

KINGSNORTH PARISH COUNCIL



Ms Maria Stevens
Budget Consultation 2022/23
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CC:

Cllr Neil Shorter– Finance portfolio holder
Cllr Neil Bell– Planning portfolio holder
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Dear Ms Stevens,

Re: Ashford Borough Council Budget Consultation 2022/23

The Parish Council is grateful for the opportunity to comment on Ashford Borough Council's draft budget for 2022/23.

Maintenance and replacement

Through the course of the past year, it has become clear that Ashford Borough Council do not appear to set aside funds for large infrequent (but entirely predictable) items of maintenance or repair. Examples of this include-

- There was no funding set aside for the replacement of the play equipment at the Park Farm Moat, which has been expected for a long time and was known to be in the order of £250,000. Similarly, we are told the oak structure at the Moat are intended to be removed and not replaced as they deteriorate (which they are currently).
- There has been no funding set aside for the desilting of the Moat at the Park Farm Moat, which is to be expected every 20-25 years with a fishing lake and will cost more than £30,000. Without this funding the fish stocks are anticipated to be lost soon. (Further detail on this comment can be found on pages 2 and 3.)
- There has been no funding set aside for the maintenance of the ditches in the sizeable areas of woodland owned by the Borough Council within our Parish. These ditches would appear not to have been cleared/dug since they have been in the Borough Councils ownership for well over 20 years. Some of these ditches run into ponds within the woodland which are now silted up themselves.
- As a large estate like Park Farm ages there will come a time when most of the street names will need to be replaced. Residents already raise with us the poor condition of signage in many places. Is the full replacement of signage scheduled and funded for a future year?

Whilst the above issues are specific to Kingsnorth Parish, we imagine they may similarly be occurring across the Borough and wonder if there is the possibility that the Borough Council is accumulating a backlog of such issues.

We support the Borough Council's ambitions on climate change but there should, in parallel, be attention on adapting to the potential adverse conditions residents may experience as our climate changes. We would suggest that the first step would be to ensure the basic maintenance of the existing wet infrastructure such as the ditches that help to avoid flooding to the homes of our residents, before new projects are sought out.

Stodmarsh and ABC's budget

We understand that the Borough Council has decided that it intends to create large areas of wetlands to help mitigate the adverse implications on water quality that arise from development.

Decision takers are required to apply the precautionary principle when deciding on planning applications with such matters. This will not be limited to the prospects that the wetland will be created and that it will initially mitigate the harm from the development. The decision taker will be required to apply themselves to the question of whether those harms will continue to be mitigated through the life of the development.

Ashford Borough Council does not have a statutory duty to create and maintain wetland for the purpose of mitigating nutrients arising from planned development. As a result, a decision taker cannot take it as read that this will occur. They will have to consider the track record of Ashford Borough Council in maintaining similar water assets within the Borough.

At present, should an application come forward relying on ABC's wetland scheme, our Parish will be raising in our representations that no weight should be given to the proposed scheme of mitigation, as applying a precautionary approach the Borough Council is unlikely to maintain the asset to the degree necessary given their track record to date with other water assets in our Parish.

Example – The Moat

The moat at Park Farm likely dates from the 13th or 14th Century and was excavated to remove silt in 1995 as the Park Farm estate was being constructed. The purpose of this work was to improve the water quality and the site has and continues to be used by a fishing club. Ownership of the site then passed to Ashford Borough Council together with the playground and rest of the park.

For a few years the angling club has been raising concerns about the levels of silt and that the fish stocks may be lost in the summer. A survey by ABC has since confirmed that there are high levels of silt in the Moat.

In November 2020 the Parish council formally considered a proposal (see appendix) by ABC that we fund half of the de-silting works. ABC acknowledged that this was not our responsibility, but the Parish Council considered the issue to be pressing and very much supports the continued fishing of the Moat as it is one of very few available activities that might appeal to older children in the Parish and is also frequently used by other user groups.

Together the fishing club, Borough Councillors and the Parish Council were able to offer to pay for half of the works, but ABC then informed us that they would not fund the remaining half.

In 2021 the Parish Council has sought quotes for the works, looked for potential grants which might contribute towards the works and have funded our own survey of the fish stock in addition to a second silt survey. The aim being to help us understand the available options.

We have at our November 2021 meeting agreed to fund the application of 'Siltex' to the pond which should assist in pausing or result in some minor reduction in the levels of silt at the Moat. This work is expected in late January 2022. We took this decision as, given a lack of action on the part of ABC, we felt that it might give us a little more time for ABC to find the funds for the necessary desilting. There remains a reasonable chance that stocks may be lost this summer, particularly if there were prolonged hot weather.

