.

The Parish meetings on Sept 22nd to 26th should also be a recruiting ground. People can be asked if they want to participate in the core group or sign up for the supporters' group. Signing up forms should include a column for people to state relevant skills or interest.

4. Other points. Could we get Prince Charles interested? The first Prince of Wales visited the Palace in 1298.

The History Society has a lot of material on Charing History and some on family history. This could be the basis of a small tourist-attracting exhibition.

FOURTH STREET
experts in place

Charing Palace ‘Community Hub’ Viability Report

Charing Palace Trust

30 October 2018

Funding raised by The National Lottery and awarded by the Heritage Lottery Fund
heritage lottery fund LOTTERY FUNDED
AHF The Architectural Heritage Fund

Contents

Appendices

Fourth Street Place Consultants Ltd, 407 The Print Rooms, 164-180 Union Street, London, SE1 0LH
www.fourth-street.com

Funding raised by The National Lottery and awarded by the Heritage Lottery Fund
heritage lottery fund LOTTERY FUNDED
AHF The Architectural Heritage Fund

1 Introduction

Fourth Street was commissioned in March 2018 by the Charing Palace Trust to advise on the financial viability of the Charing Palace Community Hub project.

The work has been supported by the following:

- Site visits to Charing and various sites and attractions in and around the area;
- Meetings with the Charing Palace Trustees and the appointed project manager and mentor;
- Consultations with a variety of local businesses and stakeholders (see Appendix 1);
- Market research to assess the viability of individual uses forming part of the community hub option;
- Update of the spatial brief for the community hub option; and
- Construction of a financial model to assess the financial viability (capital, funding and operations).

This report follows on from previous studies (summarised in section 2.1 below) and provides a further stepping-stone in the development planning process for the Archbishop's Palace complex in Charing. As such, this report is not intended to be a final and conclusive study on viability but rather, to inform a necessary and subsequent Project Scoping Study that will build on its considerations and assumptions, and layer in further detail and refinement of options, relevant to this stage of development planning and informed by other comparator projects.

2 Background and Context

2.1 Preferred 'Community Hub' Option (2016/17)

A series of reports[1] were published during 2016 and 2017 relating to the strategic review of options for the Charing Palace site, commissioned by Ashford Borough Council and supported by Historic England.

The assessments and options considered in these reports were presented and discussed at two public meetings in Charing. The option which promoted the concept of a 'community hub' was favoured and encouraged the formation of the Charing Palace Trust[2] in June 2017.

At the time, the 'community hub' option was relatively fluid in its definition and included consideration of:

- Refurbishing and converting the Archbishop's Apartments as workspace (with an option suggested for converting it into accommodation to link with a possible restaurant in the Great Hall);
- Converting the Great Hall, and with a possible extension ranging from 85sq.m to 450sq.m, that could include: *Community cinema with 2 screens; Bistro / bar / coffee shop, including large outdoor seating area; Large flexible function room; One or more boardroom style meeting rooms; Library, with village archive centre and small exhibition about the history of Charing Palace; outside children's play area.*
- Creating a new access road from Pett Lane to the Great Hall with parking set along its length and in the area immediately to the east of the Great Hall. Overflow parking would be provided in the North Paddock.
- Restoration of the western range of accommodation as residential;
- Enabling residential development on the western side of the site – with a variety of configurations and scale; and

The concept[3] for creating a community garden in the paddock immediately to the north of the Great Hall was subsequently added.

2.2 CPT have no legal entitlement

It is important to note that at the time of this report the Charing Palace Trust do not have any legal entitlement to any of the buildings or land that make up the Charing Palace site. It should be noted however that without the letter from Spitalfields Trust to CPT, dated 14th April 2017, grant funding from

[1] Strategic Review of Options, Drury McPherson Partnership, March 2017; Options For Charing Palace, Possible Uses and Viability, Colliers International, May 2016 and updated May 2017; (with contributions from (contributors: Thomas Ford Partnership, D.R. Nolans & Co, Swale and Thames Survey Company)
[2] Charitable Incorporated Organisation, Charity Number: 1173293
[3] Idea conceived by Terry Whitbread

the Heritage Lottery Fund and Architectural Heritage Fund to undertake the Viability Study and Scoping Report would not have been forthcoming.

The majority of the site remains in the freehold ownership of Brenda Ansell.

2.3 Current assumptions regarding the Spitalfields Trust

The Spitalfields Trust (ST) have an Option to acquire the Palace site and buildings from the current owner. This option is understood to expire in June 2018, although the Spitalfields Trust have indicated that they have secured an extension to this.

The Spitalfields Trust have exercised the Option in acquiring the southern range of buildings and completed the refurbishment of No. 2 Cottages in 2017, which has since been sold into private ownership. They are in the process of restoring the Gatehouse and have indicated to CPT that following completion they will focus on planning and architectural work for the next stage, and this may take several years, and they will then continue restoration work on a rolling basis.

Spitalfields Trust recognise that the restoration of the Great Hall will be a challenge for them and have asked how CPT would use it, suggesting a new Village Hall would be a possibility.

Taking this into account, there appears to be two principal options to be considered in this viability assessment.

- Firstly, the assumption that the Spitalfields Trust continue their development efforts on the rolling basis, leaving only the Great Hall to the Charing Palace Trust, along with lands necessary to support its development and operation. In this option, it is assumed that any surplus generated from the private sale of refurbished properties will be retained by the Spitalfields Trust and, in line with their objects, invested into subsequent conservation projects.
- Secondly, Spitalfields Trust refurbish the western range of buildings (having completed and sold the Gatehouse) and come to an agreement with CPT that the Apartments together with the Great Hall can be released for the 'community hub' project; again, together with sufficient land to support its development and operation.

Based on the latest dialogue between ST and CPT, the second of these options is considered the least likely at this stage and carries with it significant additional risk and uncertainty but provides the greatest prospect of long-term operational viability (assuming there are no additional financing costs for delivering the Apartments).

From a conservation and access perspective, CPT's favoured option would be to unite the Apartments and Great Hall for the purposes of the community hub.

This paper assesses the financial viability of these two distinct options.

2.4 Kent County Council: Charing Library

Charing library is located on Market Place, adjacent to the Palace site.

Kent County Council who own and operate the library have indicated their interest in relocating the library into an integrated community hub. This is consistent with KCC's current policy and a *Libraries, Registrations and Archives* strategy is currently in development, which will promote such change.

The current library extends to 128sq.m in total including public and back of house areas. KCC have indicated that the front of house areas could be reduced substantially to around 80sq.m, with support functions being shared with other community hub activities.

The library currently opens for 18hrs a week and is staffed by one employee and activities are run by volunteers and third-party organisations. There are 636 active borrowers, most of which are assumed to originate from Charing itself. On average, it attracts 7.7 visits and 14.8 items borrowed per hour of opening. The library hosts 113 events across the year – mostly children's activities such as, storytelling, baby bouncing and talk time.

If the Charing library function were to be integrated into the community hub, the current library building would become redundant. It is assumed that this would be redeveloped, and the capital receipt contributed towards the refurbishment costs of the community hub and the relocated library more specifically.

As an operating baseline, it is assumed that the integrated library would be open for at least the same number of hours per week as the existing library. However, with the co-location of other services and activities within the community hub, it is likely that the opening hours could be extended through the more efficient staffing and operational regime.

2.5 Charing Parish Council: Parish Hall

Charing has several facilities across the village that provide space for the community and private hire including, the Parish Hall, the Sports Pavilion, the Church Barn and the Methodist Church Hall.

With the planned increase in housing within Charing, the provision of further community space is likely through Section 106 or CIL[4] contributions. At this stage, it is not clear if this would result in new facilities being developed – in closer proximity to the new housing – or, investment in the existing stock.

Each facility currently operates independently focusing on its principal purpose but making its space(s) available for community and private hire although, none of them operate anywhere near capacity and the level of income generated is modest.

A new facility must be mindful of the existing facilities in the area and the potential displacement effect it might have, which may negatively impact their individual financial positions.

The concept of integrating the Parish Hall functions into a new community hub was suggested in the 2017 options appraisal report. While any decision would be subject to local referendum, it could offer several advantages, including:

[4] Community Infrastructure Levy

Funding raised by The National Lottery heritage lottery fund AHF The Architectural Heritage Fund

- the provision of modern, fit-for-purpose facilities for the community and Parish Council (the current Parish Hall reportedly suffers from an unreliable and expensive heating system, no disabled toilet access, no parking and no Wi-Fi);
- adding to the concentration of activities within a new community hub and generating operational efficiencies and economies of scale; and
- re-purposing the existing Parish Hall to generate a capital or revenue contribution towards the new community hub.

During the dialogue undertaken as part of this study (see Appendix 1 for list of consultees) the Chair of the Parish Council, while discussing the possibility of integrating the Parish Hall, noted that as a minimum, a new facility would need to accommodate the current Parish Hall's capacity (i.e. 130 seated) and include double height space (for badminton), a separate meeting room and an office, while also addressing the current drawbacks i.e. parking, heating, disabled access, Wi-Fi.

Whether or not these requirements can be fully met within the refurbished curtilage of the Great Hall will need to be determined in the next stage of design development and feasibility. However, based on the conceptual design thinking within the 2017 Options Appraisal work, it seems that most of these requirements could be achieved albeit, through the provision of shared facilities rather than dedicated to Parish use. This is a key issue that will need to be determined early in the design development process as it could have a profound impact on the design solution and potentially, the need for additional accommodation.

2.6 St Peter & St Paul Church: Church Barn

Previous studies suggested the possible integration of the Church Barn into the community hub. Having reviewed this, the case for integration certainly has less appeal than the Parish Hall, although the Church warden concedes that the concept has never been considered.

Financially, the Church Barn is reported to breakeven and its character and physical attributes are appealing to those who use and hire the space. Despite not being listed, its re-development (assuming its functions were integrated into the community hub) is considered unlikely due to the original gifting of land and the relocation of the medieval barn itself in the 1950s.

The option of integration has therefore not been assumed in this viability assessment. As the scheme progresses, it is recommended that CPT engage with the Church about the community hub and Church Barn functions (and the Church more generally) remaining complementary rather than competitive.

3 Governance and Management Arrangements

Like the scheme itself, there are a variety of organisational arrangements that could be implemented to govern and manage the project through the delivery and operational phases. Important to note, is the changing skills and expertise required through these phases. Rarely in such circumstances does the governance for planning and delivering a project suit the longer-term management and operational needs.

Building on the proposals set out within the 2017 study, the following is noted:

3.1 Development

- The Charing Palace Trust (CPT) has now been established and is championing the community hub project. However, as noted in Section 2.2 above, CPT have no legal entitlement to either the land or buildings.
- The Spitalfields Trust remains instrumental. It is a building preservation trust which undertakes a rolling programme of projects by acquiring, repairing and selling properties, applying the proceeds of one project to the working capital required for the next. Having begun a rolling programme of restoration at Charing Palace and having an Option on the site it has, in its gift, the possibility of ceding elements of the site to CPT for the development of the community hub.
- For the purposes of this viability assessment, we have assumed two possible options:
    - Option 1: CPT are ceded (on a freehold basis) the Great Hall and land necessary for the development and operation of the community hub;
    - Option 2: CPT are ceded (on a freehold basis) the Apartments, in addition to the Great Hall and land necessary for the development and operation of the community hub.
- In both scenarios, it is assumed that a contractor would undertake the work on behalf of CPT.
- For any enabling development, it is assumed CPT could do one of the following (the latter being assumed within this viability assessment):
    - Sell the development land having secured planning permission and thereby, achieve an uplift between the acquisition and selling price; or
    - Work with a development partner to deliver the residential development and sell the properties either on a freehold or long leasehold basis. In this scenario, CPT would need to ensure its risk is sufficiently mitigated through its agreement with the development partner.

3.2 Operation

- In operation, it is assumed that CPT will have some executive capacity to at least manage and curate the ongoing community hub rather than acting only as a landlord. The scale of this executive operational capacity is where further options exist.

- At one end of the spectrum, CPT's operating capacity might be very light with a single employee proactively managing contracts with a range of service providers or leaseholders, curating and co-ordinating the community hub programme. At the other end of the spectrum, CPT could be directly managing and operating a range of different functions within the community hub e.g. café, accommodation, programming and hire of space, extended library offer etc.
- In any event, it is assumed that CPT would have a controlling interest in the community hub.
- For this viability assessment we have assumed a model whereby CPT have a small executive capacity and works collaboratively with a number of other organisations. This would include:
    - Kent County Council in managing the extended library offer, ensuring it is fully integrated into the other functions of the community hub and operational efficiencies are optimised e.g. co-ordinated staff roles and responsibilities.
    - An experienced third-party caterer to run the café, venue hire and accommodation in the Apartments (for the option that includes the Apartments).
    - CPT would manage the above contracts (and others related to the operation and maintenance of its land and buildings) as well as focusing on community hub programming covering a range of activities such as: exhibition and events programming, fundraising, partnerships, destination marketing, volunteer co-ordination etc. Typically, where a charity has been established as a limited company with charitable status, a subsidiary trading company would be established, with its trading profits covenanted back to the parent organisation. A similar situation is assumed for the CPT Charitable Incorporated Organisation although, being a relatively new type of organisation, CPT should seek legal advice on the most appropriate structuring.

4 Capital Cost Appraisal

4.1 Options: Summary Capital Costs & Funding

The estimated capital cost for each option is summarised in Figure 1 below and the detailed assumptions described in the sections that follow.

The options being considered are:

- Option 1: CPT are ceded (on a freehold basis) the Great Hall and land necessary for the development and operation of the community hub;
- Option 2: CPT are ceded (on a freehold basis) the Apartments, in addition to the Great Hall and land necessary for the development and operation of the community hub. For this option there are two alternatives considered i.e. the conversion of the Apartments into either Accommodation (Option 2a) or Workspace/Studios (Option 2b).

Figure 1. Summary capital costs and funding for Options 1, 2a & 2b

Capital Expenditure	*OPTION 1: GREAT HALL*	*OPTION 2a: GREAT HALL & APARTMENTS (Accommodation)*	*OPTION 2b: GREAT HALL & APARTMENTS (Workspace)*
Apartments	-	(£1,348k)	(£1,084k)
Great Hall	(£2,526k)	(£2,526k)	(£2,526k)
External works	(£493k)	(£493k)	(£493k)
	(£3,019k)	(£4,367k)	(£4,102k)
Contributions arising from:		-	-
Enabling development	£331k	£331k	£331k
Sale of existing Parish Hall site	£450k	£450k	£450k
Sale of existing Library site	£350k	£350k	£350k
	£1,131k	£1,131k	£1,131k
Capital deficit	**(£1,887k)**	**(£3,236k)**	**(£2,971k)**
Capital deficit as % of Total Capital Cost	63%	74%	72%

4.2 Impact of Varying the Scale of Enabling Development

The scale of enabling development could vary (subject to consent) and by doing so, lower the capital deficit that needs to be funded through capital grant(s) or other fundraising means. Figure 2 below estimates the value and quantum of enabling development for different levels of capital grant (e.g. HLF or other grant contributions). For example, if a capital grant equal to 50% of the capital cost for Option 1 were targeted (i.e. £1,509k), this would require £709k of enabling development contribution to be raised, requiring 5.4 new residential units to be built @ 180sq.m/unit (assuming all other variables remained constant). In Figure 1 above the assumption used for all options is that the contribution from enabling development would be £331k and equates to 3.0 residential units.

Figure 2. Enabling Development vs HLF (or other) Grant

	ENABLING DEVELOPMENT CONTRIBUTION				ENABLING DEVELOPMENT NO. OF UNITS (@180sq.m/unit)			
	HLF (or other) Grant as % of Capital Cost				HLF (or other) Grant as % of Capital Cost			
	70%	60%	50%	40%	70%	60%	50%	40%
OPTION 1: GREAT HALL	£106k	£407k	£709k	£1,011k	0.8	3.1	5.4	7.8
OPTION 2a: GREAT HALL & APARTMENTS(Accommodatior	£510k	£947k	£1,384k	£1,820k	3.9	7.3	10.6	14.0
OPTION 2b:GREAT HALL & APARTMENTS (Workspace)	£431k	£841k	£1,251k	£1,661k	3.3	6.4	9.6	12.7

4.3 Capital Costs

The capital costs associated with each component of the scheme are described in this section together with any variations between the options.

These estimates build on the previous cost estimates[5] with updates to reflect the passing of time since that work was undertaken and the updated definition for the two options now being assessed. The estimates are therefore assumed to reflect the present day but do not include an allowance for inflation to reflect the actual delivery programme.

Significant changes to previous cost assumptions are noted against each of the tables.

No consideration has been made within the capital costs for land acquisition. It is assumed that the acquisition cost could be affected by a number of factors including (but not limited to), the specific terms of the Spitalfields Trust's option on the land and buildings, the owner's aspirations and liabilities associated with the listed buildings and scheduled ancient monument.

Finally, no costs have been included to cover CPT's role and activity in the development nor any pre-operational costs associated with the community hub (which would typically include operational staff appointments from say, 6 months in advance of opening, marketing and launch budgets, etc.). Pre-operational costs are typically included within the capital budget.

4.3.1 Great Hall

A spatial brief for the converted Great Hall is set out in Figure 3, which is compliant with the concept design proposals developed as part of the 2017 options appraisal work.

At this stage, the scale of the Great Hall is assumed to sufficiently cater for the needs of the community hub functions and therefore, development of additional community hub buildings to the east of the Great Hall is not assumed. However, it is acknowledged that as the scheme progresses, additional space may be required to satisfy partner needs (i.e. Kent County Council or Charing Parish Council) or, to address a specific demand beyond the existing scope of the community hub.

[5] Colliers and DR Nolans reports in 2016/17.

Funding raised by The National Lottery heritage lottery fund AHF The Architectural Heritage Fund

Figure 3. Great Hall spatial brief

	m^2
Ground Floor	
Extended library, interpretation & flexible space	115
Circulation & draft lobby	105
Toilets	30
Storage	20
Kitchen	30
Café/ restaurant servery & seating	50
	350
First Floor	
Flexible space & meeting rooms	205
Circulation	35
Storage	15
Office	25
	280
TOTAL	**630**

Figure 4 sets out the estimated cost for converting the Great Hall. Significant updates are noted as follows:

- Inclusion of an allowance for furnishings e.g. commercial kitchen, café/restaurant servery and furniture, decoration, multi-media, furniture for meeting rooms and venue hire etc.
- Inclusion of an allowance for interpreting the history and heritage of the site.
- Adjustment of the Professional fees from 12.5% to 15%.
- External works relating to the Great Hall have been excluded and are separately accounted for in Section 4.3.2.

Figure 4. Conversion of Great Hall (Options 1 and 2)

	m^2	£ rate	
Refurb existing	30	£2,000	£60,000
New within existing	600	£2,250	£1,350,000
New build			£0
Interpretation		£250,000	£250,000
Furnishings		£250,000	£250,000
		£3,032	£1,910,000
Professional fees	15.0%		£286,500
Contingency	15.0%		£329,475
		£4,009	**£2,525,975**

4.3.2 External Works (to support Great Hall)

Previously, external works relating to the Great Hall as a community hub was costed at 15% of the build cost, plus professional fees and contingency. This equated to £274k.

Figure 5 sets out the updated and more detailed external works. The cost of these has risen substantially.

Figure 5. External Works for Great Hall (Options 1 and 2)

	Unit		£ rate	
New access road	100	m	£325	£32,500
Landscaping			£25,000	£25,000
Car parking	50	spaces	£1,500	£75,000
Overflow parking	50	spaces	£1,000	£50,000
Courtyard	400	m^2	£150	£60,000
Community Garden & Play Area	1600	m^2	£50	£80,000
Services connections			£50,000	£50,000
				£372,500
Professional fees		15.0%		£55,875
Contingency		15.0%		£64,256
				£492,631

4.3.3 Apartments

Figure 6 sets out the estimated cost for converting the Apartments into guest accommodation. Significant updates are noted as follows:

- Inclusion of an allowance for home furnishings e.g. kitchen appliances and equipment, tableware, cutlery/crockery, decorations, lamps and shades, bathroom equipment, furniture, linen, towels, multi-media etc.
- Adjustment of the Professional fees from 12.5% to 15%

Figure 6. Conversion of Apartments to Accommodation (Option 2a)

	m^2	£ rate	
Repair costs		£247,632	£247,632
Refurbish existing	310	£1,900	£589,000
New build			
Furnishings		£50,000	£50,000
		£2,860	£886,632
External works	15.0%		£132,995
Professional fees	15.0%		£152,944
Contingency	15.0%		£175,886
		£4,350	**£1,348,456**

Figure 7 sets out the estimates cost for the alternative option for converting the Apartments into workspace/studio. Significant updates are noted as follows:

- Adjustment of the Professional fees from 12.5% to 15%

Figure 7. Conversion of Apartments to Workspace/Studio (Option 2b)

	m^2	£ rate	
Repair costs		£247,632	£247,632
Refurbish existing	310	£1,500	£465,000
New build			
Furnishings			£0
		£2,299	£712,632
External works	15.0%		£106,895
Professional fees	15.0%		£122,929
Contingency	15.0%		£141,368
		£3,496	**£1,083,824**

4.4 Capital Funding

Funding of the capital scheme is assumed to be raised through the combination of:

- Capital contribution from Kent County Council resulting from the sale of the existing Charing library site. No valuation for this property has been provided for this study. If one assumed it was sold with a commercial use, based on a rent of £125/sqm and a yield of 6%, its value would be £267k. However, with a change of use to residential, its valuation would likely increase. For the purposes of this study, we have assumed a notional value of £350k.
- Capital contribution from Charing Parish Council resulting from the sale of the existing Parish Hall site. No valuation of this property has been provided for this study. If one assumed it was sold with a commercial use, based on a rent of £125/sqm and a yield of 6%, its value would be £281k. However, with a change of use to residential, its valuation would likely increase substantially. For the purposes of this study, we have assumed a notional value of £450k.
- Capital contribution resulting from enabling residential development on the Palace site (see assumptions and calculation in Section 4.4.1 below).
- HLF major grant.
- Other fundraising and grant applications.

4.4.1 Enabling Development

For the purposes of this study, we have assumed a consistent quantum of enabling residential development for each option and its scale is consistent with that illustrated in the previous report by Colliers.

A separate calculation has been made for each option that adjusts the quantum of enabling development to reduce the level of required Heritage Lottery Fund (or other) capital grant being sought (see Figure 2 in Section 4.1).

The assumptions used to calculate the enabling development are consistent with those included in the previous Colliers report and includes no cost for land acquisition.

It is worth noting that since the Colliers work was undertaken (c.2016), the average residential sales values for the TN27 Postcode – estimated by Zoopla – has increased significantly. For detached properties the increase is estimated by Zoopla at 15% with the average selling price for detached houses being £3,993 per sq.m (see like for like comparison tables at Appendix 2.1).

Figure 8. Enabling Residential Calculation

Area (Sq.m)		540
Average unit size (Sq.m)		180
Units		3.0
Cost per Sq.m		£2,870
Build cost		£1,549,796
VAT	0%	-
Marketing & finance	10%	154,980
Developer's Profit	8%	123,984
Total cost		**£1,828,759**
Sales price per Sq.m	£4,000	£2,160,000
Surplus	18%	£331,241
Land acquisition cost	0%	£0
Enabling contribution		**£331,241**

5 Revenue (Operational) Appraisal

5.1 Options: Summary Operational Financials

The operational income and expenditure projections for each of the three options under consideration are summarised in Figure 9, Figure 10 and Figure 11 below.

The Yr-3 figures reflect the detailed operational projections described in Sections 5.3 and 5.4. For reference, operational costs are expected to be slightly higher in the first years of operation and some areas of the business are anticipated to take longer to establish in the marketplace.

Over the initial five-year operating period, the net surplus/deficit varies significantly between the three options. Option 1 is projected to accumulate a deficit of £135k, Option 2a a surplus of £64k and Option 2b a surplus of £9k. However, while the inclusion of the Apartments in Options 2a and 2b push both into surplus, no costs have been assumed for financing the restoration and conversion to the Apartments.

It should also be noted that while the rest of the Community Hub functions (i.e. excluding the Apartments; and mostly contained within the converted Great Hall) are projected to generate an operational deficit, no assumptions at this stage have been made for any ongoing fundraising (i.e. visitor donations, philanthropy, endowment etc.) or revenue grants related to the education objects of the CPT or heritage related programming. These would help in mitigating operating risk and enable CPT's programming and community engagement to be amplified. As an example, it may be possible to capitalise some of the operational programming and engagement costs incurred in the early years of operation as part of an HLF grant application and in doing so, reduce or offset some of the projected deficit in Option 1 and increase the surplus in Option 2a and Option 2b.

Figure 9. Five Year Income & Expenditure (Option 1)

	Yr1	Yr2	Yr3	Yr4	Yr5
Income					
Contribution: Accommodation	-	-	-	-	-
Contribution: Café	£16k	£19k	£18k	£19k	£18k
Contribution: Venue hire	£5k	£7k	£9k	£10k	£11k
Programming income	£41k	£38k	£38k	£41k	£38k
Membership income	£3k	£4k	£5k	£5k	£5k
Retail income	£25k	£29k	£27k	£27k	£27k
	£89k	£97k	£97k	£104k	£99k
Expenditure					
Programming costs	(£31k)	(£28k)	(£28k)	(£31k)	(£28k)
Membership costs	(£3k)	(£4k)	(£5k)	(£5k)	(£5k)
Retail costs	(£14k)	(£16k)	(£15k)	(£15k)	(£15k)
Staffing	(£45k)	(£45k)	(£45k)	(£45k)	(£45k)
Overheads	(£32k)	(£31k)	(£31k)	(£31k)	(£31k)
	(£124k)	(£123k)	(£123k)	(£126k)	(£123k)
Net surplus/deficit	**(£35k)**	**(£26k)**	**(£26k)**	**(£23k)**	**(£25k)**

Figure 10. Five Year Income & Expenditure (Option 2a)

	Yr1	Yr2	Yr3	Yr4	Yr5
Income					
Contribution: Accommodation	£29k	£41k	£39k	£41k	£43k
Contribution: Café	£17k	£21k	£19k	£21k	£19k
Contribution: Venue hire	£5k	£7k	£9k	£10k	£11k
Programming income	£41k	£38k	£38k	£41k	£38k
Membership income	£3k	£4k	£5k	£5k	£5k
Retail income	£25k	£29k	£27k	£27k	£27k
	£119k	£139k	£137k	£146k	£143k
Expenditure					
Programming costs	(£31k)	(£28k)	(£28k)	(£31k)	(£28k)
Membership costs	(£3k)	(£4k)	(£5k)	(£5k)	(£5k)
Retail costs	(£14k)	(£16k)	(£15k)	(£15k)	(£15k)
Staffing	(£45k)	(£45k)	(£45k)	(£45k)	(£45k)
Overheads	(£32k)	(£31k)	(£31k)	(£31k)	(£31k)
	(£124k)	(£123k)	(£123k)	(£126k)	(£123k)
Net surplus/deficit	**(£4k)**	**£16k**	**£14k**	**£19k**	**£19k**

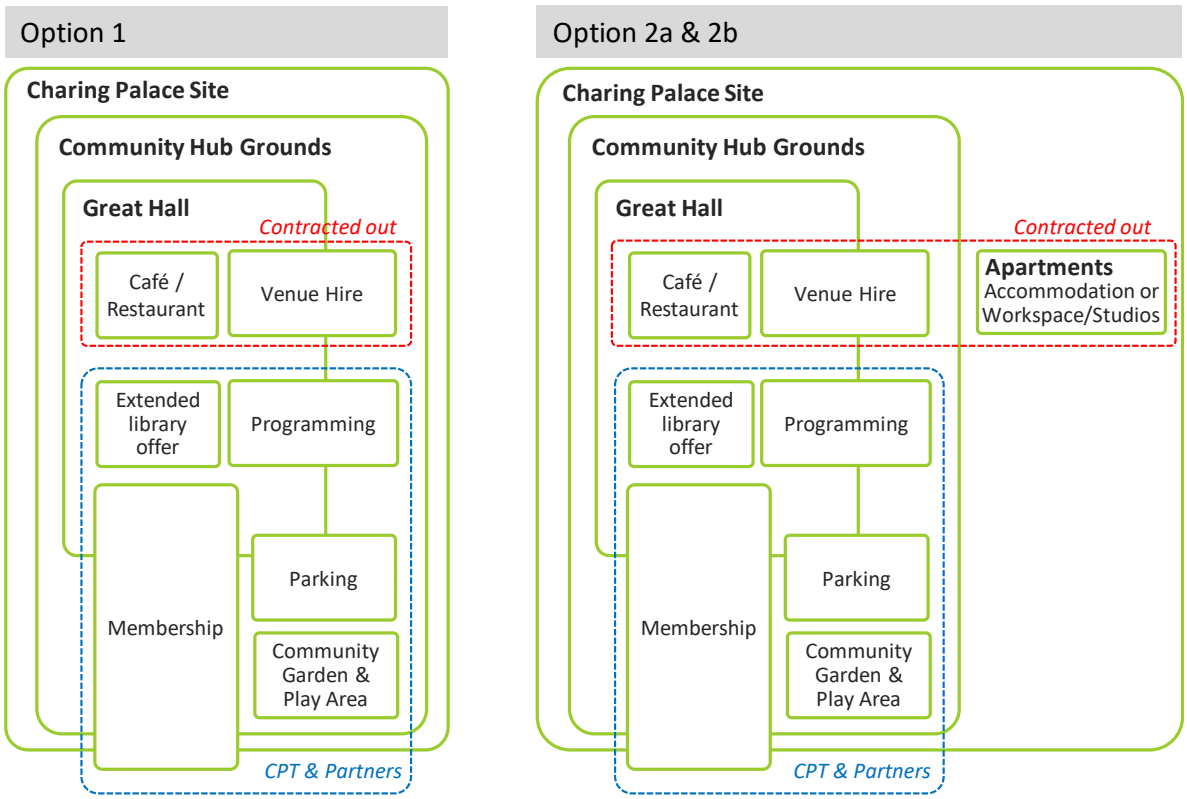
Figure 11. Five Year Income & Expenditure (Option 2b)

	Yr1	Yr2	Yr3	Yr4	Yr5
Income					
Contribution: Workspace	£21k	£29k	£28k	£29k	£31k
Contribution: Café	£17k	£21k	£19k	£21k	£19k
Contribution: Venue hire	£5k	£7k	£9k	£10k	£11k
Programming income	£41k	£38k	£38k	£41k	£38k
Membership income	£3k	£4k	£5k	£5k	£5k
Retail income	£25k	£29k	£27k	£27k	£27k
	£111k	£127k	£126k	£134k	£130k
Expenditure					
Programming costs	(£31k)	(£28k)	(£28k)	(£31k)	(£28k)
Membership costs	(£3k)	(£4k)	(£5k)	(£5k)	(£5k)
Retail costs	(£14k)	(£16k)	(£15k)	(£15k)	(£15k)
Staffing	(£45k)	(£45k)	(£45k)	(£45k)	(£45k)
Overheads	(£32k)	(£31k)	(£31k)	(£31k)	(£31k)
	(£124k)	(£123k)	(£123k)	(£126k)	(£123k)
Net surplus/deficit	**(£13k)**	**£4k**	**£3k**	**£8k**	**£7k**

5.2 Operational Functions, Relationships & Responsibilities

The diagram below denotes the difference between Option 1 and Option 2 being the inclusion or exclusion of the Apartments.

