

SCRUTINY COMMITTEE

Wednesday, 13th May, 2026

10.00 am

**Council Chamber, Sessions House, County
Hall, Maidstone**



UNRESTRICTED ITEMS

(During these items the meeting is likely to be open to the public)

A - Committee Business

- A1 Apologies and Substitutes
- A2 Declarations of Interests by Members in items on the Agenda for this Meeting
- A3 Minutes of the meeting held on 3 March and 1 April 2026 (Pages 1 - 22)

B - Any items placed on the agenda by any Member of the Council for discussion

- B1 KCC Preparedness for Winter (Pages 23 - 42)

C - Any items called-in

- C1 Call-in of Decision 26/00007 - Heritage Conservation Strategy Amendment (Pages 43 - 114)

D - To Note

- D1 Short Focused Inquiry - Water Supply Issues (Pages 115 - 150)
- D2 Work Programme (Pages 151 - 154)

EXEMPT ITEMS

(At the time of preparing the agenda there were no exempt items. During any such items which may arise the meeting is likely NOT to be open to the public)

Benjamin Watts
Deputy Chief Executive
03000 416814

Tuesday, 5 May 2026

KENT COUNTY COUNCIL

SCRUTINY COMMITTEE

MINUTES of a meeting of the Scrutiny Committee held in the Council Chamber, Sessions House, County Hall, Maidstone on Tuesday, 3 March 2026.

PRESENT: Mr R G Streatfeild, MBE (Chair), Mr A Brady (Vice-Chair), Mr W Chapman, Mr J Defriend, Mr J Eustace, Mr A J Hook, Mr M A J Hood, Mrs S Hudson, Mr T Mole, Mr T L Shonk, Mr D Truder and Mr M Paul (Substitute for Dr G Sturley)

ALSO PRESENT: Mr B Collins, Mrs M Lawes, Mr T Prater, Mr P Thomas and Mr P Webb

IN ATTENDANCE: Miss M Bundy (Democratic Services Officer), Mr H D'Alton (Programme Manager (Strategic Programmes)), Mrs S Holt-Castle (Director of Growth and Communities), Mr J Pearson (Head of Libraries Registration and Archives), Mrs R Spore (Director of Infrastructure) and Mrs A Taylor (Assistant Democratic Services Manager (Scrutiny))

UNRESTRICTED ITEMS**35. Apologies and Substitutes**

(Item A1)

Apologies were received from Dr Sturley, for whom Mr Paul was substituting and the church and parent governor representatives.

Mr Collins was in attendance virtually.

36. Declarations of Interests by Members in items on the Agenda for this Meeting

(Item A2)

There were no declarations of interest from Members of the Committee.

Mr Prater who was a guest at the Committee declared that he was a Member of Folkestone Town Council, Folkestone and Hythe District Council, Sandgate Parish Council, Hythe Town Council and Kent County Council.

37. Call-in of Decision 25/00104 - Future of Library Provision in Folkestone Town Centre

(Item B1)

1. The Committee was advised on the formal call- in process and reminded that discussion should be focussed on the valid grounds for call- in with the purpose of scrutinising the decision taken, rather than proposing alternatives. The four possible outcomes were outlined: making no comments, making comments without requiring reconsideration, postponing implementation to allow

reconsideration by the decision- maker, or postponing implementation pending review by Full Council.

2. The Chairman invited Tim Prater, one of the call-in members, to provide reasons for the call-in. Mr Prater outlined that the closure of Grace Hill Library had been a consequence of long- term underinvestment leading to the building becoming unusable, leaving central Folkestone without a library for over three years. He highlighted that only one bid, led by Creative Folkestone and supported by One Folkestone, was submitted following the Asset of Community Value (ACV) and open marketing process, proposing a long- lease arrangement to enable substantial grant- funded restoration. He stated that no substantive discussions had taken place between KCC and the bidders after submission, despite the bid being an initial framework requiring additional negotiation. He also emphasised strong public support for retaining the Grace Hill building as a library and argued that insufficient consideration had been given to developing the partnership option. Mr Prater concluded by arguing the decision be sent back to the decision- maker with comments from the Scrutiny Committee to allow for reconsideration.
3. A written statement from Councillor John Baker (Folkestone West) was read to the Committee, by the Chairman, acknowledging the continued provision of library services in Folkestone but emphasising the historic and cultural importance of the Grace Hill building. Mr Baker highlighted strong community sentiment and stated that disposal via auction would be premature. He called for further structured engagement with Creative Folkestone and other interested parties, full exploration of asset transfer or partnership options and investigation of relevant grant funding. He concluded that all reasonable options to retain Grace Hill as a community asset should be examined before taking an irreversible decision.
4. Paul Webb, Cabinet Member for Community and Regulatory Services, recognised the strong community sentiment in Folkestone and the limited library access experienced since Grace Hill had closed since December 2022. He confirmed that the temporary library at 14 Sandgate Road would provide a full multi- use service for the foreseeable future and stated that the issues raised related mainly to infrastructure. Mr Webb also confirmed that discussions regarding the future of Grace Hill were ongoing but that the proposals received to date had not met the Council's criteria and in the absence of a compliant proposal, the Council would proceed with disposal via auction.
5. Brian Collins, Deputy Leader, highlighted the ongoing holding costs for the Grace Hill building were approximately £100,000 per year and emphasised that exploring grant- funded options that could take up to two years would mean substantial costs would continue to accrue during that period.
6. Hugh D'Alton, Programme Manager, provided background on the earlier public consultation and the interim key decision taken in January 2025. The decision acknowledged further information was needed before determining the long- term future of Grace Hill building and set out next steps, including initiating the ACV process and undertaking a 12- week period of open marketing. He explained that this was a reflection of the strong community interest and allowed for time to engage with potential proposers including meeting with Creative Folkestone both before and during the process. The recent cabinet decision had therefore been

based on the proposals and information received through the structured and transparent engagement over the past year.

7. James Pearson, Head of Libraries, Registration and Archives, clarified that while the main adult and children's library areas at Grace Hill were located on the accessible ground floor, other parts of the service operated across three levels, indicating that the building was not always fully accessible to all users.
8. Rebecca Spore, Director of Infrastructure, outlined that the recent decision confirmed the Council's commitment to maintaining library services, recognised the outcome of the ACV process and established 14 Sandgate Road as the library location for the foreseeable future. The decision also authorised proceeding with an open market disposal of the Grace Hill building, therefore while proposals could still be considered as part of the disposal process, it was separate from decisions about the future location of the library service itself.
9. The Chairman invited questions and comments from Members, and the subsequent discussion included the following:
 - a. Mr Pearson explained that there had been substantial engagement with Creative Folkestone during the development stage before their proposal was submitted. At the start of the marketing period, KCC wrote to all interested groups, including proactively contacting Creative Folkestone, setting out the assessment criteria, required information and bid timetable, and offering opportunities for engagement throughout.
 - b. Stephanie Holt- Castle, Director of Growth and Communities, confirmed that after the January meeting of the Growth, Environment and Transport (GET) Cabinet Committee, she had met twice with Creative Folkestone to discuss how their initial submission could be further developed. A subsequent meeting had also taken place with Infrastructure officers and Creative Folkestone representatives, where Creative Folkestone had agreed to take the discussions away and consider what further proposals they might prepare prior to the building's potential auction.
 - c. Mrs Spore confirmed that financial appraisals for both the proposals received and the option of 14 Sandgate Road were included within exempt appendixes of the original decision papers. She also highlighted that the recent decision related to progressing an open market disposal did not prevent any party, including Creative Folkestone, from submitting a proposal during the disposal process which would be considered by her and her team in line with standard procedures.
 - d. Mrs Spore confirmed that no action on the building's future could progress until a formal decision was made that it was no longer required. She explained that the ACV process determined the timeline, with the window closing on 7 September 2026, after which the process would restart if no arrangement or disposal on the property had been secured. Therefore, to meet the deadline, a new ownership model would need to be in place by summer 2026. It was also clarified that for the purposes of the ACV process, a "disposal" included either a freehold sale or the grant of a lease exceeding 25 years.

- e. In response to questions about the flexibility of the 7 September deadline, it was highlighted that the holding costs associated with Grace Hill were a significant factor for the Council when considering deliverability and timelines and that Creative Folkestone had been aware of these constraints from the outset.
- f. It was confirmed that Creative Folkestone's proposal did not include taking on the building's holding costs. Mrs Spore added that Creative Folkestone had indicated a willingness to assume refurbishment and ongoing maintenance responsibilities through lease terms. However, if the library service was included within the proposal, KCC would incur a service charge, as proportional maintenance and running costs would be recharged back to the Council.
- g. Mrs Spore explained that the disposal risk assessment did not consider wider community impact but focussed solely on KCC's requirements. She also highlighted that the Council could not predict what proposals might come forward on the open market or what would happen to the building thereafter.
- h. Mr Prater reiterated that Creative Folkestone's proposal was a partnership offer rather than a fixed financial bid, which would have required further discussions. He stated that, based on correspondence in recent days, no further partnership discussions had taken place.
- i. Mr D'Alton re-established the timeline of engagement with Creative Folkestone as beginning following the temporary closure of the Grace Hill building in 2022 and confirmed that their proposed vision had been raised prior to the January 2025 Key Decision. Mrs Spore further clarified that some discussions had taken place with Creative Folkestone following their proposal, but no proposal containing additional detail had been submitted to date. The existing submission remained a partnership proposal with detailed terms yet to be developed and this had been evaluated alongside the decision.
- j. Mrs Holt- Castle assured the Committee that engagement with Creative Folkestone had not ceased. She stated that discussions had taken place before and after the January 2026 GET Cabinet Committee meeting, during which she reiterated the Council's key requirements as location, space, partnership potential, cost, deliverability and environmental impact. Creative Folkestone had been asked to consider these points ahead of any future submission. Furthermore, Creative Folkestone had been given clear timelines, including the ACV and market- assessment windows and had been advised to submit detailed proposals within these timeframes before the building would be taken to auction.
- k. Mrs Spore stated that anyone, including Creative Folkestone, was free to submit a proposal, and the Council would welcome this. She added that a recent proposal had been received from another party believed to be working with Creative Folkestone, and this would be considered as part of the disposal process should the decision proceed. She clarified that they were looking for new ownership models for the building and that it could not be taken to auction until the decision was implementable. It was explained that while auction dates were available in June and July, no firm timeline could be given at present.

- l. Mr Collins highlighted that the holding costs of the building remained the central challenge. He stressed that the building was in a poor condition and that neither Creative Folkestone nor others appeared willing to take on the ongoing costs, particularly given the uncertainty around grant funding and potentially increasing costs if major issues were to arise.
- m. Mr D'Alton reported that contact with Creative Folkestone had taken place within the preceding weeks, where an update on the Grace Hill building was received.
- n. Mr Collins confirmed that KCC was open to negotiations and potential future partnership options, however he would not be willing to support delays in the process that would result in unnecessary costs to Kent residents.
- o. Mr Collins asserted that his main priority was restoring a full library service for Folkestone residents. He emphasised that the key issue was the lack of available funding to refurbish the Grace Hill building if it were retained, highlighting that no source of capital had been identified to cover the substantial costs required. He also acknowledged that the building could potentially increase in value in the long term if restored through a partnership model but maintained that the upfront investment needed was currently beyond the Council's financial capacity. He argued that the Council needed to balance potential long- term asset value against the practical constraints of existing resources.
- p. Mrs Spore confirmed that, since the January GET Cabinet Committee meeting, an approach and proposal had been received regarding the Grace Hill building but due to the current lack of an implementable decision, a guide price for auction had not been set. She reiterated that any future guide price would be determined based on a range of factors and further detail could be shared with Members outside the meeting or within the exempt papers.
- q. It was established that, under the Local Government Act (LGA) 1972, the Council had a statutory obligation to dispose of assets no longer required. It was also reaffirmed that the lack of available capital funding was a key barrier to progressing partnership proposals. Creative Folkestone's previous proposals had identified potential external funding sources but no applications had yet been made and no funding currently secured.
- r. Mrs Spore advised that within the period of her tenure, there were not any examples of the partnership model proposed by Creative Folkestone in Kent.
- s. Mr D'Alton explained that the County Council had been clear about the criteria that would need to be met in order to take a favourable view of any partnership model and directed Members towards Creative Folkestone's proposals within the appraisal of their bid set out in an appendix to the report.
- t. It was clarified that the majority of the estimated £100,000 annual holding costs related to security rather than insurance. It was also explained that vacant listed buildings carried inherent risks and costs could rise if security

arrangements needed to be strengthened. Whilst officers could not predict any specific future issues, certain risks such as vandalism and the building's listed status could lead to increased holding costs. The current holding costs over the last couple of years had been slightly above £100,000, with specific figures available outside of the Committee.

- u. Mr Prater confirmed that the proposed arrangement with Creative Folkestone would be novel and asserted that the Council had operated a wide range of partnership and leasehold arrangements across the county. It was acknowledged that despite the type of partnership model proposed for the Grace Hill building having not been undertaken before, KCC had the necessary expertise to manage such arrangements.

10. Following the questions, the Chairman welcomed comments and views from the Committee about the call-in. These included:

- a. Members posed whether the proposal was significantly different from other partnership or lease arrangements, particularly due to its financial implications for the Council.
- b. A Member expressed concerns about the long- term risk of the Grace Hill building remaining empty, argued that the ACV process did not allow sufficient time for a comprehensive proposal and asserted greater urgency was needed in discussions with Creative Folkestone. They also questioned whether the case for disposal had been clearly evidenced and suggested that retaining the freehold under a partnership model could provide long- term community value.
- c. A Member stressed the widespread local support for retaining Grace Hill by representatives and local residents as a library and community building. They addressed the funding and holding- cost concerns by referencing previous decisions in which full funding had not been secured in advance. Furthermore, they raised the accessibility considerations and the long- term community and asset value of the Grace Hill building as key points for re- evaluation of the decision. Finally, it was highlighted that partnership models were common across Kent and that the building was originally gifted for community use.
- d. A Member argued that they had heard no evidence that justified further delaying the implementation of the decision. They felt the Committee had all the information necessary and that officers had gone to great lengths to engage with Creative Folkestone on their proposal.
- e. A Member questioned claims surrounding the history of the Grace Hill building, including the assertion it was gifted with restrictions on sale or use.
- f. It was explained that Creative Folkestone had a strong record of maintaining challenging historic properties locally and that selling the building at auction would be a gamble, as the financial return could not be guaranteed.

- g. A Member warned of the risk that, if the building was sold at auction without safeguards, a new owner might leave it derelict, creating long- term social problems for Folkestone and incurring associated costs to emergency services and KCC. They posed that disposals contracts could include terms to minimise this risk. They also argued that further time was needed to explore opportunities by interested parties and that grant- funded restoration of historic buildings was achievable but required multi- year planning. Finally, they raised the number of successful partnership arrangements delivered by KCC as one of the reasons for reconsideration of the decision.
 - h. A Member clarified that the call- in was centred around financial governance, not whether Grace Hill was valued and, in that regard, they saw no evidence of procedural failure. They argued that spending £2.9 million on repairs was not a responsible use of scarce capital and highlighted the Council's duty to provide an efficient library service, not preserve a specific building. They emphasised that services would continue under the new Sandgate Road location, and that delays risked leaving residents without a library provision. The Member finally raised that all consultation and statutory processes had been properly followed and expressed concerns that retaining the building could set a precedent that was detrimental to the Council.
 - i. It was emphasised that consultation responses showed strong resident support for retaining Grace Hill as a library, which strengthened rather than weakened the case for referring the decision to Full Council.
 - j. A Member reported that local residents welcomed the addition of the temporary library service and argued that the new location served the community better due to its proximity to attractions such as Folkestone Museum.
 - k. A Member praised the more central location of the new library service and highlighted that the estimated £2.9 million restoration cost for the Grace Hill building could ultimately be much higher in the case of unforeseen expenses.
 - l. It was highlighted that the new library site was more central, in a pedestrianised area and not on a bus route, which could make access harder for elderly and vulnerable residents. It was also emphasised that no one was proposing a £3 million restoration, rather Members were asking officers to engage with interested parties to explore options and demonstrate openness to retaining the asset. It was added that this initial exploratory work would represent a relatively small financial commitment.
11. The Chairman called on the Cabinet Members and call- in Members to provide comments and clarifications on the Member's points of debate:
- a. Mr Webb assured the Committee that the library provision aspect of the decision was now secured in the town centre. He stressed that while Creative Folkestone had expressed interest in the Grace Hill building, they had not, over the three-year period, submitted a proposal that officers considered acceptable in terms of partnership arrangements or liabilities. As the Council had to consider both ongoing and potential future costs, the conclusion had

been reached to proceed with decision. However, if Creative Folkestone were to bring forward a viable proposal in the future, it could be reconsidered.

- b. Mr Collins stated that Creative Folkestone and other interested parties had been given ample opportunity to present constructive proposals but had not done so. He argued that any further delay to the decision's implementation would result in unnecessary cost to the Council and Members should consider this when judging the call-in.
- c. Mr Prater argued that the Committee recognised the building's community value and wished to see it retained for community use, but without the ongoing financial burden falling on the Council. He therefore suggested that any sale should include covenants to safeguard future community use.

12. The Chairman summarised the key issue of the debate as balancing the financial cost to the Council with the value of the Grace Hill building to local residents. He outlined the arguments made in favour of disposal on economic grounds, as well as those seeking further consideration of options that might preserve community value. He acknowledged differing views regarding the extent of partnership discussions with Creative Folkestone but confirmed that officers considered the option for further engagement still open. He emphasised that the call-in had been declared valid and therefore required proper scrutiny and highlighted the importance of the decision for the 631 central Folkestone library borrowers identified in the EQIA. The Chairman also reiterated key points raised by the Local Member for Folkestone West and the importance of considering local views in the debate.

13. Following the debate, the Chairman welcomed proposals from the Committee:

- a. Mr Hood proposed and Mr Brady seconded option (d) in the report to 'require implementation of the decision to be postponed pending review or scrutiny of the matter by the full Council.'
- b. The Committee was informed that referring the matter to Full Council would not change the decision making route, as Full Council was not the decisionmaker for this issue. If option (d) were agreed, the matter would first return to Cabinet for an urgent meeting. Cabinet would then decide whether to rescind or confirm the original decision. Only if Cabinet confirmed the decision would the matter proceed to Full Council for debate. It was also stressed that escalation to Full Council was generally reserved for exceptional circumstances.
- c. Following guidance from the Chairman, Mr Hood rescinded his proposal of option (d) in the report and instead proposed option (c) to 'require implementation of the decision to be postponed pending reconsideration of the matter by the decision-maker in light of the Committee's comments'. This was seconded by Mr Brady. Comments raised by the Committee included the following:
 - i. The Committee expresses concern about the risk of buyers of the building leaving it empty and requests the Cabinet Member reflect on possible steps to avoid or mitigate that risk.