Fishing ponds do silt up over time and this must have been anticipated when the asset was received by the Borough Council. It remains the Parish Councils position that the works are immediately necessary, and we would ask that ABC finds the funds for these works to occur before or at the same time as any works to the playgrounds. Trying to carry out the works afterwards would be both more costly and more disruptive to our residents.

Many thanks,

A handwritten signature in black ink, reading "P Le Rossignol". The signature is written in a cursive style with a vertical line at the end of the name.

Peter Le Rossignol (Kingsnorth Parish Council Manager)

Appendix

ABC's proposal document to the PC

Proposal: To de-silt the Moat (Park Farm) to ensure its continued viability as a popular community angling venue at the centre of the local community, while also paying attention to the heritage features of the medieval moated manor house site.

The Moat is an important landmark in the centre of the Park Farm estate and is home to a popular and well-run angling venue managed by Stanhope Angling Society (SAS) under licence from ABC. The Moat attracts a diverse demographic of anglers, including families and young people. However, there is a need to address the gradual silting up of the water body since it was last de-silted. It has now reached the point where the water depth can be less than 1 metre. The total footprint of the Moat covers an area of approximately 6900sq m - of which approximately 3000sq m is part of the water body.

Having undertaken a basic silt survey earlier this year following concerns raised by local community representatives, it was found that silt levels are between 0.5m and 2m in depth. Based on an average depth of 1.5m the approximate volume of silt to be removed is between 5,300m³ – 5,600m³ from approximately 2600sq m of the water body forming the core of the fishery. This calculation did not take account of the 400sq m area of the Moat that is more severely silted and overgrown and does not currently form part of the fishery.

Although water levels were unusually high at the time of the silt survey due to heavy rainfall, it was noted that levels would be likely to decrease during periods of low rainfall. If the water levels fall too low, they could affect oxygen levels for the fish in the Moat.

An initial proposal to remove the silt from the area of the Moat currently used for fishing and deposit it in the moat that is not currently part of the fishery was costed at approximately £32,000. This would have involved constructing a wall with Kentish ragstone boulders and then being landscaped. This proposal would allow the silt to be retained on-site and attractively landscaped, while the work would be minimally disruptive to the community. Another important element of the proposal was the protection of the fish stock while the work takes place.

Further consultation with Senior Archaeological Officer at Kent County Council indicated this proposal would not be ideal as it could adversely affect the archeologically interest of the Moat which is identified on the Historic Environment Record (HER) as a heritage asset. The HER suggests there was a manor house and probably other structures within the moat central platform and in the immediate surrounding area, including a possible causeway. It seems this is a medieval moated complex but most of the original structures have gone, except for the square moat itself, but there is some potential for yet unknown archaeology to survive here.

Consequently, an alternative option has been developed which is acceptable to the Senior Archaeological Officer at KCC which takes account of the historic nature of the site.

As we cannot put the silt either in one side of the Moat (as originally proposed) or on the island, the only viable option is to deposit the silt somewhere on site.

The best area is believed an area approximately 30m x 30m square in the SE corner of the surrounding open space (see square in red).

This would be the best place as it is in a corner where there is no through footfall and is surrounded on two side by trees/hedges making it easy to fence off to create a working area. The proposal is to create a bund

using topsoil from the site and then fill with the silt and gradually level off towards the north of the square. The area would then be re-seeded.

We have received one estimate for this option £25,000-£27,000. A more detailed quotation will be sought before works are commissioned.

If the moat is not de-silted it could jeopardise angling at the Moat in the future. The Moat is a key feature within Kingsnorth, is well used by the local community providing a visual amenity as well as recreational one. There is also a connection between the Moat and the wider surface water drainage of the park farm area which could lead to a significantly increased chance of localised flooding during periods of high rainfall. Although this link needs further investigation, it is believed the Moat is not an isolated structure within the drainage system of the area.

The level of investment required is not insignificant and as the Borough Council is facing numerous pressures on its budgets now due to the Covid 19 pandemic, especially as we now approach a second lockdown period, it is understood that the request for financial support needs to be considered as part of a wider range of works across the Borough. The work has a relationship to the Council's Recovery Plan by continuing to support this important community asset and drainage feature so will be reconsidered as part of a wider review of identified works on 26th November 2020.

The Moat was last desilted in 1995.

While it is acknowledged that ABC owns the asset and is responsible for its maintenance, Kingsnorth Parish Council is asked to consider whether it would contribute of up to 50% of the final costs of the works in partnership with the Borough Council, as the Moat is such a key feature within the Park Farm area of Kingsnorth.

Ideally, work will be commissioned as soon as possible after a decision on funding has been reached.