Figure 12. Operational Functions, Relationships & Responsibilities



5.3 Operational Income

In this section the operational financial projections are described and any variations between the options noted. These projections represent a baseline case and the third year of trading following the launch.

5.3.1 Apartments (as either Accommodation or Workspace)

Despite the 2017 options appraisal proposing the conversion of the Archbishop's Apartments into workspace/studios, the view of Drury McPherson Partnership is that a more sympathetic use would be in line with its original residential purpose. In the main, this is due to the more intrusive works necessary to convert the space to workspace and the small room sizes.

From a financial perspective, conversion to accommodation is likely to generate greater financial return, although the capital expenditure is anticipated to be higher.

While there is understood to be demand in Ashford Borough Council area for workspace and studio space, demand in a rural location like Charing – in particular, for the creative and artisan sectors – is hard to predict and carries with it far greater risk and uncertainty.

Appendix 2.4 summarises workspace currently being marketed in the Ashford Borough Council area and their rates. Most of this stock is not comparable to the redevelopment of the Apartments in Charing as they are either significantly larger and/or part of a larger cluster of related development or, located in an urban setting or, purpose-built rather than converted historic buildings.

Appendix 2.5 describes in greater detail a selection of these workspace properties that have greater relevance and synergy with what could be developed at Charing. Albeit, the majority of these are still significantly larger in scope. The rates for these comparator properties have been used to inform the estimated rates for the workspace option within the Apartments.

To confirm, CPT are not in favour of conversion to residential, as it would provide the least public access to this historic asset. Furthermore, its residential value could well be hindered being located immediately adjacent to the Great Hall in its converted state as a community hub.

Research into the supply of and demand for accommodation locally indicates two possible opportunities, namely:

- Basic accommodation that targets backpackers and walkers, largely being attracted to the area by the North Downs Way. The Kent Downs AONB, who manage and promote the trail, notes there is a lack of lower priced accommodation in the area currently to satisfy long distance walkers (N.B. this is a UK-wide phenomenon with other national trails, particularly in the South of England e.g. South Downs Way, South West Coastal Path). A key issue for Charing is the scale of this market, which is relatively small and niche, as well as being seasonal. Despite this, there is expected to be significant product and promotional investment in the Kent Downs Way over the coming years, which is consistent with Ashford and Kent's wider tourism economy objectives.
- A more up-market non-serviced accommodation offer, akin to a Landmark Trust style property. This could either be a single dwelling or divided into apartments/studios depending on the physical and conservation constraints. Either way, as a short-break holiday let, it would command significantly higher income and be less influenced by seasonal demand. Furthermore, demand risk would be mitigated by a back-up option of renting the property on a longer term residential basis either in combination with a holiday let or as a dedicated offer.

For the basis of this viability assessment and the option of converting the Apartments into accommodation, a single up-market holiday let is recommended and that the option of catering for the seasonal demand for backpackers and long-distance walkers be considered through the separate provision of a small campsite or temporary accommodation elsewhere on the site.

Despite its location in the heart of Kent and on the fringe of the Kent Downs AONB, the supply of higher quality non-serviced accommodation is relatively limited (see Appendix 2.3).

Interestingly, the tourism trend for Ashford has been showing positive signs of growth despite the decline in some areas within Kent. Furthermore, as one looks ahead, investment in the visitor economy in Ashford is significant and positive (see Appendix 2.4).

Figure 13 summarises the projected income as an up-market holiday let. Based on an internal floorspace of 310m^2, laid out over three floors, it is assumed that the property could comfortably accommodate eight people/beds in four or five bedrooms. Rental rates have been benchmarked against comparable accommodation (see Appendix 2.3) and, together with occupancy rates, have been adjusted for seasonal variations. The resulting blended occupancy rate of 65% is considered prudent for this stage of planning and over time, as the reputation of the property gains appeal in the marketplace, should be capable of rising and delivering greater profit. Overall, a healthy annual net income contribution is projected. There would also be an opportunity to upsell additional product and services to guests which could reasonably be expected to achieve a further 10%-20% of income but, for the baseline projection and prudence, this has been excluded (see 'other income').

Figure 13. Income from short-term holiday lets (Option 2a)

Income					
Beds		8			
Days/yr available		365			
	Average £/ night	£/ night/ person	% of availability	Occupancy %	£
Peak	550	68.75	25%	100%	£50,188
Mid	350	43.75	50%	60%	£38,325
Low	250	31.25	25%	40%	£9,125
				65%	
Rentals				100%	£97,638
Other income				0%	£0
					£97,638
Expenditure					
Admin				5%	£4,882
Marketing				10%	£9,764
Overheads				35%	£34,173
Property maintenance				10%	£9,764
Finance				0%	£0
					£58,583
Net operating income				**40%**	**£39,055**

By comparison, if the property was converted and rented exclusively on a short-term tenancy basis (say, 6 or 12-month lets), the annual net operating income is estimated to be significantly lower at around £12k (based on rates benchmarked against a range of comparable properties currently being marketed in the area – see Appendix 2.1).

If the Apartments were instead converted into workspace, Figure 14 below sets out the projected annual income. The rental rate and occupancy level are consistent with the previous Colliers report. It is assumed that an agency and legal services will be commissioned to market and negotiate leases on behalf

of CPT and a cost for this has been assumed. It is assumed the tenant will be responsible for all utility costs, business rates and dilapidations.

Figure 14. Income from workspace / studios (Option 2b)

Workspace / Studios		
Income		
Lettable area (sq.m)	310	
Rent (£/sq.m pa)	£125	
Void allowance	20%	
		£31,000
Expenditure		
Agency & legals	10%	£3,100
Net operating income		**£27,900**

5.3.2 Café / Restaurant

The café / restaurant is assumed to operate 7-days a week with patrons being a mix of regular local visitors, walkers and visitors to the surrounding area (i.e. Kent Downs, Church events, VFR[6] etc), library visitors and those attracted to the community hub for one-off events, exhibitions and programming.

The performance of the café will be strongly linked to the programming of the community hub. Limited programming and the café / restaurant business will suffer, while extensive programming and the business will benefit.

It is assumed at this stage that the café / restaurant business will be contracted out to an experienced operator. In time, as CPT gains experience and confidence, the option to bring the operation in-house may become more attractive and plausible.

Initial discussions with a range of local operators has indicated positive interest in operating contracts, reflecting enthusiasm about the market potential. The type of contract and its scope has yet to be determined. Critically, an agreement must strive to incentivise the operator to work in the interests of CPT and the community hub, rather than work with a narrow focus.

At this stage it is assumed the contract would cover the café / restaurant as well as the hiring of the venue for events and for Option 2, the guest accommodation in the adjacent Apartments (thus, offering the potential for a part-catered accommodation offer if that were desired).

It is assumed that CPT would own the kitchen and café / restaurant equipment, ensuring that, should the contract fail, the business would still have the capacity to operate with minimal disruption albeit, having either been brought in-house or contracted to a new operator.

[6] Visiting Friends and Relatives

Funding raised by The National Lottery heritage lottery fund AHF The Architectural Heritage Fund

Combining the café / restaurant business with the event hire and accommodation business should make it significantly more attractive and financially viable for prospective operators. Its performance would understandably be improved if the contracted operator were able to gain efficiencies by having a wider portfolio of related businesses. Over the last 5 years, there has been significant growth in small portfolio catering businesses spanning cafes, restaurants, bakeries, event catering and the like. However, there becomes a balance to be struck between a larger and potentially blander brand (which may afford greater efficiency) and a small, more unique operation which could be fully aligned with the community hub concept.

In these types of facilities, the café / restaurant often becomes its beating heart and its design and layout needs careful consideration to capitalise on the potential. Demand will vary from the time of day, to the day of the week and seasonally through the year. Its design should reflect this and be chameleon in nature, capable of adapting and flexing to changing demand patterns. It should also have an outdoor offer, catering for fine weather days and to capitalise on growing markets such as weekend cyclists.

Figure 15. Café / Restaurant (Option 2)

	% split	Average daily patrons	Ave spend per patron (net of VAT)	£
Snacks	70%	39	£3.50	£49,184
Meals	30%	17	£12.50	£75,281
		55	£6.20	£124,465
Cost of sales			40%	(£49,786)
				£74,679
Rent/Management Fee			15%	**£18,670**

For Option 1, where the Apartments are excluded from the scheme, it is assumed that the Rent/Management Fee resulting from the café will fall slightly due to the reduced operating efficiencies and the absence of regular staying guests or workforce to cater for. A small reduction of 5% is assumed.

Figure 16. Café / Restaurant (Option 1)

	% split	Average daily patrons	Ave spend per patron (net of VAT)	£
Snacks	70%	36	£3.50	£46,501
Meals	30%	16	£12.50	£71,175
		52	£6.20	£117,676
Cost of sales			40%	(£47,070)
				£70,606
Rent/Management Fee			15%	**£17,651**

5.3.3 Venue Hire

It is assumed that the operation of the venue hire business will be combined with the café business.

Initial market testing indicates a belief that the market appeal for the Great Hall as a character venue for receptions (i.e. weddings, dinners, dances etc.) could be strong, despite the volume of competition in the area[7] which covers a range of hotels, golf clubs and historic properties, typically offering capacities up to around 200 guests.

The key issue for the Great Hall will be, to what extent *could* and *should* the Great Hall be promoted as a character venue for private events given its principal function as a community hub. We have assumed that the commercialisation of the venue for private hire will be tempered and the projections reflect this.

The model assumes a combination of community and private events which may include: local interest groups and societies, parish meetings and events, education and training classes, group sessions (e.g. yoga, Pilates), supper clubs, film screenings, seminars and meetings, receptions and banquets.

The model assumes community events will be charged at a reduced rate. Pricing for hire should be influenced by the individual event bearing in mind that those generating larger wet sales (i.e. bar receipts) might be offered a significantly reduced hire charge. Understandably, the majority of income is derived from wet sales.

Figure 17. Venue Hire assumptions (Option 1 & 2)

No. of events	Small	Medium	Large
Community events	10	5	1
Private functions	30	15	5
Average attendees			
Community events	10	50	120
Private functions	10	50	120
Hire cost			
Community events	£15	£35	£75
Private functions	£50	£500	£1,000
Average catering spend/attendee			
Community events	£0.00	£3.50	£5.00
Private functions	£3.50	£25.00	£45.00

[7] See Appendix 4 of Colliers International's Options for Charing Palace report, May 2016

Funding raised by The National Lottery heritage lottery fund AHF The Architectural Heritage Fund

Figure 18. Venue Hire financials (Option 1 & 2)

Hire income	Small	Medium	Large	£
Community events	£150	£175	£75	£400
Private functions	£1,500	£7,500	£5,000	£14,000
	£1,650	£7,675	£5,075	£14,400
Catering income				
Community events	£0	£875	£600	£1,475
Private functions	£1,050	£18,750	£27,000	£46,800
	£1,050	£19,625	£27,600	£48,275
Operating Costs				
Hire costs			25%	£3,600
Catering costs			85%	£41,034
				£44,634
Gross Profit				
Hire margin			75%	£10,800
Catering margin			15%	£7,241
				£18,041
Rent/Management Fee			15%	**£9,401**

5.3.4 Programming

At the core of the community hub will be a programme of events and activities running throughout the calendar year. These will be curated by CPT, working with a range of partners.

The programme will provide a broad range of engagement opportunities designed to address the charitable objects of CPT and the priorities of its partners.

The programme will be a vital component of the community hub, providing a range of on-mission experiences and reasons for people to visit and crucially, to regularly return.

The programme itself is expected to run at a deficit, offset by other income generating activities.

The programme will evolve as the definition of the community hub strengthens and the interpretation and audience development plan is developed. At this stage, five types of programming have been assumed, covering:

- Education e.g. primary school groups, foreign language students.
- Small events e.g. Continued Professional Development (CPD), specialist demonstrations, evening classes, group experiences.
- Large events e.g. guest lectures, receptions, fairs, artistic and cultural performances.
- Guided tours e.g. volunteer-led guided tours.
- Exhibitions e.g. temporary exhibitions, installations or experiences (developed by CPT or by third parties or in partnership).

This level of programming anticipates around 7,500 'engagements' by visitors to the community hub.

Figure 19. Programming (Option 1 & 2)

	Ave attendance	No. of events	Ave ticket price	Income £	Gross Profit %	Gross Profit £
Education	30	30	£2.50	£2,250	50%	£1,125
Small events	15	50	£15.00	£11,250	20%	£2,250
Large events	150	4	£7.50	£4,500	25%	£1,125
Guided tours	15	50	£5.00	£3,750	75%	£2,813
Exhibitions	1,500	3	£3.50	£15,750	15%	£2,363
				£37,500		**£9,675**

5.3.5 Extended Library Offer

Although KCC have expressed their interest in exploring the option of integrating Charing library, discussions are only at an early stage. At the time of writing this report, no information has been shared regarding the operating costs and incomes associated with the current library. As such, it is assumed that the operational cost of providing the library service will continue to be met by KCC although, it is anticipated that its integration with the community hub will give rise to operational efficiencies and cost savings for KCC.

It is assumed that the library's offer, as part of the community hub, will be extended through a range of other facilities and services related to the history and heritage of the Palace and Charing more generally. The detail of these facilities and services has yet to be defined but, based on experience elsewhere, could include:

- storage of local collections and archives e.g. artefacts, records, deeds, maps, deeds, cuttings, microfilms etc. and areas for managed access to these.
- workstations that provide online access to digitised data and collections;
- combination of permanent and temporary installations about the Palace, Charing and the wider area, topical issues, ancestry and genealogy, etc.
- study areas and informal workspace for research, students and local business professionals.

At this stage, no additional income is assumed to cover the extended library offer. The additional costs and staff required to cover its operation are included within the overheads and staffing sections below.

5.3.6 Community Hub Membership

A community membership programme is assumed which will offer a range of member benefits and discounts.

Benefits would cover things like regular e-news publications, preview access to new events and exhibitions at the community hub, member events, promotional deals with selected partners, discounts on ticketed events, café and retail purchases.

The objective of a membership programme is to garner local support and enthusiasm for the community hub, not to generate a profit from the scheme itself. It would of course, have an associated fundraising

dimension to encourage local philanthropy and legacy donations and would be an important mechanism for recruiting volunteers.

As is the case for most membership programmes of this scale and nature, it is assumed that it will be cost neutral i.e. the programme spend will match the income generated.

Membership numbers are projected to grow steadily during the development phase, accelerate around the time of launch and return to steady growth over the first couple of years in operation before plateauing.

Figure 20. Membership (Option 1 & 2)

		£
Members	350	
Average subscription price (individual)	£15	
Income		£5,250
Cost of membership programme	100%	(£5,250)
Gross Profit		**£0**

5.3.7 Community Garden and Outdoor Play

The concept of creating a community garden to the north of the Great Hall has been suggested, which would *'reflect garden styles through the Palace's history'* and provide a local amenity, attraction for visitors and source of local produce for the café.

Hadlow College in Tonbridge has expressed an interest to CPT in adopting the concept as a student project – to research and develop the design.

At this stage, it is assumed that the cost of implementing the garden would be funded as part of the overall project together with specific fundraising campaigns for the garden itself. The cost of maintaining and opening the community garden is assumed to be offset through the combination of volunteers, ongoing fundraising and cross-subsidy from the 'community hub'.

In addition to the community garden, outdoor play will be developed to encourage families and carers with children. The concept proposes, much like the Magic Garden at Hampton Court Palace, to theme the play on the history of the palace thereby extending the interpretation and engagement opportunities. The outdoor play is assumed to be free to access and will be designed to cater for different age categories.

5.3.8 Retail

The volume and nature of destination visitors means that the retail ambition within the community hub needs to be cautioned.

At this stage, it is assumed that the staffing and management of the retail operation is integrated into the community hub operations as it would be incapable of generating a profit in isolation. The range of merchandise needs to be carefully considered to appeal to the variety of visitors. As an example, there may be a guide book on the palace itself targeting destination visitors, local maps for walkers, souvenirs

for school groups and children, local art work displayed around the café, plant sales relating to the community garden etc.

Figure 21. Retail (Option 1 & 2)

	% split	Average daily patrons	Ave spend per patron (net of VAT)	£
Guide book	40%	10	£4.50	£16,425
Other	60%	15	£2.00	£10,950
		25	£3.00	£27,375
Cost of sales			55%	(£15,056)
Gross Profit				**£12,319**

5.4 Operational Expenditure

5.4.1 Staff

Much of the community hub will be staffed by the café contractor, KCC library staff and volunteers. It is assumed that the co-ordination of these and the strategic overview of facility will be directed by a manager, employed by the CPT, and supported by an assistant.

Key to the success of the facility, and maintaining an efficient operation, will be the effective mobilisation and co-ordination of volunteers. Given the nature and significance of Charing Palace assets and the proposed development, there should be a healthy attraction for volunteers and the challenge is in maintaining their enthusiasm and coordinating their efforts in an efficient and effective way.

Figure 22. Staff (Option 1 & 2)

	FTE	Salary	Oncosts	£
Manager	1	£30,000	15%	£34,500
Assistant	0.5	£17,500	15%	£10,063
Archivist/Historian (Vol)	1.5	£0	0%	£0
Welcome/Explainer (Vol)	1.5	£0	0%	£0
Community Gardener (Vol)	1.5	£0	0%	£0
Tour Guide (Vol)	0.5	£0	0%	£0
Other (Vol)	1	£0	0%	
				£0
				£44,563

5.4.2 Overheads

The overheads of the community hub facilities will be apportioned and allocated across its various functions. The overheads estimated for CPT's operations are summarised below and are considered reasonable for the scale of operation being proposed. In addition to these operational costs, there will be a need to develop a capital renewal strategy to address the longer-term needs of the buildings, its services and equipment.

Figure 23. Overheads (Option 1 & 2)

		£
Finance & legal		£1,500
IT		£500
Administration		£1,500
Building costs		£2,000
Utilities		£4,000
Volunteer co-ordination		£2,000
Access & engagement		£7,500
Extended library offer		£2,500
Marketing		£1,500
Repairs and Maintenance		£5,000
Contingency	10%	£2,800
		£30,800

Appendices

1 Consultees

- Andrew Osborne, Economic Development Manager, Ashford Borough Council
- Angharad Yeo, Artist (Charing)
- Caroline Stanford, Landmark Trust
- Catherine Bradley, Kent Downs AONB
- David Geddes (2016/2017 options appraisal work)
- Elizabeth Tweed, No.44 - boutique (Charing)
- Jackie Taylor-Smith, Strategic Manager Business Development Libraries, Kent County Council
- Jennifer Hedley, Artist and teacher (Charing)
- Jill Leyland, Chair of Charing Parish Council
- Keith Oram, Charing History Society
- Martyn Johns, GM&M Johns Family Butchers (Charing)
- Nick Sandford, Estate Manager, Godinton House & Gardens
- Paul Drury, Drury McPherson Partnership (2016/2017 options appraisal work)
- Richard Alderton, Director Place and Space, Ashford Borough Council
- Simon McCormack, Thomas Ford and Partners (2016/2017 options appraisal work)
- Sarah Jane Hawkins, Mulberry Tea Room (Charing)
- Vin Patel, Wady and Brett, Licensed General Store (Charing)

2 Market Analysis

2.1 Average Residential Values for TN27 Postcode estimated by Zoopla

June 2018					
Property type	*Avg current value*	*Avg £ per sq m*	*Avg # beds*	*Avg £ paid (last 12m)*	*% Change*
Detached	£639,803	£3,993	3.90	£542,773	15%
Semi-Detached	£345,510	£3,531	3.00	£375,013	14%
Terraced	£286,325	£3,272	2.70	£249,542	9%
Flats	£172,290	£3,186	1.80	£136,000	26%

Extract from Colliers Report 2017				
Property type	*Avg current value*	*Avg £ per sq m*	*Avg # beds*	*Avg £ paid (last 12m)*
Detached	£595,162	£3,475	4	£517,946
Semi-Detached	£320,471	£3,110	3.1	£350,041
Terraced	£273,332	£3,002	2.8	£256,660
Flats	£186,035	£2,529	1.9	£159,350

2.2 Comparator rates for short-term residential tenancies

Location	**Beds**	**Type**	**Monthly £**
Charing	3	Semi	£950
Charing	3	Semi	£1,150
Lenham Heath	3	Semi/ character (Oast House)	£1,700
Egerton	3	Semi	£975
Challock	1	Detached / fully furnished	£1,517
Throwley	1	Detached / fully furnished	£1,560
Egerton Forstal	2	Detached / fully furnished	£2,058
Woodside Green	2	Detached / fully furnished / Barn conversion	£2,058

2.3 Comparator rates for accommodation near Charing

Figure 24. Summary average 'comparable rate' for accommodation within 0-15miles of Charing

Type	*No. within 15 miles of Charing*	*Average comarable rate*
Self Catering	15	£157
Hotel	23	£74
B&B	14	£89
Campsite	3	£19
Inn	1	£80

Figure 25. Accommodation within 0-5miles of Charing

Name	*Type*	*No. of rooms*	*Average room / unit rate*	*Comparable rate*	*Distance from Charing (miles)*
Premier Inn Ashford North	Hotel	60	£60	£60	2.2
The Bowl Inn Charing	Inn	6	£80	£80	2.2
Shepherd's Farm Cottage	Self-Catering	1	£225	£225	2.7
Granary Cottage	Self-Catering	1	£425	£425	3.0
The Harrow Hill Hotel	Hotel	14	£45	£45	3.6
The Old Stables	Self-Catering	1	£400	£400	3.7
The Barrow House	Bed and Breakfast	3	£80	£80	3.9
Dog & Bear Hotel	Hotel	24	£60	£60	4.0
4&5 Lime Tree Cottages	Self-Catering	2	£370	£185	4.2
Dunn Street Farm Camping	Campsite		£8	£8	4.5
Hedgale Barn	Bed and Breakfast	2	£320	£320	4.5
The Dering Arms	Bed and Breakfast	4	£85	£85	4.6

Figure 26. Accommodation within 5-10miles of Charing

Name	*Type*	*No. of rooms*	*Average room / unit rate*	*Comparable rate*	*Distance from Charing (miles)*
The Frith Farm House - Damson Cottage	Self-Catering	3	£323	£108	5.1
The Frith Farm House - The Hayloft	Self-Catering	2	£253	£127	5.1
The Frith Farm House - Blossom Cottage	Self-Catering	1	£132	£132	5.1
The Frith Farm House - Cherry Cottage	Self-Catering	1	£157	£157	5.1
Elvey Farm	Bed and Breakfast	5	£65	£65	5.3
Lords Wood Camping	Campsite	50	£30	£30	5.7
Chilston Park Hotel	Hotel	53	£109	£109	5.7
The Roebuck Inn - RelaxInnz	Hotel	3	£59	£59	5.9
Travelodge Ashford	Hotel		£60	£60	5.9
Holiday Inn - Ashford North	Hotel	92	£60	£60	6.0
Hayesbank B&B	Bed and Breakfast	5	£45	£45	6.1
Cornerstone B&B	Bed and Breakfast	11	£42	£42	6.2
Sandhurst Farm Forge	Bed and Breakfast	2	£60	£60	6.2
Welsummer Camping	Campsite	21	£20	£20	6.3
Stourview Cottage	Bed and Breakfast	4	£100	£100	6.3
The Prospect Tower (Landmark Trust)	Self-Catering	1	£55	£55	6.4
Ashford International Hotel	Hotel	179	£111	£111	6.6
Downsview Guest House	Bed and Breakfast	13	£65	£65	6.8
The Conningbrook Hotel	Hotel	29	£80	£80	6.8
The New Flying Horse	Hotel	9	£76	£76	6.9
Croft Hotel	Hotel	17	£50	£50	7.0
Bramley Knowle Farm B&B and Self Catering	Bed and Breakfast	3	£50	£50	7.1
Frasers	Bed and Breakfast	5	£85	£85	7.2
3 Malthouse Cottages	Self-Catering	2	£140	£35	7.3
Forge Cottage	Self-Catering	2	£500	£250	7.7
Eastwell Manor Hotel	Hotel	62	£60	£60	7.8
The Sanctuary	Self-Catering	3	£212	£71	7.9
Apple Pye Cottage	Self-Catering	2	£86	£86	7.9
Who'd A Thought It	Hotel	13	£100	£100	8.0
Plumpton House	Self-Catering	3	£60	£60	9.5
Homelea Bed and Breakfast	Bed and Breakfast	4	£135	£135	9.5

Figure 27. Accommodation within 10-15miles of Charing

Name	Type	No. of rooms	Average room / unit rate	Comparable rate	Distance from Charing (miles)
Railway Hotel	Hotel	7	£48	£48	10.1
March Cottage Bed and Breakfast	Bed and Breakfast	3	£65	£65	10.2
Orchard Cottage Holidays	Self-Catering	3	£225	£38	10.4
The Faversham Creek Hotel	Hotel	7	£100	£100	10.7
Murcure Maidstone Great Danes Hotel	Hotel		£75	£75	10.8
Judd's Folly Hotel	Hotel	6	£65	£65	11.0
Days Inn Maidstone	Hotel		£60	£60	11.7
White Horse Inn	Hotel	13	£85	£85	11.7
The Sun Inn	Hotel	14	£90	£90	11.9
Howfield Manor Hotel	Hotel	15	£70	£70	12.0
Tonge Barn Hotel	Hotel	9	£95	£95	12.9
The Golden Hope - Wetherspoon	Hotel		£65	£65	13.1
Warren Farm	Bed and Breakfast	2	£45	£45	14.3

Figure 28. Landmark Trust properties in Kent

Name	Type	Rental Type	No. of rooms	"From" rate pn	Comparable rate pppn	Distance from Charing (miles)
The Prospect Tower (Landmark Trust)	Self-Catering		1	£110	£55	24.2
St Edward's Presbytery (Landmark Trust)	Self-Catering		2	£68	£17	34.5
The Grange (Landmark Trust)	Self-Catering		4	£182	£23	34.5
Hole Cottage (Landmark Trust)	Self-Catering		2	£112	£28	42.2
Obriss Farm (Landmark Trust)	Self-Catering		3	£105	£21	47.0