- ii. The Committee expresses the desire that the Cabinet Member talk further with the interested parties in the community about what could be done for the building.
 - iii. The Committee fully understands that the full library service with a temporary lease would open in May, in regard to the long- term future of the Grace Hill building.
 - iv. The Committee understands the argument for speed but acknowledges that option (c) would not necessarily cause a long delay to the decision's implementation or for a summer auction to take place.
 - v. Before any final decision is made on the Grace Hill building, Mr Webb and Mr Collins should meet with Creative Folkestone to discuss their proposal.
 - vi. The Committee expresses the desire that the Cabinet Member aims to maintain the building for community use in disposal.
- d. Members voted on the motion. The motion failed.
- e. Mr Eustace proposed and Mr Chapman seconded option (a) to 'make no comments'. Members voted on the motion. The motion was passed by majority vote.

RESOLVED that the Scrutiny Committee make no comments.

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SCRUTINY COMMITTEE

MINUTES of a meeting of the Scrutiny Committee held in the Council Chamber, Sessions House, County Hall, Maidstone on Wednesday, 1 April 2026.

PRESENT: Mr R G Streatfeild, MBE (Chair), Mr A Brady (Vice-Chair), Mr W Chapman, Mr J Defriend, Mr J Eustace, Mr A J Hook, Mr M A J Hood, Mrs S Hudson, Mr T Mole, Mr R Palmer (Substitute for Dr G Sturley), Mr M Paul (Substitute for Mr D Truder), Mr M Reidy, Mr T L Shonk and Mr P Thomas

ALSO PRESENT: Mrs G Foster, Mrs B Fordham, Mr J Henderson, Mr P Osborne and Mr P Webb

IN ATTENDANCE: Miss M Bundy (Democratic Services Officer), Mr C Chapman (Interim Deputy Director for Education: Access and Inclusion), Mr R Emmett (Head of Highways (Operations)), Mrs S Holt-Castle (Director of Growth and Communities), Mr S Jones (Corporate Director of Growth, Environment and Transport), Mr A Loosemore (Head of Highway Asset Management), Ms C McInnes (Corporate Director Children, Young People and Education), Ms L Miller (Business Innovation Manager), Mr M Smyth (Director of Environment and Waste) and Mrs A Taylor (Assistant Democratic Services Manager (Scrutiny))

UNRESTRICTED ITEMS

38. Apologies and Substitutes

(Item A1)

Apologies were received from Mr Truder, for whom Mr Paul was substituting and Dr Sturley, for whom Mr Palmer was substituting.

39. Declarations of Interests by Members in items on the Agenda for this Meeting

(Item A2)

1. The following declarations were made in relation to item C1 on the agenda:

- a) Mr Defriend declared that his partner's daughter was a non-verbal child with autism that attended a specialist school.
- b) Mr Reidy declared that he was a governor at St Simon's Stock Catholic school and Holy Family Catholic school in Maidstone.
- c) Mr Shonk declared that his wife was a chaperone for the Home to School Transport scheme.
- d) Mr Thomas declared that his granddaughter attended a specialist school.

40. Minutes of the meeting held on 22 January 2026

(Item A3)

RESOLVED that the minutes of the meeting held on 22 January 2026 were a correct record and they be signed by the Chairman.

41. What would a Sustainable SEND System Cost?

(Item C1)

1. The report was introduced by Beverley Fordham, Cabinet Member for Education and Skills, who provided an overview of major ongoing reforms to the Special Educational Needs and Disability (SEND) system, KCC's assessment and Education, Health and Care Plan (EHCP) processes and potential alternative models of provision in light of the Government's SEND White Paper and subsequent announcements. She also explained that the cost of a financially sustainable SEND system depended on the chosen policy direction, with KCC working towards a balanced approach aligned with national reform.
2. In response to questions and comments from Members, discussion covered the following:
 - a) Craig Chapman, Interim Deputy Director for Education: Access and Inclusion, advised that Central Government anticipated SEND numbers to rise for approximately 5 years before returning to current levels over a ten-year reform period, driven by increased support within mainstream schools. He recognised that Kent remained an outlier in specialist placements, raising the question of whether it would align with national trends by 2035. He further stated that Central Government's proposals broadly reflected the approach Kent had been pursuing, aiming to redirect resources from specialist to mainstream provision to reduce escalating costs.
 - b) Christine McInnes, Interim Corporate Director for Children, Young People and Education, emphasised that the White Paper did not propose removing specialist schools, rather it sought to rebalance the proportion of children placed in specialist and independent provision. She explained that special schools remained essential for children with complex needs, with some highly specialist provision continuing in the Independent sector.
 - c) It was emphasised that the paper could not provide costed scenarios without clearer expectations from Members on the preferred model of a 'sustainable SEND system' as different models would generate different financial outcomes. It was also highlighted that KCC had to produce reform plans modelled on Central Government proposals, meaning further detail could only be provided once this full funding information was released.
 - d) Mr Chapman advised that if Kent continued operating at its current capacity, the SEND budget would reach an overspend of around £100 million in 2027. Central Government's deficit plan only addressed historic overspend, meaning that ongoing annual deficits would still rise unless there were reforms. He explained that while KCC was working with the Department for Education (DfE) on reform plans, the financial risk and potential future overspend ultimately sat with the Council.

- e) Mr Chapman stated that tribunal decisions had a clear financial impact by potentially directing pupils into high- cost independent provision. He explained that KCC supported the proposed SEND reforms, which aimed to reduce conflict in the system and to ensure limited resources were benefitting the greatest number of children. He also outlined that previous increases in spending did not necessarily improve outcomes and contributed to an unsustainable model. It was added that a detailed report on the tribunal system was published the previous year and could be updated for Members. It was also highlighted that Kent performed better than the national average, with approximately 96% of tribunal cases decided in favour of the parents.
- f) Mr Chapman advised that it was too early to assess whether Central Government's national estimates for a sustainable SEND system was accurate as KCC was still awaiting significant clarification on expectations and funding. Mrs McInnes also reminded Members of the proactive action taken, including £20 million of capital assigned to expand specialist resource bases and create nearly 900 additional places. The investment was informed by detailed mapping which showed that some pupils moved into the independent sector at secondary levels due to gaps in local provision.
- g) Mrs McInnes highlighted that evidence showed significant increases in SEND and mental health spending did not lead to improved outcomes for children, with mental health indicators continuing to decline. She added that both national and local data indicated that spending and decision- making had diverged from the national average since 2017 without improvement, raising concerns about the effectiveness of existing arrangements if future levels of support were reduced. She also outlined that wider societal considerations about appropriate support for children with SEND needs, particularly in preparing them for adult life, were central to decisions on future spending and investment.
- h) Mrs McInnes confirmed a focus on early identification and support for children with additional needs at the nursery stage. This included specialist nursery staff providing outreach support in mainstream settings, reducing the need for children to move into special schools, with early feedback reported as positive. Work on neurodiversity in mainstream schools, focused on early identification, reasonable adjustments and closer partnership with parents, was also delivering positive outcomes without necessarily increasing costs.
- i) Mr Chapman explained that the costs of scaling up current pilot initiatives across the county could not yet be quantified. He advised that costs depended on strategic and political decisions about where limited resources should be prioritised, as increasing investment in one area would require reductions elsewhere without necessarily meeting the provision required. Different approaches, such as investing in earlier identification pathways or in upskilling mainstream schools to meet needs without formal diagnoses, could use these same resources in different ways. He stated the direction set out in the white paper would shape these decisions and their associated financial implications.
- j) It was confirmed that current government policy encouraged schools to bid to include nursery provision, indicating an expectation that more primary schools would have attached nurseries. It was highlighted that outcomes for early

years children were improved when they had access to qualified teaching staff. SEND projections were also published annually in the Kent Education Commissioning Plan, with data broken down by district and updated each year using a range of data sources.

- k) Mrs McInnes confirmed that the High Needs Funding Block would remain frozen for the next financial year. While further Government announcements suggested that additional funding may be forthcoming, details had not yet been confirmed. It was stated that any additional funding was expected to be directed to schools, and that for the next financial year Kent had applied a small uplift to school budgets. Government guidance also indicated that schools were expected to review their budgets, including managing expenditure and considering the use of reserves.
- l) Mr Chapman confirmed that the Safety Valve agreement had ended and that a write-off of the accumulated deficit had been applied, taking account of the Council's contributions, meaning Kent was not disadvantaged. He advised that future SEND reform plans remained uncertain, as Central Government expectations and funding arrangements had yet to be confirmed. It was stated that Central Government anticipated continued growth in demand for approximately five years before reforms took effect, with funding expected to reflect this period of growth followed by longer-term reduction. Mr Chapman also confirmed that the write-off of 90% of the accumulated deficit was conditional on KCC reaching agreement with Central Government on the reform plan.
- m) It was explained that home to school transport costs were being considered as part of the wider SEND system. Work to improve the efficiency of transport delivery had resulted in significant savings over recent years while maintaining provision. Although transport was taken into account alongside SEND decision-making, decisions remained primarily driven by pupil need, with transport considered as a contributory factor.
- n) Mrs McInnes confirmed that cost-benefit modelling had been undertaken to assess the balance between local specialist provision and associated transport costs. This modelling supported the successful bid to the DfE for two new special schools. The Council was also continuing to develop a wider continuum of provision, including a £20 million investment in Specialist Resource Provisions (SRPs), and also investing in improvements to accessibility within mainstream settings, such as hoists and ramps.
- o) It was confirmed that provision planning took geography into account and sought to locate services closer to families where possible to reduce transport. Where children were already settled in placements, particularly historic ones, changes were avoided to prevent disruption to education.
- p) Mr Chapman reported that, in recent years, some Local Authorities (LAs) placing looked-after children with EHCPs in Kent provision had refused to meet the associated costs. However, the DfE had consulted on and was reverting to the previous position in which the placed LA retained both financial and corporate parenting responsibilities.

- q) Mr Chapman explained that strengthening early support and intervention could reduce the likelihood of parents progressing to appeals or tribunals. Whilst the right to appeal remained with parents, the current system potentially pushed cases towards a more adversarial process. He asserted that shifting focus and resources earlier could improve support and parental confidence in the system. It was also stated that tribunal outcomes did not necessarily reflect poor LA decision-making, as tribunals operated under different criteria and did not consider wider system impacts or affordability. Cost figures could be circulated to the Committee outside of the meeting.
 - r) Mrs McInnes added that access to specialist support for mainstream schools had been simplified through professional resource groups, giving each school named professionals and faster access to services which was expected to reduce long waiting times. She outlined that programmes such as This is Me and Partnership for Inclusion of Neurodiversity in Schools (PINS) aimed to build parental confidence and support early intervention in mainstream settings, though the impact would take time to embed.
 - s) Mrs McInnes explained that she could not provide a definitive cost for a “sustainable” SEND system as KCC was required to deliver a statutory SEND service within the funding made available by Central Government and this future funding allocation was currently unknown. She also highlighted that clearer information from Central Government would support future planning, particularly in three areas: a clear definition of complex need, clearer expectations of what provision mainstream schools should provide and wider public debate about the role and level of specialist provision for children with additional needs.
 - t) In response to a question on the definition of a “good” SEND system, Mrs McInnes acknowledged the answer was complex and outlined examples of inclusive practice where schools worked in partnership, challenged each other constructively and met needs through shared resources, rather than additional funding. She highlighted the Council’s aim to achieve greater consistency across mainstream schools and the challenge of establishing a clear baseline of what all mainstream schools were reasonably expected to provide.
 - u) Mrs McInnes emphasised that defining SEND thresholds was a critical and challenging issue, frequently subject to differing expectations and challenges. She continued by explaining that delivering sufficient SEND provision relied on professional judgement and approach rather than easily visible outcomes. She confirmed that a future paper could be brought back to the Committee, subject to guidance from Members on these parameters.
3. Mrs Fordham, suggested a more structured approach be taken to define what constituted a good and sustainable SEND system before seeking a cost analysis. She advised that agreed evidence, outcomes and principles be developed in advance to support informed debate based on logic and a rational flow.
4. The Chairman summarised the discussion by referencing the critical Ofsted reports and the multi- agency SEND planning that had preceded the item coming to the Scrutiny Committee. He highlighted that the paper usefully set out recent improvement activity within current resources, whilst acknowledging the key

tension between a needs- led SEND system and the requirement to maintain a balanced budget amid rising demand. Members were reassured that further opportunities would be available, both publicly and privately, to continue this work. The Chairman proposed the Scrutiny Committee note the report. This was agreed by the Committee.

5. RESOLVED that the Scrutiny Committee note the report.

42. Winter Service - Update Report

(Item C2)

1. The report was introduced by Peter Osborne, Cabinet Member for Highways and Transport, who updated the Committee on the progress of KCC's Winter Service up to the end of January 2026 and outlined pressures experienced during the most recent winter period and lessons learned. He also highlighted adequacy of resources and capacity, clarity on the definition and responsibilities around street cleanings, pothole maintenance, future planning and long- term resilience.
2. Following questions and comments from Members, discussion covered the following:
 - a) Simon Jones, Corporate Director for Growth, Environment and Transport (GET) confirmed that the data showed an increasing number of surface defects, supporting perceptions of worsening pothole conditions linked to recent winters, unusual weather, and the overall condition of the highway network.
 - b) Andrew Loosemore, Interim Director of Highways and Transport, explained that while January typically saw a spike in surface defect reports, February experienced an unprecedented increase due to cumulative severe winter conditions. Although this created a significant pressure and backlog, report levels reduced in March and recovery work was continuing.
 - c) Mr Jones highlighted the existing scheme through which Parish Councils could invest their own funding into Highway Improvement Plans. Parishes that wished to accelerate local repairs were also advised to engage with the Highway Improvement team, who could liaise with operations as appropriate.
 - d) Mr Jones explained that it was not possible to set a fixed timescale for when surface defects would reach intervention levels, as deterioration rates varied and were managed through a routine inspection regime. Mr Loosemore further confirmed that repairs were prioritised using a risk- based approach in line with the national Code of Practice for Well Managed Highways, with defects allocated to timed repair categories. Lower- risk issues were addressed through planned maintenance and asset management programmes.
 - e) Richard Emmett, Head of Highways (Operations), explained that primary salting routes were planned to capacity and could not currently be expanded. However, additional "snow routes" may be deployed during severe weather once primary routes were complete, and in some cases single access routes to villages had been added. Members could raise requests through their Local

Highway Managers, and post- season reviews of routes were undertaken over the summer months.

- f) Mr Jones advised that weather forecasting services were kept under regular review and confirmed that the Council had recently starting using Met Office forecasting. Alongside this, operational experience and innovations under the new contract were expected to improve preparedness for future extreme weather at no extra cost to the Council. Mr Emmett outlined these potential innovations, including the use of vehicle telematics to enable live tracking of gritting vehicles. They also included recognising pressures caused by the same staff covering both winter operations and pothole repairs, with work underway to explore designated crews to better manage emergencies and reduce operational strain.
- g) Mr Loosemore confirmed that the use of spray markings to identify temporary pothole repairs had been explored previously, but practical issues and potential confusion with utility markings meant this did not progress. The issue had recently been revisited, and it was acknowledged that there was a need to improve public understanding, with further consideration and a potential update to be provided outside the Committee.
- h) Mr Loosemore confirmed that there was no evidence to suggest that salting caused roads to deteriorate more quickly. The quantities of salt used were minimal and had little impact on road surfaces, with deterioration primarily caused by freeze- thaw cycles, prolonged rainfall and the age of the roads.
- i) Mr Loosemore outlined that the Highways Term Maintenance contract covered a wide range of services beyond pothole repairs, including highways management, winter service and drainage. Sub- contracting was used to manage peaks and troughs in demand and to provide specialist services, as it would be unaffordable for the contractor to retain sufficient core staff to meet maximum demand at all times. In addition, the Council also used the contract to engage directly with local Small and Medium- sized Enterprises (SMEs) to provide added resilience when required. Mr Jones also identified that the new contract separated fixed overhead costs from operational costs, providing transparency and ensuring contractors did not profit from increased subcontracting or additional work.
- j) It was explained that decisions on patching versus resurfacing were based on balancing budgets, demand, available resources and the need for durable repairs. Inspectors assessing defects were required to choose the most appropriate and cost- effective intervention, which could involve individual repairs, larger patches or resurfacing. Whilst resurfacing could be more sustainable, it was not always feasible due to demand and budget constraints.
- k) Mr Jones explained that for larger developments, pre- and post-works inspections were undertaken to help identify potential damage and seek contributions where possible, although this could be challenging, particularly with smaller developers. Discussions were ongoing with major developers, including the use of commuted sums for future maintenance, but a balance needed to be struck where new adopted roads may reduce long-term maintenance needs.

- l) Mr Loosemore advised that a fixed timescale for permanent repairs could not be given as once temporary repairs had made defects safe, the permanent repairs were programmed as part of the wider works programme. The timing depended on priorities and whether further planned works were scheduled for the road, which could be months or years later.
 - m) Mr Osborne confirmed that arrangements were in place with lower- tier authorities' street cleansing teams to clear detritus from the Highway to help manage surface water flooding.
 - n) Mr Emmett explained that salting routes were based on the Resilient Kent Network, focusing on A and B roads and other strategic routes that provided key access to towns and villages. The criteria was established to ensure resources were targeted where they were most reasonably practicable during severe weather, given limited capacity. While requests from Members and the public were considered, not all roads could be included, and the strategic network provided the necessary boundaries for route selection.
 - o) Mr Emmett stated that the use of farmers to assist with rural road maintenance was reviewed annually, alongside their rates. However, the scheme was becoming more challenging to sustain as long- standing participants had retired and changes in farming practices had reduced the availability of suitable personnel.
 - p) A Member highlighted the value of engaging with the Highway Improvement Plan and thanked officers for their work.
3. The Chairman summarised the discussion and highlighted the following actions for further consideration: potential innovations discussed by Members, the provision of a publicly available document setting out salting routes and criteria for their selection and clearer guidance for Members on how routes may be reviewed. The Chairman also reiterated the importance of Parishes engaging with Highways officers and concluded by recognising the unprecedented challenges faced by the road network. The Chairman proposed the Scrutiny Committee note the details of the report and the actions being taken regarding KCC's ongoing winter service and highways repairs. This was agreed by the Committee.
 4. RESOLVED that the Scrutiny Committee note the details of the report and the actions being taken regarding KCC's ongoing winter service and highway repairs.

43. Fly-Tipping (Item C3)

1. The item was introduced by Jamie Henderson, Cabinet Member for Environment, Coastal Regeneration and Public Health, who outlined the impact of fly-tipping on streets and rural areas. He highlighted the significant costs associated with clearance and disposal and the pressure placed on County and Borough Council budgets, as well as the impact on landowners, farmers and businesses.