Figure 29. Airbnb advertised properties within 10miles of Charing

Name	Type	Rental Type	No. of rooms	Average rate pn	Comparable rate pppn	Distance from Charing (miles)
Cosy Room Charing	Bed & Breakfast	Private Room	1	£45	£23	0
Cosy Room Charing	Bed & Breakfast	Private Room	1	£45	£23	0
Peckwater House	Self-Catering	Entire House	5	£250	£31	0
Peckwater House	Self-Catering	Private Room	1	£50	£25	0
The Cart Lodge, Darling Buds Farm	Self-Catering	Entire Bungalow	2	£140	£35	0.9
Swan Street Hayloft	Self-Catering	Enitre Cottage	2	£130	£33	1.4
Traditional 17th C Kentish Barn	Self-Catering	Entire House	4	£375	£38	1.4
Shaw Grange	Bed & Breakfast	Private Room	1	£85	£43	1.6
Bowl Cottage	Bed & Breakfast	Private Room	1	£28	£14	1.6
Nettlepole Yellow Room	Bed & Breakfast	Private Room	1	£75	£38	2.6
Garden Cottage	Self-Catering	Entire Guesthouse	1	£100	£50	2.9
Beautiful family home in rural kent	Bed & Breakfast	Private Room	3	£79	£13	3
Stunning Cottage in Egerton	Self-Catering	Entire Cottage	2	£91	£46	3.5
Luxury, Contemporary Barn Conversion	Self-Catering	Entire House	6	£750	£47	3.6
Bells Forstal Farm Stables	Self-Catering	Entire House	2	£118	£30	4.1
Spacious Room in Tranquil Location	Bed & Breakfast	Private Room	1	£65	£33	4.1
Double ensuite room	Self-Catering	Private Room	1	£55	£28	4.1
The Nutshell	Self-Catering	Entire House	1	£89	£45	4.3
The Granary	Self-Catering	Entire House	1	£350	£175	5.1
Kindling Cottage Stalisfield Green	Self-Catering	Entire House	1	£120	£60	5.1
Nettlepole Bird Room	Bed & Breakfast	Private Room	1	£90	£45	5.1
Stables Farm Shepherd's Hut	Self-Catering	Shepherds Hut	1	£70	£35	5.1
Pretty Cottage on a Farm	Bed & Breakfast	Private Room	1	£67	£34	5.6
Secluded & comfortable family home	Bed & Breakfast	Private Room	3	£80	£13	6.2
Lovely Contemporary Eco House Near Cl	Self-Catering	Private Room	1	£70	£35	6.2
The Cart Shed at South Barn	Self-Catering	Entire Guesthouse	1	£75	£38	6.2
The Annexe, Stanford Bridge Barn	Self-Catering	Private Room	1	£92	£46	6.2
The Studio at Arden	Self-Catering	Entire Chalet	1	£85	£21	9.5
Arden B&B in the garden of England	Bed & Breakfast	Private Room	3	£85	£14	9.5

2.4 Available workspace in Ashford and rates

Figure 30. Available office space in Ashford Borough Council

	Total area (sq m)	Rent (£/pa)	Rent (£/m^2 pa)
10/12 Middle Row, Ashford, Kent , TN24 8SQ	84	£10,000	£119
11 New Street, Ashford, Kent , TN24 8TN	37	£7,800	£210
190 Eureka Park, Upper Pemberton, Ashford, Kent , TN25 4AZ	276	£58,000	£210
1st and 2nd Floor Offices, 17-25 New Rents, Ashford, Kent , TN23 1DX	118-119	£15.2k-£16k	£129-£135
2nd Floor Office Space, 1 Middle Row, Ashford, Kent , TN24 8SQ	40	£5,000	£125
75 High Street, Ashford, Kent , TN24 8SF	86	£28,000	£325
94c High Street, Tenterden, Kent , TN306JB	92	£12,500	£137
Burnt House Farm Business Park , Unit 11, Bedlam Lane , Smarden, AShford, Kent , TN27 8PG	28	£4,740	£170
Calgarth House, 39-41 Bank Street, Ashford, Kent , TN23 1DQ	117-426	£17.6k-£64k	£151
Detached Granary Office, Westwell Leacon, Charing, Ashford, Kent , TN27 0EH	43	£5,400	£126
The Granary, Eastwell Court Farm, First Floor, Eastwell Park, Ashford, Kent , TN25 4JS	85	£14,400	£170
Epps Building, Surplus Office Accommodation, Bridge Road, Ashford, Kent , TN23 1BB	91	£10,500	£116
First & Second Floor, 10a Bank Street, Ashford, Kent , TN23 1BX	69	£5,000	£73
First Floor Office, 21 Sayers Lane, Tenterden, Kent , TN30 6BW	65	£8,500	£131
First Floor Offices, 57 High Street, Ashford, Kent , TN24 8SG	24	£3,900	£161
First Floor Suite, 162a Godinton Road , Ashford, Kent , TN23 1LN	53	£5,500	£103
First Floor, 2A Market Buildings, Ashford, Ashford, Kent , TN23 1JA	29	£5,500	£192
Ground Floor Office Suite, 162a Godinton Road , Ashford, Kent , TN23 1LN	16	£3,600	£228
Henwood Industrial Estate, Highpoint Business Village, First Floor Unit 7, Ashford, Kent , TN24 8DH	148	£18,000	£121
Henwood Industrial Estate, Highpoint Business Village, First Floor Unit 9, Ashford, Kent , TN24 8DH	53	£8,500	£160
Henwood Industrial Estate, Unit 13, Highpoint Business Village, Ashford, Kent , TN24 8DH	51	£7,500	£147
Henwood Industrial Estate, Unit 3, Highpoint Business Village , Ashford, Kent , TN24 8DH	162	£22,800	£140
Henwood Pavilion, Suite 2 1st Floor, Hythe Road, Ashford, Kent , TN24 8DH	45	£6,250	£140
Henwood Pavilion, Suite 2 2nd Floor, Hythe Road, Ashford, Kent , TN24 8DH	62	£8,500	£138
International House, 11th Floor, Dover Place, Ashford, Kent , TN23 1HU	541	£93,184	£172
International House, Suite 1, 4th Floor , Dover Place, Ashford, Kent , TN23 1HU	73	£23,274	£321
International House, Suite 2, 2nd Floor, Dover Place, Ashford, Kent , TN23 1HU	53	£9,120	£172
International House, Suite 2, 3rd Floor , Dover Place, Ashford, Kent , TN23 1HU	46	£14,768	£320
International House, Suite 3, 2nd Floor, Dover Place, Ashford, Kent , TN23 1HU	54	£9,296	£172
International House, Suite 5, 4th Floor , Dover Place, Ashford, Kent , TN23 1HU	49	£15,615	£321
International House, Suite B 10th Floor, Dover Place, Ashford, Kent , TN23 1HU	176	£30,320	£172
KPCH Business Park, Suite 10, Canterbury Road, Willesborough, Ashford, Kent , TN24 0BP	24	£2,640	£110
Office F4, 100 Ellingham Way, Ashford, Kent , TN23 6LZ	22	£3,840	£174
Office G1, 100 Ellingham Way, Ashford, Kent , TN23 6LZ	20	£3,960	£199
Office Suites 5-7, Pound Lane, Smeeth, Ashford, Kent , TN25 6RJ	17-31	£4.3k-£6k	£196-£257
Orbital Park , Unit 4 , The Glenmore Centre, Ashford, Kent , TN24 0TL	184	£22,000	£120
Orbital Park, Unit 12, Oak Tree Business Centre, Ashford, Kent , TN24 0SY	83	£18,500	£224
Pickhill Business Centre, Unit 11, Smallhythe Road, Tenterden, Kent , TN30 7LZ	153	£21,000	£137
Pluto House, Suite B, First Floor, 19-33 Station Road, Ashford, Kent , TN23 1PP	135	£15,900	£118
Pound Lane Industrial Estate, Unit 1, Pound Lane, Kingsnorth, Ashford, Kent , TN23 3EJ	121	£15,000	£124
Second Floor Suite 2, 18 North Street, Ashford, Kent, TN24 8JR	12	£2,820	£237
Stourside Place, Station Road, Ashford, Kent , TN23 1PP	252-504	£43k-£87k	£173
Surplus Offices, Ground Floor, Bridge Road, Ashford, Kent , TN23 1BB	31	£5,250	£168
The Old Court, 8 Tufton Street, Ashford, Kent , TN23 1QN	418	£75,000	£179
The Thorne Business Park, Forge Hill, Bethersden, Bethersden, Kent , TN26 3AF	23-65	£3k-£7.6k	£117-£133
Williamson House, Suite 19 Ground Floor, Wotton Road, Ashford, Kent , TN23 6LW	15	£2,640	£172
Williamson House, Suite 32 Ground Floor, Wotton Road, Ashford, Kent , TN23 6LW	29	£4,500	£155

2.5 Workspace case studies in Ashford Borough Council

2.5.1 Evegate Business Park, Ashford

Based in a rural setting, in the south side of Ashford. Evegate Business Park is made up of converted barns and includes a range of different uses including offices, marketspace, retail. Its developed over a number of years.

Evegate is already home to a broad range of successful businesses including shops, café, micro pub, services and country walks. It's business start-up record includes established local businesses Clive Emson Auctioneers, Holiday Extras and Evegate Publishing.

Evegate's Buildings:

1) The Courtyard – a converted farm building, including a converted cart shed and oast houses. It has four retail units and five serviced units which are all occupies
2) Oast House – one office unit with a meeting room and three retail units
3) Park Barn – comprises of twenty-one offices over four floors, shared kitchen, conference room and post collection. Units range from 250 sq ft to 1,500 sq ft.
4) Park Grange – a mix of six office units spread over two floors and six retail units
5) The Gatehouse – purposefully built for a veterinary clinic on the g round floor and self-contained residences for Evegate's onsite groundsmen on the upper floor
6) Hembrow – Evegate's newest building consisting of two serviced and three office units spread over two floors with private kitchens
7) Merchant – most recently converted space

2.5.2 Mersham-le-Hatch

Based in a rural setting, the historic Mersham-le-Hatch Business Village is set within a courtyard setting. There is a restaurant and, walled garden and business units – with some associated with food

e.g. Kent Cookery School and The Cake Place. It has been the setting for weddings and afternoon tea as well as the "Secret Retreat Day Spa". The SR Hair Spa opened in May 2018.

Two single storey retail units, which are recently converted garages, are being advertised for late 2018:

- Unit 1 is 22.9sqm, charged at £6,500 per annum
- Unit 2 is 33.3sqm, charged at £9,500 per annum

2.5.3 Mersham Hatch Estate

The Wood Turners is located on Church Road in Smeeth (TN25 6SA). There are three separate office units in the property which will all be available in September 2018. The units are split into the following sizes which can be let separately or as a whole:

- Unit 1 is 55.7sqm, charged at £9,600 pa which is equivalent to £172.35 per sqm per annum
- Unit 2 and 3 are both 46sqm, charged at £7,920 pa which is equivalent to £172.17 per sqm per annum

2.5.4 Repton Park

There are two developments available for freehold, with prices available on application:

- Parcel 8 which is at the entrance to Repton Park will provide 4 retail/business units which will be available individually or in multiples. Above the units are ten one-bedroom apartments and ten two-bedroom apartments. The Two units are 66.3m2 and the other two are 67.2m2
- Parcel 10 which is located on the same road a few meters away will provide a further two units which can be used as business units or retail outlets sized at 70m2 and 62.5m2. Above the units are seven live/work spaces, two bed units. Thirteen one-bed apartments and twenty-two two-bed apartments.

2.5.5 Various

Thorne Business Park, Forge Hill

Based in a rural location with landscaped gardens in the north east edge of Bethersden, in close proximity to Pluckley railway station. This refurbished oast building has been transformed into modern office accommodation.

There are a number of suites currently available for rent, including:

- Suite 10 – 22.6 sqm £3,000 pa, £195 per sqm per annum
- Suite 8 – 28.8 sqm £3,720 pa, £192 per sqm per annum
- Suite 5 & 6, which consists of one large open room and one smaller office with an interconnecting door – 64.9 sqm £8,400 per annum, £192 per sqm per annum
- Suite 2 – 28.9 sqm. £3,750 per annum, £192 per sqm per annum

The Granary, Eastwell Court Farm, Eastwell Park

Based in a rural location 3 miles from Ashfrod. The Granary has recently converted first floor offices of about 85m2 with a reception, kitchen and parking. The office space is priced at £12,000 per annum.

£170 per sqm per annum

The Old Courthouse, Tufton Street, Ashford

This office suite is located on the ground floor of Ashford's old court building It is predominantly open plan in nature and could be split if required. The current configuration provides workstations for over 50 people.

The 4,180 sqm space is priced at £75,000 per annum

£179 per sqm per annum

Calgarth House, Ashford

Located in close proximity to the town centre. There are a number of new developments on Elwick Road, including a multi-screen cinema complex, restaurants, residential and commercial office premises.

Calgarth House is a well maintained period style property, with the entire interior completey reconstructed to provide three floors of modern office accommodation.

The second and third floors are available to let as a whole making up 425.9 sqm of space for £64,179 per annum. Both floors have open floor office spaces with kitchen facilities

£150 per sqm per annum

Burnt House Farm Business Park, Smarden Burnt House Farm is a recently converted former agricultural building. Unit 11 measures 27.9m² charged at £4,740 per annum. The office has a variety of facilities including toilet, kitchenette and open plan office area. £170 per sqm per annum	
18 North Street, Ashford This Grade II Listed Building is located close to the High Street. The offices are accessed via a shared entrance. There are two front offices overlooking North Street and a further smaller office at the rear on the first floor, and further office space on the second floor.. The office suite also has use of its own kitchen and W.C. facilities. ➢ First floor – 56.6 sqm, charged at £8,700 pa ➢ Second floor – 11.9 sqm, charged at £2,820 pa £154 per sqm per annum and £237 per sqm per annum respectively	

3 Ashford Tourism Trends

- Ashford is investing heavily in its leisure and tourism sector, with planned investments totalling around £100 million. In particular, there has been heavy investment in the family attractions and entertainment offer with the opening of Flip Out, Hollywood Bowling (through AMF Bowling), Pressure Point Escape Rooms, Escape 60 and a planned new IMAX theatre. Moreover, Ashford is set to become the 'model railway capital of the UK' with the opening of the Ashford International Model Railway Education Centre (Aimrec). Aimrec is expected to attract up to 500,000 visits a year, with fundraising for the £6m project being supported by VIP model railway fans such as Roger Daltrey, Jools Holland and Pete Waterman. Elwick Place, a £75 million leisure hub, is set to open in Christmas 2018, comprising of a 900 seat Picturehouse, 8 restaurants, a Travelodge hotel and further plans to provide up to 200 residential apartments.
- Attractions in Ashford[8] have seen a gradual increase in visitor numbers. Between 2015 and 2016, Hole Park Gardens (paid admission) increased visits by 16% from 11,800 to 13,700; Smallhythe Place (paid admission) rose from 17,000 to 17,400; and Ashford Borough Museum (free admission) saw a 20% increase in visits from 2,800 to 3,400.
- The Economic Impact of Tourism in Ashford (2015) report, commissioned by VisitKent states that 'Since Visit Kent's launch in 2002, the value of Kent's tourism industry has risen by 49%'.
- The serviced accommodation occupancy data shows an increase of 2.4% in room occupancy between 2013 (68.1%) and 2015 (70.5%).
- Although trips[9] to Kent have been decreasing over the last two years (8% decrease in 2013-15 to 3.03 million and 2% decrease in 2014-16 to 2.9 million), Ashford has had a strong increase in the number of total trips to 261,000 in 2014-16.
- The number of Holiday trips made to Ashford increased by 12% in 2014-16 to 110,000, whereas Kent had an 8% increase to 1.2 million visits.
- Overnight visitors to Ashford increased by 10% to 636,000 in 2014-16 and has been a growing trend since 2011-13, which saw visits increase by 29% from 423,000 to 546,000. Kent on the other hand saw overnight visitors decrease by 23% in 2013-15 from 8.4 million to 7.4 million, further dropping by 2% in 2014-16.

[8] Reported to Visit England Visits to Attractions
[9] Trips cover Holiday, VFR and business.

All information, analysis and recommendations made for clients by Fourth Street are made in good faith and represent Fourth Street's professional judgement on the basis of information obtained from the client and elsewhere during the course of the assignment. However, since the achievement of recommendations, forecasts and valuations depends on factors outside Fourth Street's control, no statement made by Fourth Street may be deemed in any circumstances to be a representation, undertaking or warranty, and Fourth Street cannot accept any liability should such statements prove to be inaccurate or based on incorrect premises. In particular, and without limiting the generality of the foregoing, any projections, financial and otherwise, in this report are intended only to illustrate particular points of argument and do not constitute forecasts of actual performance.

CHARING NEIGHBOURHOOD PLAN

PROJECT 130 TOURISM

This section includes

- Tourism report and an analysis of visitor accommodation within 10 miles of Charing
- Reference has been made to the ‘Village Trail’
- Letter of 18-08-18 to traders to gauge their support to boosting tourism

Charing Neighbourhood Development Plan – Tourism

Charing lies in a very attractive location at the foot of the North Downs and has been an important resting place for centuries on the mediaeval Pilgrim's trail to the shrine of Thomas Becket at Canterbury. The village has a wealth of interesting and historic buildings and the remains of a palace used by the Archbishops of Canterbury.

Charing is ideally situated to attract tourism, not only for those walking the Pilgrim's Trail, but also visitors passing on their way to local towns and attractions. Tourism can increase the footfall for local retailers but maximum commercial benefit would be obtained if those visitors were to stay overnight in the village. Facilities in the village are currently very limited in this regard although many different types of visitor accommodation are available close by to suit all budgets - see Annexe 1.

An increase in tourism should be supported provided there is no adverse effect on the character of the village and surrounding area. Improvement in visitor numbers could also generate additional employment opportunities for local residents. The limited resources for refreshment and/or accommodation in the village centre is a disincentive for travellers to either visit or prolong their stay in Charing. This compares unfavourably with Lenham where various options exist.

The Charing Palace project which is already underway may provide opportunities in the future for both local employment and a tourist attraction. However the village will need additional facilities to encourage tourists to remain in the village otherwise they will move on elsewhere.

Visitor Accommodation available within a radius of 10 miles (See Appendix 1)

Appendix 1

Visitor Accommodation available within a radius of 10 miles

Hotels:

The Dog & Bear Hotel (4.1 miles)
The Square
Lenham
Maidstone ME17 2PG

Phone: 01622 858219
Website: www.dogandbearlenham.co.uk

Ashford International Hotel (5.1 miles)
Simone Weil Avenue,
Ashford TN24 8UX

Phone: 01233 219 988
Website: www.qhotels.co.uk/our-locations/ashford-international-hotel

Chilston Park Hotel (5.7 miles)
Sandway
Lenham
Maidstone ME17 2BE

Phone: 0845 072 7426
Website: www.handpickedhotels.co.uk/chilstonpark

The Conningbrook Hotel (6.8 miles)
Canterbury Road
Ashford TN24 9QR

Phone: 01233 636 863
Website: www.conningbrookashford.co.uk

Eastwell Manor (A Champneys Spa Hotel) (7.0 miles)
Eastwell Court
Ashford TN25 4HR

Phone: 01233 213 000
Website: www.eastwellmanor.co.uk

Appendix 1

Visitor Accommodation available within a radius of 10 miles

Boutique Hotels

Elvey Farm (5.3 miles)
Elvey Lane
Pluckley TN27 0SU

Phone: 01233 840442
Website: www.elveyfarm.co.uk

Frasers (5.3 miles)
Coldharbour Farm
Barham's Mill Road
Egerton
Nr. Ashford TN27 9DD

Phone: 01233 756122
Website: http://www.frasers-events.co.uk

The Croft Hotel (6.9 miles)
Canterbury Road
Kennington
Ashford TN25 4DU

Phone: 01233 622 140
Website: http://www.thecroft.biz

Appendix 1

Visitor Accommodation available within a radius of 10 miles

Holiday Inns, Premier Inns & Travelodges

Holiday Inn Ashford – North A20 (1.8 miles)
Maidstone Road
Ashford TN26 1AR

Phone: 01233 713 333
Website: www.ihg.com/holidayinn/hotels/gb/en

Premier Inn Ashford North (2.1 miles)
Maidstone Road
Hothfield Common
Ashford TN26 1AP

Phone: 0871 527 8028
Website: www.premierinn.com

Holiday Inn - Ashford Central (5.8 miles)
Canterbury Road
Ashford TN24 8QQ

Phone: 0871 942 9001
Website: www.ihg.com/holidayinn/hotels/gb/en

Premier Inn Ashford Eureka Leisure Park (5.8 miles)
Eureka Leisure Park,
Ashford TN25 4BN

Phone: 0871 527 8028
Website: www.premierinn.com

Travelodge Ashford Hotel (5.8 miles)
Eureka Leisure Park
Rutherford Road
Ashford TN25 4BN

Phone: 0871 984 6004
Website: www.travelodge.co.uk

Premier Inn Ashford Central (9.3 miles)
Hall Avenue
Orbital Business Park
Sevington
Ashford TN24 0GN

Phone: 0871 527 8028
Website: www.premierinn.com

Appendix 1

Visitor Accommodation available within a radius of 10 miles

Inns:

The Bowl Inn (2.6 miles)
Egg Hill Road
Charing
Ashford TN27 0HG

Phone: 01233 712256
Website: www.bowlinncharing.com

The Dering Arms (6.2 miles)
The Grove
Pluckley TN27 0RR

Phone: 01233 840371
Website: http://www.deringarms.com

The Chequers Inn (6.8 miles)
Smarden
Ashford TN27 8QA

Phone: 01233 770 217
Website: www.thechequerssmarden.com

The Flying Horse (6.9 miles)
Wye Road
Boughton Lees
Ashford TN25 4HH

Phone: 01233 620914
Website: www.theflyinghorse-kent.uk

Who'd A Thought It (7.5 miles)
Headcorn Road
Grafty Green
Near Lenham
Maidstone ME17 2AR

Phone: http://www.whodathoughtit.com/
Website: http://www.whodathoughtit.com

The Harrow Inn (8.4 miles)
Hubbards Hill
Warren St
Maidstone ME17 2ED

Phone: 01622 859 846
Website: http://www.harrowhillhotel.com

Appendix 1

Visitor Accommodation available within a radius of 10 miles

Bed & Breakfast

Shaw Grange Bed & Breakfast (5.3 miles)
Maidstone Road,
Ashford
TN27 0DB

Phone: 07947 187204

Pluckley Pad B&B (3.5 miles)
Home Cottage
Station Road
Pluckley
TN27 0QX

Huntingfield House B&B (5.0 miles)
Stalisfield Road
Eastling
Kent ME13 0HT

Snoadhill Cottage (5.9 miles)
Fridd Lane
Bethersden TN26 3DY

Hayes Bank (6.0 miles)
18 Canterbury Road
Ashford TN24 8JX

Darling Buds Farm 6.0 miles)
Tuesnoad Lane
Bethersden
TN26 3 EQ

Self-catering cottages

Landews Meadow Cottages (3.9 miles)
Landews Meadow Farm,
Green Lane,
Challock TN25 4BL

Phone: 01233 742617

Further self-catering accommodation is available through properties offered via AIRBNB at www.airbnb.co.uk

Charing Parish Council

15th August 2018

Letter to High Street and nearby businesses

Dear Sir/Madam

Reviving business in Charing through boosting tourism

Our latest survey of businesses in and around the high street confirmed that many would like to see improved car parking facilities and more tourists to boost footfall.

Both these issues are being addressed through our Neighbourhood Plan which we plan to make available for public consultation later this year. In the meantime we are working on plans to boost tourism and your support is needed. That support may take the form of: joining our working group/committee; making a financial contribution; sponsoring a meeting of traders; inputting ideas and helping with communications.

Our plans currently are to: develop a stand-alone website with full details on Charing's history and heritage assets with the opportunity for businesses to have adverts; design and erect useful signage; link updated versions of the Charing Trail with the North Downs Trail; introduce interpretation boards; assess mini or pop-up museums; promote festivals and events far afield.

Our plan is to raise around £15,000 with hopefully £12,000 from grants and £3,000 privately raised.

We believe that this project could have significant benefits for businesses in and around the high street. To that end we plan to hold a meeting of business owners in the parish hall for an hour at 6 pm. Before setting a firm date we would like to canvas support. Would you let us know if you are generally supportive of our plans an indication of the support you may give and also whether you are prepared to attend such a meeting by emailing either Corry or Hugh?

Kind regards

Corry Bain-Smith, Chair Tourism Committee

Hugh Billot, Chair Neighbourhood Plan

CHARING NEIGHBOURHOOD PLAN

PROJECT 131 HYRDROLOGICAL STUDY

A detailed investigation by Water Resources Associates was undertaken (part funded by local residents and part funded by CPC), namely:

Hydrological Appraisal of Charing's Future Development and Public Water Supply, February 2018

Mrs Lucy Simmons

Hydrological Appraisal of Charing's Future Development and Public Water Supply Kent

Final Report

February 2018

Water Resource Associates

DOCUMENT CONTROL

No of Copies	*Version*	*Date*	*Location/ Comment*
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PDF	v2	06 February 2018	2nd Draft for comment by client
PDF	v3	09 February 2018	Final version for preliminary issue
PDF	v4	12 February 2018	Final version for issue

This is Document v4 of the Final report
Signed on behalf of Water Resource Associates:

Paul A C Holmes, BSc MSc MCIWEM CGeol FGS
Project Director

MAIN CONTRIBUTORS

This assignment was carried out by:

Paul A C Holmes	Project management and groundwater assessment
Dr Harvey J E Rodda	Surface water hydrology

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Water Resource Associates [WRA] is grateful to Mrs Lucy Simmons for the invitation to carry out this assignment, to to Tylden Reed FBHI for provision of rainfall data, and to Charing Parish Council, Lucy Simmons, Christine Wickenden, Carol and Francis Evans, Rachel Washington and Wendy Jefferson for their support and financial contributions.

Cover photographs: Aerial view of the headwaters of Charing West Brook, West Brook streamflow gauging, grass ditch in Poppyfields housing estate, and West Brook downstream of the railway culvert.

DISCLAIMER

While every opportunity has been taken to ensure the accuracy of the information presented in this report, Water Resource Associates cannot be held responsible for errors or omissions, but reserve the right to provide further consultation if clarification is required. This document has been produced by WRA for the sole use of the client: the report may not be used by any other party, without the explicit written permission of WRA and the client.

Summary

Background

This report makes a hydrological assessment of the Upper Stour catchment in Kent, with particular focus on flood risk, stream baseflow and environmental flows in the context of proposed development and public water supply in the area of Lenham and Charing. The appraisal provides factual information for the parish and local residents when scrutinising planned developments, and has in particular reviewed proposed residential estates of 380 new homes on part of the Otterden Estate administered by the Wheler Foundation, and described here as the Wheler North and South Meadows at Charing, covering more than 20 hectares. In a similar manner, a site for 150 new homes has been identified in the sensitive Chalk spring area around Tanyard Farm at Lenham.

Information in this report may be used in posterity for future studies to inform the preparation of the Ashford Local Plan, Charing Neighbourhood Plan and any other guidelines which the village may need to produce.

Upper Stour Catchment

The Upper Stour at Chart Leacon gauging station [on the outskirts of Ashford] drains 72.5 km^2 of Kent countryside, underlain by Chalk and Lower Greensand aquifers separated by a belt of impermeable Gault Clay [GC], developed between the two escarpments of the North Downs and Hythe Beds. The average annual rainfall for this catchment is 712 mm for the period 1986-2008, with annual losses and runoff of 417 and 295mm. Chalk springs emerge on the Wheler northern meadow at the Gault Clay contact and then flow over the surface of the impermeable clay which underlies the majority of the two sites. The resulting stream, Charing West Brook, flows along the western boundary of the two meadows before continuing its course to the Upper Stour, 3 km from source to main river

Drainage and Surface Water

Physical Characteristics

The topography, hydrology and land use differ significantly between the Wheler North and South Meadows. The North Meadow is flat to gently sloping [0.020 m/m] with rough grazing, hedgerows and pockets of trees, falling from an elevation of 97 to 89 mOD at the railway embankment. The meadow is underlain by head and alluvial deposits over Chalk and Gault Clay and crossed by ditches conveying water from the springs to the main channel, culverted under the railway.

The South Meadow has a steeper slope [0.056 m/m], with an east-west fall of 12 m from the boundary to West Brook. The land is a more uniform area of grazing, with two parallel stream channels in the NW corner which merge to form West Brook, and the stream then flows in an artificial channel along the eastern edge of the disused sand quarry.

Due to the clayey nature of the soil, the stream and ditches are responsive to rainfall, with a lot of standing water and overland flow after rain, ponding in surface hollows and depressions.

Flood Risk

Environment Agency riverine flood modelling is not provided for small streams like West Brook, but is available for the main river Stour. Storm-water modelling has though been completed and these EA maps show areas of extensive inundation across the Wheler Meadows, as would be expected with the gentle slope and clay substrate. This floodwater then flows off down West Brook valley, as well as entering the disused quarry. The mapping also identifies the shallow sub-valley at the SE corner of the South Meadow.

WRA has modelled the West Brook catchment using ReFH to compare flood flows from the existing and developed areas assuming a 60% urbanisation. The 100-year peak flow from the urbanised catchment is 0.78 m^3/s, some 0.2 m^3/s higher than the existing catchment at the outlet from the South Meadow, and the flood volume would increase by 776 m^3 after development. By itself, this increase in discharge would not have a significant impact on the River Stour which would have a peak in excess of 20 m^3/s: furthermore, this proposed urbanisation should have been assessed together with other proposed developments in the Stour catchment at the time of design of the Rothfield flood storage scheme.

Flood risk assessments were undertaken for both Wheler developments by LK Consult, a consulting and contracting company offering services in contaminated land, flood risk and drainage. The reports were poorly written, lacking in detail in particular on the topography, hydrology, geology and the proposed SuDS measures.

In the LK reports, estimates of the greenfield surface runoff were made using inaccurate, outdated empirical methods rather than using ReFH in accordance with current SuDS guidelines. Estimates of the developed site flow were made using a different rainfall-runoff approach with outdated methods and data, so the results identifying required flood storage volumes are uncertain and not clearly presented.

Sustainable Drainage

The LK reports provide little detail on the proposed SuDS measures to attenuate the surface runoff from the new developments. Some drawings of proposed drainage were shown with the flow direction going against the existing gradient. Given the poor reporting by LK, it is not possible to assess the impact with/without SUDS on the flood characteristics of West Brook.

Furthermore, the majority of South Meadow is underlain by impermeable clay where it is not generally feasible to construct SuDs infiltration schemes, so the site would depend on construction of large attenuation ponds with inherent impact on baseflow.

Groundwater

Public Water Supply

SEW operates five boreholes at Charing drilled through Gault Clay [GC] into the Folkestone Beds aquifer and located at a key point in the supply network between Maidstone and Ashford. While there are regional plans to increase supply through schemes such as Broad Oak Reservoir, existing supplies should be conserved as far as possible, and district planning should ensure that development plans do not have an adverse impact on the existing yield of water supply sources. Kent is an area of serious water stress with the majority of public water supply obtained from groundwater.

Hydrogeology

Springs occur at the Chalk-GC boundary along the foot of the North Downs escarpment, which give origin to streams flowing across the Gault Clay and Folkestone Beds, and then discharge into the Upper Stour.

The Folkestone Beds at Charing are 45 to 60 m thick, and consist of weakly-cemented yellowish sands that have been used for water supply since 1903 and quarried for construction material. Outcrop of the aquifer occupies a broad central belt between the North Downs escarpment and the River Stour, covering an area of 9.1 km^2. Recharge of the Folkestone Beds aquifer originates from three sources: rainfall on the aquifer outcrop, Chalk spring and Gault Clay runoff, and infiltration through the bed of streams crossing the aquifer outcrop and sand quarries.

The Upper Stour is fed by springs from the Hythe Beds aquifer and six Chalk spring tributaries: Lenham Brook, Tanyard East Lenham Brook, Charing Heath Brook, Charing West and East Brooks and Westwell Brook.

Groundwater rest levels in the Folkestone Beds at SEW's source-works is of the order of 20 m bgl, so West Brook loses water across the outcrop by infiltration through the stream-bed and banks. It was noted in the field that erosion of the Gault Clay is minimal, and streams occupy small channels so the stream bed across the Folkestone Beds is not lined with impermeable alluvium. Furthermore, the Chalk springs in the stream headwaters are obscured by head deposits which are a mixture of materials derived from erosion of the Chalk including flint fragments.

Streamflow measurements at three sites on 18 January 2018 showed that Chalk spring discharge amounted to 5.7 l/s, and as the brook crossed the Gault Clay, it picked up runoff resulting in a flow increase to almost 10 l/s upstream of Charing Heath Road, but then stream-bed losses across the Folkestone Beds reduced the flow by 24% to 7.3 l/s at Newlands Stud.

In addition to aquifer recharge, the Chalk-GC streams are an important source for maintaining flow in the Upper Stour, where 58% is derived from the Hythe Beds, 40% from the Chalk-GC streams, and 15.9% from Folkestone Beds discharge at lower elevations towards Ashford.

Source Protection Zones

The proposed Wheler developments lie within SPZ2 which is overlain by Gault Clay and gives rise to an SPZ4 classification where the degree of risk relates to the thickness of cover of the protecting clay layer. The South Meadow and A20 petrol station are close to the SPZ1 boundaries. No excavation or earth-moving activities should be permitted in the southern part of South Meadow where the GC thickness is likely to be no more than a few metres.

The South Meadow is further complicated by the presence of an old sandpit adjacent to Newlands Farm, which was worked between 1990 and 2003, and is only a few metres away from the proposed development. Surface runoff potentially overflows into this sand-pit when the capacity of West Brook stream-channel is exceeded, so this offers a further line of contamination into the public water supply.

SPZ1 at the SEW treatment works is in contact with the West Brook stream and a drainage course crosses the SPZ1 area from a low point in South Meadow along the southern boundary of Brook Cottages. After rainfall, this channel takes water into a small pond and overflows for a short distance before infiltrating entirely into the Folkestone Beds. Providing another line of contamination into the public water supply with an unacceptably short travel time.

Drainage Problems on the Poppyfields Estate

Problems with water and damp have been reported since completion of the new residential development, described generally as water ingress in garages, water standing on patios and waterlogged ground in some gardens. The Chalk-GC boundary is located roughly 75 m from and parallel to the A20 Maidstone Road, and across a large proportion of the estate, these formations are obscured by head deposits of clay, silt, sand and gravel, formed by periglacial action during the Quaternary Period.

Groundwater in the Chalk can therefore move over the top of the Gault Clay and cause the water ingress noted. This is an important process in the North Meadow and explains why the spring line is not always precisely at the GC boundary but further down-gradient on the Gault Clay.

Impact of Proposed Development

Ashford Local Plan

Proposed development areas are shown in the Local Plans published by Ashford and Maidstone Borough Councils, and other ongoing or recently-completed planning applications were reviewed and mapped across the Upper Stour.

While the majority have no particular impact on water resources and flood defence, those sites with a large footprint and impact on the Folkestone Beds aquifer at Lenham and Charing are highlighted in this report. These high-impact sites are located on Chalk stream headwaters of the Stour tributaries and on the outcrop area of the Folkestone Beds aquifer in Charing source SPZ3. They are located on five out of seven of the Chalk streams of the upper Stour: two brooks at Lenham, Charing West and East Brooks and at Tutt Hill.

Charing Residential Development

Two sites shown in the Local Plan are Wheler North Meadow on the West Brook spring-line, and an area adjacent to The Moat on the East Brook spring-line. Wheler South Meadow was identified in the Local Plan as an "alternative site" which was rejected but has appeared as a planning application and appeal. Carter-Jonas is involved in the North Meadow and Gladman Developments in the South Meadow. Part of North Meadow to the rear of Charing Motors is subject of a planning application for 17 houses and includes reinstatement of a ditch in the vicinity of the Chalk springs.

There are two recently-completed residential developments at Charing, which demonstrate how large-scale residential estates are generally poorly-designed and that it is difficult to manage and enforce the outcome of construction with the present system of regulatory controls. A broad belt of agricultural land between Charing railway station and the Swan Hotel has successively been built over during the past 45 years, to provide new homes:

- Old railway sidings 1965-1973
- Charing Green 2003-2004
- Poppyfields 2014-2015

Charing Green, incorporates a deep attenuation pond which is a permanent water feature with goldfish and other fauna. When this pond fills, it overflows into an inadequate ditch along the North Meadow boundary, which also receives water from a new open grass channel through the centre of Poppyfields estate. This drainage ponds and floods behind the railway embankment where there is no clear outlet, and in summer, stagnant water encourages the growth of algae. In addition to public health concerns, these large-scale residential developments have an adverse impact and derogation of the public water supply.

Reduction in Yield of PWS Boreholes

Activities and land development which reduce recharge of the Folkestone Beds aquifer will result in a reduction in the capacity of the existing boreholes at Charing to pump groundwater into the water supply network. The focus of design to reduce flood risk at the Charing development sites will depend on the construction of large flood retention facilities, as infiltration-based measures will not be effective on Gault Clay. On the southern margin of South Meadow, the lack of thickness of Gault Clay will mean that both infiltration-based schemes and attenuation ponds cannot be built due to the risk of opening up a rapid transit route for groundwater movement through to the SEW source. Poppyfields shows that large ponds may not operate as designed, reducing baseflow in West Brook and aquifer recharge.

Further alteration of the Chalk spring regime in West Brook will increase the adverse impact on borehole yield, particularly as the spring outflow is dispersed through the head deposits just above the Gault Clay contact. Proposed large-scale development will reduce stream baseflow and derogate the public water supply in an irreversible manner.

Deterioration in Water Quality

The proposed development increases the risk of accidental pollution from suburban activities and from the A20, which may require closure of the affected water supply boreholes. Given the relative absence of nearby large PWS sources, it is unlikely that alternative supplies could be imported from outside the Charing supply area to replace lost supply, at the short notice required by a sudden point pollution event.

Concentration of nitrates in the Folkestone Beds aquifer is high due to past agricultural practices, and uncontrolled garden-related activities would further exacerbate the problem, requiring additional treatment at source.

Fatal Flaw

Unfortunately, there is a fatal flaw in current local planning procedures, when addressing water resource matters, due to the fact that hydrology is not always fully understood, and planning rules and guidelines are insufficiently comprehensive to analyse all aspects of the water dilemma. Basic planning tests place undue focus on flooding and pollution, making it possible to miss important aspects of "water quantity and water balance".

The Environment Agency is a statutory consultee in the planning process, but an adequate review of water resource aspects may be omitted, and as a government department, it is not entirely independent of central policy-making. A typical Agency response at planning consultation is that "adequate investigation and risk assessment should be carried out to address contamination and risks to controlled waters", with no mention of water resources impact or "water quantity and water balance", and passing responsibility on to the developer with little enforcement.

The reality of the proposed large-scale residential developments schemes in the Upper Stour is that the condition of Chalk spring streams will be permanently altered, as well as the natural overland flow processes which feed those streams. The "water quantity and water balance" at the FB recharge zone and Upper Stour will be adversely affected, through reduction in the natural baseflow of West Brook. Nutrient loading of the stream will increase.

Conclusions

The proposals for large-scale development across an important Chalk scarp spring-line demonstrates an inherent lack of understanding of hydrological processes, and they would have an adverse impact on public water supply and environmental baseflows in the Upper Stour.

Groundwater discharge at the Chalk-GC spring-line and Gault Clay runoff at Charing provide a significant contribution to the water available in the Folkestone Beds aquifer used for public water supply and baseflow in the Upper Stour.

The aim of SuDs is to promote water infiltration and water retention so that runoff rates are similar to pre-development conditions: in practice, a natural regime is rarely achieved with large-scale developments. Poor design of the attenuation pond at Poppyfields results in excessive water retention, thereby reducing baseflow in West Brook, which has reduced the potential for aquifer recharge.

Information contained in the Wheler FRAs is insufficient and inaccurate, so the impact of proposed development on flooding cannot be assessed.

The hydrology and soil/geology of the two Wheler development areas are different. The North Meadow is a complex assemblage of head and alluvial deposits overlying Chalk and Gault Clay, which gives rise to a buried spring-line and shallow groundwater moving through the head and alluvium over the Gault Clay contact. Waterlogging of soil in the Poppyfield gardens is most likely due to this process causing ingress into garages and pooling of water on lawns and terraces. There has been no mention of addressing these issues in the developer's design.

Large-scale developments inevitably involve widespread earth-moving operations, with the digging of trenches for foundations, drains and sewers. Such activities will inevitably intercept groundwater in the North Meadow and have an adverse impact on the source of baseflow in the West Brook, in turn affecting aquifer recharge. This shallow groundwater will also affect the foundations for house construction.

The proposed developments in the Wheler meadows will increase the risk of pollution of the public water supply, and over time lead to a deterioration in water quality.

Matters of specific concern are the shortening of stream travel times between the A20 and source boreholes, through the construction of straightened and over-deepened channels, such as the grass ditch through the Poppyfields estate. Accidental fuel and chemical spills on the A20 will arrive too quickly for an appropriate response at the water company treatment works. Although stormwater runoff from rooves and road drainage would be directed to an attenuation pond, overflow from the pond will take substances from the urban runoff into West Brook and into the Folkestone Beds aquifer.

Nutrients from grass cuttings and garden refuse dumped on the banks of watercourses by residents, application of garden lawn, compost and plant feeds, weedkiller, occasional spillage of obnoxious substances, car washing and other usual suburban activities will all produce a chemical mix which is discharged via the drainage and attenuation facilities to West Brook and into the Folkestone Beds aquifer. The increase in nutrients discharged from the Poppyfields estate was evident in algal growth in stagnating water in the North Meadow outlet stream, which will already result in increased concentrations in the public water supply, requiring expensive removal at the treatment works.

Proposed demolition of the petrol station at Charing Motors poses a significant risk to contamination of the public water supply source, again via West Brook. If hydrocarbons are allowed to enter the Folkestone Beds aquifer, it can result in permanent damage, and there are a number of water supply sources in Sussex and Kent, which have been taken out of service due to hydrocarbon contamination.

Recommendations

Large-scale developments should be planned at locations which do not derogate public water supply or reduce environmental flows in local streams. The impact of the Charing proposals on groundwater source yield, water quality and environmental flows in the Upper Stour is considered to be unjustified. Such large-scale residential developments across Chalk spring sources should not be encouraged in the Local Plan, and planning applications should be rejected.

Both Lenham and Charing villages should conserve and protect the Chalk-GC springs and streams, as they provide an important role in replenishing groundwater used for public water supply and maintaining baseflow in the Upper Stour.

The need to maintain runoff for stream baseflow contradicts the objective of retaining runoff to reduce flood risk, when applied to large-scale developments.

In the light of the adverse and detrimental impacts on the environment, public water supply and the well-being of the local community, the proposed developments at Charing cannot be considered to be sustainable or in the long-term interests of future generations, but instead indulges the attempt to meet short-sighted political goals.

Future planning policy should aim to keep development away from the Chalk spring-line and the Chalk stream corridor, as this resource feeds the Folkestone Beds aquifer and maintains environmental flow in the Upper Stour. Smaller-scale, low impact development to meet housing demands is more appropriate.

Glossary of Units, Terms and Abbreviations

Mld	Megalitres per day
l/s	litres per second
m3/s	cubic metres per second
mm	millimetres
m bgl	metres below ground level
mOD	metres above Ordnance Datum
Ha	hectare
catchment	area drained by a river
river gauging	point on the river where the rate of discharge is measured
GW	Groundwater
RWL	Rest water level
GIS	Geographical Information Systems
FEH	Flood Estimation Handbook
ReFH	Revitalised Flood Hydrograph model
FRA	Flood risk assessment
PPG	Planning policy guidance
PPS	Planning policy statement
SuDS	Sustainable drainage systems
SPZ	Source protection zone
BGS	British Geological Survey
PWS	Public Water Supply
ABC	Ashford Borough Council
GDL	Gladman Developments Ltd
EA	Environment Agency
CPRE	Campaign to Protect Rural England
WHS	Wallingford Hydro Solutions
IH	Institute of Hydrology
NRFA	National River Flow Archive
BRDA	British Rainfall Digital Archive
GC	Gault Clay
FB	Folkestone Beds
SB	Sandgate Beds
HB	Hythe Beds

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1 Introduction

1-1 Background

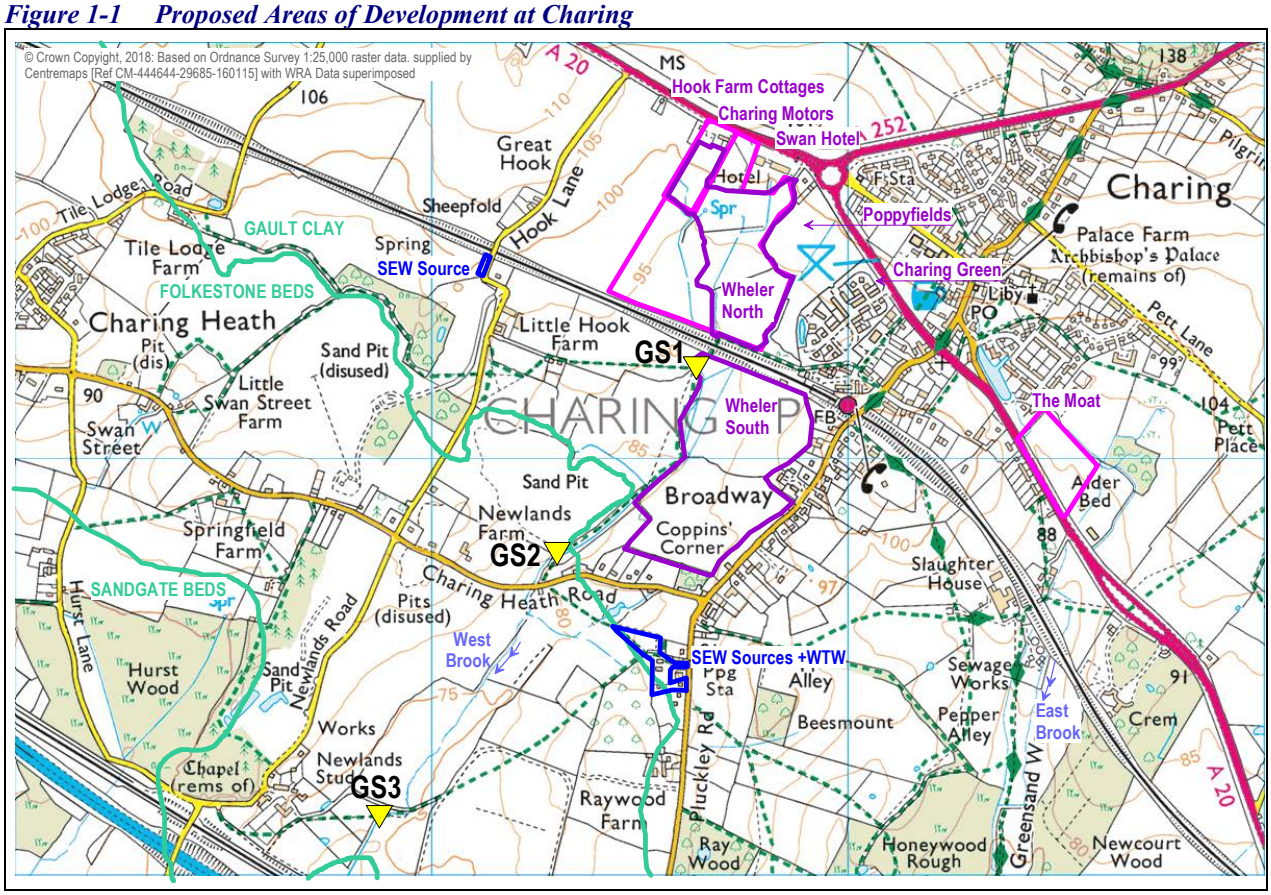
This report has been prepared following discussion with local resident, Mrs Lucy Simmons, subsequent fieldwork and a review of planned development in the Upper Stour catchment of Kent.

This hydrological appraisal provides information for the Charing Neighbourhood Plan [Charing Parish Council], for the Charing Action Group, CPRE and for local residents to take initiative on planned developments, and provide evidence in the lead-up to a public inquiry.

Charing residents have been particularly concerned about the possible development of part of the Otterden Estate administered by the Wheler Foundation, which comprises approximately 735 hectares of mixed farming enterprises along the North Downs of which 30% is woodland, residential lets and parkland.

Two areas of the Estate covering more than 20 hectares are the subject of planned residential development for 135 and 245 new houses respectively at the Wheler North meadows and Wheler South meadows, located on either side of the main line railway where it leaves Charing towards Maidstone. Those areas and other recent development areas are shown in Figure 1-1.

Figure 1-1 Proposed Areas of Development at Charing



Key: Purple outline: Wheler developments
Pink outline: Development shown in the Local Plan
Blue: SEW boreholes and water treatment works

1-2 Scope of Work

The client raised the following key questions in order to prepare the scope of work for this report:

- Should Charing village aim to conserve and protect the Wheler south and north meadows into the future because they are more important to our water supply and the river Stour than as areas for housing development?
- Is the surface water runoff from the meadows an important contributor to the water available in the aquifer [for public water supply at the borehole] and the water levels in the river Stour.
- Is there a danger of pollution of the public water supply from the following sources:
  - The A20 and northern bypass.
  - Roads and hard surfaces within the existing and proposed housing developments.
  - Nutrients from grass cuttings and garden refuse dumped on the banks of watercourses by residents of the housing developments.
  - Proposed demolition of the petrol station.
  - Close proximity and over-crossing of the existing foul sewer and surface water drains on the Poppy Fields estate [Ashford Borough Council planning application ref 12/00793/CONF/AS] which have apparently not received appropriate certificates and Southern Water refuses to adopt.
  - Soil and nutrients from commercial compost used by residents to improve the poor soil in their gardens [Signs of silting present at the culvert from the Charing Green attenuation pond].
  - Construction activities, including earth-moving, machinery and soil disturbance.
- Is the balance of probability of contamination of the aquifer and/or the river tributary water by housing development too great a risk?
- Will foundations affect the groundwater within the northern meadows, and thus the spring that supplies the river Stour?
- Will groundwater affect the foundations of any new housing development? – there are reported to be springs that appear after heavy rainfall [most recently a spring appeared near the gate access to the northern meadows]
- Is the Chalk spring water in the existing watercourses of particular ecological significance [The WWF are currently campaigning for preservation of chalk streams].
- Will housing development on all these meadows increase the runoff volume so that there is a consequential increase in volume of water downstream, affecting the floodwater attenuation reservoir at Ripper's Cross, Hothfield? And, on the way, potentially also causing flooding at Swallow Mill [off the Pluckley Road at Little Chart], The Swan junction at Little Chart and Brown Mill between Little Chart and Hothfield.
- The waterlogging of the soil in gardens on the recent Poppyfields estate has caused residents to demand additional drainage because of surface water ingress into garages and pooling of water on lawns and terraces. Any development on the Wheler meadows will be on the same soil and the northern meadows are on a similar gradient. Is this a factor for consideration?
- Looking at the much bigger picture…. What will be the cumulative effect of development [especially of the northern meadows], taking into account all the proposed development sites along the A20 within Ashford's draft Local Plan as these are all adjacent to tributaries of the upper Stour plus planned development at Lenham which is directly opposite the headwaters of the Stour.

The appraisal will examine the sustainability of the proposed developments, in the light of the Brundland sustainability statement "Sustainable development meets the needs of the present without compromising the ability of future generations to meet their needs".

From the gathered evidence, the report will conclude whether development on these meadows would or would not be sustainable in terms of the impact on water resources and flood defence.

Information in the report may be used in posterity for future studies to inform the preparation of Charing neighbourhood Plan and any future plans that the village is obliged to produce.

2 Surface Water Hydrology

2-1 Overview

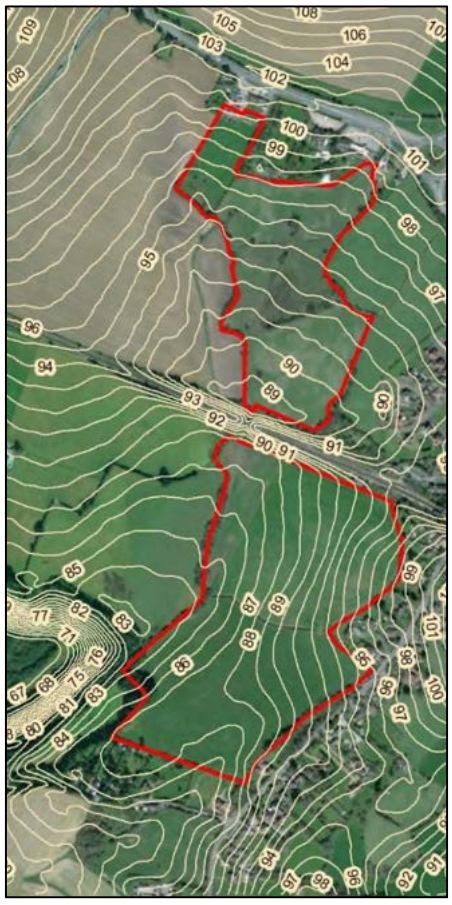
This section aims to review the flood risk assessments carried out for proposed developments, and includes an assessment of the likely performance of SUDS management practices on low permeability sites with particular reference to options available for the Wheler meadows.

The sites are located within the upper catchment area of the Great Stour and the main river is found some 2 km south of the Wheler developments. At Chart Leacon gauging station on the upstream side of the Ashford urban area, the Great Stour drains 72.5 km^2 of mainly rural land which is underlain by Chalk, Gault Clay and Lower Greensand, developed between the two escarpments of the North Downs Chalk and Hythe Beds between Liverton Street, Egerton and Pluckley. The average annual rainfall for this catchment is 736 mm for the period 1941-1970, 726 mm for the period 1961-1990 [NRFA[1]], and 712 mm for the period 1986-2008 [Hydrometric Register, Marsh and Hannaford, 2008]. The baseflow index is high at 0.64 with high annual losses of 417 mm and annual runoff of 295mm. The springs which emerge at the northern site collect water which has infiltrated through the permeable Chalk and superficial layers of head and alluvium, this then flows over the surface of the impermeable Gault Clay which underlies both of the sites. Ultimately the springs form West Brook, which flows for 2.5 km along the western boundary of the southern site before continuing its course to the Upper Stour.

2-2 Description of the Wheler Meadows

2-2-1 Characteristics of the North Wheler Meadows

Figure 2-1 Topography of the Wheler Meadows Sites



The two Wheler development sites [North and South Meadows] are contrasting in terms of their topography, surface water hydrology and land use. The overall topography of the area is shown in Figure 2-1. The 1 m contours have been derived from the Geoperspectives digital terrain model, which is the result of an airborne survey giving spot heights at regular 5 m intervals and has an error of +/- 0.3 m.

The Wheler North meadows is a flat to gently sloping area of rough grazing, interspersed with hedgerows and pockets of trees. The site falls from 97 mOD at the northern boundary to 89 mOD at the railway embankment giving an average slope of 0.02 m/m.

Springs are present towards the northern boundary of this site and the water is conveyed in ditches flowing through the site in a southerly direction.

Photographs of the North Meadow grazing and ditches are shown in Appendix C [in Figures C-1 and C-3].

Surface water ponding was also observed in depressions during the visit to the site in January 2018 [Figure C-2], despite comparatively little rainfall during the preceding week.

The springs converge to form the headwaters of Charing West Brook which then flows along the western edge of the site [C-5], and is then taken in a large brick-arch culvert under the railway embankment [C-6].

Note for Figures 2-1 and 2-2. Contours overlaid on historical satellite imagery dated April 2013, Google Earth. Large-print version in APPENDIX A-2.