2. Following questions and comments from Members, discussion covered the following:
- a) Mr Henderson assured the Committee that businesses were required to be licensed as waste carriers and pay for lawful disposal and that commercial waste should not be subsidised by Council taxpayers. He also explained that £345,000 was spent dealing with fly-tipping in 2025 in gate fees alone, increasing the case for investment in stronger enforcement activity. He suggested that in light of the current Lords review, it could be timely to seek assistance from Central Government to support enforcement and help struggling businesses.
 - b) Matthew Smyth, Director for Environment and Waste, explained that commercial operators could use waste transfer stations at cost, but that expanding access would add non-statutory costs to Kent taxpayers. He also outlined that commercial waste volumes could be comparable to household waste, making limits on access impractical. He added that the booking system had reduced costs by £1.4 million and was supported by 96% of users.
 - c) Mr Henderson agreed with a suggestion that clearer promotion of licensing requirements could support legal compliance and reduction in fly-tipping, citing the numbers of under-licensing among small companies.
 - d) Mr Smyth highlighted that residents were legally responsible for ensuring their waste was disposed of correctly, even when using a third-party waste carrier. He therefore agreed that any educational campaign should target not only businesses, but also residents to raise awareness of their waste responsibilities.
 - e) Mr Smyth acknowledged inconsistencies within a table in the report and assured the Committee the source would be reviewed and a correct table reissued.
 - f) Lucy Miller, Business Innovation Manager, confirmed that there was currently no assistance available from the Department for Environment, Food and Rural Affairs (DEFRA) for farmers or landowners affected by mass fly-tipping. However, this issue of clear up costs for farmers and private landowners was being considered as part of the ongoing House of Lords Inquiry, and Members would be kept updated as further information became available.
 - g) Ms Miller elaborated that fly-tipping and enforcement was being widely considered at national level, through the House of Lords Inquiry. She outlined that the Environment Agency had published a 10-point action plan to address fly-tipping and illegal waste sites, including measures such as improved intelligence handling, greater transparency and community engagements. Further relevant links could be shared with Members outside of the Committee.

- h) Mr Henderson also encouraged Borough Councils to apply maximum penalties available to ensure a consistent approach across Kent and help prevent displacements of offenders between areas.
- i) Ms Miller reported that the Council had strengthened its working relationship with the Environment Agency over the past 18 months. She confirmed that the waste carrier registration system was being reviewed due to not being fit for purpose, roadside checks were taking place in Kent with partner agencies, and that encouraging greater consistency in fixed penalty notices was supported. She also raised concerns that court fines could be lower than fixed penalties, with undermined deterrence, and confirmed that the issue was being raised with DEFRA and the Environment Agency.
- j) Mr Smyth stated that differences in fly-tipping figures between districts largely reflected inconsistent reporting practices, as there was no single agreed definition of a fly-tip. While this made direct comparison difficult, he agreed to take further consideration on what differentiated Dover from other areas.
- k) Mr Henderson agreed to seek further information from the Environment Agency on numbers of enforcement activity over the previous 12 months and plans going forward. Ms Miller explained that many fly-tipping incidents could not be enforced due to a lack of evidence, meaning enforcement figures did not always correlate with reported incidents. She added that the number of prosecutions was comparable to other areas and that investigations could take between six and twelve months to conclude.
- l) Paul Webb, Cabinet Member for Integrated Children's Services, welcomed the proposals for a multi-agency enforcement hub, highlighting that significant work was already underway to strengthen partnership working.
- m) Ms Miller explained that traders should provide householders with a waste transfer note detailing how waste was disposed of, although the current paper-based system was recognised as outdated and open to abuse. She advised that a national electronic waste-tracking system was expected to be introduced to improve transparency and compliance. She also assured Members that stronger sanctions, including action against company directors, driving license penalties and tougher enforcement against illegal waste sites were being considered nationally as part of the Environment Agency's 10-point action plans. While progress was positive, it was acknowledged that implementation would take time and further detail could be provided to Cabinet Committee in future, if required.
- n) Mr Smyth clarified that the proposed hub was still at an early, exploratory stage and not yet a fully developed project. As a result, no timescale had been set, and further work would be needed before it could be progressed.
- o) Ms Miller stated that proposals to make it mandatory for any business who registers with Companies House to register as a waste carrier would need to be considered at a national level by DEFRA and the Environment Agency, rather than led by KCC. She highlighted limitations, as not all

businesses were registered with Companies House, including sole traders and partnerships, but confirmed the suggestion could potentially be fed back to relevant national bodies.

- p) Mr Jones clarified that National Highways were responsible for fly-tipping on motorways, including on lay-bys, hard shoulders, and verge clearances, and this was managed through their maintenance contracts. Fly-tipping on A roads, however, fell under the responsibility of District and Borough Councils as the waste collection authorities. Other than two locations that were managed by independent contractors on behalf of National Highways, National Highways were responsible only for Design, Build, Finance and Operate (DBFO) roads in Kent.
 - q) Ms Miller explained that deterrence activity was developed jointly with District and Borough councils. This included identifying fly-tipping hotspots through intelligence-led approaches and deploying appropriate enforcement and monitoring measures. She recognised that while cameras were one option, other operational and enforcement techniques were also used. It was added that effective deterrence relied on sharing intelligence with districts to target hotspots and applying proportionate interventions beyond signage alone.
 - r) Mr Smyth clarified that camera funding and deployment responsibilities sat with District and Borough Councils, with KCC's role in limited to facilitating coordination and information sharing rather than direct deployment.
 - s) Mr Smyth explained that the Kent Resource Partnership (KRP) provided the main mechanism for standardising approaches and sharing best practice across Kent. The Partnership brought together waste officers from all 13 authorities and reported to a Members' group of portfolio holders. It was also acknowledged that Members' views on best practice could be raised with the KRP in future.
 - t) Mr Henderson advised that communication with Central Government would take place after publication of the House of Lords' report, with information then used to inform steps. He also outlined examples of modern approaches, including Maidstone's use of AI and use of camera technology to tackle littering.
 - u) Mr Henderson acknowledged that fly-tipping figures did not account for incidents on private land, where landowners disposed of waste at their own expense without reporting it. As a result, the true scale of the problem was likely under-reported, and potential value was recognised in enabling landowners and businesses to share this information.
3. The Chairman proposed to note the report and to make the following recommendations to the Cabinet Member for consideration:
- i) For KCC to promote waste carrier licenses for small and medium businesses.

- ii) To promote tradesperson licensing including the use of electronic tracking and informing the public on what they should expect in terms of information from tradespeople.
- iii) To encourage District and Borough councils to adopt consistent, maximised fines and messaging.
- iv) Request the Cabinet Member consider writing to the Environment Agency regarding licensing and businesses operating without appropriate licences.
- v) For there to be consideration of the implementation of a multi-agency hub.
- vi) Request the Cabinet Member consider writing to the relevant department with regard to getting consistent levels of fines in prosecutions to ensure fly-tipping is not treated as a business cost.

4. This was agreed by the Committee.

5. RESOLVED that the Scrutiny Committee note the report and make the following recommendations to the Cabinet Member for consideration:

- i) For KCC to promote waste carrier licenses for small and medium businesses.
- ii) To promote tradesperson licensing including the use of electronic tracking and informing the public on what they should expect in terms of information from tradespeople.
- iii) To encourage District and Borough councils to adopt consistent, maximised fines and messaging.
- iv) Request the Cabinet Member consider writing to the Environment Agency regarding licensing and businesses operating without appropriate licences.
- v) For there to be consideration of the implementation of a multi-agency hub.
- vi) Request the Cabinet Member consider writing to the relevant department with regard to getting consistent levels of fines in prosecutions to ensure fly-tipping is not treated as a business cost.

44. Work Programme

(Item D1)

RESOLVED to note the Work Programme.

From: Diane Morton, Cabinet Member for Adult Social Care
Jamie Henderson, Cabinet Member for Environment, Coastal
Regeneration and Public Health

Sarah Hammond, Corporate Director, Adult Social Care and Health
Anjan Ghosh, Director of Public Health

To: Scrutiny Committee - 13 May 2026

Subject: **Kent County Council Response to Winter 2025/2026 and
Preparedness for Winter 2026/2027**

Status: Unrestricted

Summary: This report informs Scrutiny Committee about the responsiveness of Kent County Council's Winter 2025/2026 plans including how the key services and functions acted in response to the system demands.

It also provides an account of our preparedness for Winter 2026/2027 to ensure resilience in the system, informed by lessons learned from how the last Winter period was managed, reflecting on both the successes and challenges encountered.

Recommendation: The Scrutiny Committee is asked to **NOTE** the content of the report.

1. Introduction

- 1.1 A report on the Adult Social Care and Health (ASCH) Operational Escalation Plan 2025/2026 was presented to the Adult Social Care and Public Health Cabinet Committee on 12 November 2025.
- 1.2 This report to the Scrutiny Committee considers the role played by key adult social care services, highlighting the Kent Public Health winter preparedness programme's focus on maximising uptake of preventative vaccinations (particularly flu) through collaborative work between NHS, Kent County Council (KCC), and the care sector.
- 1.3 The purpose of this report is to provide a review of how the health, care and public health system performed, in handling the operational pressures during Winter 2025-26, noting what worked well, including the impact on key services and functions. It also considers key issues and lessons learned which informs our preparedness for Winter 2026/2027.

- 2. System Response to Winter 2025/2026, Impact on Services and Lessons Learned**
- 2.1 Response to demand on key NHS services (hospital admission and discharge, data)
- 2.1.1 An integrated brokerage function was implemented in November 2025, bringing together health and social care capacity to improve coordination and responsiveness. This has improved visibility of available provision, supported more timely sourcing of care, and strengthened the Council's ability to manage price and ensure best value across the market. Work will continue with system partners to further develop this approach, supporting improved system flow, more consistent pricing and better use of community-based provision ahead of Winter 2026/2027.
- 2.1.2 There continues to be an over reliance on discharge to Pathway 3 service beds (people who need bed-based care and support in care homes) across Kent and Medway with the county being an outlier in terms of the national averages for this pathway.
- 2.1.3 Transfer of Care Hubs are in place across the county with focus on collaborative working across all areas. NHS England is supporting a programme within East Kent Hospitals to eliminate corridor care in the acute hospitals and this plan includes a focus on improvements to the transfer of care hub process. The programme is ongoing with full KCC engagement.
- 2.1.4 The Short Term Pathways service review has been a priority focus during the last year. The recommendations of the review focus on remodelling of the hospital discharge teams to prioritise a reduction in avoidable hospital admissions and increase the number of people being discharged home to recover from an acute hospital admission rather than to Pathway 3 services.
- 2.1.5 Where a bed based recovery and reablement service is unavoidable, the priority must be access to formal rehabilitation services or KCC Adult Short Stay Services, as we know outcomes for individuals are better when they receive focused rehabilitation and enablement services with the percentage of people moving to long term residential placement following a placement in Adult Short Stay Services being below 30% for 2025/2026.
- 2.2 Adult Social Care response to demand on its key services (such as Hospital Social Work Team, Kent Enablement at Home (KEaH) service, Short Stay services)
- 2.2.1 In North Kent, the KEaH+ hospital service consistently meets demand from the acute trusts which is below the commissioned level of service.
- 2.2.2 KEaH+ in West Kent is commissioned to provide 50 hospital discharges per week. This target has been largely delivered across the area but with significant pressures due to staff vacancies and an increase in the number of people being discharged with a high level of care and support needs resulting

in a higher number of hours needing to be delivered by the service. The length of time from referral to discharge has increased, this is due to increased demand to the service and has also reduced the availability for KEaH service offers for those individuals who are not on hospital discharge pathways.

- 2.2.3 The introduction of Home First in West Kent, commissioned by Kent Community Health Foundation Trust (KCHFT), will meet some of the additional demand for hospital discharge and create increased opportunities for joint working as we move into Winter Planning for 2026/2027.
- 2.2.4 Winter preparedness will include reviewing the current demand for double handed care and support and working with the acute trusts to prevent deconditioning whilst in the acute hospitals.
- 2.2.5 In East Kent, the KEaH service focuses on discharges from the community hospitals and KCHFT's community based Urgent Care Services. Over the last year, collaborative working with the community hospitals has reduced the number of beds days lost whilst awaiting a start date for the KEaH service on discharge. The average wait for service start date has reduced from 6.8 days to 3.8 days during the last year.

2.3 Adult Short Stay Services

- 2.3.1 An increase in available bed occupancy has been seen across all four services between December 2025 to March 2026 with Westview, Broadmeadow and Westbrook exceeding occupancy targets throughout this period. Average available bed occupancy was 85%. Coordination and joint working across the services have contributed to this success and will continue into Winter 2026/2027. Success has been further enhanced by collaborative working with hospital discharge teams across the county.
- 2.3.2 The enablement model across the units has been developed over the past year and has improved outcomes for people leaving the service, with consistently low numbers of people entering long term care home placements from the Adult Short Stay Services. 70% of people discharged from the service return to their own home. This focus will continue into Winter 2026/2027.
- 2.3.3 The average length of stay across the service increased from 6.1 weeks to 7.3 weeks during the last winter period, due to flexing the admission criteria for people leaving the acute hospitals which resulted in the service supporting people with higher acuity of needs and requiring longer periods of assessment. Moving forward, the Short Term Pathways review and implementation, will support increased responsiveness for completion of assessment leading to a reduced length of stay.
- 2.3.4 A review of the service delivery and full occupancy challenges has included identification of an increase in the number of people accepted for admission from the acute hospitals where the referral is then withdrawn. Work is

underway to review the findings and implement improvement actions, as this does impact of occupancy levels across the service.

- 2.3.5 Ongoing fire safety works has affected occupancy at Broadmeadow throughout the last financial year. This work is expected to be completed by the end of June 2026, the unit will then be in a position to deliver full-service occupancy in time for Winter 2026/2027.
- 2.4 Care home care and accommodation provision
 - 2.4.1 During Winter 2025/2026, Adults Commissioning took proactive action to respond to sustained demand pressures in residential and nursing care. This work recognised the significant challenges facing the care market, including increases to the National Living Wage, ongoing workforce pressures, and rising operating costs for providers.
 - 2.4.2 To support market stability, Adults Commissioning undertook detailed financial modelling to better understand the true cost drivers within residential provision. This evidence-based approach informed pricing and sustainability activity, ensuring that future pricing decisions are lawful, transparent and support the long-term viability of the market.
 - 2.4.3 This work has been progressed through the Strategic Reset Programme, helping to maintain sufficient and sustainable capacity through winter and beyond, and reducing the risk of provider failure or market withdrawal at a time of heightened demand.
 - 2.4.4 Alongside this, Adults Commissioning worked closely with quality and operational colleagues throughout the winter period to closely monitor provider stability, identify emerging risks at an early stage, and to take action where needed. This joint approach ensured providers continued to meet contractual and regulatory requirements, despite increased winter pressures.
 - 2.4.5 Residential and nursing care specifications further supported resilience during winter by requiring providers to have robust arrangements in place with health partners. This includes effective engagement in Continuing Health Care (CHC) reviews and clear escalation processes where individuals' needs deteriorate, helping to manage demand surges and avoid unnecessary service disruption.
 - 2.4.6 During 2025/2026, 35 care homes continued to use digital monitoring (Feebris) of 1016 residents. The technology monitors individuals and identifies where there are changes which require action, reducing the risk of needs escalating and may result in hospital admission. During 2025/2026 there were discussions with the Integrated Care Board (ICB) regarding using winter pressure funding to scale up digital monitoring within care homes. Unfortunately, this was not agreed in time to realise the benefits within Winter 2025/2026, however discussions are continuing with a view to being utilised in time for Winter 2026/2027.

- 2.4.7 During Winter 2025/2026, Homecare continued to see an increase in demand. Commissioning and Arranging Support meet on a regular basis to look at how we can facilitate more capacity with contracted providers. Commissioners have regular contact with providers to identify emerging trends and issues.
- 2.4.8 A programme of training and development has been produced to support the care sector workforce with resilience training and to upskill for winter pressures. During 2025/2026, 1,500 care sector staff attended 17 bitesize webinars. At the annual Kent Registered Managers conference in September 2025 there was a focused session on contingency planning for care services.
- 2.4.9 The Technology Enhanced Lives Service (TELS) experienced a clear and recurring surge in referral activity, with November 2025 identified as the peak month for both Long Term and Short Term services, particularly those supporting hospital discharge and enablement. November 2025 saw a total of 402 referrals made into TELS. This pattern mirrors November 2024 data, which was also the highest referral month that year, suggesting a seasonal trend across Kent.
- 2.4.10 Referrals during the November 2025 peak were primarily generated by Community Teams, Adult Social Care Connect, and KEaH. The service saw the highest demand from older adults, with the 80–84, 85–89, and 90–94 age groups accounting for the majority of referrals. The highest referring localities were West Kent, North Kent, and Thanet and South Kent Coast.
- 2.4.11 This recurring winter spike highlights the importance of ensuring sufficient staffing capacity and operational readiness during peak periods. This includes capacity within Kent TELS, as well as across our strategic partners, PA Consulting, Red Alert, and Appello, to effectively manage increased referral volumes, installation demand, and call handling pressures.
- 2.4.12 Data also shows a drop in referrals during December 2025, similar to previous years, this is in line with holiday periods and reduced system activity. This is followed by renewed pressure in January 2026 and February 2026, with referrals rising again to approximately 250 per month, reinforcing the need for sustained winter planning beyond the immediate Christmas period. A chart showing the number of people receiving services with Adult Social Care each month, is attached as Appendix 1.

2.5 Joint working with the NHS on Flu vaccination

- 2.5.1 The Kent Public Health winter preparedness programme focused on maximising uptake of preventative vaccinations (particularly flu); strengthening collaboration between NHS, the local authority, and care sectors; early identification and management of infectious disease outbreaks; and use of real-time intelligence to support rapid response. Further information, which has been provided by the ICB, on the flu vaccinations uptake in Kent is attached as Appendix 1.

- 2.5.2 For the first time, KCC Public Health provided dedicated funding to NHS Kent and Medway to support the promotion of winter vaccination messages, reflecting the priority placed on effective vaccine communications.
- 2.5.3 The Kent County Council Influenza Communications Campaign was designed to amplify NHS and UK Health Security Agency (UKHSA) winter vaccines campaigns which included the following key audiences:
- School age children: Led by NHS/School Immunisation Team
 - Younger children: Led by NHS/GP practices
 - Pregnant women: Led by NHS/maternity appointments, GP practices or pharmacies
 - People with weakened immune system/eligible conditions: Led by NHS/GP practices
 - Older adults: 65+ resident in a care home for older adults: Led by NHS/UKHSA
- 2.5.4 Media features and releases were first published in September 2025 and frequently updated throughout Winter 2025/2026 to reflect cold weather advice, including calls for eligible groups to get vaccinated.
- 2.5.5 Specific campaigns and communications were targeted at Registered Managers of Care Homes to highlight the importance of flu and Covid-19 vaccinations (plus Pneumococcal, RSV (Respiratory Syncytial Virus) and shingles vaccinations), infection prevention and hydration guidance.
- 2.5.6 The Public Health Protection Team activity for autumn/winter 2025/2026 included:
- Issued several targeted calls to social care staff, care home staff and domiciliary care staff to get vaccinated
 - Added calls to get vaccinated into all routine Infection Protection Control advice to Kent care homes
 - Invitation to the NHS Vaccine Programme team to attend KCC's outbreak management webinar in December 2025 to share details with Care home managers and staff
 - Targeted mail shot highlighting the importance of vaccine uptake followed on from the DPH's letter
- 2.5.7 The Health Protection Board (HPB) provided system wide leadership for infectious disease prevention and control. Key actions overseen through the HPB include:
- Promotion of robust infection prevention and control (IPC) standards in health and care settings, including hand hygiene, environmental cleaning, and exclusion policies
 - Seasonal preparedness planning with acute trusts, community services, and care homes
 - Workforce awareness and training on early recognition and reporting of symptoms
 - Close liaison with UKHSA, infection control teams, and local authority partners

- Monitoring of system impact, including bed capacity and discharge delays

3. Lessons learned – challenges and successes (joint working of frontline teams, impact of communication, public information and education, flexing capacity in response to surge in demand, escalation process)

- 3.1 Key lessons learned from the Winter 2025/2026 vaccination programme include simplifying eligibility and campaign dates, reducing contractual barriers so providers can vaccinate more flexibly, streamlining processes to cut administration, and ensuring sufficient programme funding.
- 3.2 Operationally, timely Patient Group Directions (PGD) and training (especially for maternity), clearer targeted communications to build confidence in priority and low-uptake groups, and early collaboration with NHSE/ICB and partners are critical. Clear arrangements for housebound and care home vaccination, reduced financial risk through improved vaccine supply assurance, consistent understanding of consent, and planning for the concentrated delivery period (mostly before the end of November) can help manage system burden.
- 3.3 During Winter 2025/2026 Adult Social Care participated in exercises to validate the Operational Pressures Escalation Plan and provide assurance of the procedures:
- Exercise Aegis, NHS England’s strategic winter preparedness exercise involved regional representatives from across the southeast. Scenarios prompt strategic reflection and collective action across systems, with a focus on clinical and operational safety, urgent and emergency care performance, emergency department oversight, strategic response to pressure, governance and decision-making and workforce resilience. The Operational Pressures Escalation Plan was deemed effective with no significant gaps highlighted for KCC.
 - Exercise Melville II, a Local Health Resilience Partnership exercise simulated the evacuation of patients from an acute hospital. The exercise involved all Kent and Medway NHS organisations including KCC Adult Social Care. By applying the procedures outlined in the Operational Pressures Escalation Plan, KCC was able to support the NHS response to deliver against the exercise objectives to identify and triage patients requiring evacuation, identify bed capacity within the local health system, allocate beds across the health system to patients requiring evacuation and coordinate the transfer of evacuees with the transport resources available. It was recommended to repeat the exercise with KCC operational teams to re-validate the Plan and identify any areas for improvement.
 - Exercise Melville III was completed in April 2026, to test the Operational Pressures Escalation Plan and Service Business Continuity Plans reflecting learning from Exercise Melville II. The exercise was conducted with Team Managers and Senior Practitioners in Adult Social Care. Exercise participants were able to effectively enact the procedures outlined in the Plan under the extreme conditions generated by the scenario. Participants identified a range of additional measures which could be used

to create capacity and/or increase throughput which have subsequently been reflected in the most recent version of the Plan.

- 3.4 Water supply disruption, during Winter 2025/2026, was a challenge for the local health and care system, placing additional strain on services. Adult Social Care provided evidence to the Member's Short, Focused Inquiry examining the causes, handling and impacts of the December 2025 and January 2026 water supply failures. The evidence detailed the significant contribution made by KCC Adult Social Care services, contracted providers, and the voluntary sector to support the community. In May 2026, Adult Social Care will join other multi-agency partners to contribute to the design and development of the South East Water alternative provision service which is activated in response to water supply disruption. This provides an opportunity to influence the response to future outages, limiting the impact on community and the local health and care system.

4. Preparedness for Winter 2026/2027 and Assurance

4.1 Preventative, technology and early help

- 4.1.1 Preventative and early help activity through the Public Health flu vaccination programme will continue to provide assurance through strong, well-established collaboration between NHS England, ICBs, local authorities and providers. Clear commissioner guidance will be maintained to ensure effective partnership working, including robust arrangements between providers and any sub-contracting partners. The continued use and development of real-time reporting via the Federated Data Platform (FDP) will support improved system oversight, enabling proactive monitoring of vaccination uptake and emerging system pressures. Enhanced system-wide visibility of vaccine stock will support timely decision-making, reduce the risk of shortages and strengthen operational resilience. A sustained focus on targeted prevention and early intervention will be embedded, with learning from each winter season routinely applied to inform planning, delivery and continuous improvement for future vaccination programmes.
- 4.1.2 To strengthen support in the community and people's own homes for Winter 2026/2027, the remodelling of Short Term Pathways will be needed to further reduce avoidable hospital admissions and to support timely, safe and less restrictive discharges from acute settings. A consistent focus on Occupational Therapy engagement with the acute trust and providers will be essential to embed the single-handed care model, supporting earlier discharge and greater independence at home.
- 4.1.3 The Home First model in West Kent will be developed and embedded, building on the current soft launch and supported by successful recruitment to ensure sufficient capacity ahead of winter pressures.
- 4.1.4 In preparation for Winter 2026/2027, KEaH is working with KCHFT to reduce transfer of care times for home care services. This will support hospital avoidance and reducing corridor care in the acute hospitals. On a countywide

level, KEaH's main challenge this year has been the recruitment freeze which has impacted on recruitment onboarding and training streams which are generally constant throughout the year. Referrals and service starts have increased by 15% over the last year despite current vacancy levels of 27% across the county. A recruitment strategy that includes external advertising campaigns is due to be launched imminently. Recruitment must be a priority to sustain this level of service delivery.

- 4.1.5 Working with Health Partners to use residential and nursing beds as step up beds to prevent hospital admissions will include wrapping health and rehabilitation support around them with access to community nursing support.
- 4.1.6 An effective KEaH recruitment campaign will be required to secure the workforce needed to deliver care at home at scale.
- 4.1.7 Collectively, these actions are critical to improving community-based support, increasing system resilience and reducing pressure on acute services during Winter 2026/2027.
- 4.1.8 There is ongoing development of TELS ready for Winter 2026/2027 by increasing awareness on technology within communities as part of prevention and the use of activity monitoring within KEaH to help increase capacity.
- 4.3 Enhanced support to providers of accommodation care
 - 4.3.1 Adults Commissioning is actively market-shaping and contract managing Older People's Residential and Nursing (OPRN) and Homecare services to maintain sufficient capacity through winter pressures.
 - 4.3.2 The current OPRN contracts set clear service expectations around staffing, clinical escalation, pressure care, continuing healthcare liaison and safe management of changing needs, providing assurance of quality and continuity over winter.
 - 4.3.3 Commissioning continues to maintain a balanced mix of framework and spot provision, ensuring placements can be sourced in periods of increased demand whilst ensuring quality and value for money.
 - 4.3.4 Work between Adult Social Care and the ICB on options to scale up digital monitoring within care homes is ongoing.
- 4.4 Additional capacity to deal with exceptional increase in demand
 - 4.4.1 To provide assurance that demand pressures can be managed sustainably, investment needs to move upstream through prevention, enablement, community support, TELS and equipment.

- 4.4.2 Adult Social Care needs to continue shifting its approach towards prevention through targeted investment in community-based support, enablement and early help. Commissioned services will need to align more consistently with neighbourhood working, with a stronger focus on promoting independence and reducing escalation into long-term and high-cost care.
- 4.4.3 Workforce capacity needs to be right-sized to support this shift, with additional resource required within prevention services, including Adult Social Care Connect, Enablement and TELS, to enable effective upstream intervention. Digital and technological innovation in social care, including the further development of TELS and digital monitoring in care homes and the responsible use of artificial intelligence, will need to be progressed to support independence and resilience. This will require strengthened strategic and local partnerships and deeper engagement with communities. Collectively, this activity is required to deliver the priorities set out in the Prevention Framework delivery plan, in partnership with Public Health, Growth and Communities, and Integrated Children's Services, and to support a reduction in avoidable hospital admissions.
- 4.4.4 The new equipment service with Medequip is fully mobilised and Trusted Assessor models are being explored to build capacity for assessing and allocating low level equipment and technology.
- 4.4.5 From a commissioning perspective, a system-wide diagnostic of hospital discharge pathways has been undertaken to identify the key drivers of delay, variation and reliance on bed-based care. This has informed a clear set of priorities focused on strengthening Pathways 0–2, reducing reliance on Pathway 3, and embedding a consistent Home First approach across the system.
- 4.4.6 Commissioning will play a central role in delivering this shift through the redesign of Home Care services, the development of integrated brokerage to improve coordination and manage capacity and pricing, and the expansion of preventative approaches including TELS. These changes will support earlier intervention, improve flow through the system and ensure a more sustainable, community-based model of care aligned to Adult Social Care and system-wide priorities.
- 4.4.7 Commissioning will also increasingly align with the development of integrated neighbourhood teams. Work is underway with system partners to consider how commissioning can evolve to support more coordinated, place-based and preventative approaches to care, enabling earlier intervention and improved outcomes for local populations. This will be supported through a review of the Better Care Fund (BCF), ensuring investment is aligned to system priorities, strengthens community capacity and supports a shift towards prevention, independence and reduced reliance on higher-cost care. Delivering this shift will require commissioning to move away from traditional, volume-based models towards more flexible, outcome-focused approaches, with a stronger emphasis on prevention, market shaping and active management of capacity, quality and price.

- 4.4.8 To support the care sector workforce resilience and upskill for Winter pressures there will be a continued programme of bitesize training and provider forums. There is a focus on future proofing the workforce and maintaining capacity through an ongoing programme of bootcamps to upskill the existing workforce and recruit new workers.

5. Conclusion

- 5.1 Winter 2025/2026 continued to place significant pressure on the local health and care system. However, Adult Social Care, working closely with NHS, Public Health and system partners, played a critical role in maintaining service delivery, supporting safe discharge and strengthening system resilience. The period highlighted clear strengths, including effective escalation arrangements, strong performance within Adult Short Stay Services, improving vaccination uptake, and robust multi-agency coordination, alongside ongoing challenges relating to hospital flow, workforce capacity and community provision.
- 5.2. Learning from Winter 2025/2026 has informed a clear approach to preparedness for Winter 2026/2027, with a strong focus on prevention, enabling people to remain at home, improving discharge pathways, stabilising the workforce and strengthening public health resilience. The actions set out in this report provide assurance that Adult Social Care and partners are focused on the response to Winter 2026/2027, reducing avoidable hospital admissions and supporting sustainable system resilience going forward.

6. Recommendation

6.1 Recommendation: The Scrutiny Committee is asked to **NOTE** the content of the report.

7. Background documents

Adult Social Care and Health Operational Pressures Escalation Plan
2025/2026 Cabinet Committee Report
<https://democracy.kent.gov.uk/documents/s133135/Adult%20Social%20Care%20Operational%20Pressures%20Escalation%20Plan%2020252026.pdf>

Operational Pressures Escalation Plan
[Operational Pressures Escalation Plan](#)

8. Appendices

Appendix 1 – Number of People receiving services with Adult Social Care
Appendix 2 – Flu Vaccination Uptake in Kent

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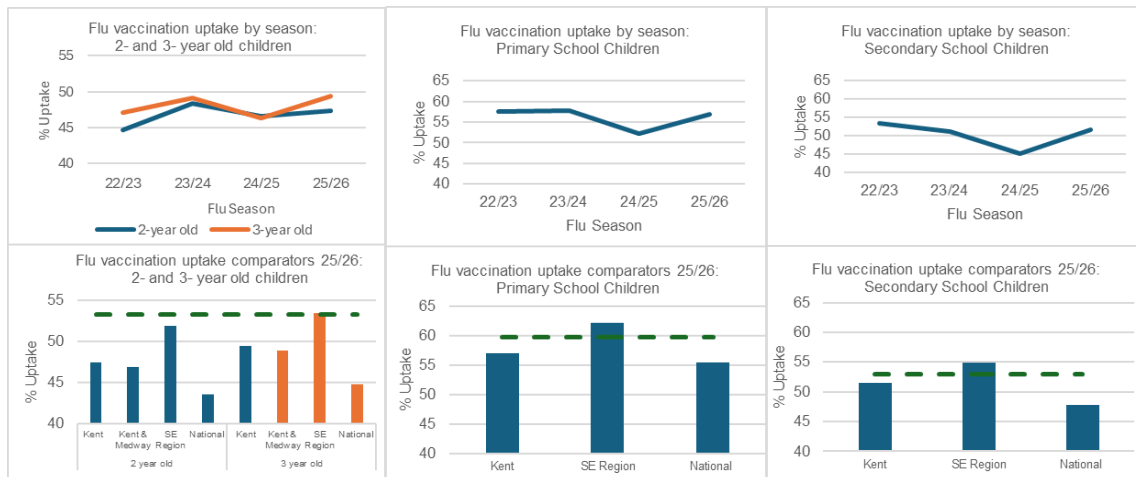
Appendix One – NHS Flu Vaccination Programme Data

1. Uptake of flu vaccinations according to cohort from 22/23 to 25/26

2 and 3 Yr old children

Primary School

Secondary School

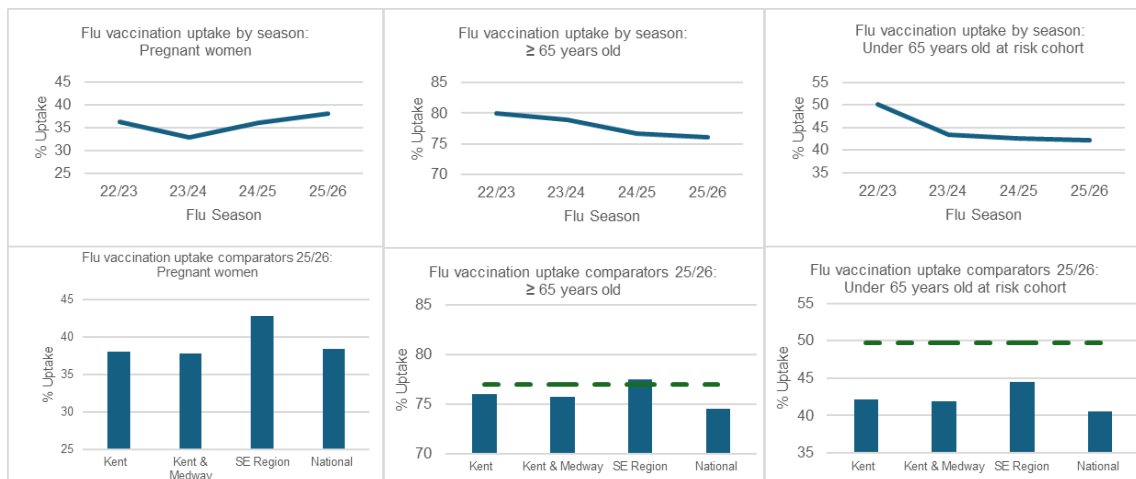


Kent LA school uptake data source: ImmForm

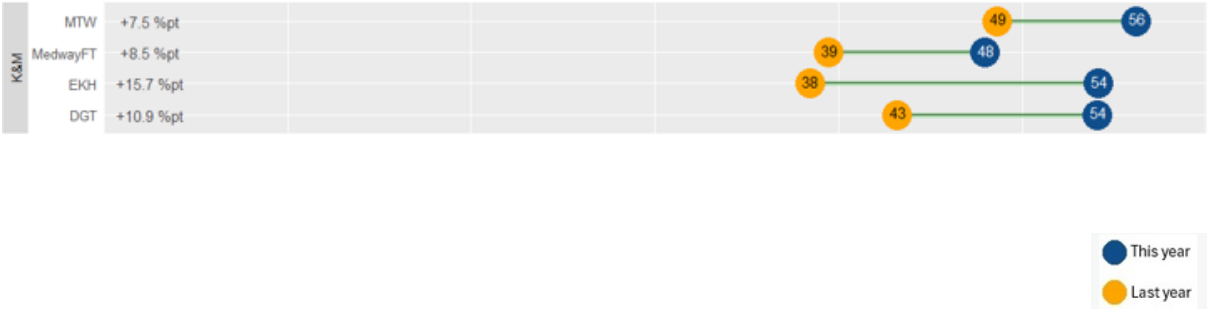
Pregnant Women

> 65 yrs old cohort

<65 yrs old cohort



Hospital Frontline Clinical Healthcare Workers Vaccine Uptake in 2025/26 and change from 2024/25



Source: *FDP Vaccinations: Trust Performance Reporting - Frontline HCW – Vaccination Events up to 28-Feb-2026 Frontline Healthcare Workers in Acute Trusts* - this report shows Active, Substantive staff in one of the following staff groups: Medical & Dental, Nursing & Midwifery, Additional Clinical Services, Allied Health Professional ICB uptake values do not include ambulance trust data

Figure 1: People receiving services with Adult Social Care each month (excludes those transferred to ASC from CYPE in September 2025. Subject to updates).