[1] http://nrfa.ceh.ac.uk/data/station/spatial/40022

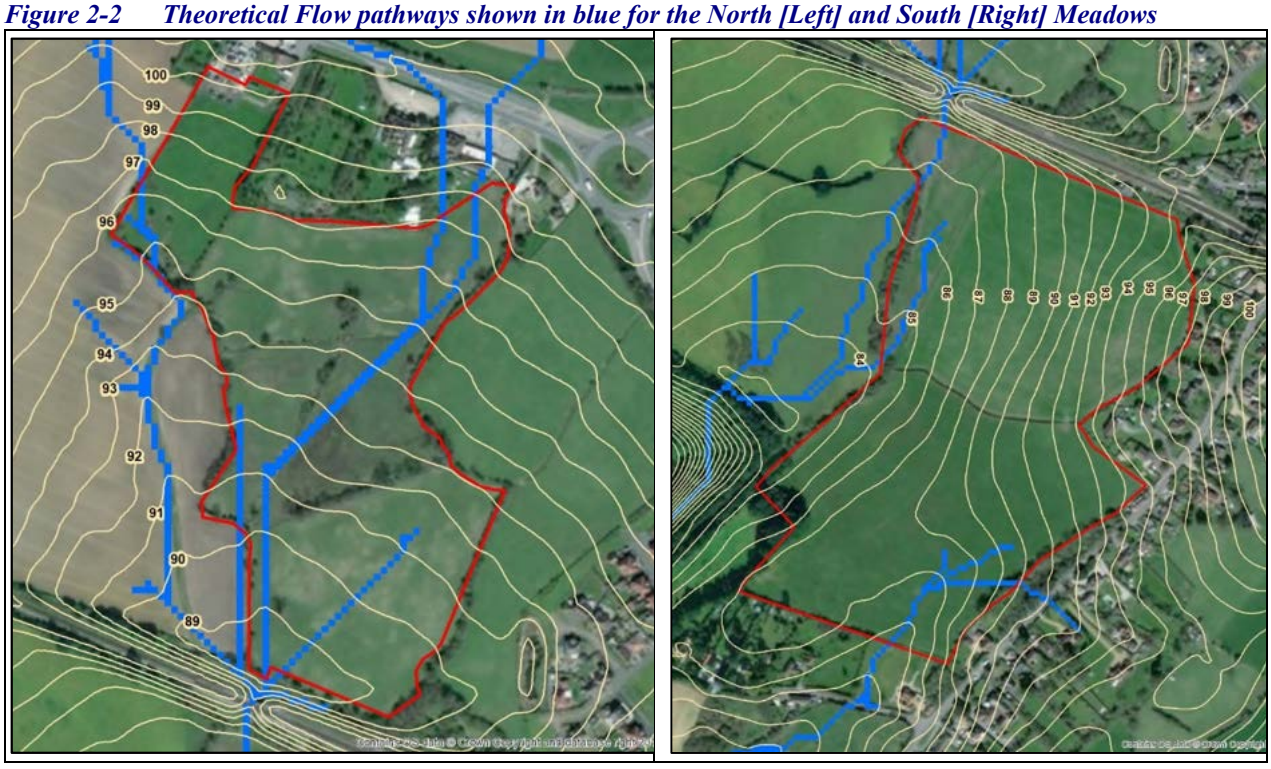
2-2-2 Characteristics of the South Wheler Meadows

The southern Wheler Meadow site has a much steeper slope [0.056 m/m], with a considerable east to west fall of 12 m from the boundary towards the West Brook [C7]. The land is a more uniform area of grazing, with two parallel stream channels in the alluvial NW corner of the meadow which then merge to form West Brook [C8].

2-3 Surface Hydrology

The theoretical routes which overland flow would take across the development area [flow pathways], were calculated from the topographic data using Arc-GIS software and cell-based modelling routines, to identify potential flow direction and flow accumulation. These flow pathways are shown for each site in Figure 2-2.

Figure 2-2 Theoretical Flow pathways shown in blue for the North [Left] and South [Right] Meadows



The pathways generally match the mapped locations of stream channels although flow pathways in the south-east corner of the southern meadow drain a relatively small area, so a permanent channel is not present. Likewise, flow from the chalk spring headwaters does not fill the sandpit, but flows in an artificial channel, around the eastern edge of the old sand pit. The accumulation of the flow as a stream first appears in the property to the south of the development site and continues across Charing Heath road [C-11, C-12]. As both sites are underlain by impermeable clay the stream and ditches which drain them will be responsive to rainfall, and surface water will extend across the flow pathways and also occupy surface hollows and depressions [C3]. During prolonged wet conditions, the topsoil above the Gault Clay layer will become saturated and surface water would be extensive across both sites, flowing down the steeper eastern slope of the southern site as sheet flow or in rills. Groundwater from the Chalk springs in the northern site sustains low flow in the stream during dry periods, also called "baseflow".

2-4 Flood Risk

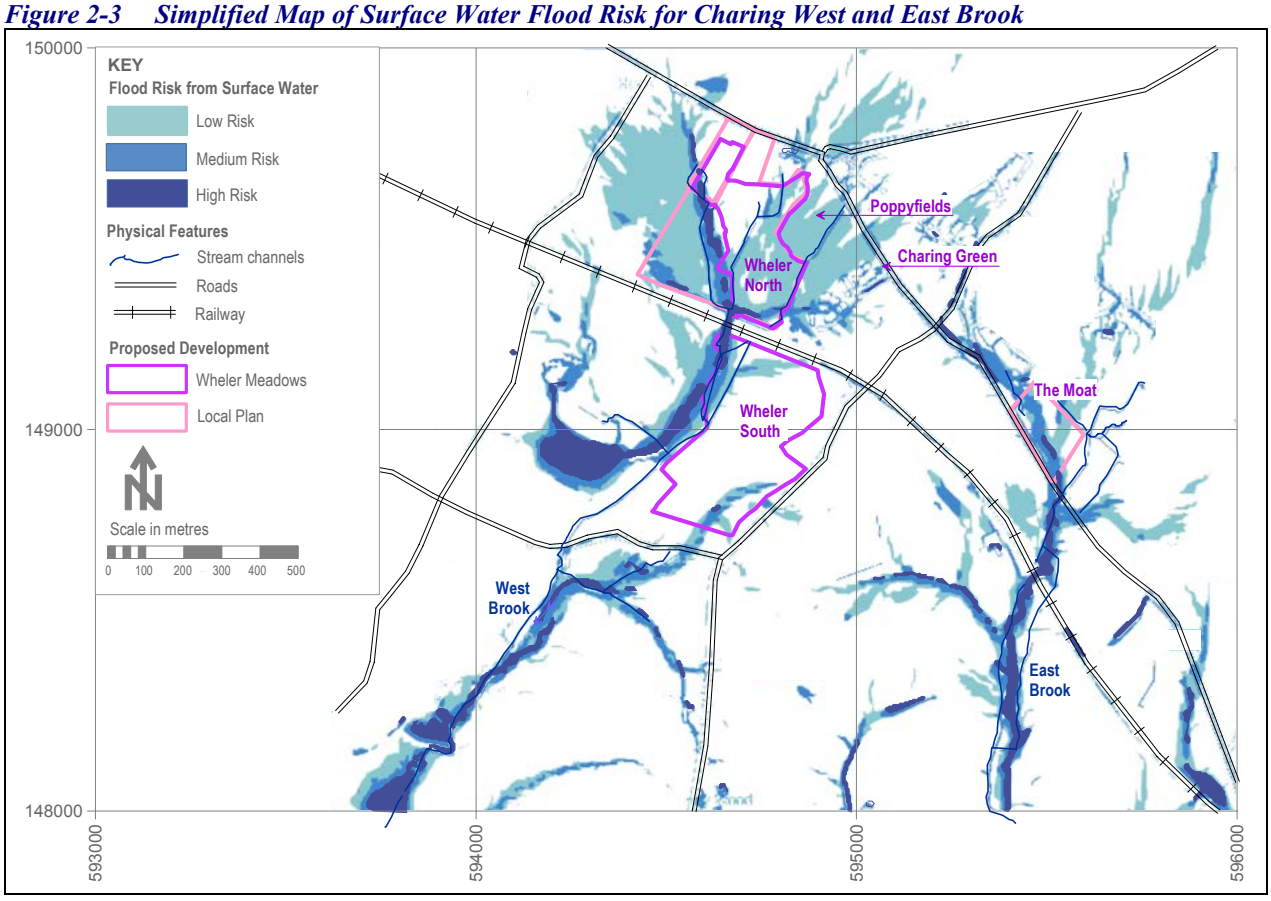
2-4-1 Environment Agency Mapping

Flood risk maps are provided by the Environment Agency [EA] and available in digital format over the internet show the current risk of flooding from rivers and surface water. The EA define the severity of the flood by its return period. A flood with a 1 in 100-year return period is expected to occur on average just once in a period of 100 years and is referred to as a 100-year flood in this report. The EA maps of river

flooding show 3 flood zones, flood zone 1 is a low probability of flooding outside the 1000-year flood outline, flood zone 2 has a medium probability of flooding and is between the 100-year and 1000-year outlines, flood zone 3 has a high probability of flooding and is within the 100-year flood outline. The maps are only available for streams designated as main rivers and draining catchment areas greater than 3 km^2. West Brook and its associated springs do not satisfy this requirement therefore maps of river flooding have not been produced for the areas around the development site. According to the EA information, these are shown as zone 1, but it does not mean they are in a low flood risk area.

Maps showing surface water flooding were produced by the EA in 2013. These use a cell-based modelling approach similar to the delineation of flood pathways but include an input of rainfall. The flood risk is classified as very low [outside a 1000-year event], low [between 100 and 1000 year], moderate [between 30 and 100 year] and high [within a 30-year event]. A simplified map is shown in Figure 2-3, which shows a large area of low to high risk following the course of the West Brook, and an area of moderate risk to low risk covering most of the North Meadows, with areas of high risk following the drainage channels. A smaller area of low to moderate risk is shown around the south-eastern boundary of South Meadow. Further details are provided by the EA website mapping which includes estimates of the depth and velocity of the flood waters at different risk levels.

Figure 2-3 Simplified Map of Surface Water Flood Risk for Charing West and East Brook



Flood outline based on Environment Agency data [OGS] with WRA data added: https://flood-warning-information.service.gov.uk/long-term-flood-risk/

2-4-2 Historical Flooding

Records of historical flooding in Charing are sparse, since such records are mainly documented for areas where major rivers are present. There are no entries referring to Charing in the British Hydrological Society Chronology of Extreme Hydrological Events [Black and Law, 2005]. Information for the River Stour however is available from the Chart Leacon gauging station. Over a period going back to 1967, the highest flow on record was recorded on 27th December 1985, 20.2 m^3/s, followed by 13.3 m^3/s on 28/12/1979 and 13.1 m^3/s on 20/03/1975. It is likely that during these times, the West Brook would have also been in flood. Some information on heavy rainfall and surface water flooding is available for the Charing area. The Surface

Water Management Plan for Kent County Council [Ashford Stage 1 SWMP Final Report JBA, 2013] includes a table with areas reported to suffer from surface water flooding. A total of 10 incidents were included for Charing and Charing Heath mostly from Kent County Council Highways reporting blocked gulley's and flooding of roads. Finally, there are three records for rain gauges in Charing the British Rainfall Digital Archive [BRDA - Rodda et al., 2009]. This is a listing of extreme UK daily rainfalls above a given threshold going back to 1866. The rainfalls are listed in Table 2-1.

Table 2-1 Extreme Rainfalls in Charing from the BRDA

Raingauge Location	Date	Rainfall [mm]
Charing Pumping Station	20/10/1921	33.5
Charing Egerton	20/10/1955	76.2
Charing Pett Place	20/10/1955	65.0

To put these falls in context, the total rainfall for a typical UK wet day will be around 20mm, the storm of 21st October 1955 produced more than the average monthly rainfall in just one day. Such an event would have caused flooding of the Charing stream and considerable surface water runoff. More recent rainfall totals have been provided by Charing residents, Tylden and Stephanie Reed, over the period 2012-2017. Their maximum daily fall recorded was 51mm on 12th October 2013.

2-4-3 Hydrological Modelling

One component of this appraisal aimed to identify the current flow volumes from the development sites and predict the likely flows once the sites had been developed with a proportion of urban surfaces covering the original greenfield area. This was undertaken using the Revitalised Flood Hydrograph [ReFH] programme [WHS, 2016] of the Flood Estimation Handbook [IH, 1999]. This is the standard methodology for estimating flows in British catchments. The ReFH is a rainfall-runoff modelling approach, where an estimated amount of rainfall over a specific duration is input into the stream catchment and the response of the flow in the stream over time is calculated based on catchment parameters describing the topography, geology, soil, and land use. This approach is ideally suited for testing the effect of urbanisation, as the software can be re-run using identical rainfall and parameters apart from specifying a proportion of the area as an impermeable urban surface [representing the building roofs, driveways and roads]. This simulation was undertaken using a 100-year rainfall over a 6-hour period, in accordance with the latest sustainable drainage system guidelines [Woods-Ballard et al, 2015]. The total depth of rainfall over this period was calculated in the software as 52.3 mm. The comparison of this value with the observed extreme rainfalls in Table 2-1 show that it is a reasonable estimate.

The catchment and resulting parameters were downloaded from a web-based version of the FEH [CEH, 2018] for the outlet of the stream at the southern site. The software automatically delineates the catchment area and parameters are generated from a number of GIS format data-layers describing the topography, geology, soils, land use and climate. A map of the West Brook catchment is shown in Figure 2-4 and the catchment parameters are listed in the Appendix 1.

In order to provide the correct estimate of flows generated from just the development sites, the FEH parameters needed to be edited. The key parameters which needed to be changed were the area reduced from 2.47 to 0.202 km^2, and the base flow index [BFIHOST]. This is an indication of the proportion of flow from groundwater and the proportion from surface water in the catchment. Values range from 0 for a totally surface water fed catchment to 1 for a totally groundwater fed catchment. As the FEH catchment contains a proportion of groundwater-fed areas from the Chalk north of the development sites, a BFIHOST value of 0.718 was used for the whole catchment. For the entirely impermeable Gault Clay of the development sites a value of 0.3 was used, based on an average value from gauged catchments on impermeable clay within the Kent rivers hydrometric area. The FEH 100-year 6-hour rainfall profile and the resulting hydrographs for rural and urban scenarios are shown in Figure 2-5 for the Wheler Meadow developments.

The urban scenario produces a sharper peak to the hydrograph with a higher peak flow and a quicker time to the peak. Overall a greater volume of water will be conveyed from the site from the direct flow of the storm

hydrograph. Under the rural scenario, flow will continue at rates between 0.02 and 0.05 m^3/s for a further 24 hours. Summary results from the hydrographs are given in Table 2-2.

Figure 2-4 FEH Catchment for Charing West Brook at Charing Heath Road

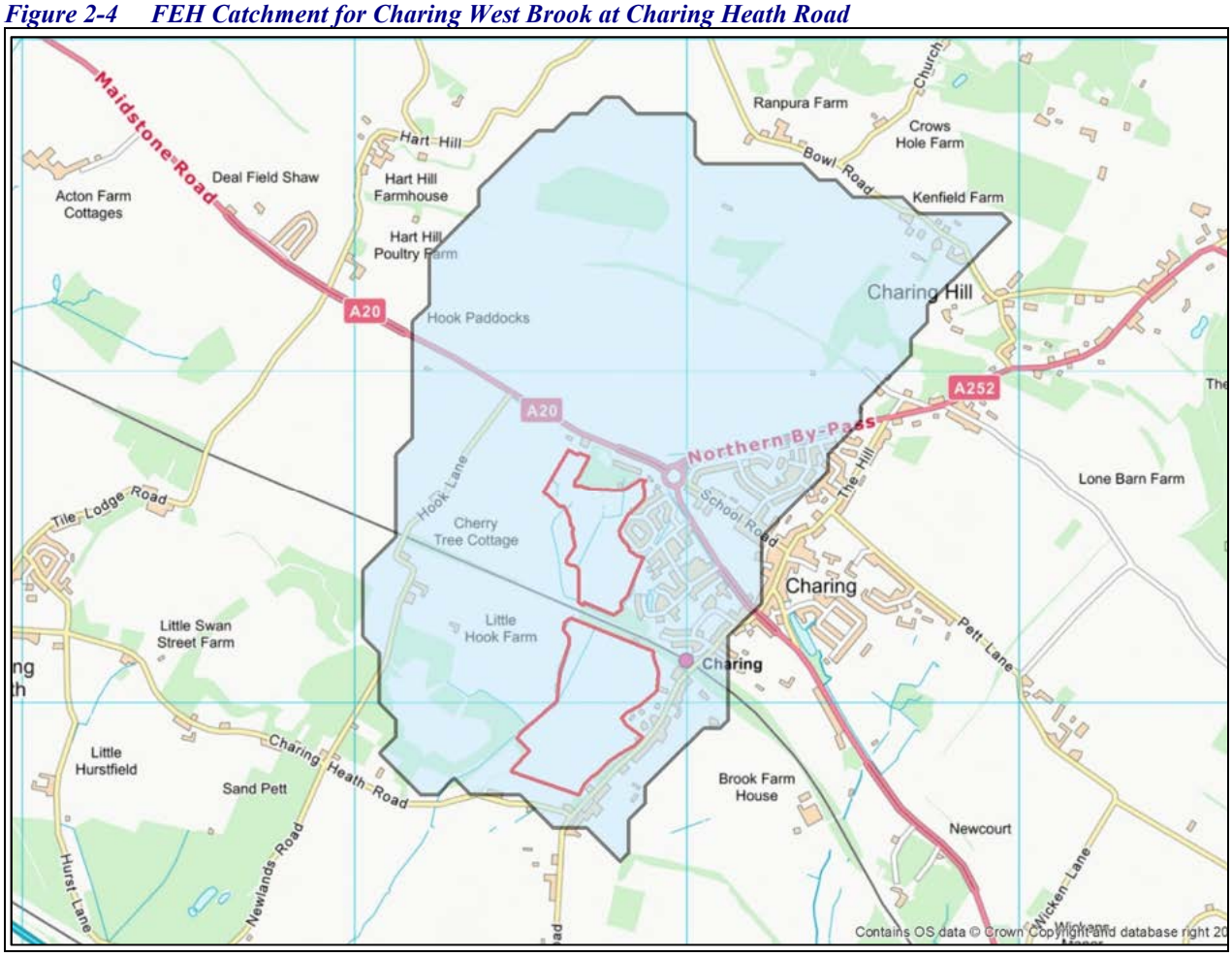


Figure 2-5 ReFH Rainfall Profile and Hydrographs for Rural and Urban Land Use at Wheler Meadows

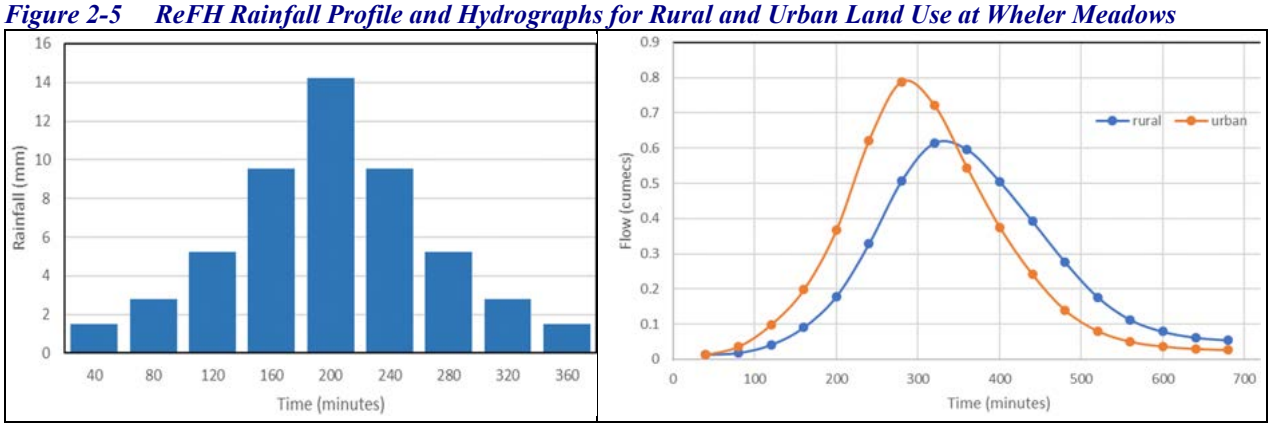


Table 2-2 Key Outputs from the ReFH Simulation

Scenario	Peak Flow [m^3/s]	Mean Flow [m^3/s]	Total Volume [m^3]
100- year rural	0.61	0.24	9711
100-year urban	0.78	0.26	10487

2-5 Flood Risk Assessments

2-5-1 General Background

A flood risk assessment [FRA] is a detailed report which is submitted as part of a planning application. This is required where development sites are shown to be within areas of medium to high risk of flooding as shown on the Environment Agency's [EA] flood zone maps or required for any areas more than 1 ha in area. The latter criterion applies to the Wheler developments. The aim of the FRA is to consider the flood risk to the development site from all sources and to ensure the flood risk for the new development is low and that the risk to neighbouring properties is not increased by the development. It should also ensure there is safe emergency access to and from the site during flood events and where possible look to enhance the local environment in terms of biodiversity and amenity value. FRAs should always provide as a minimum requirement detail on the location of the site, the physical environment [i.e. topography, geology, soils, hydrology], and a description of the proposed development. If the site is at risk of flooding from main rivers or the sea, the key requirement in terms of flood risk is to identify a design flood level and ensure the finished floor levels of buildings are above this level. In cases where there is a large development [>1 ha] that is not shown to be at risk of flooding from rivers or the sea, the key requirement is to ensure the surface runoff of water from the site does not exceed what would be expected under the greenfield or pre-development conditions.

The level of detail associated with a FRA should be proportional to the scale of the development, and the overall risk. A proper understanding of risk is key to undertaking the FRA. The risk associated with an environmental hazard such as flooding is a combination of the hazard, the exposure and the vulnerability. The hazard refers to flooding from all sources, while exposure refers to the number of properties which are going to be exposed to the hazard. With a greater number of properties, there will be a greater risk. The vulnerability describes the particular nature of the properties. For flooding, a four-storey building would have a lower vulnerability than a bungalow with a basement. A greater level of detail would therefore be expected for the FRA associated with a significant housing development such as in the current study as opposed to a proposed single dwelling development. The two FRAs for Wheler North and Wheler South are dealt with separately in the following sections.

2-5-2 Wheler Meadow FRAs

FRAs for both the Wheler North and South Meadows were prepared by the same company, LK Consult Ltd, on behalf of Gladman Developments as part of the planning applications. The southern site FRA was dated December 2016 and the northern site FRA January 2018. LK Consult Ltd is described on the LK Group website as providing "technical expertise in contaminated land, flood risk and drainage, project management, sustainability and asbestos surveying, with a division specialising in land remediation and the treatment of Japanese knotweed". Water resources and hydrology does not appear to be included in their areas of expertise and apart from offering FRAs as a service, the company does not offer other hydrological services.

Both the FRAs "appear" to be substantial documents. The southern site FRA consists of a total of 118 pages including appendices and the northern site FRA consists of 95 pages including appendices. However, out of these documents many pages are left blank [19 for the southern and 16 for the northern] and much of the appendices are made up of information provided by third parties, drawings, e-mail correspondence and output for software. Altogether only around 12 pages of relevant written text, which includes tables and summary calculations, are provided in the FRAs. Ultimately this is not the appropriate level of detail for such major developments. The submissions are however part of a common technique of such planning applications whereby what appears to be a considerable report is presented to statutory consultees such as the EA, in the hope that they would assume it has a detailed content which meets all the requirements and in some cases the consultees have been known to not even bother to read such documents.

The LK FRAs have a very similar format and are therefore combined for a single review over the following sections.

Overall both the FRAs are inadequate due to a lack of detail, omissions of key information, the use of outdated methodology and poorly written text with a lack of attention to the document structure. The last point belies the requirement from the National Planning Policy Framework Guidance [2012] and its

preceding guideline documents such [PPG 25 and PPS 25] that an FRA should be a detailed document undertaken by suitably qualified professionals. Also, the disclaimer on the document versions page from LK Consult states: "*This report has been prepared by LK Consult Ltd. [LKC] who have exercised such professional skill, care and diligence as may reasonably be expected of a properly qualified and competent consultant experienced in preparing reports of a similar scope*." The document is not in the format of a proper written consultancy report, significant key information is tabulated in note form and there is an inability to properly cite and describe the necessary figures and other information in the appendices. For example, under section 2 in both reports [Site Setting] there is a description of the EA maps used to classify flood risk but there is no proper reference to these maps which are included in LKC's Appendix C. This appendix is entitled EA Data and includes a lengthy e-mail correspondence and maps from the EA which do not have a title or any further description. The reader is therefore not properly informed about the content on these maps.

2-5-3 FRA Baseline Information

In terms of the technical content of the FRAs much information is missing. The topography is presented in the appendix as a large-scale map with written spot heights which are generally illegible at the reading scale of the document. It is therefore difficult to assess the topography from this not only of the site itself but also of the surrounding area. A GIS based maps showing contours or a shaded colour-ramp of the topography of the site and surrounding area such as Figures 7 and 8 above, should be included.

Likewise, the information on the geology, soils and hydrology of the site is lacking. This is provided in the FRAs as a summary table [Table 2.1] which is significantly less detail than what is normally expected. The geology does not refer to the maps shown in the appendix [Appendix B site information], these have been generated by a third party [Landmark Information Group] who provide a service to home owners and parties without a detailed understanding of the physical environment. It would be expected that an FRA consultant would have the expertise to be able to identify geological information from the freely available information provided on-line by the British Geological Survey [2018] and make their own assessment of the site. A normal requirement of a large-scale development would be a field geological investigation including shallow boreholes and trial pits to confirm the local geology and define key hydrogeological parameters including measurement of infiltration rate and the presence of groundwater. Neither report has this information. Furthermore, their mapping of watercourses fails to show important ditches taking water along the north and south sides of the railway embankment.

The description of the site hydrology is also inadequate. There is no information about the location of the site in terms of a main river catchment and basic parameters such as the annual average rainfall, evapotranspiration and runoff are missing. The FRAs rely purely on the EA's assessment of flood risk from its maps of fluvial and surface water flooding, and they ignore the presence of West Brook flowing along the length of the western boundary and the various drainage channels in the northern site as sources of potential flooding. Neither FRA attempts to assess the risks posed by these watercourses: a simple estimate of the flood flow and associated design flood levels would be a basic requirement. The northern site FRA fails to mention that the whole of the northern site is a zone of groundwater emergence with a number of springs. These are clearly shown on the OS mapping of the area, and standing water was clearly visible from areas bordering the site, such as the view shown in Figure C-2. These are important features of the landscape and the northern site provides a function as an emergency zone for groundwater which has infiltrated through the Chalk strata to the north of the site. The main drainage ditch serving the Poppyfields and Charing Green developments, observed in the south-east corner of the northern meadow [Figure C-3] appeared to have no outlet and therefore would just spill out onto the surrounding land under wet conditions.

No information is provided in the FRAs about historical flooding in Charing: the summary table of both FRAs [Table 3.1] simply states "*The site has no history of flooding from any source*". However, local residents have observed surface water at the sites and the published surface water management plan has identified several incidents of flooding on the surrounding roads. Although there had not been much rainfall prior to field reconnaissance carried out by WRA on 18-January 2018 [Table 2-3], there were significant amounts of surface water lying on the site, as shown in Figure C-2. Under wetter conditions and in periods of significant flood-producing rainfall, these conditions will be widespread, confirmed by the Environment Agency mapping shown in Figure 2-3.

Overall the lack of background information about the site and the poor presentation of what little information has been found does not give other parties confidence that LK Consult have made a proper assessment of flood risk and that the flood risk associated with any proposed development will not be increased.

Table 2-3 Charing Daily Rainfall prior to Field Reconnaissance

Date	7/1/18	8/1/18	9/1/18	10/1/18	11/1/18	12/1/18	13/1/18	14/1/18	15/1/18	16/1/18	17/1/18	18/1/18
Rainfall mm	0.1	0.0	1.3	0.1	2.5	0.0	0.0	0.8	7.5	0.6	1.8	0.4

2-5-4 Surface Runoff Estimates

The FRAs both have a section on estimation of the flood discharge from the greenfield site, the development site and what storage requirements should be included as part of the new SuDS [sustainable drainage systems] design to ensure the risk of flooding to neighbouring properties is not increased. The purpose of SuDS is to provide a drainage system for the developed site that replicates what occurs under natural conditions, namely that rain falling on the site will gradually infiltrate into the soil and emerge as flow in the drainage ditches then ultimately be conveyed into the West Brook. Traditional artificial drainage would have surface water from the impermeable surfaces of a new development [roofs, roads and paving] piped to the nearest water course. This would give a significant increase in flow following rainfall with the potential for increasing flooding downstream. SuDS have been implemented for the past two decades and include features such as storage ponds, artificial wetlands, soakaways, filter strips and permeable paving. Additional advantages of SuDS are their ability to remove pollutants from surface runoff and to provide enhanced biodiversity and amenity value.

The key parameters for any SuDS design are the estimates of flow from the site under greenfield conditions, estimates of the flow from the developed site and an estimate of the required storage volume to ensure the developed site flow does not exceed that under greenfield conditions. The estimates of greenfield and developed site flows can be made using the ReFH software as shown in Section 2-4-3 of this report, and in accordance with the latest SuDS guidelines [Woods-Ballard et al, 2015]. The estimates of the greenfield runoff undertaken by LK Consult have not used this method, despite being undertaken sometime after the SuDS guidelines were published and the software was released [January 2016].

The two methods used in the FRAs are the IH Report 124 [Marshall and Bayliss, 1994] and ADAS 345 [ADAS 1981] methods. These are outdated and less accurate methods, developed in the 1970s and 80s. They do not follow a rainfall-runoff approach as used in the ReFH, instead they are based on equations relating the peak surface runoff to a few simple parameters such as the area, annual average rainfall and soil characteristics. The parameter values are taken from inaccurate paper maps, look-up tables and nomograms. In the case of the IH 124 method, the purpose of this method was to estimate the flow in small streams draining catchments between 0.5 and 20 km^2 [50 -200 ha] in size and not meant for plot scale studies. They have been shown to be inaccurate, conceptually incorrect and produce just an estimate of the peak flow from a greenfield site rather than the full storm hydrograph. In addition, they cannot be used in a scenario-testing mode to see what the effect of urbanizing the area would be. In fact, a different method has to be used which is based on event rainfall and completely different from the IH 124 and ADAS 345 methods, therefore making a comparison of the results highly uncertain. By contrast, the new ReFH software was specifically designed to include the simulation of the surface runoff from a plot scale site from both the greenfield and developed site scenario.