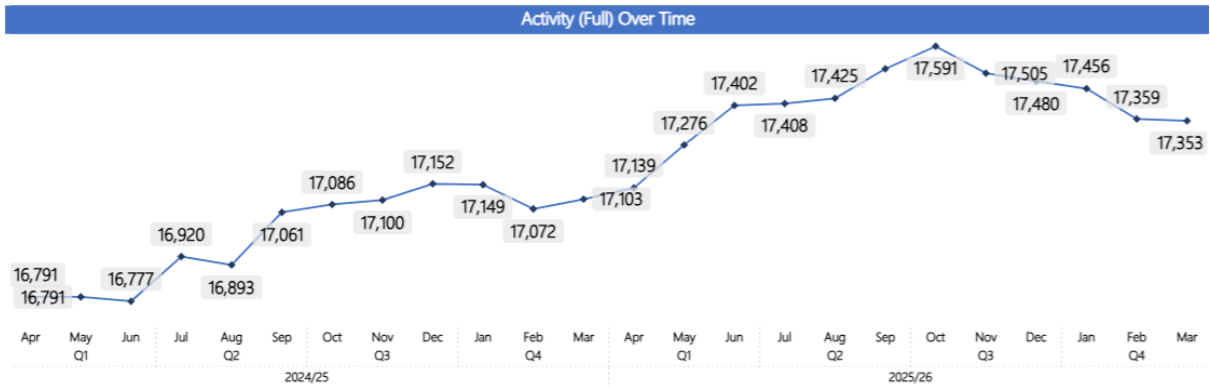
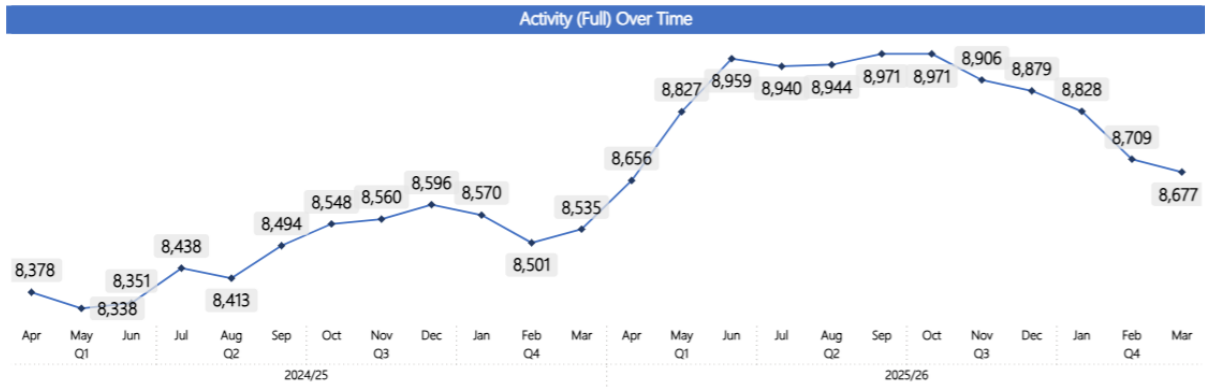


Figure 2: Older People (aged 65+) receiving services with Adult Social Care each month (subject to updates)

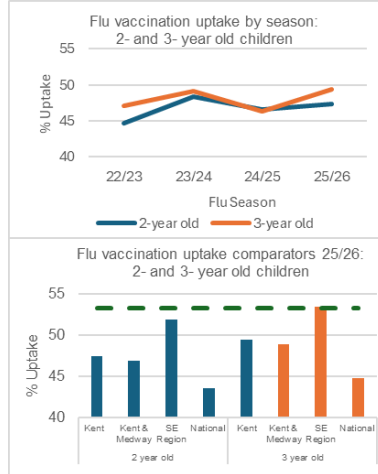


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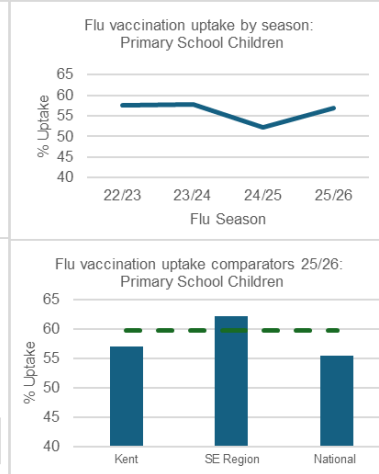
Flu Vaccinations Uptake in Kent

1. Uptake of flu vaccinations according to cohort from 22/23 to 25/26

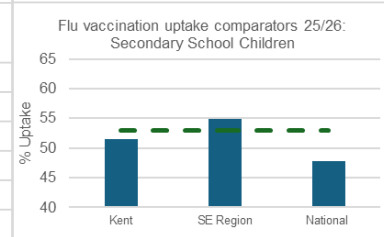
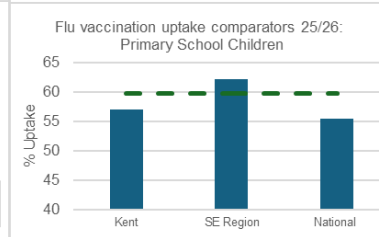
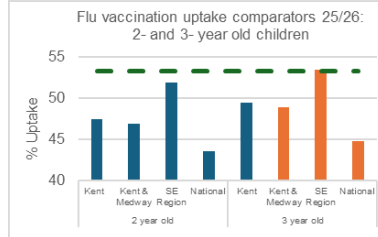
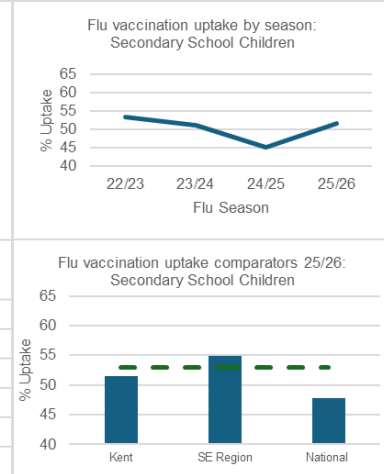
2 and 3 Yr old children



Primary School



Secondary School



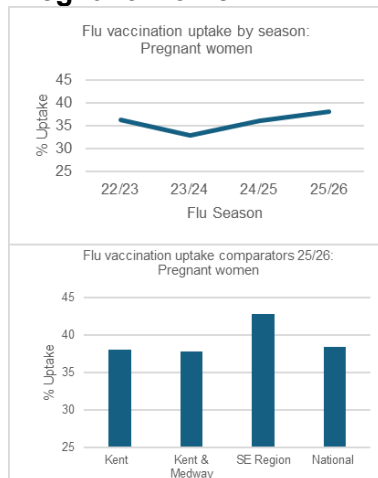
Kent LA school uptake data source:ImmForm

The uptake of flu vaccinations for 2 yr olds in Kent in 25/26 is 47.4% as compared to 46.6% in 24/25. The uptake for 3 yr olds also saw a slight increase in 25/26 as compared to 24/25, 49.4% as compared to 46.4%.

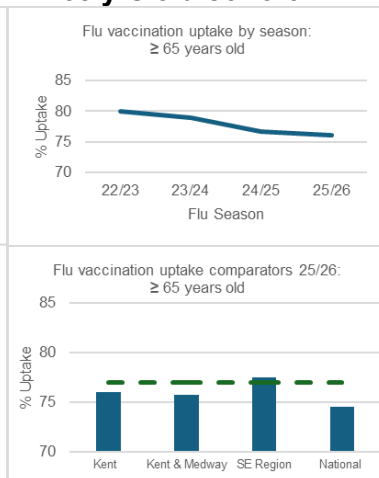
There has been an increase of 5% in the uptake in primary school aged children in 25/26. The uptake in 25/26 is 57% while it was 52% in 24/25.

There has been an increase of 7% in flu vaccination uptake in secondary school aged children in 25/26, 51.5% as compared to 45% in 24/25

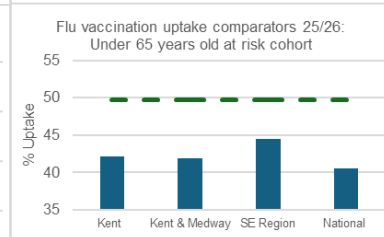
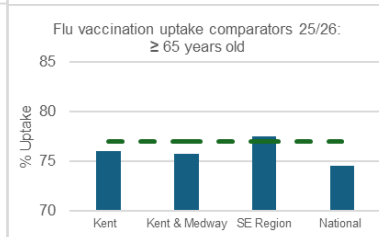
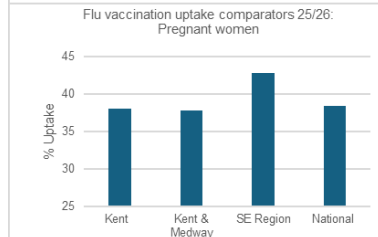
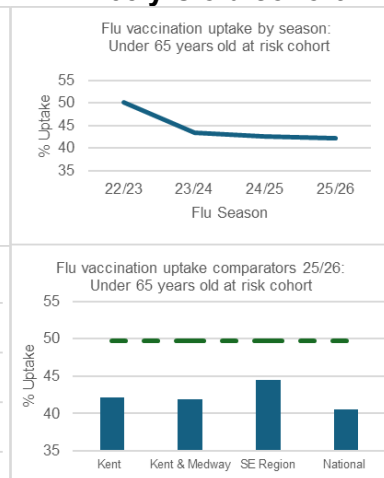
Pregnant Women



> 65 yrs old cohort



<65 yrs old cohort



In 25/26 there has been an increase of 2% in uptake of flu vaccination in pregnant women 38.0% as compared to 24/25, 36%.

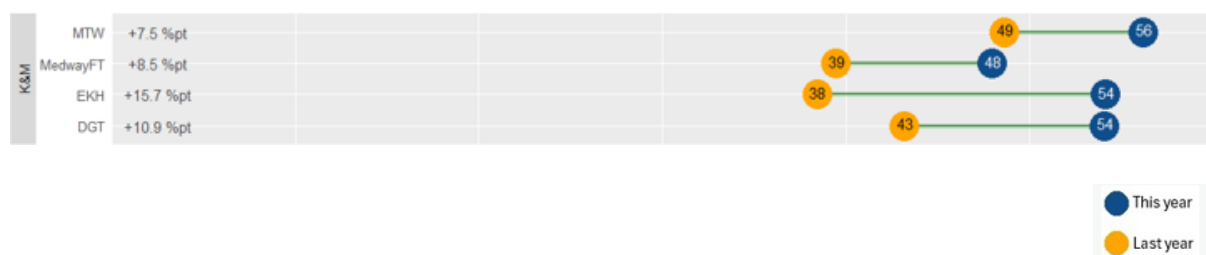
There has been a marginal increase in 25/26 in uptake of flu vaccination in individuals who are less than 65 yrs and in a clinical risk group. The uptake has gone up from 42.2% to 42.6%. There is wide variation in uptake between disease groups with 75.8% uptake among patients living with kidney disease compared to 27.9% of patients living with BMI >=40 and no other risk groups in 2025/26. This is a similar pattern each year.

There is also variation in patients in a clinical risk group who are a working age with 30.5% of 16 to 50 years being vaccinated compared to 50.5% of 50 – 65 years.

The only cohort that has seen a slight decrease in uptake of flu vaccination is the 65+ yrs cohort. There was a decrease of 0.6% in 25/26.

Large disparities in vaccination uptake between different ethnic groups remain.

Hospital Frontline Clinical Healthcare Workers Vaccine Uptake in 2025/26 and change from 2024/25



Source: FDP *Vaccinations: Trust Performance Reporting - Frontline HCW – Vaccination Events up to 28-Feb-2026 Frontline Healthcare Workers in Acute Trusts* - this report shows Active, Substantive staff in one of the following staff groups: Medical & Dental, Nursing & Midwifery, Additional Clinical Services, Allied Health Professional ICB uptake values do not include ambulance trust data

There has been a marked improvement in uptake of flu vaccinations in frontline health care works in 25/26 as compared to 24/25. The biggest improvement of 15.7% points has been seen in East Kent Hospitals Trust.

2. Challenges in delivery of flu vaccinations and potential solutions

- Call for more effective information about eligibility and vaccine education.** From both providers and stakeholders there has been strong feedback that the top challenges for seasonal vaccination were patient concerns about the vaccine, and lack of awareness about eligibility. Actions are underway locally; however suggestion has been to step up national comms to educate the public with clear, proactive messages about eligibility and tackle misinformation with clear and more visible vaccine information. This includes information on safety and benefits for the pregnant cohort and specific targeted comms for the school aged cohorts

Systems and policies are not optimal for Flu delivery. GPs have raised concerns about the adverse impact of not being able to vaccinate any member of the public, and the financial risk attached to ordering their own stock. Community Pharmacies raised concerns about not having direct access to patient lists. Almost all providers raised concerns about late availability of PDGs, templates, searches and point of care systems generally. Maternity services noted logistical challenges in serving seldom-heard groups and limited capacity for training the workforce. Vaccine supply issues were noted at the start of the season with a widespread variation in the

numbers of vaccines ordered and the delivery dates to providers. Vaccination of long-term inpatients needs to be embedded within acute trust delivery as low numbers were offered vaccination in 2025/26. In addition, a coordinated approach to care home and housebound delivery is essential.

- **Workforce capacity is stretched, and more funding is needed across the programme.** The 25/26 funding levels and programme changes were felt to make delivery harder generally. Concerns were also raised about the clarifications about unregistered healthcare workers' role in taking consent.

3. The key lessons learnt and the impact on services

- Aligning and simplifying eligibility and campaign dates
- Making policy changes to reduce contractual restrictions on providers e.g. to vaccinate patients registered elsewhere
- Streamlining processes and reducing admin
- Increasing funding for the programme
- Escalating need for timely PGD and training materials to UKHSA (especially for maternity) to enable programme to start on time
- Engendering vaccine confidence in the population via clearer messaging especially for key cohorts and lowest uptake groups
- Targeted comms early in the season, focusing on priority cohorts, may support practices to make improvements
- Early collaboration and planning with NHSE/ICB and other stakeholders
- Clear and consistent arrangements for the vaccination of the housebound and those resident in care homes
- National review of vaccine supply to reduce the risk of practices opting out of the flu vaccination programme due to the financial risk
- Ensuring system colleagues fully understand the consent process for vaccinations
- The majority of flu vaccination is delivered before the end of November which creates a burden on the system for a short period

4. What assurances we have for future winters.

- Strong collaboration between NHSE/ICB and other stakeholders from previous years
- Clear guidance from the commissioner on the collaboration between providers and any sub-contracting arrangements
- Real time reporting available via FDP which allows for close monitoring of vaccination activity
- Vaccine stock reporting availability via FDP allows NHSE/ICB to have assurance there is sufficient vaccine stock in the system

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By: Joel Cook – Democratic Services Manager

To: Scrutiny Committee – 13 May 2026

Subject: **Call-in of Decision 26/00007 - Heritage Conservation Strategy Amendment**

Summary: This decision, taken on 1 April 2026, has been called-in to the Scrutiny Committee by Mr Hood, Ms Russell & Mrs Hudson.

Background

1. Decision 26/00007 – Heritage Conservation Strategy Amendment was considered by the [Growth, Environment & Transport Cabinet Committee on Tuesday, 10th March, 2026](#) prior to the decision being taken by the Cabinet Member for Environment, Coastal Regeneration and Public Health, on 1 April 2026.
2. Following the decision being taken, the call-in request was submitted by Non-Executive Members from more than one political group.
3. Call-in powers are held by the Scrutiny Committee in accordance with the Local Government Act 2000. These are intended, under the legislation, to provide an opportunity for non-Executive Members to further scrutinise significant decisions, where the call-in criteria are met, before they are implemented and to recommend reconsideration if deemed appropriate by the Committee.
4. The call-in was duly assessed by Democratic Services, including a review of the reasons given by those Members calling in the decision and an investigation into whether all issues raised in the call-in were adequately addressed by the decision documentation, committee reports, responses to written questions or committee debate. The results of this review were considered by the Democratic Services Manager and the call-in was determined to be valid under the call-in arrangements set out in the Constitution. Call-in reasons must be clear, correct and align to one or more of the following criteria under s17.67 of the Constitution:

Members can call-in a decision for one or more of the following reasons:
 - (a) The decision is not in line with the Council's Policy Framework,
 - (b) The decision is not in accordance with the Council's Budget,
 - (c) The decision was not taken in accordance with the principles of decision making set out in 8.5, and/or
 - (d) The decision was not taken in accordance with the arrangements set out in Section 12.
5. The full call-in request is set out in Appendix A. The key issue highlighted by the call-in which supports further Scrutiny consideration is summarised below:

Reason one: 8.5(f) explanation of options considered and giving reasons for decisions

- The call-in highlights a lack of proper consideration and assessment of the specific recommendation made by the Cabinet Committee. While the Executive was not obliged to accept or implement the recommendation, further information could have been included in the final decision documentation to articulate how the recommendation was considered and give substantive policy reasons for why it was rejected.

Process

6. In determining the validity of any call-in, no judgement is made by Democratic Services as to whether the decision itself is flawed, inappropriate or improper. The review found that there is scope to explore some elements further to secure appropriate assurance that the decision took account of required information and that the reasoning is clear. In accordance with the call-in arrangements, it is for the Scrutiny Committee to determine whether any recommendations should be made to the Executive and any reconsideration of the decision is necessary or appropriate.
7. The Cabinet Member, or nominated representative, and relevant Officers will attend the Scrutiny Committee to present their response to the call-in and to respond to questions.
8. The Scrutiny Committee should consider the reasons set out by the Members calling-in the decision, the documentation available and the response from the Executive given at the meeting, giving due regard to the information made available during questioning and discussion on this item. For clarity, the decision under consideration has been taken – call-in prevents implementation but does not reset or cancel the taking of the original decision.
9. The Scrutiny Committee has a range of options in terms of responding to the call-in. The specific options are set out in the Recommendation section of this report. It will be for members of the Committee, having debated and reviewed the decision, to propose and second an appropriate resolution from that list of options. The Chair of the Committee will set out how this will be approach during the meeting to ensure appropriate debate and due consideration of the issues before any resolutions are sought.
10. It is important to confirm that the Scrutiny Committee has no power to override or prevent the decision being progressed – it may formally resolve comments about the decision or the manner in which it was taken. These provide a public record of suggestions for improvement or criticisms of an approach so as to support learning and avoiding of prior mistakes in the future. If significant concerns about the decision-making remain after consideration by the Committee, it may refer the decision for reconsideration by the Decision-maker. Implementation of the decision will remain paused until after the decision-maker has reconsidered – the decision-maker may choose to confirm their decision and move to implementation if they so wish at that point.

11. The Committee also has the option to refer the decision to Full Council; however, this is designed for responding to only the most extreme cases where there is a significant risk of improper decision-making, financial non-compliance or departure from the Strategic Statement without reasonable justification. It should also be highlighted that Full Council does not have authority to override or take Executive decisions – the County Council, in the event of a referral will have only the same power as the Scrutiny Committee; to refer the decision back to the decision-maker for reconsideration.
12. The decision papers remain [available online](#) but are republished in the agenda pack as appendices for ease of reference.

Recommendation – Options for the Scrutiny Committee

The Scrutiny Committee may:

- a) make no comments
- b) express comments but not require reconsideration of the decision
- c) require implementation of the decision to be postponed pending reconsideration of the matter by the decision-maker in light of the Committee's comments; or
- d) require implementation of the decision to be postponed pending review or scrutiny of the matter by the full Council.

Appendices

- a) Scrutiny call-in reasons submitted by Mr Hood, Ms Russell & Mrs Hudson
- b) Executive Response
- c) [26/00007 - Record of Decision](#)
- d) [26/00007 - Decision Report](#)
- e) [26/00007 - Appendix A - EQIA](#)
- f) [26/00007 Appendix 1 Kent Heritage Conservation Strategy Update](#)
- g) [26/00007 - Appendix 2 Background Information](#)

Background documents

- Recent Cabinet Committee reports
- a) [Agenda for Growth, Environment & Transport Cabinet Committee on Tuesday, 10th March, 2026, 10.00 am](#)
- Previous Decision (August 2024)
- b) [Decision - 24/00068 - KCC Heritage Conservation Strategy Revision - Change to Windmills Policy](#)

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Call-in Request for Executive Decision 26/00007 – Heritage Conservation Strategy Amendment

Call-in request submitted by: Mr Hood, Ms Russell & Mrs Hudson

Reasons for calling in the decision:

Reason One: The decision was not taken in accordance with the principles of decision making set out in 8.5 (f) explanation of the options considered and giving reasons for decisions

During the Growth, Environment & Transport Cabinet Committee on 10th March, Mr Mark Hood put forward an amendment to set up a Kent Windmills Trust to coordinate the future management of Kent's windmills and support current and future volunteer groups intending to own or manage Kent windmills. The Chair put the amendment to the vote and the recommendation passed. It was recommended that the Cabinet Member consider the Committee's agreed recommendation to section 3.4 when taking the key decision.

The Record of Decision notes the Cabinet Committee recommendation but states that it was not followed on the basis that it goes beyond the scope of the accompanying decision, which is limited to adopting amendments to the Strategy and delegating authority for its implementation.

However, while this explains why the recommendation was considered outside the formal scope of the decision, it does not set out any analysis of the option itself, nor does it explain why the recommendation was not considered appropriate in terms of value for money, deliverability, or achievement of the Strategy's aims.

As such, the decision does not clearly demonstrate compliance with constitutional principle (f), which requires an explanation of the options considered and the reasons for decisions, supported by sufficient analysis to allow effective scrutiny.

The call-in seeks assurance that the explanation for rejecting a formally agreed committee option is supported by sufficient analysis, as required by the constitution.

Reason Two: The decision is not in line with the Council's Policy Framework – Reforming Kent.

The Council's Strategic Statement identifies the delivery of best value for residents as a core priority, including securing sustainable outcomes and minimising long-term risk to the public purse. The key decision is justified on the basis of cost reduction and the sustainable divestment of heritage assets, and therefore depends not only on achieving short-term savings but also on ensuring that assets are transferred in a way that is deliverable, resilient, and capable of being sustained over time.

While the Cabinet Committee put forward a recommendation that raised potential implications for the effectiveness of the divestment process, including the coordination of ownership and the identification and support of suitable future custodians, the Record of

Decision does not set out any analysis demonstrating how this option was assessed in relation to the Council's best-value objective. In the absence of such analysis, it is unclear how the chosen approach was tested against reasonable alternatives that may affect long-term value, sustainability, and risk, as envisaged by the Strategic Statement's commitment to securing best value for residents.

By: Jamie Henderson, Cabinet Member for Environment, Coastal Regeneration and Public Health
Simon Jones, Corporate Director, Growth, Environment and Transport

To: Scrutiny Committee – 13 May 2026

Subject: Call-in Decision: 26/0007 Heritage Conservation Strategy Amendment

Status: Unrestricted

Summary

This report responds to the call-in of decision 26/0007 Heritage Conservation Strategy Amendment. It explains the proposed amendments to KCC's Heritage Conservation Strategy to reflect the (already agreed) policy to divest KCC's eight windmills while securing a sustainable future as community assets. It summarises the Growth, Environment & Transport Cabinet Committee's recommendation to establish a single Kent Windmills Trust and the Cabinet Member's reasons for declining that recommendation. It confirms the amended Strategy supports viable community-led trust proposals, rather than committing KCC to establish and run a countywide trust.

1. Background to the Heritage Conservation Strategy amendment Executive Decision 26/00007, 1st April 2026

- 1.1 On 2nd August 2024, the decision by Kent County Council to divest its eight windmills was taken by the Cabinet Member for Environment. This decision was that:
- (i) KCC should seek to divest itself of the windmills it currently owns by a method that ensures that the windmills have a sustainable future in which they are appropriately cared for and maintained as community assets, and that
 - (ii) The Heritage Conservation Strategy is updated to this effect.
- 1.2 In advance of this decision, a review of options for the future of windmills was undertaken and discussed at the Environment and Transport Cabinet Committee on 15th November 2023. The review was then published as part of the windmill asset public consultation, which ran November 2023 to January 2024.
- 1.3 The outcome of the public consultation and the final proposed policy change for windmills was considered by members of the Environment and Transport Cabinet Committee at the meeting on 9th July 2024. The key decision confirming Kent County Council should seek to divest itself of the windmills was made the following month – [decision 24/00068](#).

- 1.4 A requirement of the key decision was the update of the Heritage Conservation Strategy. Adopted and published in March 2022, the Strategy did not include provision for the mill's divestment and therefore required updating to reflect this new policy position.
- 1.5 On 10th March 2026, the amendments to the Heritage Conservation Strategy were presented to the Growth, Environment and Transport Cabinet Committee. These amendments were:
- a) A new objective, stating: *Kent County Council should seek to divest itself of the windmills it currently owns by a method that ensures that the windmills have a sustainable future in which they are appropriately cared for and maintained as community assets.*
 - b) Amendment of the objective concerning the management approach, to acknowledge that mills would still need to be managed during the divestment and that any remaining in Kent County Council's ownership following the divestment process, would still need a management approach.
 - c) In acknowledgement that divestment would remove the need to find alternative funding approaches, removal of the objective to *explore alternative funding mechanisms for windmills, including setting up a charitable Trust to oversee management, and develop a funding strategy.*
 - d) In recognition of the support that the mill's volunteer groups and trusts (and other interested parties) would need, the objective concerning Kent County Council's relationships with these bodies was amended to include: *the groups and other interested parties will be supported through the divestment process.*

2. Background to the decline of cabinet committee's recommendation

- 2.1 During the Growth, Environment & Transport Cabinet Committee on 10th March, the members voted in favour of the recommendation to include in the Heritage Conservation Strategy: *"The council commits to setting up a Kent Windmills Trust to coordinate the future management of Kent's windmills and to support current and future volunteer groups intending to own or manage Kent windmills"*.
- 2.2 This recommendation was declined by the Cabinet Member as:
- a) The approach being taken is to empower local communities to propose to KCC how they would like to take responsibility for their local windmill. This means that different approaches may be taken for different windmills to meet local needs. Creating a trust for all the windmills would take away this flexibility and impose a one size fits all delivery model.
 - b) The changes to the strategy do not preclude any viable proposal for community led trusts for any or all of the windmills coming forward. This would be a decision for the community or interested party to put forward during the divestment process.

- c) The establishment of a trust by Kent County Council would not be aligned with the key decision to divest itself of the windmills it owns. The establishment of a trust was one of the options assessed in the 2023 review and considered as part of the subsequent consultation, the associated report to Environment and Transport Cabinet Committee in 2024 and the resulting key decision. A trust would create new financial and governance risks for the Council. Certainly, in the short term, and possibly into the longer term, a reduction in Kent County Council's financial expenditure and burdens would not be achieved. And therefore, the 2024 decision's forecast revenue and capital savings from the divestment would not be realised.
- d) It is the administration's position that council tax payers' money must be used as a last resort for non-statutory items. The county council recognises that the windmills are important assets to the county's heritage and especially important to the local communities; hence, the divestment key decision makes provisions to ensure that the process is progressed in a way that ensures a sustainable future for the windmills. The authority must first seek to fully divest itself of the financial liability and risk associated with the windmills. A review and consideration of alternative options for any mills that remain in our ownership would only take place once the divestment process is concluded.

3. Conclusion

- 3.1 In conclusion, the amendment to the Heritage Conservation Strategy updates the document to reflect the Council's previously agreed policy to divest its eight windmills; while setting out how the Council will support communities through the divestment process. It does not commit the Council to establishing and operating a single countywide trust, which would reduce local flexibility and introduce additional governance and financial risk.
- 3.2 The changes to the strategy do not preclude the establishment of a (or a number of) viable community-led trust(s) being established. Any proposal for such a trust to secure the sustainable future for the windmills as valued local assets would be welcomed as a potential bid during the divestment process. The objectives will be amended to make this clear.
- 3.3 For purposes of clarification, the changes to the Heritage Conservation Strategy windmill objectives are set out in the table below.

Heritage Conservation Strategy 2022	Heritage Conservation Strategy 2026
n/a – new objective	Kent County Council should seek to divest itself of the windmills it currently owns by a method that ensures that the windmills have a sustainable future in which they are appropriately cared for and maintained as community assets.
Follow a management approach to KCC-owned windmills, so that:	For any windmills remaining in KCC ownership and management, to follow a

Heritage Conservation Strategy 2022	Heritage Conservation Strategy 2026
<p>i) Mills capable of milling flour (Drapers Mill, Margate, and Cranbrook Mill) remain able to do so.</p> <p>ii) The weatherproofing programme will be undertaken as needed on a rolling cycle.</p> <p>iii) Static mills will be returned to visual completeness subject to funding</p> <p>iv) Static mills will be made active wherever possible [also Strategic Aim 3].</p>	<p>management approach so that:</p> <p>i) Mills capable of milling flour (Drapers Mill, Margate, and Cranbrook Mill) remain able to do so.</p> <p>ii) The weatherproofing programme will be undertaken as needed on a rolling cycle.</p> <p>iii) Static mills will be returned to visual completeness subject to funding.</p> <p>iv) Static mills will be made active wherever possible.</p>
<p>KCC's relationship with the windmill volunteer groups will be strengthened.</p>	<p>KCC's relationship with the windmill volunteer groups will be strengthened and the groups and other interested parties will be supported through the divestment process as appropriate; support will be provided for any viable proposal for establishing community-led trusts to oversee the future management and/or ownership of any or all of the county's mills.</p>
<p>Explore alternative funding mechanisms for the windmills, including setting up a charitable Trust to oversee management, and develop a funding strategy.</p>	<p>n/a – objective removed</p>

Contact Details

Report Author

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Relevant Director

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KENT COUNTY COUNCIL – RECORD OF DECISION

DECISION TAKEN BY:

Jamie Henderson, Cabinet Member for Environment, Coastal Regeneration & Public Health

DECISION NUMBER:

26/00007

Executive Decision – key**26/00007 – Heritage Conservation Strategy**

Decision:

As Cabinet Member for Environment, Coastal Regeneration & Public Health, I agree to:

ADOPT proposed amendments to the Heritage Conservation Strategy.

DELEGATE authority to the Corporate Director for Growth, Environment and Transport or other officer as required by the Corporate Director to review the Strategy on an annual basis and revise the strategy where changes do not require additional governance.

DELEGATE authority to the Corporate Director Growth, Environment and Transport, in consultation with the Cabinet Member Coastal Regeneration, Environment and Special Projects, to take the actions required to support the implementation of the strategy.

Reasons for decision:

The Heritage Conservation Strategy is being updated mainly to implement an Executive Decision requiring Kent County Council to divest its windmills as sustainable community assets, reduce long-term costs, and comply with new legal requirements. The update also ensures the strategy remains aligned with current priorities and legal obligations.

Financial implications:

The cost of updating the strategy is limited to staff time and minor redesign of the final document.

There would be a Revenue Contribution to Capital Outlay saving of up to £150k pa (plus service/Corporate Landlord costs of approximately £23k pa) once all assets are divested and once all arrangements are finalised.

Legal implications:

None at this stage to update the Strategy.

Equalities implications:

Depending on the nature of the divestment methods chosen, older people could be disproportionately impacted upon.

The revised strategy and information on divestment will be disseminated in accessible formats in order to ensure that people of all groups can learn about the future process of divestment and participate in any opportunities offered.

Data Protection implications:

None

Cabinet Committee recommendations and other consultation:

The proposed decision will be considered by the Growth, Environment and Transport Cabinet Committee on 10 March 2026

The Cabinet Committee recommended that ***“at the start of objective eight on page 205 that it reads, the council commits to setting up a Kent Windmills Trust to coordinate the future management of Kent's windmills and to support current and future volunteer groups intending to own or manage Kent windmills”***

The Cabinet Member noted the recommendation made by the Cabinet Committee, however, feels that it goes beyond what the accompanying decision is actually doing, which is:

- Adopting proposed amendments to the Heritage Conservation Strategy, and
- Delegating authority to enable implementation and routine updating of that strategy.

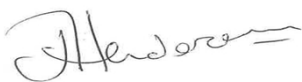
Any alternatives considered and rejected:

Not updating the Heritage Conservation Strategy was considered but rejected due to strong support from members and senior management and the need to align with the Executive Decision

Any interest declared when the decision was taken and any dispensation granted by the Proper Officer:

None

01/04/2026



.....

.....

Signed

Date

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From: Simon Jones, Corporate Director of Growth, Environment and Transport

To: Paul King, Cabinet Member for Environment, Coastal Regeneration

Subject: Heritage Conservation Strategy – revised following Executive Decision

Decision no: 26/00007

Key Decision: *It affects more than 2 Electoral Divisions*

Classification: Unrestricted

Past Pathway of report: N/A

Future Pathway of report: N/A

Electoral Division: Cranbrook, Elham Valley, Gravesham Rural, Herne Village and Sturry, Gravesham Rural, Margate, Sandwich, Sevenoaks Rural, Tenterden.

Is the decision eligible for call-in? Yes

Summary: This report presents a revised Heritage Conservation Strategy (Appendix 1) which has been updated following the Executive Decision 2nd August 2024 which stated:

1. KCC should seek to divest itself of the windmills it currently owns by a method that ensures that the windmills have a sustainable future in which they are appropriately cared for and maintained as community assets, and that
2. The Heritage Conservation Strategy is updated to this effect.

In addition, the Strategy has been updated to include provision for a statutory Historic Environment Record for Kent as set out in the Levelling Up and Regeneration Act 2023 and to take account of KCC’s changed policy on climate change.

Recommendation(s):
The Cabinet Member for Environment, Coastal Regeneration & Special Projects is asked to agree the proposed decision as detailed in the attached Proposed Record of Decision document.

1. Introduction

1.1 This report presents the Environment and Transport Cabinet Committee with a revised Heritage Conservation Strategy (Appendix 1) following the Executive Decision 24/000068 on 2nd August 2024 which stated that 1) KCC should seek to divest itself of the windmills it currently owns by a method that ensures that the windmills have a sustainable future in which they are appropriately cared for and maintained as community assets, and further, that 2) the Heritage Conservation Strategy is updated to this effect.

- 1.2 The original Kent County Council Heritage Conservation Strategy was adopted in 2022 after it was discussed and endorsed by members at the Environment and Transport Cabinet Committee meeting on 17 March 2022. Preparation of the strategy was informed by a Member Working Group and public consultation was undertaken in late 2021.
- 1.3 The Executive Decision by KCC to divest itself of its eight historic windmills was taken on the basis that it would allow alternative ownership arrangements to be explored, with the aim of reducing KCC's long term financial obligations. For background, more detail on the decision is provided in Appendix 2.
- 1.4 In addition, the Strategy has been updated to include provision for a statutory Historic Environment Record for Kent as set out in the Levelling Up and Regeneration Act 2023 and to take account of KCC's changed policy on climate change.

2. Key Considerations

- 2.1 To implement the executive decision for KCC to divest its windmills, ensuring their sustainable future as community assets, while supporting volunteer groups and maintaining any mills that cannot be divested.
- 2.2 To ensure that the strategy is updated for new statutory requirements.
- 2.3 To reflect the change in KCC's approach to climate change which has shifted to focus on resilience and adaptation for heritage assets, updating objectives to address climate-related risks and future-proof conservation efforts.

3. How the Heritage Conservation Strategy has been updated to reflect the windmill policy changes.

- 3.1 The August 2024 decision required an update of the Heritage Conservation Strategy, published 2022, to reflect this change in policy (https://www.kent.gov.uk/_data/assets/pdf_file/0019/205075/Heritage-Conservation-Strategy.pdf).

- 3.2 A new objective has been added to section 6 of the strategy, which is concerned with managing KCC-owned heritage assets:

Objective 6: KCC should seek to divest itself of the windmills it currently owns by a method that ensures that the windmills have a sustainable future in which they are appropriately cared for and maintained as community assets [also SA3].

- 3.3 If it is not possible to divest some of the windmills, KCC will need to continue to maintain and manage them in line with listed building and health and safety legislation and with the awareness that active mills tend to have reduced structural and maintenance problems. Consequently, the original objective that dealt with KCC's management of these assets has been retained with the slight amendment that this will only apply to the mills which remain in KCC ownership and management:

Objective 7: For any windmills remaining in KCC ownership and management, follow a management approach so that:

- i) Mills capable of milling flour (Drapers Mill, Margate, and Cranbrook Mill) remain able to do so.
- ii) The weatherproofing programme will be undertaken as needed on a rolling cycle.
- iii) Static mills will be returned to visual completeness subject to funding
- iv) Static mills will be made active wherever possible. [Also Strategic Aim 3].

3.4 It is not considered appropriate for KCC itself to set up a trust to own and manage the windmills so the original objective to explore alternative funding mechanisms for the windmills, including setting up a charitable Trust, is removed.

3.5 Recognising that it will be vital for KCC's relationship with the volunteer windmill groups (essential to maintaining the mills and making them accessible for visitors and the local community) to be strengthened and that support will be provided to the mill groups and other interested parties during the divestment process, the objective which covered this is amended to:

Objective 8: KCC's relationship with the windmill volunteer groups will be strengthened and the groups and other interested parties will be supported through the divestment process [Also Strategic Aim 3].

4. Other amendments to the Heritage Conservation Strategy

4.1 KCC recognises that our changing climate will continue to affect the county's historic environment. The Council is no longer operating under a formal climate emergency declaration but remains committed to understanding and managing the risks posed by a changing climate. Our focus is therefore on resilience and adaptation, ensuring that heritage assets can withstand and respond to future environmental challenges. Strategic Aim 5 and objectives 21 and 22 have been amended to reflect this approach:

Strategic Aim 5 Contribute to KCC's action to address climate change and adaptation.

Objective 21: Work with partners to develop approaches that improve the resilience of heritage assets to climate-related impacts.

Objective 22: Assess, with partners, the vulnerability of Kent's historic environment to climate change and create an adaptation framework to guide future conservation efforts.

4.2 The Levelling-up and Regeneration Act 2023 (Article 212) requires the County Council as relevant authority to maintain the Historic Environment Record for its area. The legislative and policy background section of the Strategy has been updated to reflect this, and Objective 4 has been amended (see below) to include the requirement. Guidance detailing what the requirement will involve is expected in due course.

4.3 *Objective 4:* Continue to maintain and enhance the Kent HER, to meet the requirements of LUR Act 2023 and the NPPF and underpin decision-making in planning and development management [also Strategic Aim 2]

5. Options considered and dismissed, and associated risk

5.1 Not updating the Heritage Conservation Strategy was considered but rejected due to strong support from members and senior management and the need to align with the Executive Decision

6. Financial Implications

6.1 The cost of updating the strategy is limited to staff time and minor redesign of the final document. There would be a Revenue Contribution to Capital Outlay saving of up to £150k pa (plus service/Corporate Landlord costs of approximately £23k pa) once all assets are divested and once all arrangements are finalised.