Not only are the methods used outdated, but it is unclear how the estimates of volume are generated. The peak greenfield flow from the IH 124 and ADAS methods are listed but there is no estimate of a total volume from the developed site. Normally it would be expected that for a SUDS design there should be a clear estimate of the greenfield peak flow and associated volume, the developed site peak flow and associated volume and the storage requirements [the difference in the volume] as has been calculated as part of the WRA assessment shown in Table 2 using the ReFH software. For the LK Consult FRA section 5.3.1 "Attenuation Estimate", a greenfield volume and storage volume are given without stating the preferred method for greenfield flow estimation nor giving an estimate of the greenfield. The Appendix E of the LK Consult FRA presents the results from a drainage software package called Master Drain which simply automates the IH 124 and ADAS methods and then uses the Wallingford Procedure to estimate the flow from the developed site. The Wallingford Procedure is also an outdated technique from 1981 which uses estimates

of rainfall derived in the 1970s from less than 15 years of observed data. This is then converted into flows from an urban area based on fairly simple parameters describing the impermeable areas. This software is again using another outdated method and data and is not adequate for assessing the impacts of climate change as the rainfall data it uses 40 years old and does not incorporate many of the incidents of record rainfall experienced this century [such as the wettest and second wettest years on record for 2000 and 2012].

Finally, following the estimates of greenfield and developed site flows, the FRA should include details of the SuDS design which will be implemented to provide the necessary storage and ensure the flows from the developed site do not exceed that of the greenfield site. Only a very brief description of the SuDS is provided in two sentences, and the FRA states that a detailed design can be presented during the detailed design phase. As the application has now reached the stage of a planning appeal, a detailed design would be expected. The SuDS design should be tested using drainage design software and rainfall estimates from the FEH which are based on data from 1961-2013 and have more accurate and up-to-date methods for estimating the rainfall return periods that those used in the Wallingford procedure. The only drawing of the SuDS is shown as a drainage strategy plan in Appendix F of both FRAs, no detail is given in terms of the dimensions and construction of the features and as was noted by one of the statutory consultees, the flow direction is going against the natural gradient in some locations, in the south eastern corner of the southern site and in the centre of the northern sites.

Looking at the results of the Master Drain software in LK Appendix E there is still no clear calculation showing how the storage volumes have been estimated. The IH 124 and ADAS 345 methods are presented and the peak flows are given as output but normally a total volume associated with the flow would be given, as the product of flow over the given duration [i.e. 6 hours]. Likewise, it is not clear how the volume from the developed site scenario is calculated. It appears LK Consultants have plugged some values into a software package and presented answers without a clear explanation of how the calculations are made. This does not provide any confidence in their ability to calculate the surface runoff and associated storage volumes. In particular if the IH 124 method has been used as the preferred estimate of the greenfield flow then this method is known to produce significant underestimates [Rodda and Hawkins, 2012]. A design which includes large areas of greenfield land within the areas of housing will therefore be underestimating the flood risk posed by the greenfield runoff.

Given the theoretical and inaccurate nature of the work carried out for the developments, it is not possible to assess their impact with/without SUDS on the flood characteristics of the Charing stream and implications for flood management of the river Stour above the Hothfield flood storage reservoir.

Furthermore, the majority of the Wheler South meadow is underlain by an impermeable formation [Gault Clay] and it is not generally feasible to construct infiltration-based SuDs schemes in this kind of terrain. The developers have not carried out any infiltration tests to demonstrate that this would indeed be possible on the site, which is standard practice, even in viable geologies. In the light of the ground conditions, it can be stated with reasonable certainty that infiltration-based SuDs schemes would not work at this location, so the site would depend on the construction of large attenuation ponds.

Finally, the proposed development plans show construction in the active floodplain of West Brook, which is generally considered inappropriate due to downstream impact, as well as flood-proofing properties.

3 Groundwater

3-1 Public Water Supply

South East Water's source works at Charing are located at a critical point in their supply network, on a line of Lower Greensand sources stretching from Maidstone across to Ashford [Henwood], following the foot of the North Downs escarpment. While there are regional plans to increase supply through schemes such as Broad Oak Reservoir, existing supplies need to be conserved as far as possible, and district planning should ensure that development plans do not have an adverse impact on the existing yield of water supply sources.

The Charing boreholes currently pump groundwater after treatment to service reservoirs at Charing Hill and Warren Street which then command the distribution of water via three trunk mains between Lenham and Westwell and south to Bethesden and Tenterden. The local supply network is briefly mentioned here to highlight the importance of the Lower Greensand boreholes in the Charing area. Every effort should be made to conserve the present balance of water resources and avoid actions which derogate these supplies.

The reader is also reminded of the water scarcity status of SE England, particularly Kent where a high proportion of public water supply is obtained from groundwater. The Environment Agency's July-2013 classification placed this region in an area of "serious water stress".

Large-scale increased demand for public water supply in such a groundwater dependent water-scarce area could be viewed as irresponsible or uninformed planning on the part of government.

3-2 Geological Setting

The boundary between the Chalk and the Gault Clay at the foot of the North Downs escarpment is marked by a number of springs, some ephemeral and some perennial. Groundwater issuing from the Chalk springs moves across the Gault Clay gaining flow from surface runoff before crossing the Folkestone Beds and discharging finally into the Upper Stour. South of the River Stour, a second lower escarpment of harder Hythe Beds [known historically as Ragstone and Hassock] forms the southern catchment boundary, which is underlain by Atherfield Clay and Wealden Clay strata. The distribution of these geological formations in the Upper Stour catchment is shown in Figure 3-1. For the purposes of this appraisal, information is shown within the catchment as far as the Environment Agency water level monitoring point at Brownmill Bridge [Environment Agency Location ID: E4370].

Public water supply aquifers of particular importance for this review is the Lower Greensand sequence listed in order of increasing geological age as follows:

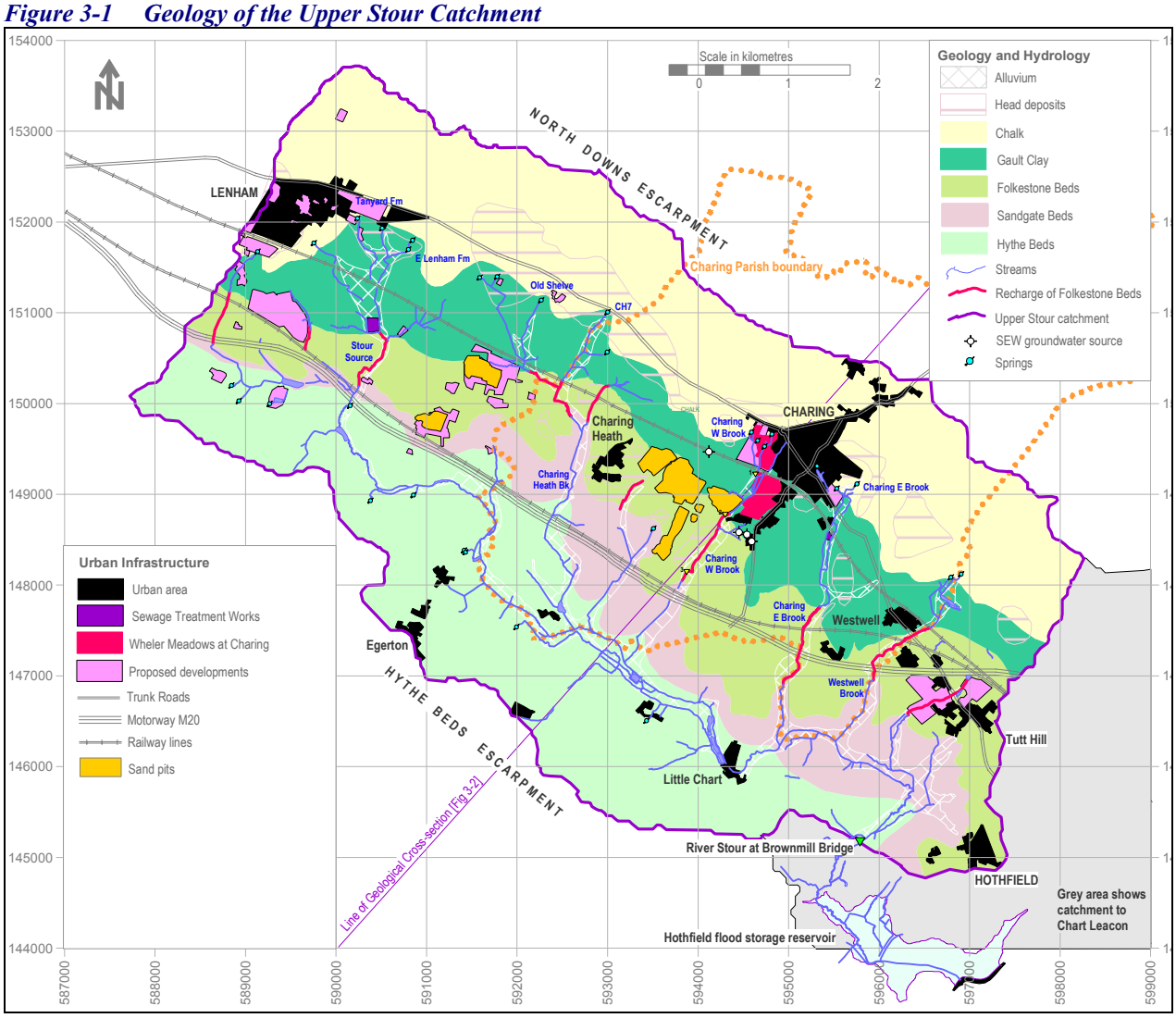
- Folkestone Beds: medium and coarse-grained, well-sorted sands and weakly cemented sandstones
- Sandgate Beds: intercalation of fine sands, silts and silty clays
- Hythe Beds: alternating sandy limestone [Ragstone] and glauconitic sandy mudstones [hassock]

The base of the Lower Greensand is marked by a clay horizon known as the Atherfield Clay, which ultimately rests on the Weald Clay.

The Folkestone Beds in the Charing area are between 45 m and 60 m thick, with lateral variation and thinning to zero between 8 and 15 km to the north in the London Basin. The Folkestone Beds consist predominantly of loosely-consolidated quartzose sands, generally fine to medium grade and of a pale grey to yellowish colour. The sandy strata become finer-grained with depth, resulting in lateral and vertical variations in aquifer parameters. The low proportion of fine particles in the sands means that they are a valuable aquifer and also a good quality building and construction material which has been widely worked along the outcrop. The extent of operational and disused sand-pits is also shown in Figure 3-1. Importance of the aquifer as a public water supply aquifer resulted historically in the construction and development of boreholes since 1903, replacing earlier use by the village of the Chalk springs and wells in the Lower Chalk.

The Folkestone Beds are underlain by the argillaceous Sandgate Beds dominated by grey clay, which effectively separate them from the older Hythe Beds strata. The Gault Clay consists primarily of stiff grey clays containing phosphatic and pyritic nodules towards the base, forming a thick and impermeable barrier between the Folkestone Beds and the overlying Chalk strata.

Figure 3-1 Geology of the Upper Stour Catchment



South East Water currently exploit five of the boreholes which have been drilled through the Gault Clay into the Folkestone Beds. Borehole logs are available in the BGS borehole inventory and their characteristics have been summarised in Table 3-1.

Table 3-1 Summary of Borehole Records in the BGS Archive

Site name	East	North	Depth m	BGS ID:	BGS Reference	WL m bgl	Con Date	CK	GC	FB	SB	HB
Charing 3			54.5	?	TQ94NW59	22.00		- -	0-1.9	1.9-48	48-55	
Charing 6	595420	148850	114.0	757792	TQ94NE110	24.30	1987	- -	0-52	52-89.9	89.9-114	
Brook Ho, [obs]	595400	148880	119.3	757793	TQ94NE111	23.46	1986	- -	14-47	47-92.5	92-119.3	92-119.3
CH 7 production	592980	151000	130.0	635664	TQ95SW27			0-12	12-88	88-128		
Charing PS	594540	148500	55.3	753866	TQ94NW227	18.90	1903	- -	No data			
Cappins Corner	594690	148650	19.2	753653	TQ94NW14	19.20	1958	- -	No data			
Charing 2	594540	148430	48.5	753762	TQ94NW123	21.00	1933	- -	0-31.4	31.4-48.5		
Charing PS	594540	148470	33.5	753656	TQ94NW17		1906	- -	No data			
Charing 1 prod	594540	148500	49.9	753641	TQ94NW2		1931	- -	0-1.8	1.8-48.2	48.2-50	
Charing trial 1	594540	148510	91.4	753657	TQ94NW18	18.29	1965	- -	0-1.8	1.8-48.5	48.5-61	73.2
Charing 6			103.0					- -	0-49	49-89	89-103	
Charing 5								- -	0-36.9	36.9-76.5		

Note: CK Chalk; GC Gault Clay; FB Folkestone Beds; SB Sandgate Beds; HB Hythe Beds; Atherfield Clay at 91.4 m bgl in Charing 1 trial. A number of boreholes are registered at the water treatment works [PS], and refer to original boreholes which were deepened in 1950-1964.

3-3 Hydrogeology

3-3-1 Recharge of the Folkestone Beds

The importance of the Folkestone Beds as a source of public water supply at Charing was explained in the previous section, while springs from the Hythe Beds aquifer maintains environmental low flow [baseflow] in the Upper Stour. The catchment of the Upper Stour at Brownmill Bridge was shown in Figure 3-1, and it can be seen that the outcrop of the Folkestone Beds aquifer occupies a broad central belt between the North Downs escarpment and the River Stour, covering an area of 9.1 km^2. This outcrop area offers the only point where rainfall and surface water can infiltrate and recharge the groundwater reserves in the aquifer.

Recharge of the Folkestone Beds aquifer originates from three sources:

- Rainfall direct on to the Folkestone Beds [FB] outcrop.
- Runoff from the Gault Clay [GC] directly over-ground onto the Folkestone Beds outcrop.
- Infiltration through the bed of streams crossing the Folkestone Beds outcrop.

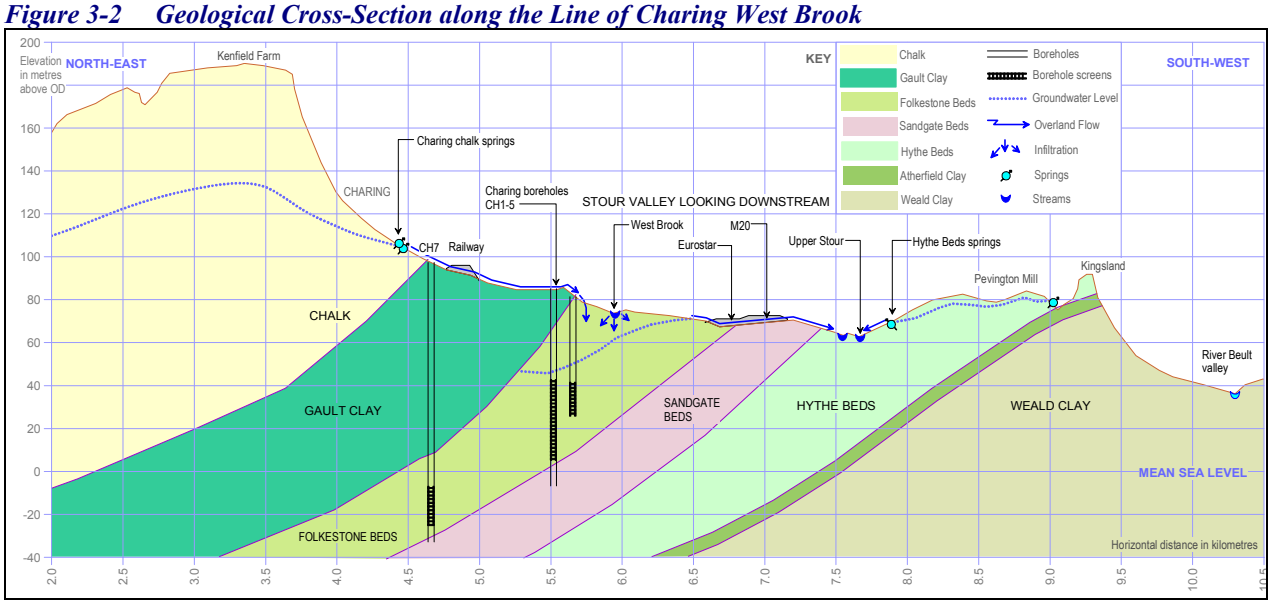
Typically, water emerges from a number of Chalk springs which then coalesce to form a shallow bifurcating stream channel which in many locations has been historically straightened and deepened by farmers to pick up overland flow across the Gault Clay. Some of the runoff moves off directly down-slope and disappears after crossing the GC-FB boundary.

The same hydrological processes occur all along the North Downs and a similar recharge mechanism was studied in the Upper Darent at Sevenoaks.

3-3-2 The Chalk Springs

The Upper Stour [above Brownmill Bridge] is fed by six main tributaries, all of which originate in Chalk springs. At Charing village, two groups of springs give rise to the Charing West and East Brooks. These Chalk springs are an extremely important source of water both for the Folkestone Beds aquifer and for the River Stour baseflow. The passage of water from Chalk spring to River Stour can be visualised in the cross-section shown in Figure 3-2. A brief description is now provided of those left bank tributaries to highlight the importance of the Chalk springs in replenishing water pumped out of the Folkestone Beds for public water supply.

Figure 3-2 Geological Cross-Section along the Line of Charing West Brook



Lenham Brook rises at a spring-pond on the Chalk-GC boundary, 135 m south of Lenham station, and then flows across the Gault Clay and Folkestone Beds before being replenished by springs in the Hythe Beds in the vicinity of Chilston Park hotel.

The source of the Stour is generally acknowledged to be located at three Chalk springs near East Lenham and Tanyard Farms. One spring flows into the natural pond at East Lenham Farm, a second spring rises in a garden close to the Old Ashford Road and a third spring has been made into a small lake at East Lenham. The outflow from the springs forms a stream which crosses from the Lower Chalk onto the Gault Clay about 300m downstream. After a further 1 km, the Lenham Sewage Treatment Works discharges to the Stream, which then makes up a significant proportion of the baseflow. The stream then crosses the 600 m wide outcrop of the Folkestone Beds and onto the Sandgate Beds at Chapel Farm before passing in culvert under the M20 Motorway.

Charing Heath Brook is the next Chalk stream and it derives water from five separate springs between New Shelve Farm and Charing 7 Borehole close to the Chalk-GC boundary, but obscured by head deposits in a similar manner to the Charing West Brook. The stream crosses a small fault at the GC-FB boundary and then flows for some 450 m across the Folkestone Beds outcrop. At Cherry Farm, a tributary which follows the south side of the railway line crosses 400 m of Folkestone Beds outcrop, and will therefore also contribute infiltration to the aquifer. Another tributary of Charing Heath Brook rises north of Burleigh Farm and crosses 500 m of Folkestone Beds outcrop providing another line of recharge. The water level records in boreholes suggest that groundwater is 12 m bgl downstream of CH7 and up to 3m bgl in the lower reach of the FB outcrop.

The origin of Charing West Brook is marked by a group of four springs and seepages close to the base of Lower Chalk and partially obscured by head deposits across the Wheler North meadow. As a result of the head deposits, the Chalk resurgence is dispersed in nature and results in some waterlogging of the fields, although there are two prominent points of resurgence. A small gathering flow proceeds southwards over the Gault Clay to streamflow gauging point, GS1, south of the railway culvert. Swinging south-westwards, the brook channel matures becoming wider and deeper and falls across the foul sewer crossing, GS2, where it begins a 1 km journey across the Folkestone Beds: this is a much wider outcrop recharge area than other tributaries to the NW. Streamflow was measured again at the public footbridge by Newlands Stud, GS3, where it leaves the Folkestone Beds outcrop. Based on the available borehole data, the brook would appear to be perched some 18-20 m above the water table at the upper end of the outcrop. In contrast, groundwater levels are probably close to the surface in the lower reach of the brook. The Charing-7 borehole was drilled to a depth of 130 m bgl passing through the Folkestone Beds and into the Sandgate Beds, with groundwater level at 36 m bgl.

Charing East Brook rises to the southeast of Charing from two main sources, a small lake at The Moat and a spring above an alder bed, both close to the Chalk-GC boundary. The brook flows southwards past Charing Sewage Works to the GC-FB boundary, about 1.5 km south. The route of the brook across the FB outcrop is similar to West Brook at 1 km, before travelling a further 730 m downstream to the confluence with the Upper Stour.

Westwell Brook rises 1.5 km southeast of Charing at two Chalk springs, and like the others crosses the Gault Clay and Folkestone Beds. Groundwater levels are higher in the aquifer at this location so the recharge mechanism will be different to the other streams.

The following summarises the characteristics of these Chalk streams:

- Source of the Stour is a Chalk water stream which is substantially perched over the Folkestone Beds outcrop. The stream is losing water through its bed into the Folkestone Beds.
- Charing Heath Brook is uncertain, but it is likely to have a component of stored water in the Head Deposits and possibly a further component of Chalk water migrating sub-surface. The stream is perched over the entire Folkestone Beds section and is losing water into the underlying aquifer.
- Charing West Brook is perched over the upper end of its course on the Folkestone Beds where it could lose water into the aquifer, but would appear to be in continuity with the aquifer at the lower end, gaining flow during periods when the water table is higher than the stream level.
- Charing East Brook is a Chalk stream with additional contribution from the Charing WTW at the upper end. Overall, the stream flow is accreting over the Folkestone Beds section as the regional water table is higher than the water level in the stream.

3-3-3 Streamflow Losses

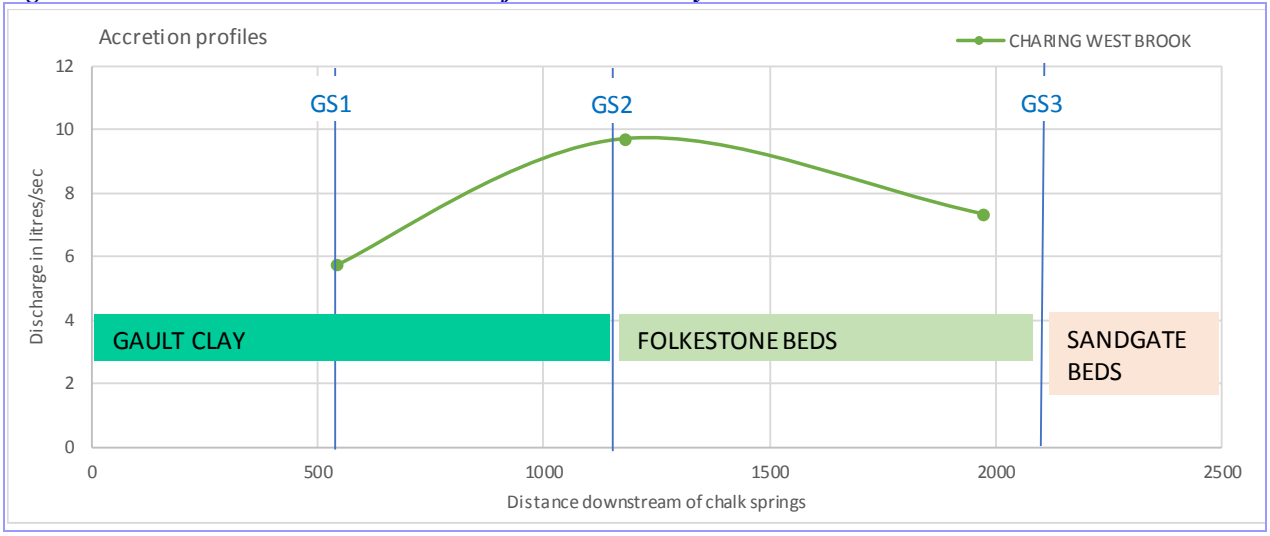
Focusing on the Charing West Brook, groundwater rest levels in the Folkestone Beds at the boundary with Gault Clay is of the order of 20 m bgl, so the brook loses water across the outcrop by infiltration through the stream-bed and banks. It was noted in the field that erosion of the Gault Clay is relatively small-scale, and streams occupy small channels so the stream bed across the Folkestone Beds is not lined with impermeable alluvium. Furthermore, the Chalk springs in the stream headwaters are obscured by head deposits which are a mixture of materials derived from erosion of the Chalk including flint fragments. As a result, the stream bed is quite hard with only a small thickness of silt.

South East Water carried out a campaign of streamflow measurements in 1993-1995 to confirm this recharge mechanism, and some additional gauging was carried out by WRA on 18th January 2018 for this review. Discharge measurements were made at three sites using a Braystoke current meter [Valeport BFM 002, S/N 1399] and details are provided in Appendix B. The results, summarised in Table 3-2, and Figure 3-3 show that discharge from the springs amounted to 5.7 l/s, and as the brook crossed the Gault Clay, it picked up runoff resulting in a flow increase to almost 10 l/s upstream of Charing Heath Road, but then stream-bed losses across the Folkestone Beds reduced the flow by 24% to 7.3 l/s at Newlands Stud.

Table 3-2 Summary of West Brook Gauging Results

Location	Distance downstream	Start	Finish	Width	Velocity	XS-Area	Discharge	
	m			m	m/sec	m^2	m^3/s	l/s
Chalk springs	0							
GS 1 Footbridge in Wheler South Meadow	545	13:42	14:05	0.74	0.095	0.05152	0.006	5.73
GS 2 - 50 m d/s Footbridge w/ pipe culvert and fall	1182	14:30	15:00	1.40	0.116	0.07765	0.010	9.69
GS 3 - Newlands Stud footbridge	1972	15:15	15:52	1.00	0.183	0.04065	0.007	7.32

Figure 3-3 West Brook Flow Accretion Profile on 18 January 2018



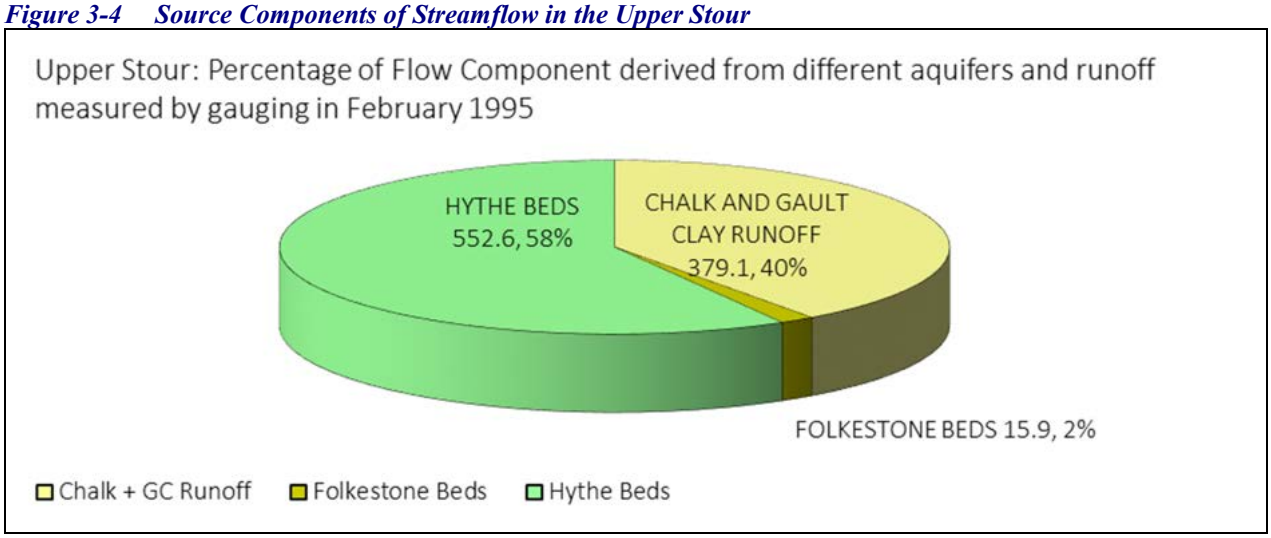
3-3-4 Composition of Baseflow in the Upper Stour

Finally, it is worth mentioning again the importance of Chalk springs in the make-up of baseflow in the River Stour. As a result of streamflow gauging done in 1993-1995, it was found that baseflow in the river was derived primarily from Hythe Beds and the inflow from Chalk springs and GC runoff. This is shown in the pie chart in Figure 3-4.

Notably, input is comparatively small from the Folkestone Beds, because the brooks lose water across the outcrop. However, further down the Stour catchment towards Hothfield, Folkestone Beds groundwater levels in the Charing East Brook and Westwell Brook are probably closer to the surface.