7. Equalities implications

7.1 An Equality Impact Assessment (Appendix 3) has been prepared and is included in the Background Documents.

8. Governance

8.1 The Corporate Director of Growth, Environment and Transport, or another Officer as required by the Corporate Director will inherit the main delegations in this decision.

9. Conclusions

9.1 The Heritage Conservation Strategy has been updated firstly to reflect Executive Decision 24/000068 which stated that:

1. KCC should seek to divest itself of the windmills it currently owns by a method that ensures that the windmills have a sustainable future in which they are appropriately cared for and maintained as community assets, and that
2. The Heritage Conservation Strategy is updated to this effect.

9.2 Secondly, the Strategy has been updated to cover the requirement which is set out in the Levelling-up and Regeneration Act 2023 for KCC to maintain the Historic Environment Record for its area and thirdly to reflect KCC's changed position on a climate change emergency.

10. Recommendation

10.1 The Cabinet Member for Environment, Coastal Regeneration & Special Projects is asked to agree the proposed decision as detailed in the attached Record of Decision document.

11. Background Documents

- Appendix 1: Updated Heritage Conservation Strategy
- Appendix 2: Background information on Executive Decision 24/000068 – windmill divestment
- Appendix 3: Equality Impact Assessment

12. Contact details

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EQIA Submission – ID Number

Section A

EQIA Title

Heritage Conservation Strategy - Divestment of KCC Windmills Policy Change

Responsible Officer

Dyson, Lis - GT - ECE

Approved by (Note: approval of this EqIA must be completed within the EqIA App)

Helen Shulver - GT - ECE

Type of Activity

Service Change

No

Service Redesign

No

Project/Programme

No

Commissioning/Procurement

No

Strategy/Policy

Strategy/Policy

Details of other Service Activity

No

Accountability and Responsibility

Directorate

Growth Environment and Transport

Responsible Service

Heritage Conservation / Environment and Circular Economy

Responsible Head of Service

Helen Shulver - GT - ECE

Responsible Director

Matthew Smyth - GT - ECE

Aims and Objectives

We are proposing to make changes to the Kent Heritage Conservation Strategy which would allow KCC to consider options for alternative ownership arrangements and/or financial responsibility for our eight windmills.

We are proposing to find alternative arrangements for each windmill separately because the current arrangements vary from site to site.

The windmills are all prominent rural or urban landmarks and highly graded designated (listed) buildings. As such, they are currently maintained in a condition that allows them to remain accessible to the general public to visit for educational and recreational purposes. However, KCC is facing a large increase in the cost of services, fuelled by high inflation, market conditions and increasing demands on its services from growth in the number of households and complexity of needs, which means that it needs to find ways to save money and has resulted in KCC proposing a change to ownership of these windmills.

There are no laws that say we must continue to own historic sites like windmills. However, as the current owner of the windmills, we do have a statutory duty to keep them safe, weatherproof, and

preserve their unique character and appearance. If KCC does not do this, Historic England could put the windmills on its "At Risk" list, and/or enforcement action could be taken by the Local Planning Authority.

No regular staff are employed to open the windmills to the public. Instead, through management agreements, locally based volunteer teams give up their spare time on scheduled open days to admit and guide visitors around the sites and buildings.

The proposed change to the ownership arrangements would mean that the ownership of each windmill may change to a local interest group, a private company or individual.

There could be a loss of amenity, volunteering and educational opportunities as future public access and enjoyment of these windmills is dependent on whoever takes on the responsibility for them. It may therefore indirectly affect other members of the community. This includes people who live near the mills, as well as others who live in other parts of Kent, or further afield, who plan to travel and visit the mills on scheduled open days when they are fully accessible

Section B – Evidence

Do you have data related to the protected groups of the people impacted by this activity?

Yes

It is possible to get the data in a timely and cost effective way?

Yes

Is there national evidence/data that you can use?

Yes

Have you consulted with stakeholders?

Yes

Who have you involved, consulted and engaged with?

Full public consultation undertaken between 28th November 2023 and 29th January 2024.
Users registered with Let's talk Kent who had expressed an interest in being kept informed of consultation regarding 'Arts and culture' and 'Environment and countryside' (8,559 people)
Users registered with Let's talk Kent who participated in the 2021 Heritage Conservation Strategy consultation and asked to be kept informed (258 people).
The seven local volunteer groups currently connected with the windmills.
Members of the communities in which these windmills stand.
Other Kent residents in or around these communities as well as further afield.
Key stakeholders at a national level including members of societies and groups with a stated interest in the subject.
Key stakeholders at an international level including members of societies and groups with a stated interest in the subject

Has there been a previous Equality Analysis (EQIA) in the last 3 years?

No

Do you have evidence that can help you understand the potential impact of your activity?

Yes

Section C – Impact

Who may be impacted by the activity?

Service Users/clients

Service users/clients

Staff

Staff/Volunteers

Residents/Communities/Citizens

Residents/communities/citizens

Are there any positive impacts for all or any of the protected groups as a result of the activity that you

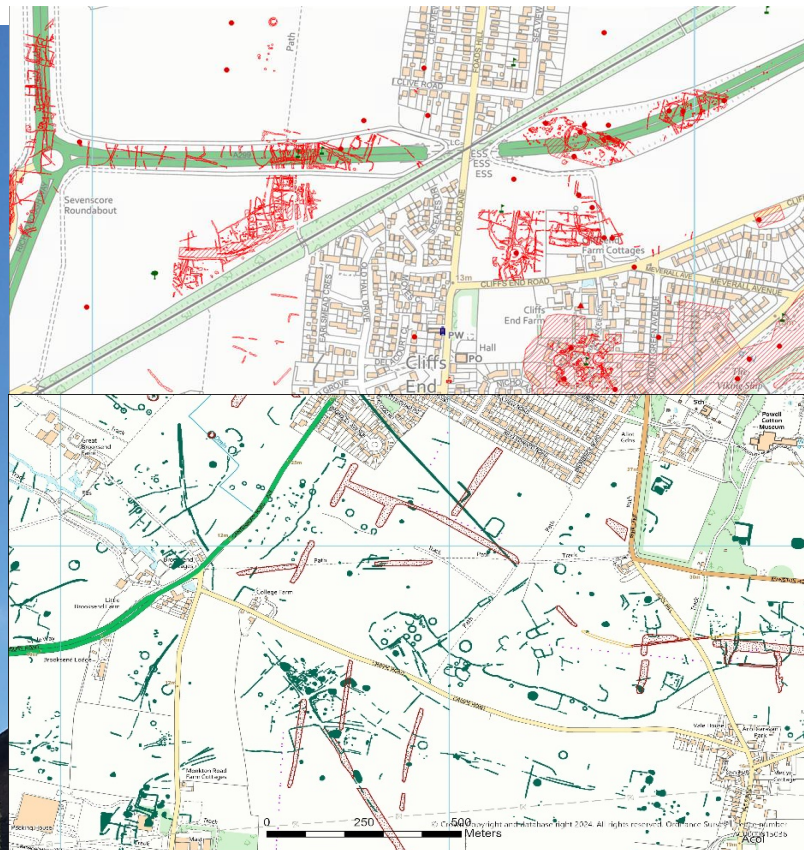
are doing?
Yes
Details of Positive Impacts
<p>The data currently available nationally indicates that windmill sites such as these can be equally well cared for by groups based in the communities in which they are located, as they can by local authorities.</p> <p>These groups tend to be charitable trusts or charitable incorporated companies set up with the twin aims of protecting the historic fabric of these buildings and ensuring they remain publicly accessible for educational and recreational purposes.</p>
Negative impacts and Mitigating Actions
19. Negative Impacts and Mitigating actions for Age
Are there negative impacts for age?
Yes
Details of negative impacts for Age
<p>All of the volunteer teams potentially affected by the proposal are composed of people of retirement age, for whom the process of volunteering at the windmill sites might be a key focus of their weekly routine.</p> <p>This may provide them with a sense of purpose and social connection. The potential loss of these opportunities could have a negative impact on their mental and physical health.</p>
Mitigating Actions for Age
<p>It would be important to manage the change in relationship between KCC and the volunteer teams, to minimise any negative impacts on the volunteers' wellbeing</p> <p>This would include keeping them informed of the changes, providing them with opportunities to ask questions, and addressing any concerns they may have</p>
Responsible Officer for Mitigating Actions – Age
Lis Dyson
20. Negative impacts and Mitigating actions for Disability
Are there negative impacts for Disability?
No
Details of Negative Impacts for Disability
Not Applicable
Mitigating actions for Disability
Not Applicable
Responsible Officer for Disability
Not Applicable
21. Negative Impacts and Mitigating actions for Sex
Are there negative impacts for Sex
No
Details of negative impacts for Sex
Not Applicable
Mitigating actions for Sex
Not Applicable
Responsible Officer for Sex
Not Applicable
22. Negative Impacts and Mitigating actions for Gender identity/transgender
Are there negative impacts for Gender identity/transgender

No
Negative impacts for Gender identity/transgender
Not Applicable
Mitigating actions for Gender identity/transgender
Not Applicable
Responsible Officer for mitigating actions for Gender identity/transgender
Not Applicable
23. Negative impacts and Mitigating actions for Race
Are there negative impacts for Race
No
Negative impacts for Race
Not Applicable
Mitigating actions for Race
Not Applicable
Responsible Officer for mitigating actions for Race
Not Applicable
24. Negative impacts and Mitigating actions for Religion and belief
Are there negative impacts for Religion and belief
No
Negative impacts for Religion and belief
Not Applicable
Mitigating actions for Religion and belief
Not Applicable
Responsible Officer for mitigating actions for Religion and Belief
Not Applicable
25. Negative impacts and Mitigating actions for Sexual Orientation
Are there negative impacts for Sexual Orientation
No
Negative impacts for Sexual Orientation
Not Applicable
Mitigating actions for Sexual Orientation
Not Applicable
Responsible Officer for mitigating actions for Sexual Orientation
Not Applicable
26. Negative impacts and Mitigating actions for Pregnancy and Maternity
Are there negative impacts for Pregnancy and Maternity
No
Negative impacts for Pregnancy and Maternity
Not Applicable
Mitigating actions for Pregnancy and Maternity
Not Applicable
Responsible Officer for mitigating actions for Pregnancy and Maternity
Not Applicable
27. Negative impacts and Mitigating actions for Marriage and Civil Partnerships
Are there negative impacts for Marriage and Civil Partnerships
No
Negative impacts for Marriage and Civil Partnerships
Not Applicable
Mitigating actions for Marriage and Civil Partnerships
Not Applicable

Responsible Officer for Marriage and Civil Partnerships
Not Applicable
28. Negative impacts and Mitigating actions for Carer's responsibilities
Are there negative impacts for Carer's responsibilities
No
Negative impacts for Carer's responsibilities
Not Applicable
Mitigating actions for Carer's responsibilities
Not Applicable
Responsible Officer for Carer's responsibilities
Not Applicable

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Kent Heritage Conservation Strategy (Revised 2025) DRAFT



kent.gov.uk/heritageconservationstrategy



Heritage Conservation Strategy
 March 2022 (Revised 2025)

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Foreword

Kent's heritage is one of our county's greatest strengths. It shapes our identity, enriches our communities, and gives future generations a clear link to the stories that built this place we call home. Protecting it isn't just about preservation—it's about pride, participation, and keeping our shared history alive.

In my role as Cabinet Member for Environment, Coastal Regeneration & Special Projects, I'm committed to a practical, people-focused approach. That means supporting our dedicated heritage teams, who do exceptional work every day, and making sure they have the tools they need to continue delivering national-level expertise and care. Kent County Council has a unique responsibility to safeguard, manage and champion this heritage, and this strategy sets out how we will do that together.

But the future of Kent's heritage depends on more than organisational effort—it depends on partnership. Our volunteers, local groups, landowners, district councils, and residents play an essential role. I want to strengthen those relationships and make it easier for communities to get involved wherever it's helpful and meaningful.

Heritage is something to be enjoyed, not just safeguarded. Whether through local projects, community archaeology, digital resources, open days, or hands-on volunteering, I want more people to feel connected to the extraordinary history on their doorstep. When residents are involved, our heritage becomes not only better protected—but better understood and valued.

This strategy is about working together, being sensible with resources, and ensuring Kent's nationally important heritage remains a source of pride, learning and inspiration. I look forward to building that future with you.

1. Introduction

1.1 This strategy sets out a vision for the future direction of Kent County Council’s approach to heritage conservation as implemented by the Heritage Conservation Service. It presents the context within which KCC operates, our strategic aims and objectives for the service, and the means by which these will be delivered. Public consultation on the strategy was undertaken in autumn 2021 and the amended strategy was adopted by Kent County Council at the Environment and Transport Cabinet Committee in March 2022. A further public consultation was undertaken in winter 2023/24 on a proposed amendment to the County Council’s approach to its historic windmills. Revised objectives are set out below under Strategic Aim 2.



Figure 1 Canterbury World Heritage Site (Courtesy of Chapter of Canterbury Cathedral).
Photograph by David King

1.2 Our heritage can be defined as “all that has been passed to us by previous generations. It is all around us. It is in the houses we live in, our places of work, the transport we use, our places of worship, our parks and gardens, the places we go to for our sport and social life, in the ground beneath our feet, in the shape of our landscape and in the placing and arrangement of our fields, villages, towns and cities. Heritage is also found in our moveable possessions, from our national treasures in our museums, to our own family heirlooms, and in the intangible such as our history, traditions, legends and language.” (Historic England <https://historicengland.org.uk/advice/hpg/generalintro/heritage-conservation-defined/>). The aspect of heritage primarily dealt with by the County Council’s Heritage Conservation Service is the historic environment

which is defined in the National Planning Policy Framework (NPPF) as “All aspects of the environment resulting from the interaction between people and places through time, including all surviving physical remains of past human activity, whether visible, buried or submerged, and landscaped and planted or managed flora”.

In order to manage our heritage effectively and pragmatically we need to understand its significance and agree policies to guide decision-making.

1.3 Kent, named after the Roman term for its Iron Age inhabitants “the Cantiaci”, has an extremely rich and varied heritage (also known as the historic environment). In such an intensively occupied county the physical environment is substantially the product of human activity, shaped by agriculture, industry, and settlement over the millennia, including reclaimed marshland, grazed downs, and managed woodland. Kent has featured prominently in the history of England and its close proximity to the continental mainland has resulted in it having a special place in our understanding of how England has related to Europe since prehistoric times, which continues to the present day. Heritage assets within the county range from the internationally important, such as the Swanscombe Skull site (the oldest such remains found in Britain), Canterbury Cathedral and St Augustine’s Abbey World Heritage Site and Dover Castle (known as the ‘key to the kingdom’), to undesignated milestones or historic lamp posts. All of these assets whether designated or not add character to our landscapes and towns and reveal the lives of former residents of Kent. For some periods of our past, before written records were routinely kept, and for people who are underrepresented in recorded history, material culture is the only means of understanding how people lived and changed the environment around them.

1.4 Natural erosion and ploughing and other agricultural processes can harm archaeological sites and historic landscapes, but conservation is possible through sensitive management, often delivered through environmental stewardship agreements. Kent’s growth agenda gives rise to major development pressure but also fantastic archaeological discoveries and opportunities to conserve outstanding historic buildings. Careful management of this often fragile and vulnerable resource is needed and opportunities for heritage-led regeneration and development-related benefits for heritage assets must be seized. The character of Kent’s historic environment can contribute greatly to the development of Kent’s sense of place and identity to underpin successful growth, and forms an important resource for education, leisure, and tourism. KCC’s Heritage Conservation Service has a key strategic role in helping to safeguard, manage and make accessible this heritage for present and future generations.

World Heritage Site	1
Scheduled Monuments	360
Listed Buildings	17,349
Registered Park and Gardens	61
Conservation Areas	493
Historic Parks and Gardens	398
Historic Environment Record monuments	99,307

Table 1 Table showing designated and non-designated heritage assets in Kent.

1.5 KCC has a key role to play in the conservation of Kent’s heritage but we are far from the only actor. Historic England is the government’s statutory advisor on the historic environment; it is responsible for identifying and designating heritage assets of national significance and manages change at such sites. It also supports local partners with specialist advice and guidance. Local authorities are responsible for implementing planning law and policy. KCC’s Heritage Conservation Service advises Kent local authorities on the impact of development proposals on Kent’s heritage (primarily on archaeological and landscape matters). Local planning authorities also designate and manage Conservation Areas and develop heritage management policies and strategies in their Local Plans. Landowners and householders manage their own heritage assets in accordance with national legislation and national and local policies. A host of community groups support the conservation of Kent’s heritage with projects and initiatives of their own.

1.6 Within this network of stakeholders and partners, KCC’s main role is to manage heritage assets in our ownership, provide an advice service to other stakeholders (in particular local planning authorities), manage the Historic Environment Record (HER) - the main strategic information resource for Kent’s historic environment and help the wider community access and enjoy Kent’s heritage through a range of community initiatives.

Legislative and policy background

1.7 The Heritage Conservation Service operates within conventions, legislation and policy at international, national and local levels.

- The UK is a signatory of the 1992 Valletta Treaty (European Convention on the Protection of the Archaeological Heritage (Revised), which aims to protect European archaeological heritage.

1. Introduction continued

- The work of the service is carried out within the general legislative framework of the UK. The main relevant legislation covering the team's historic environment advice and the management of KCC's own heritage assets is the Town and Country Planning Act 1990, the Planning (Listed Buildings and Conservation Areas) Act 1990, the Ancient Monuments and Archaeological Areas Act 1979, the Protection of Wrecks Act 1973 and the Protection of Military Remains Act 1986. Its work in relation to the Treasure process is covered by the Treasure Act 1996. The Levelling-up and Regeneration Act 2023 (Article 212) requires the County Council as relevant authority to maintain the Historic Environment Record for its area.
- Work carried out at the windmills is also covered by the Health and Safety at Work Act 1974.
- The team operates under the National Planning Policy Framework (updated 2025) and in particular chapter 16 'Conserving and enhancing the historic environment' and the Town and Country Planning (Environmental Impact Assessment) Regulations 2017.

Kent County Council's Environment Plan 2025 sets out the following goals which the Heritage Conservation Strategy will help deliver where appropriate.

- Goal 1: Deliver green energy and reduce carbon emissions.
- Goal 2: Adapt to our changing climate.
- Goal 3: Reduce flood risk and manage water resources effectively.
- Goal 4: Protect and improve the natural and built environment.
- Goal 5: Manage resources through a circular economy.
- Goal 6: Conserve and promote Kent's natural beauty and heritage.



Figure 2 Volunteers excavating Randall Manor medieval manor house within Shorne Woods Country Park.

Proposed Vision and Strategic Aims

1.8 The proposed Vision for Heritage Conservation is to:

Realise the substantial benefits and opportunities of Kent's rich heritage through its conservation, enhancement, and enjoyment by all.