The majority of the course of the River Stour has been developed on Hythe Beds and Sandgate Beds, and baseflow is dominated by contributions from numerous Hythe Beds springs and short right-bank tributaries.

Figure 3-4 Source Components of Streamflow in the Upper Stour



3-4 Source Protection Zones

Finally, in this section, mention should be made of the source protection zones, which have been rolled out as a national strategy since the late 1990s, to provide planners with a simple guideline to protect public water supply sources from pollution. The zones relate to travel times in the groundwater catchment and SPZ3 roughly coincides with the total groundwater catchment. It has been standard practice to scrutinise closely any proposed development or activity in SPZ1, where the travel time from pollution source to the point of abstraction is fast, thereby making it difficult for water companies to close down the supply in the event of pollution. The zones relating to the Charing boreholes are shown in Figure 3-5.

The proposed developments in the Wheler meadows clearly lie within SPZ2 and both the Wheler South meadow and A20 petrol station are very close to the SPZ1 boundaries. It should be noted that the SPZ2 is overlain by Gault Clay which gives rise to the SPZ4 classification where the degree of risk relates to the thickness of cover of the protecting clay layer. No excavation or earth-moving activities in the southern part of the Wheler South meadow would be appropriate as the GC thickness there is likely to be no more than a few metres.

This Wheler South meadow is further complicated by the presence of an old sandpit adjacent to Newlands Farm, which was worked between 1990 and 2003, and is only a few metres away from the proposed development. Section 2 showed that surface runoff overflows into this sand-pit when the capacity of West Brook stream-channel is exceeded, so this offers a simple line of contamination into the public water supply.

Finally, SPZ1 is in contact with the West Brook stream, and a drainage course crosses the SPZ1 area from a low point in the Wheler meadow along the southern boundary of Brook Cottages. After rainfall, this channel takes water into a small pond and overflows for a short distance before infiltrating entirely into the Folkestone Beds. As this stream would take one of the proposed drainage outlets from the Wheler South development, it offers a direct line of contamination into the public water supply with an unacceptably short travel time.

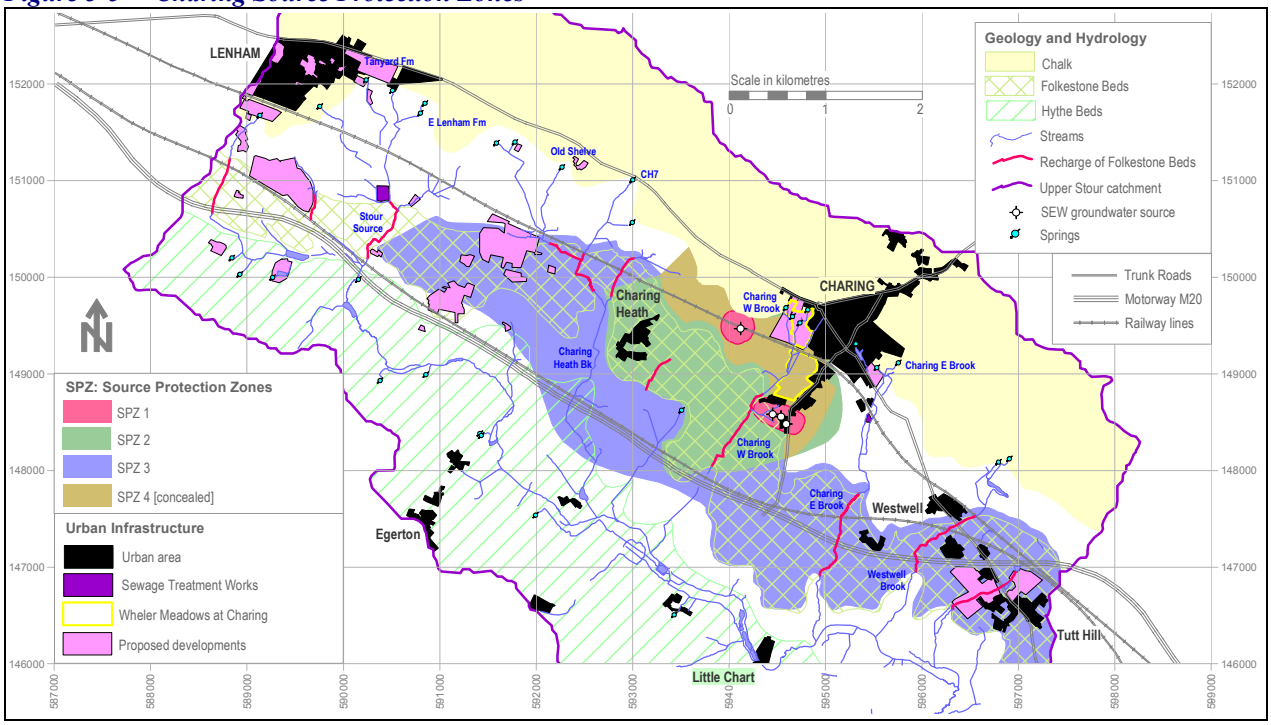
3-5 Drainage Problems on the Poppyfields Estate

Residents have noted that there has been a problem with water and damp in their homes since completion of the new residential development known as Poppyfields. The problem has been described generally as water ingress in garages and water standing on patios, as well as patches of waterlogged ground in some gardens which has affected landscaping and planting.

It is worth noting that the geology underlying the Poppyfields Estate is fairly complex and varies significantly across the site. The Chalk-GC boundary is located roughly 75 m from and parallel to the A20 Maidstone Road, with the Chalk on the main road side. However, across a large proportion of the estate, these bedrock

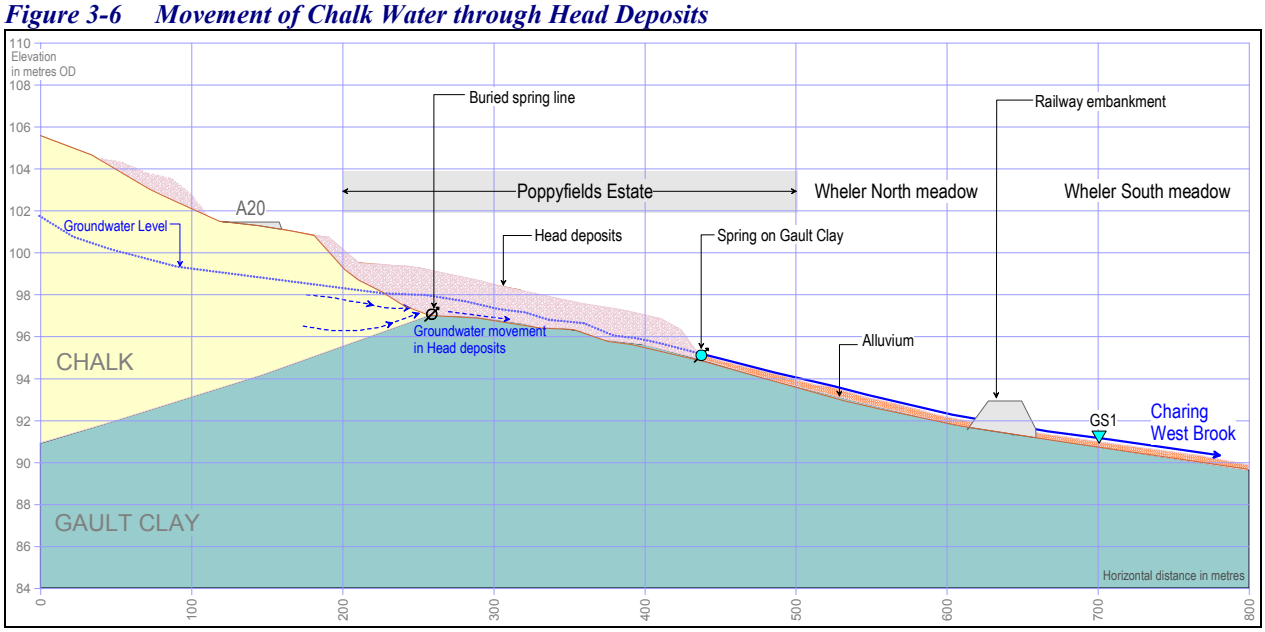
formations are obscured by head deposits which generally consist of a mixture of clay, silt, sand and gravel, formed by periglacial action during the Quaternary Period. These superficial deposits are the eroded materials which were moved by solifluction off the adjacent chalk escarpment and debris fans. Consequently, the head in places will be permeable and allow circulation of groundwater in variable amounts.

Figure 3-5 Charing Source Protection Zones



The presence of head deposits means that groundwater in the Chalk can move down-gradient over the top of the Gault Clay and hidden from view, once it crosses the GC boundary. This is in fact an important process in the North Wheler meadows and explains why the spring line is not always precisely at the GC boundary but further down-gradient on the Gault Clay. These details are shown in Figure B-2 [Appendix B] and a schematic cross-section has been drawn in Figure 3-6 to help explain this process.

Figure 3-6 Movement of Chalk Water through Head Deposits



4 Impact of Proposed Development

4-1 Ashford Borough Council Local Plan

Ashford Borough Council published in 2016 a Draft Local Plan to 2030 for consultation and this is currently being submitted to the Secretary of State and Planning Inspectorate, to start the Examination in Public [EIP] process.

Potential development sites have been reviewed as shown in the Local Plans of Ashford and Maidstone Borough Councils, as well as reviewing ongoing or recently-completed planning applications. The sites shown in these plans has been mapped across the Upper Stour and were shown in Figure 3-1 [pink].

While the majority have no obvious or significant impact on water resources, some worrying trends should be mentioned, particularly those with a large footprint and those which have a bearing on the Folkestone Beds aquifer and proposed developments at Charing.

Some of the sites of concern are located on Chalk stream headwaters of the Stour tributaries and others are located directly on the outcrop area of the Folkestone Beds aquifer and in SPZ3 of the Charing sources. The most noteworthy of these sites are located on the two brooks at Lenham, in particular in the vicinity of Tanyard Farm, on the spring-line of Charing West and East Brooks and at Tutt Hill.

While a similar strategy should be adopted for all these sites [with possible exception of the Tutt Hill area], the following sections focus on the Charing developments.

4-2 Charing Residential Growth

4-2-1 Proposed Development Sites

Two sites are shown in the Local Plan, one in the Wheler North meadow on the West Brook spring-line, and another in the area of The Moat on the East Brook spring-line.

Wheler South Meadow was identified in the ABC local planning documents as an "alternative site" [extract in Appendix D] which was rejected with the following conclusion:

CH3. This is a very large site with several different landscape features, uses and characters. The proposal on this site is for housing which could potentially be integrated into the existing development form along the northern boundary. While there are a few physical constraints, the site is some distance from a district centre. The site is not considered suitable for development.

The Wheler South area is now the subject of a planning appeal by Gladman Developments Ltd [GDL], following rejection of plans for development, and the subject of a Public Enquiry due to start on 13th March 2018. The Planning Application reference is 17/00303/AS. Carter-Jonas is in the process of applying for planning permission to develop the Wheler North area, part of which was included in the Draft Local Plan. The main concerns raised by Charing residents are that the proposed development is not sustainable given the increased volume of potable water required potentially for up to 600 new households, and that contamination during the construction and operation of the development will degrade the existing waterways and groundwater supplies. In addition to the residential development in the village, there are plans for a new hotel in the vicinity of the M20 crossing of Pluckley Road with capacity for 880 people, on the outcrop area of the Folkestone Beds aquifer.

GDL is acting for Wheler Trust with the southern meadows, and Carter-Jonas has submitted a planning application for the northern meadows, after circulating a proposal leaflet to local residents, for 135 houses [including up to 35% affordable housing] on the Wheler north meadows. The Wheler North plans were reviewed under application reference 18/00029.

Lenham has been allocated the construction of approximately 1000 new houses, 150 of which lie in the sensitive Chalk spring area around Tanyard Farm. This site has not been discussed in detail in this report, but the same principles apply with inevitable impact on groundwater resources, should the development proceed.

The two Local Plans show proposed development on five out of seven of the Chalk spring tributaries of the upper Stour between Lenham and Hothfield.

Charing is currently looking at the potential of an additional 600 houses, and a new hotel development at the Pluckley Road M20 junction with capacity for 880 people.

Part of the Wheler North meadow shown in the ABC Draft Local Plan refers to an area to the rear of the existing petrol station [Charing Motors], and a recent planning application for 17 houses on the land rear of the garage to the west of the hotel, includes reinstatement of the existing ditch to carry surface water runoff. This drain has historically received discharge from an ephemeral spring near Hook Farm cottages. A small pond on the garage property was filled in, and drainage is now designed to skirt around the site boundary.

This is another example of changes on the Chalk spring-line which have passed through the planning process unperturbed, and also alteration to drainage without an Environment Agency drainage consent.

4-2-2 Recently-Built Estates

There are two recently-completed residential developments at Charing, which demonstrate how it is difficult to conceive an appropriate design, and then manage and enforce the outcome of construction on large-scale residential estates, with the present system of regulatory controls. This is not only happening at Ashford and Maidstone, but WRA has seen these failures across most of southern Britain.

At Charing, the broad swathe of agricultural land between Charing railway station and the Swan Hotel has successively been built over, to provide new homes during the past 45 years:

- Old railway sidings 1965-1973
- Charing Green 2003-2004
- Poppyfields 2014-2015

A sequence of historical images is shown in Appendix E.

The first of the large estates built in the 21st century, known as Charing Green, incorporates a deep attenuation pond which is a permanent water feature with goldfish and other fauna. When this pond fills, it overflows into an inadequate ditch along the Wheler North boundary, which also receives water from a new open grass channel through the centre of Poppyfields estate. All of this drainage currently ponds and backs up behind the railway embankment footpath where there is no clear outlet [presumably a buried and blocked culvert]. It was reported that stagnant water in this boundary ditch gives rise to algal growth in summer months, shown in Figure C-5. It is likely that under existing conditions this part of the North Meadow and public footpath floods, finally exiting through the concrete-lined underpass beneath the railway. At the time of the site visit, the railway underpass had 0.15 m of standing water.

These points are all described here, in order to emphasize the fact that the aftermath of large-scale residential development with a single large land footprint is detrimental, and in this particular case will have adverse impact and derogation of the public water supply.

It was reported that residents of the Poppyfields estate have suffered problems with standing water on lawns and groundwater ingress into garages. As the engineering design was inadequate, the developer [David Wilson aka Barratt Homes] was obliged to retro-fit drainage systems which have only partially resolved the situation. It was noted during the field reconnaissance that residents had thrown piles of grass-cuttings into the drainage ditches around the edge of the estate, which will both obstruct flow and increase the nutrient contamination of the water, ultimately entering the Folkestone Beds aquifer.

These are the kind of practical example of how large-scale developments are difficult to implement, and they will always be subject to the monetary objectives and cost-cutting of those involved in construction, only too aware of the lack of effective enforcement of planning and environmental regulation.

4-3 Impact on Flooding

Given the theoretical and inaccurate nature of the work submitted for the Wheler meadow developments by Gladman's consultants, it is not possible to assess the implications of design proposals on flood management of the river Stour above the Hothfield flood storage reservoir.

Furthermore, the majority of the Wheler South meadow is underlain by an impermeable formation [Gault Clay] and it is not generally feasible to construct infiltration-based SuDs schemes in this kind of terrain. In the light of the ground conditions, it can be stated with reasonable certainty that dispersed SuDs schemes would not work at this location, so the site would depend on the construction of large attenuation ponds.

It has to be concluded therefore that the downstream flood risk associated with any of the proposed Charing developments will be increased.

4-4 Groundwater

4-4-1 Reduction in Yield of PWS Boreholes

Section 3 explained the processes involved in maintaining aquifer recharge and hence the yield or output of the public water supply boreholes at Charing. Actions which reduce recharge of the Folkestone Beds aquifer will result in a reduction in the capacity of the existing boreholes to pump groundwater into the supply network.

Unfortunately, the focus of design on reducing flood risk on the Charing development sites will depend on the construction of large flood retention facilities, as infiltration-based measures will not be effective on the Gault Clay terrain. On the southern margin of the Wheler South meadow, the lack of thickness of the Gault Clay will mean that both infiltration-based schemes and attenuation ponds cannot be built due to the risk of opening up a rapid transit route for groundwater movement through to the SEW source. The example of the Poppyfields site serves to demonstrate that very large ponds do not operate as designed, and the net effect of Poppyfields has been to reduce baseflow in West Brook, which already has an impact on borehole yield.

Tampering with the output from the Chalk springs and changing their regime will likewise have an adverse impact on borehole yield. It should be remembered that the spring outflow does not only issue from clearly-defined point sources but is also present in dispersed form, moving through the head deposits just above the Gault Clay contact.

In conclusion, it can be stated that the proposed large-scale development will derogate the public water supply in an irreversible manner.

4-4-2 Deterioration in Water Quality

While the residential development certainly increases the risk of accidental pollution which may require closure of the affected borehole[s], it could be considered to be a lower risk than a petrol tanker overturning on the A20 or chemical spraying of biocides along the railway embankment. The crucial point is whether alternative supplies could be imported from outside the source area to replace the Charing boreholes. Given the relative absence of nearby large sources, this is considered unlikely to be feasible, especially at the short notice required by a sudden point pollution event.

The closest site at Westwell has a comparatively smaller yield and Henwood even smaller. Ultimately, you would probably be looking at bringing in supply from one of the larger Chalk sources in the Lower Stour, such as Godmersham.

The creation of artificial channels across the development area, such as the grass-lined ditch through Poppyfields, will act to speed up the travel time of pollutants from the A20, which therefore increases the risk of water supply failure, aggravated by the planned increase in traffic along this trunk road, identified in the Maidstone and Ashford Local Plans.

Life on a relatively densely-populated housing estate with a high percentage of affordable housing on a large land footprint invariably creates conditions where all manner of unknown substances may be discharged into surface drains or accidentally spilt and washed away into watercourses. The case of throwing grass-cuttings into ditches on the Poppyfields estate has already been mentioned, and the need to avoid the increase in nitrates in aquifer, which is already a problem and close to the treatable limit.

4-5 Fatal Flaw

Unfortunately, there is a fatal flaw in current local planning procedures, when addressing hydrological matters, due to the fact that this science is not always fully understood, and planning rules and guidelines are insufficiently comprehensive to analyse all aspects of the water dilemma.

When addressing "water issues", development is usually tested against the following three criteria:

- River or surface water flooding
- SuDs infiltration and permeability of the soils
- Groundwater source protection and vulnerability to pollution

Application of these principles make it possible to miss the important aspects of "water quantity and water balance", with undue focus on flooding and pollution.

Although the Environment Agency is a statutory consultee in the planning process, it often fails to carry out an adequate review of planning applications [such as used to be done in the 1970s by its predecessor section in the regional water authorities]. The usual action is to pass the responsibility on to developers who can then dodge the bullet and eventually pass management on to chance and the final homeowners to use their imagination. A typical Agency response is that "adequate investigation and risk assessment should be carried out to address contamination and risks to controlled waters", with no mention of water resources impact or "water quantity and water balance".

The reality of such large-scale residential developments schemes as those proposed at Charing is that the condition of Chalk spring streams will be permanently altered, as well as the natural overland flow processes which feed those streams. Such changes are already occurring and borne out by the recently-completed Poppyfields development to the east of the Wheler North meadow. Here watercourses have been altered, new open channels constructed, and a significant portion of water is retained in a large permanent pond populated by goldfish. In addition, outflow from the site discharges to an old watercourse where water was found to be ponding and stagnating as the culverted outlets are buried and obstructed. In conclusion, the "water quantity and water balance" arriving at the FB recharge zone and Upper Stour has been adversely affected, particularly during times of low to medium flows.

The net effect of this development has been to reduce the natural baseflow into West Brook, and increase the nutrient loading of the stream. This has two adverse impacts on the public water supply:

- Less water in the stream for recharge affecting yield [production output] from the South East Water sources in the Folkestone Beds aquifer.
- Higher nutrient loading of recharge in a supply already suffering from high nitrates due to historical agricultural practices.

Large-scale development such as that proposed by the developer, Gladman, and many of the large area sites proposed in Local Plans are therefore fatally flawed, and it is certainly an opportune time to reverse this irresponsible trend, with smaller-scale, low impact development to meet housing demands. The key aim in reviewing planning policy into the future and taking decisions on planning applications will be to keep development away from the important Chalk spring-line and the Chalk stream corridor, as this resource feeds the Folkestone Beds aquifer and maintains environmental flow in the Upper Stour.

If the decision is taken by local councils to dismiss this important conservation strategy, water companies like South East Water will have no option but to bring forward other storage schemes similar to Broad Oak Reservoir. Given that it has taken 60 years for this scheme [initially identified by the Water Resources Board in the 1960s] to actually be considered seriously and form part of SEW's future planning, the reality is that such water resource development schemes are highly controversial and new schemes are unlikely to be built without extreme pressure such as the need for water rationing. Every endeavour should therefore be made to conserve existing resources in the Folkestone Beds and Hythe Beds aquifers.

Large footprints have an unacceptable impact on aquifer recharge. It would be far better to promote dispersed residential units, and in such a way to minimise the impact on these important Chalk streams.

5 Conclusions and Recommendations

5-1 Conclusions on Water Quantity

5-1-1 Groundwater discharge at the Chalk-GC spring-line and Gault Clay runoff from the Wheler meadows provide a major contribution to the water available in the Folkestone Beds aquifer used for public water supply and baseflow in the Upper Stour.

5-1-2 The aim of SuDs schemes is to promote water infiltration and water retention so that stormwater runoff is slowed down to reproduce pre-development conditions: in practice, a natural regime is rarely achieved where developments are large-scale and have a significant land area footprint.

5-1-3 Over-design of the attenuation pond at Poppyfields results in excessive amount of water retained, thereby reducing flow in West Brook, which has reduced the potential for aquifer recharge. Water is lost by evaporation, interception and vegetative consumption.

5-1-4 Information contained in the Wheler FRAs is insufficient and inaccurate, so the impact of proposed development on flooding cannot be assessed. The replacement of meadows with paved areas will naturally increase rates of runoff which would have an impact downstream if appropriate measures are not taken.

5-1-5 The hydrology and soil/geology of the two Wheler development areas are different. The northern meadow is a complex assemblage of head and alluvial deposits overlying Chalk and Gault Clay, which gives rise to a buried spring-line and shallow groundwater moving through the head and alluvium over the Gault Clay contact. Waterlogging of soil in the Poppyfield gardens is most likely due to this process causing ingress into garages and pooling of water on lawns and terraces. There has been no mention of addressing these issues in the developer's design.

5-1-6 Large-scale developments inevitably involve widespread earth-moving operations, with the digging of trenches for foundations, drains and sewers. Such activities will inevitably intercept groundwater in the northern meadow and have an adverse impact on the source of baseflow in the West Brook, in turn affecting aquifer recharge. This shallow groundwater will also affect the foundations for house construction in the northern meadows.

5-2 Conclusions relating to Water Quality

5-2-1 The proposed developments in the Wheler meadows will increase the risk of pollution of the public water supply, and over time lead to a deterioration in water quality.

5-2-2 Matters of specific concern are the shortening of stream travel times between the A20 and source boreholes, through the construction of straightened and over-deepened channels, such as the grass ditch through the Poppyfields estate. Accidental fuel and chemical spills on the A20 will arrive too quickly for an appropriate response at the water company treatment works.

5-2-3 Although stormwater runoff from rooves and road drainage would be directed to an attenuation pond, overflow from the pond will take substances from the urban runoff into West Brook and into the Folkestone Beds aquifer.

5-2-4 Nutrients from grass cuttings and garden refuse dumped on the banks of watercourses by residents, application of garden lawn, compost and plant feeds, weedkiller, occasional spillage of obnoxious substances, car washing and other usual suburban activities will all produce a chemical mix which is discharged via the drainage and attenuation facilities to West Brook and into the Folkestone Beds aquifer. The increase in nutrients [nitrate and phosphate] discharged from the Poppyfields estate was evident in algal growth in stagnating water in the North Wheler meadows outlet stream, which will already result in increased concentrations in the public water supply, requiring expensive removal at the treatment works.

5-2-5 Proposed demolition of the petrol station at Charing Motors poses a significant risk to contamination of the public water supply source, again via West Brook. If hydrocarbons are allowed to enter the Folkestone Beds aquifer, it can result in permanent damage, and there are a number of water supply

sources in Sussex and Kent, which have been taken out of service due to hydrocarbon contamination with continual attempts over the past 20 years to bring those sites back into production without success. This risk should not be underestimated, especially when work has already been illicitly carried out to infill the pond on the same property.

5-3 Recommended Actions

5-3-1 Little can be said that has a positive nature about the proposed developments at Charing, and such large-scale developments should be planned at locations which do not derogate public water supply or reduce environmental flows in local streams. The impact on groundwater source yield, water quality and environmental flows in the Upper Stour is considered to be unjustified.

5-3-2 Both Lenham and Charing villages should conserve and protect the Chalk springs and streams alongside Gault Clay runoff, as together they provide an important role in replenishing groundwater and maintaining flow in the Upper Stour.

5-3-3 Such large-scale residential developments across Chalk spring sources should not be encouraged in the Local Plan, and applications should be rejected if cases reach planning stage.

5-3-4 The need to maintain runoff for stream baseflow contradicts the objective of retaining runoff to reduce flood risk, when applied to large-scale developments.

5-3-5 In the light of the adverse and detrimental impacts on the environment, public water supply and the well-being of the local community, the proposed developments at Charing cannot be considered to be sustainable or in the long-term interests of future generations, but instead panders to short-term profit and short-term political quotas.

6 References and Source of Information

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Appendix A ReFH Parameters

Appendix A-1 Summary of Flood Estimation Handbook [FEH] Data

VERSION FEH CD-ROM Version 3

exported at 15:19:25, GMT Tue 23-Jan-18

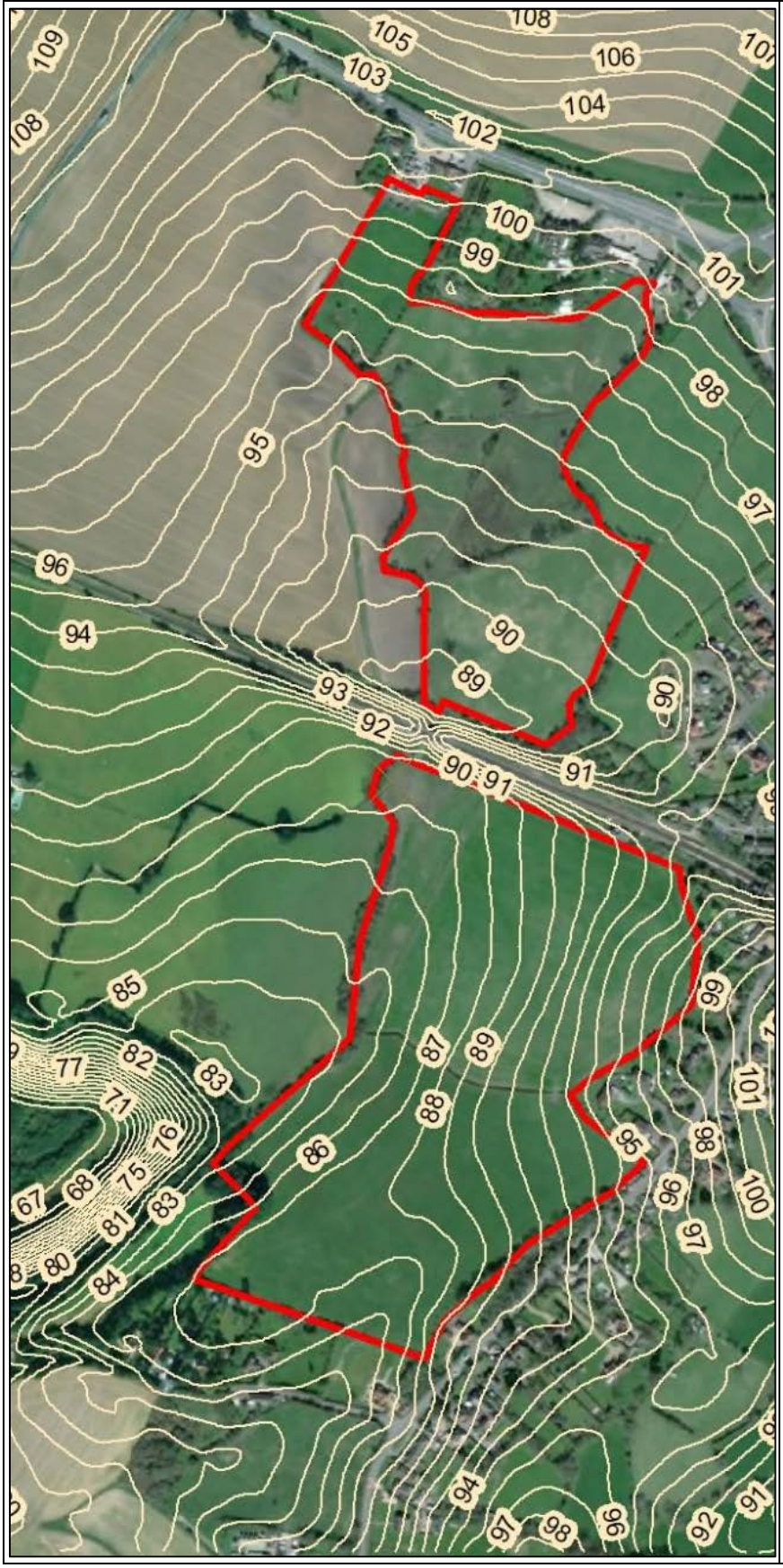
CATCHMENT GB594250,148750 TQ 94250 48750

CENTROID GB594805,149771 TQ 94805 49771

AREA	2.47
ALTBAR	122
ASPBAR	197
ASPVAR	0.72
BFIHOST	0.718
DPLBAR	1.48
DPSBAR	63.1
FARL	1
FPEXT	0.0405
FPDBAR	0.237
FPLOC	0.691
LDP	2.73
PROPWET	0.34
RMED-1H	12.1
RMED-1D	34.4
RMED-2D	44
SAAR	741
SAAR4170	754

SPRHOST	23.41
URBCONC1990	0.233
URBEXT1990	0.0167
URBLOC1990	0.922
URBCONC2000	0.706
URBEXT2000	0.0759
URBLOC2000	0.79
C	-0.0231
D1	0.34706
D2	0.3792
D3	0.26491
E	0.31204
F	2.50639
C[1 km]	-0.023
D1[1 km]	0.348
D2[1 km]	0.38
D3[1 km]	0.261
E[1 km]	0.312
F[1 km]	2.495

Appendix A-2 Topography of the Wheler Meadows



Contours overlaid on historical satellite imagery dated April 2013,

Google Earth

Appendix B Streamflow Survey

RIVER DISCHARGE MEASUREMENT	Date :	18-Jan-2018

Station :	GS 1 Footbridge in Wheler South Meadow	Observation time :	start	13:42		
River :	**Charing West Brook**		finish	14:05		
Coordinates:		Gauge reading :	start	no staff-gauge	m	
Current meter :	BFM 002 S/N 1399	[Water level]	finish		m	
Impellor :	1178-1370					
Measured from :	BY WADING	measured as distance below		water surface		

Distance from initial point	Segment width	depth d	observ depth 0.6d	Number of pulses	Time	Mean velocity in segment		cross-section area	discharge
m	m	m		revs	secs	revs/sec	m/sec	m2	m3/s
Right Bank									
0.00		0.00	0.000						
0.10	0.15	0.08	0.048	40	30	1.333	0.170	0.0120	0.0020
0.20	0.10	0.11	0.065	36	30	1.200	0.156	0.0108	0.0017
0.30	0.10	0.05	0.030	27	30	0.900	0.123	0.0050	0.0006
0.40	0.10	0.07	0.042	17	30	0.567	0.090	0.0070	0.0006
0.50	0.10	0.08	0.049	5	30	0.167	0.051	0.0082	0.0004
0.60	0.12	0.07	0.043	2	30	0.067	0.041	0.0085	0.0003
0.74	0.09	0.00	0.000	0	30	0.000	0.034	0.0000	0.0000
Left Bank									
Total							0.095	0.052	0.00573

Notes :

Weather - Sunny and cold approx 6°C, breezy, clouding over after 15:00 hrs

Stream conditions:

Soft muddy stream bed

Linear flow through culvert but silted

Error estimate - 7 %

RIVER DISCHARGE MEASUREMENT	Date :	18-Jan-2018

Station :	GS 2 - 50 m d/s pipe culvert @SW sewer	Observation time :	start	14:30		
River :	**Charing West Brook**		finish	15:00		
Coordinates:		Gauge reading :	start	no staff-gauge	m	
Current meter :	BFM 002 S/N 1399	[Water level]	finish		m	
Impellor :	1178-1370					
Measured from :	BY WADING	measured as distance below		water surface		

Distance from initial point	Segment width	depth d	observ depth 0.6d	Number of pulses	Time	Mean velocity in segment		cross-section area	discharge
m	m	m		revs	secs	revs/sec	m/sec	m2	m3/s
Right Bank									
0.05		0.000	0.000	0					
0.15	0.15	0.065	0.039	19	30	0.633	0.097	0.0098	0.0009
0.25	0.10	0.065	0.039	38	30	1.267	0.163	0.0065	0.0011
0.35	0.10	0.050	0.030	32	30	1.067	0.141	0.0050	0.0007
0.45	0.10	0.050	0.030	29	30	0.967	0.130	0.0050	0.0006
0.55	0.10	0.055	0.033	37	30	1.233	0.159	0.0055	0.0009
0.65	0.10	0.060	0.036	39	30	1.300	0.167	0.0060	0.0010
0.75	0.10	0.100	0.060	43	30	1.433	0.181	0.0100	0.0018
0.85	0.10	0.110	0.066	28	30	0.933	0.126	0.0110	0.0014
0.95	0.10	0.030	0.018	24	30	0.800	0.113	0.0030	0.0003
1.05	0.10	0.034	0.020	14	30	0.467	0.080	0.0034	0.0003
1.15	0.10	0.050	0.030	13	30	0.433	0.077	0.0050	0.0004
1.25	0.13	0.060	0.036	0	30	0.000	0.034	0.0075	0.0003
1.40	0.10	0.000	0.000	0	30	0.000	0.034	0.0000	0.0000
Left Bank									
Total							0.116	0.078	0.00969

Notes :

Weather - Sunny and cold approx 6°C, clouding over after 15:00 hrs

Stream conditions:

Hard, stoney stream bed with 5-10cm of silt

Bed was cleaned of silt by dragging prior to gauging

Error estimate - 5 %

RIVER DISCHARGE MEASUREMENT **Date :** **18-Jan-2018**

Station :	GS 3 - Newlands Stud footbridge		Observation time :	start	15:24	
River :	**Charing West Brook**			finish	15:52	
Coordinates:			Gauge reading :	start	no staff-gauge	m
Current meter :		BFM 002 S/N 1399	[Water level]	finish		m
Impellor :		1178-1370				
Measured from :		BY WADING	measured as distance below		water surface	

Distance from initial point	Segment width	depth d	observ depth 0.6d	Number of pulses	Time	Mean velocity in segment		cross-section area	discharge
m	m	m		revs	secs	revs/sec	m/sec	m2	m3/s
Right Bank									
0.00		0.000	0.000	0					
0.10	0.15	0.039	0.023	0	30	0.000	0.034	0.0059	0.0002
0.20	0.10	0.043	0.710	0	30	0.000	0.034	0.0043	0.0001
0.30	0.10	0.042	0.730	33	30	1.100	0.145	0.0042	0.0006
0.40	0.10	0.060	0.980	32	30	1.067	0.141	0.0060	0.0008
0.50	0.10	0.061	1.060	72	30	2.400	0.288	0.0061	0.0018
0.60	0.10	0.058	1.070	88	30	2.933	0.347	0.0058	0.0020
0.70	0.10	0.042	1.080	73	30	2.433	0.292	0.0042	0.0012
0.80	0.10	0.035	0.460	33	30	1.100	0.145	0.0035	0.0005
0.90	0.10	0.007	0.340	0	30	0.000	0.034	0.0007	0.0000
1.00	0.05	0.000	0.340	0	30	0.000	0.034	0.0000	0.0000
Left Bank									
Total							0.183	0.041	0.00732

Notes :

Weather - Clouded over and cold approx 6°C

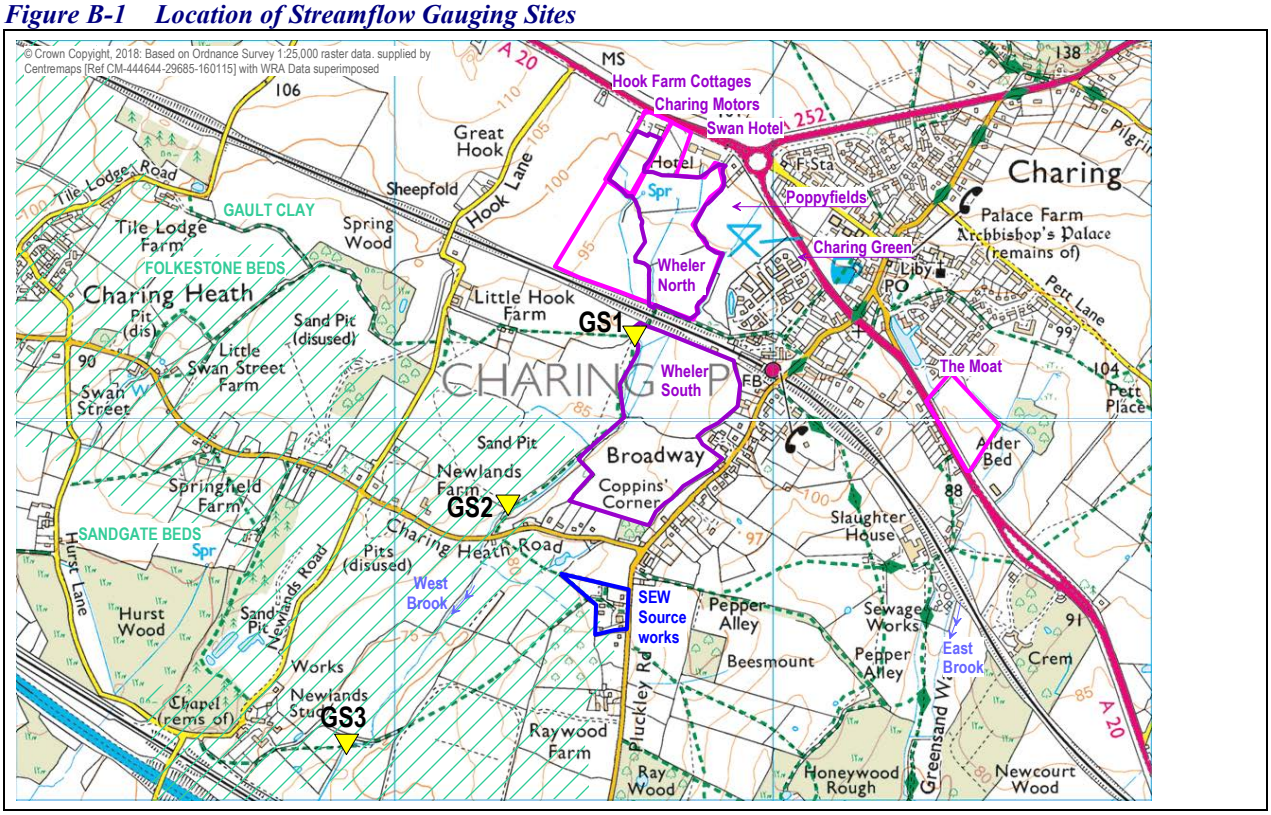
Stream conditions:

Hard stoney, clean stream bed, with RB weeded area [water-cress?]

Weed was cleared from RB, creating area of dead flow [should have cleared longer reach]

Error estimate - 5 %

Figure B-1 Location of Streamflow Gauging Sites



B-1 GS1. Wheler Meadows South footbridge by turn-style, measuring inflow from springs in Wheler North meadow

B-2 Footbridge at Southern Water sewer crossing pipe culvert and water chute with plunge pool: start of Folkestone Beds outcrop

B-3 GS2. 50m downstream of Southern Water sewer crossing

B-4 GS3. Newlands Stud footbr at downstream end of Folkestone Beds

Figure B-2 Streamflow Gauging Sites and Geological Details of the Wheler Meadows

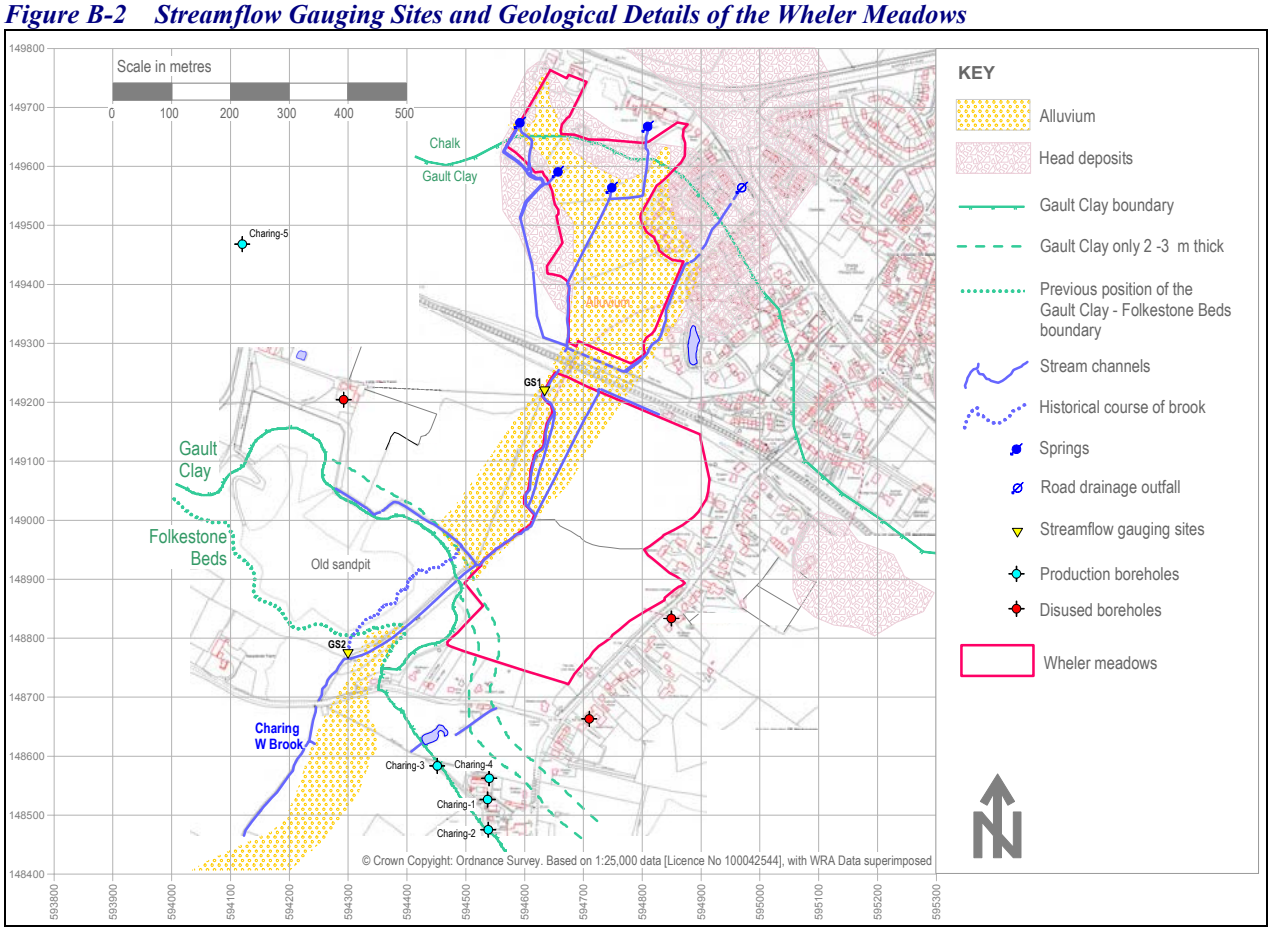
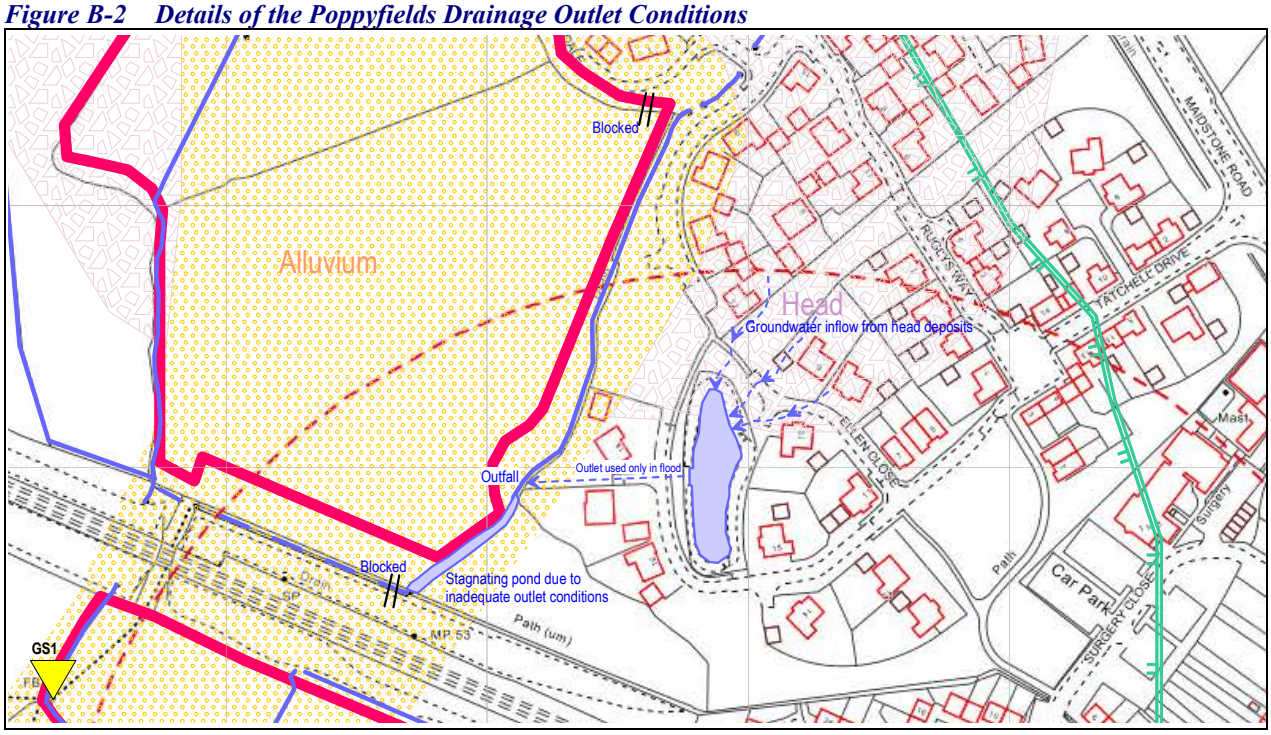


Figure B-2 Details of the Poppyfields Drainage Outlet Conditions



Appendix C Reconnaissance Photo-Log

C-1 Reconnaissance Photographs of the Wheler North Meadows

C-1 Tree-line following western boundary of meadow, looking north from the railway underpass footpath across fields underlain by head and alluvial deposits.

C-2 Wheler Meadows North: Looking west from the eastern boundary showing surface ponding after 10 mm rain during preceding 3 days.

C-3 Wheler Meadows North: Stagnant ditch at the south-east corner of the site, with no obvious outlet [possibly old buried culvert].

C-4 Stagnant ditch at the south-east corner: outlet conditions.

C-5 Algal growth in south-east boundary ditch in summer.

C-6 West Brook entering the railway culvert on the north side of the embankment.

C-2 Reconnaissance Photographs of the Wheler South Meadows and West Brook

C-7 Wheler Meadows South: View looking east from the footpath turn-style at the NW corner of the site.

C-8 Wheler Meadows South: Charing West Brook at the at the NW corner of the site.

C-9 Waterlogging of Gault Clay in Wheler South, viewed from Pluckley Road, and slow overland flow.

C-10. West Brook adjacent to disused sandpit [public footpath] at SE boundary of Wheler South meadow.

C-11. The small drainage channel flowing through the property immediately to the south-east of the southern site.

C-12. Continuation of the drainage channel under Charing Heath road.

C-3 Reconnaissance Photographs of West Brook down-valley

C-13 View looking down West Brook valley from Charing Heath Road.

C-14 Final FB reach of West Brook, upstream of Newlands Stud.

C-4 Reconnaissance Photographs of the Poppyfields Estate

C-15 Grass ditch through the new Poppyfields Estate.

C-16. Poppyfields pond [designed for attenuation but now a permanent water feature which absorbs all local baseflow].

C-17 Goldfish swimming in the Poppyfields attenuation pond.

C-18 Drainage outfall into Popoyfields attenuation pond.

Appendix D Planning

D-1 Wheler South Local Plan Summary

Site Ref: CH3 Date Survey Completed: 24/10/2014

Site Name: Pluckley Road

Site Description:

Varied undulating agricultural land with large drainage ditches to east of site. The site includes semi-mature trees with arable fields to the west and south of site. The site slopes from the eastern boundary to a ditch. The lowest point of the site is at the centre of the site.

No.	Site Assessment/ Screening Question	Assessment of effects, mitigation, uncertainties, assumptions	SCORE
Objective 1: Biodiversity			
1.1	Is the site located within or adjoining a designated habitat?	No	0
1.2	Would development of the site be likely to have a significant effect on a Local Wildlife Site?	No	0
1.3	Would development of the site result in the loss of key components in the habitat network, such as woodland, trees/hedgerows, wetland, ponds, streams and ditches or other features supporting protected species or biodiversity?	Yes – semi mature trees – TPO to SE of depot	-1
1.4	Would development of the site enable the creation of new habitat and/or components in the habitat network?	Potential on site.	1
1.5	Is the site located within or adjoining the green corridor?	No	0
Objective 2: Landscape			
2.1	Is the site within or in the setting of an Area of Outstanding Natural Beauty?	No	0
2.2	Would development of the site respect the existing character and quality of the landscape/ townscape?	Could provide limited number of dwellings on northern part of site to mirror existing development, but predominantly rural area	-1
2.3	Would there be an identifiable and cumulative visual impact from the development?	Yes – potential for high visibility from south – M20	-1
Objective 3: Cultural Heritage and Archaeology			
3.1	Is the site within or adjoining an area of archaeology importance or a Conservation Area?*	No	1
3.2	Does the site contain or does it adjoin a listed building, scheduled monument [SM] or registered Park/ garden?*	No	0
3.3	Will it respect and enhance the character and setting of Ashford's historic and/or cultural assets?	No	0
Objective 4: Water			
4.1	Is the site wholly or partially in Flood Zone 2 or 3?*	No	0
4.2	Is the site at risk from Surface Water Flooding: from the 1 in 100-year event and/or from the 1 in 30-year event?	Less than 10% for both	-2
4.3	Is the site suitable to use SuDs infiltration systems?	No – low permeability	0

4.4	Is the site within a groundwater source protection zone?	Source protection 1, 2, 3 and 4	0
Objective 5: Housing and Affordable Housing			
5.1	Does the site's size and proposed use meet the threshold for the provision of affordable housing? [currently over 15 units/ site area in excess of 0.5 ha]	Yes	1
Objective 6: Access to Services and Social Inclusion			
6.1	Will development of the site result in the loss or gain of onsite services and/ or facilities?	No	0
6.2	Is the site located in close proximity to a Local Centre/ Shop?	Circa 1km	-1
6.3	Is the site located in close proximity to a GP Surgery?	Circa 800m	0
6.4	Is the site located in close proximity to a Primary school?	No – circa 1.2km	-1
Objective 7: Health and Wellbeing			
7.1	Is the site located in close proximity to public green open space? [could include informal open space, accessible by the public]	PROWS across site, and open countryside, but no specific green open space within 1km	-1
7.2	Is the site located within close proximity of an equipped play area?	No – closest in Charing centre	-1
7.3	Does the site have direct access to a footway [PROW or pedestrian pavement]?	No pavement on road. PROWs – one in arc from Pluckley Road via depot. Another across site from northern boundary SE across site to depot, tangenting to SW.	1
7.4	Would development result in the loss or gain of local and/ or strategic open space?	No	0
7.5	Is the site close to landuse/s which may affect health and amenity?	No	0
7.6	Is the site situated in an area which is in the 20% most deprived nationally when measured against the Index of Multiple Deprivation 2010?	No	0
Objective 8: Sustainable Travel			
8.1	Is there direct access to the site from the public highway?	Yes	1
8.2	Is the site within 1.6km of an existing designated cycleway?	Yes	1
8.3	Is the site within 400m of a Railway station or bus stop that provides an hourly or more frequent bus service?	Yes – rail; no bus	1
Objective 9: Infrastructure Delivery and Availability			
9.1	Is the site reliant on the delivery of large scale/significant infrastructure to make it deliverable?	This is a large site and, with partial development, there will be pressure for substantial infrastructure provision, but in the short term this is not necessary.	0
9.2	Is the nearest GP surgery currently accepting new patients?	Yes	1
Objective 10: Land Use and Geology			
10.1	Is the site on previously developed land?	No	-1
10.2	Would development involve the reuse or redevelopment of derelict buildings?	No	0

Objective 11: Minerals and Waste and Soil			
11.1	Is the site located on existing, known mineral reserves?*	Yes – western section and south-eastern section on sandstone ashdown formation; mid sliver on sub-alluvial river terrace 3; eastern tip outside.	-1
11.2	Is the site designated as a Regionally Important Geological site [RIGS]?	No	0
11.3	Is the site on high quality grade agricultural land [1,2,3]	Grade 3	0
Objective 12: Sustainable Economic Growth, Employment and Skills			
12.1	Is the site being promoted for greater or less business/ employment space?	No	0
12.2	If the site is being promoted for business uses, does it have access to broadband?	--	0
12.3	Does the proposal include an educational component/ learning opportunities?	--	0
12.4	Would it help support sustainable tourism?	--	0
Objective 13: Town and District Centre Vitality			
13.1	Is the site within 400m of the nearest district centre?	No	0
13.2	Would the site contribute to the regeneration and revitalisation of Ashford town centre?	No	0
13.3	Would the site result in the loss of shops/services?	No	0
Conclusion: This is a very large site with several different landscape features, uses and characters. The proposal on this site is for housing which could potentially be integrated into the existing development form along the northern boundary. While there are a few physical constraints, the site is some distance from a district centre. The site is not considered suitable for development.			Total: -3

D-2 South East Water Response

4th April 2017

Our Reference: SEW Response_Charing Site_Pluckley Road_04.04.17

Your Reference: 17/00303/AS

Direct Line: 01634 276683

Mobile: 07816 534185

Email: katie.woollard@southeastwater.co.uk

Alex Stafford [Case Officer]
Planning Applications Group,
Ashford Borough Council,
Civic Centre
Ashford
Kent
TN23 1PL

01233 330 248

alex.stafford@ashford.gov.uk

Dear Alex,

Application Number: 17/00303/AS

Proposal: **Outline planning application for up to 245 dwellings [including 35% affordable housing], introduction of structural planting and landscaping, informal public open space and children's play area [LEAP and MUGA], balancing ponds, vehicular access point from Pluckley Road and associated ancillary works. All matters reserved with the exception of the means of access onto Pluckley Road.**

South East Water would like to thank Ashford Borough Council for bringing application 17/00303/AS regarding development of land off Pluckley Road, Charing, Ashford, Kent to our attention.

South East Water has reviewed this application and would like to ensure that all risks to surface and groundwater quality have been adequately assessed and mitigated for as well as confirmation from the applicant that there is no intention to abstract or impinge upon groundwater level, flow or yield.

We are requesting these additional details due to the fact that the site is located within a Groundwater Source Protection Zone 4 and 2c within close proximity of our Charing sources [150 meters to the S of the site]. The applicant should be mindful of any works being proposed that may impact on aquifer yield or quality.

This should include robust pollution protection measures and consideration of drainage design and ground disturbance to minimise potential impacts on groundwater quality and reduction in the availability of groundwater resources. Consideration should be taken of the sensitive nature of the

site in the work and method statement for any development, especially in regard to any material and fuel storage on site.

South East Water would like to reiterate that our primary concern is the water that we abstract and treat for public supply purposes and ensuring that the surface and groundwater abstracted does not fall below the tolerances of our water treatment works or the drinking water standards set by our regulators. Moreover, South East Water would like to ensure that any applicant carrying out activities within a groundwater source protection zone should follow and comply with the Environment Agency's approach to the management and protection of groundwater as outlined within their GP3 document 'Groundwater Protection: Principles and Practice' and take all measures and precautions necessary to avoid deterioration in the quality of groundwater below the site.

South East Water would like to be kept updated with any developments with regard to this application and looks forward to working with the applicant, Ashford Borough Council, and the Environment Agency to ensure that drinking water supplies remain protected in the area in the future.

Yours sincerely,

Katie Woollard
Water Resources Planner
South East Water

Cc, Brad Evans, Supply Demand Manager, South East Water
James Wilkinson, Graduate Hydrogeologist, South East Water

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Appendix E Land-use Change N of Charing Station

1990 Railway sidings converted to housing post-1965

2003 Preliminary ground preparation for the Charing Green estate and area north of the sidings infilled

2006 Completion of Charing Green development

2015 Construction of the Poppyfields Estate under-way