1.9 Underpinning this are five proposed Strategic Aims:

Strategic Aim 1 - Continue to improve the high quality and timely historic environment advice, based on accessible and up to date information and understanding, provided to KCC, local authorities and other bodies involved in growth and change.

Strategic Aim 2 - Ensure, working with new and existing partners, that KCC's historic assets are conserved, enhanced, enjoyed and valued by Kent's residents and visitors.

Strategic Aim 3 - Increase awareness, knowledge and understanding of Kent's rich heritage and increase involvement in heritage activities amongst its local communities.

Strategic Aim 4 - Work towards the service becoming more financially self-sustaining.

Strategic Aim 5 - contribute to KCC's action to address climate change and adaptation.

1.10 In order to further the Strategic Aims, each is accompanied by Objectives. In several cases the objectives relate to more than one Aim, so they have been placed under one aim with cross references to the others where relevant.

2. Our Heritage Achievements

2.1 Achievements of the Heritage Conservation service include:

- Completion of the Dover Heritage Strategy (winner of RTPI South East award for Excellence in Planning for Built Heritage), used by DDC to help secure £4.27 million NLHF funding,
- Completion of the consultation draft of the Folkestone and Hythe Heritage Strategy,
- Dover Urban Archaeological Database and archaeological characterisation completed and highly praised as excellent by Historic England,
- An innovative Archaeological Notification Areas project, which will help developers and planners by providing information up front and digitally, notification area datasets now delivered to twelve Local Planning Authorities,
- Continuing to deliver archaeological advice service to planners and developers as construction continues at pace,
- Delivering community archaeology programmes in innovative ways and modelling good practice for local groups,
- Substantial capital works undertaken at KCC's historic windmills,
- Successful recent Historic England audit of the Historic Environment Record (HER).



Figure 3 Heritage Conservation officer monitoring Lower Thames Crossing fieldwork during the Covid lockdown 2021 (Oxford Archaeology).

3. Our Opportunities

3.1 The historic environment in Kent offers a great resource for sustaining and enhancing the quality of life in the county. Heritage can inspire the regeneration of an area, complementing and supporting economic development. This can help produce higher quality and more sustainable development that is successfully integrated into the life of the county. The historic environment can also play a key role in social regeneration, well-being and in Kent's arts and cultural scene.

3.2 Key opportunities offered by Kent's heritage include:

Creating a sense of place. Whether in an urban or rural environment, the historic environment creates a 'sense of place'. The buildings, open spaces, historic features and patterns of roads and lanes define the character of settlements. It is therefore important that any change is sensitive to this character, adding to and developing distinctiveness rather than diminishing it and creating uniformity or blandness. The historic environment can hold meanings and memories for a community that go beyond the architectural, archaeological or historical importance of designated assets.

Re-use of heritage assets. Re-using existing heritage assets (most commonly historic buildings) can provide an effective way to retain historic character while conserving building resources and achieving sustainability. Guidance (see 4.2 below) demonstrates that historic structures, settlements and landscapes can in fact be more resilient in the face of climate change, and more energy efficient than some modern structures and settlements. This has also been considered in the Historic England report 'There's no Place Like Old Homes: re-use and Recycle to Reduce Carbon' (Historic England 2019).

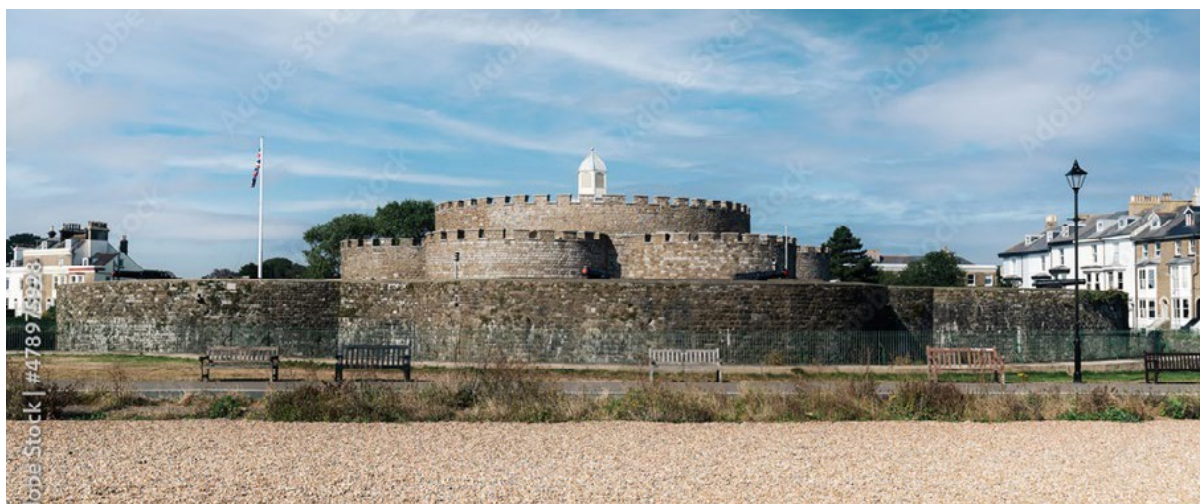


Figure 4 Deal castle is one of the finest Tudor artillery castles in England.

Attracting business and commercial activities. Heritage and a historic sense of place help to attract investment, businesses and commercial activity. Research quoted by Heritage Counts 2016 found that of 100 businesses surveyed one in four agreed that the historic environment is an important factor in deciding where to locate and was as important as road access. Research by the Heritage Lottery Fund in 2013 confirmed that innovative new businesses flourish in places that possess a good stock of historic distinctive buildings (https://www.heritagefund.org.uk/sites/default/files/media/research/new_ideas_old_buildings_2013.pdf). It also found that independent retail and leisure businesses seek to cluster in historic areas of towns and cities thereby adding to the distinctive sense of place and attracting more successful businesses. The HLF also found that businesses which occupy listed buildings generate £13,000 extra Gross Valued Added per business per year. Creative and cultural industries are particularly attracted to historic buildings because they are smaller, more flexible and cost-effective: they are 29% more likely to be found in a Listed Building than in a non-listed building (Heritage Counts 2016 and HLF 2013).

Adding value to new development. Heritage-led regeneration adds value to development projects. It is striking that in most towns it is the heritage-led developments that are among the most prestigious and financially valuable (Dover Heritage Strategy 2013).

In areas that had received investment in the historic environment, approximately one in five visitors in a survey of 1,000 stated they spent more in an area after investment in the historic environment than they did before. One in four businesses stated that the historic environment investment had directly led to an increase in business turnover (AMION and Locum Consulting 2010).

Durability of regeneration. Where new development is effectively integrated into existing settlement, by complementing existing character and materials, it is likely to prove more economically and socially durable. Retaining existing buildings among new build allows a varied street scene and can permit a wider range of occupiers; retaining historic features helps connect older people with the new community by providing reference points in space and memory.

Heritage contribution to the economy. In the year before the COVID-19 pandemic the heritage sector directly or indirectly supported more than 89,000 jobs in south-east England. Heritage employment grew almost twice as fast as the rest of the economy between 2011 and 2019. England's heritage sector generated a GVA greater than the security industry, defence industry, aerospace industry and the arts and culture industry in the UK (Source: Historic England).

The role of tourism in Kent's economy. The tourism industry is an important sector providing 67,000 jobs and contributing over £1.4 billion to the Kent economy (Kent County Council 2020).

Heritage tourism generates benefits in the local economy (Historic England 2016). A TNS study estimates that 32 per cent (£15.3bn) of the average annual spend from domestic and international tourism in the UK between 2011 and 2014 is attributable to activities broadly defined as heritage-related activities (TNS 2015).

Visiting heritage generates money for the local economy - for every £1 spent as part of a heritage visit, 32p is spent on site and the remaining 68p is spent in local businesses: restaurants, cafés, hotels and shops (HLF 2010).

Improved public health and well-being. The link between heritage and well-being is now well established (e.g. 'Wellbeing and the Historic Environment, Historic England 2018). There is presently an ongoing shift from an acute and hospital-centred, illness-based system to a person-centric, health-based system that will rely upon individual and community assets. As such, heritage can play an important role in the contribution of the arts to person-centred, place-based care through means such as arts-on-prescription activities, cultural venues and community programmes. The historic environment, archaeology and heritage form part of our experience of being human and can provide individual as well as collective opportunities to engage with arts and culture whilst having positive effects on our physical and mental health and wellbeing in the process.



Figure 5 Barrow group volunteers.

4. Our Challenges

4.1 Kent's heritage is vulnerable in a number of different ways. Some of these are a result of natural processes but most are due to human action or inaction. The vulnerability of an asset is not only related to direct impacts but also to actions that affect the setting of the asset.



Figure 6 Chillenden windmill, blown down in 2003, now re-built.

4.2 Key challenges facing Kent's historic environment include:

Natural Processes. Heritage assets can be highly vulnerable to coastal erosion as many were specifically located for their access to the sea e.g. sea defences, military sites or quays and 'hards' for landing boats. The vulnerability can be in the form of direct erosion of the monument or the burying of the monument by material deposition. Sea level change leading to inundation or salt level changes also threatens heritage assets as do changes in hydrology.

Climate change. The effect of humans on the environment can be traced over millennia but the unprecedented rate of recent change will inevitably impact on Kent's heritage with increased flash flooding, sea-level rise, rapid soaking and drying of waterlogged deposits, wind and lightning strikes impacting our fragile historic structures. Historic England has produced guidance ('Climate Change and the Historic Environment', 2008) that reviews the threats to the historic environment posed by climate change. More recent information can be found in 'Climate Change Adaptation Report' (Historic England, 2024). We are working with the University of Waterloo, Canada, to assess the impacts of climate change on Kent's heritage assets; further assessment will be undertaken as funding becomes available.

Rural activities. A range of rural activities have the potential to impact on heritage assets including ploughing (especially deep ploughing), machinery



Figure 7 Chillenden mill after restoration.

movement, changes in the local farming regime (e.g. a change from pasture to arable cultivation, removal of hedgerows or construction of new infrastructure). The increased leisure use of the countryside can also damage heritage sites, particularly when this involves increased vehicle access (e.g. mountain biking, motorbikes or off-road vehicles).

New infrastructure. The increasing population of Kent and the new development required to house it requires ever more support in the form of pipelines and sewers, roads, rail, power and water infrastructure. The impact of this on the historic environment will be assessed and mitigated and a balance sought between essential construction and conservation of important assets.

Development. The greatest impact on Kent's heritage arises from new development. KCC estimates that between 2019 and 2039 approximately 225,000 new dwellings will be built in Kent and Medway. In addition to this, commercial, leisure, minerals and waste and other development must be considered. Construction activities can directly affect buried archaeological remains through the excavation of new foundations, services, remodelling of land, removal of topsoil in advance of development, piling works and from the operation of plant. Permitted development rights have the further potential for unmonitored impacts on heritage assets.

Policy weaknesses and changes. Current approaches to protecting heritage concentrate on nationally important assets meaning that regionally or locally important assets can remain vulnerable. At the time of writing this strategy, planning reforms have been proposed that may leave Kent’s heritage more vulnerable, due to a process of zoning land that may not have been assessed for its heritage potential. It is important that local people continue to be involved in decision-making and that a strong evidence base informs any zoning of land.

Crime. Heritage assets are vulnerable to a range of types of criminal activity including arson, theft by metal detecting (known as ‘night-hawking’), vandalism and graffiti, trespass and anti-social activities.



Figure 8 Placed deposits of animal bones, including cattle skulls, in the ditch of the Ramsgate causewayed enclosure.

5. Strategic Aim 1

Continue to improve the high quality and timely historic environment advice provided to KCC, local authorities and other bodies involved in growth and change based on accessible and up to date information and understanding.

Archaeology and development

5.1 Through its Archaeology and Development team, Heritage Conservation provides archaeological advice services to all of Kent's Local Planning Authorities (LPAs) including Medway Council and Ebbsfleet Development Corporation, via Service Level Agreements (SLAs).

5.2 The Archaeology and Development team carries out about 3,500 appraisals each year. Most of these are for planning applications and many require ongoing archaeological support. In addition, the team provides heritage support to Nationally Significant Infrastructure Projects (NSIPs) and 'Garden Town' developments, and on local plan allocations. Monitoring the standard of archaeological work on development sites can be a time-consuming element of the process.

Objective 1. Continue to provide an archaeological service to Kent's planning authorities, developers and householders [also Strategic Aim 3].

Objective 2. Explore and determine the potential for requiring archaeological contractors who undertake archaeological assessments or fieldwork on KCC development-related projects to be Registered Archaeological Organisations.

Historic built environment advice

5.3 As most districts have their own Conservation Officer covering built heritage, the Heritage Conservation Service provides advice on the historic built environment only to the County Council. The KCC Conservation Architect advises on key strategic infrastructure projects and county council determined applications including developments relating to schools to ensure that heritage assets are protected and enhanced where possible. This advice is most effective when given at an early stage in the design process.

Objective 3. Continue to provide a historic built environment advice service on County Council and strategic matters in Kent [also Strategic Aim 3].

The Kent Historic Environment Record

5.4 The Kent Historic Environment Record (HER) is a database of over 91,000 heritage assets and features in Kent linked to a GIS mapping system. It includes designated assets such as Listed Buildings and Scheduled Monuments as well as non-designated assets such as archaeological sites, non-listed historic buildings, parks, and gardens etc. It is used for development management, research, education, and tourism purposes. The HER (formerly known as the Sites and Monuments Record before historic buildings were added to the record) was formally adopted by KCC in 1995.

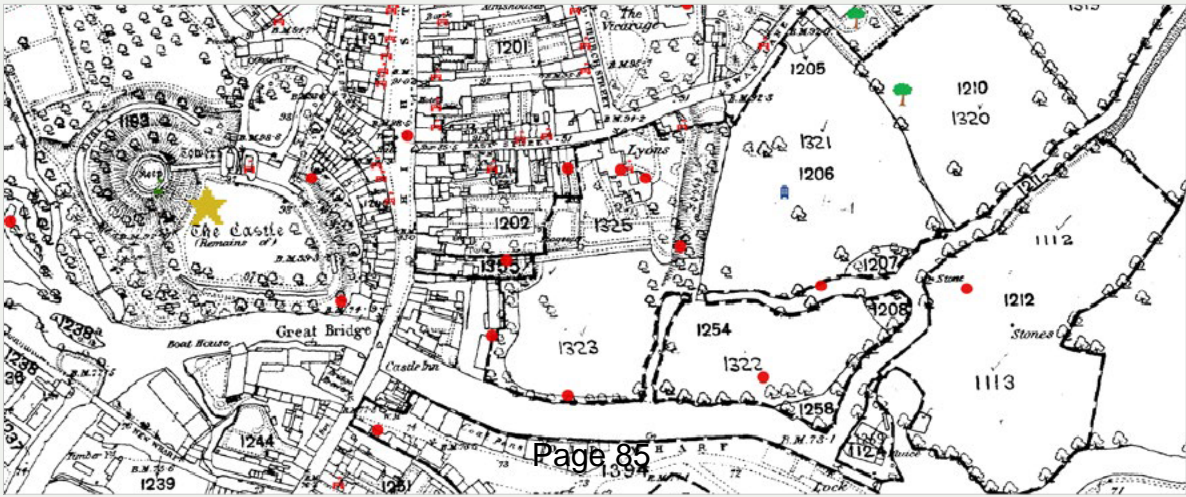
5.5 The HER is identified in the National Planning Policy Framework (NPPF) as the prime source of heritage information. The Kent HER is the only HER for the whole county and is used by all local authorities, Medway Council and Ebbsfleet Development Corporation. The Levelling-up and Regeneration (LUR) Act 2023 (Article 212) requires Kent County Council as relevant authority to maintain the HER for its area. Guidance is expected shortly.

Objective 4: Continue to maintain and enhance the Kent HER, to meet the requirements of LUR Act 2023 and the NPPF and underpin decision-making in planning and development management [also Strategic Aim 2, Strategic Aim 3].

Case Study: The Kent Historic Environment Record (HER)

The Kent HER is a database of over 91,000 historic buildings, archaeological sites and discoveries and landscapes across Kent. It contains discoveries dating from the Palaeolithic period (up to 1m years ago) to the Cold War and is used by researchers, developers, community projects and the public to learn more about Kent’s outstanding heritage. It is available to view online at www.kent.gov.uk/HER where it is accompanied by historic maps and aerial photographs as well as pages on different themes in Kent’s past, some written by the HER volunteer team. During the COVID 2020 lockdown period, the website had 176,000 page views - its highest ever and another 103,000 via the Heritage Gateway.

Heritage maps



6. Strategic Aim 2

Ensure, working with new and existing partners, that KCC's historic assets are conserved, enhanced, enjoyed and valued by Kent's residents and visitors.

KCC-owned heritage assets

6.1 Kent County Council owns and is responsible for a large number of diverse heritage assets including historic school buildings, archaeological monuments, milestones, war memorials and historic street paving. These play a vital role in the character of Kent. Information about the important heritage assets which KCC owns is spread amongst several databases (HER, K2 and Highways service owned) and the assets are under day-to-day management of different parts of the County Council. Information on the location and significance of heritage assets is not always available to relevant KCC officers or contractors and it is possible for heritage assets to be accidentally damaged. We will work with other departments in KCC to coordinate information on heritage assets and increase awareness of this fragile resource.

6.2 The Kent Highways Heritage Protocol is a document jointly produced by KCC Heritage Conservation and Highways officers, the Kent Conservation Officers Group, and Kent Design. Originally adopted in 2001, it was updated in 2011 and is currently being revised. It looks beyond the statutory requirement to conserve individual assets to consider Heritage Sensitive Situations, defined as buildings, monuments, sites, places, areas or landscapes positively identified as having a degree of significance meriting consideration in planning decisions. It is thus a source of guidance for Kent's Highways officers, developers, and others engaged in designing and maintaining Kent's current and future highway assets.

Kent County Council's approach to managing the county's highway network is set out in its Highways Asset Management Plan (HAMP). This includes, at Action 1.17, Completing work with district conservation teams to refine and finalise the Kent Highways Heritage Protocol, to ensure that we strike the right balance between conservation, affordability, lifecycle cost and future maintainability considerations in highway maintenance. In addition, the recently introduced Technical Approval Process referenced in the HAMP applies the same principles to new and renewed highway assets.

Objective 5: Work across KCC to coordinate information on heritage assets and finalise the Kent Highways Heritage protocol.

Windmills

6.3 Kent County Council owns and is responsible for the preservation of eight historic windmills which are exceptional in terms of their high listing grades, their historic and regional significance, their architectural and technological excellence, and their mechanical completeness.

Location, Name	Type	Constructed	Designation	Date Listed	Acquired by KCC
Chillenden Mill	Post	1868 (rebuilt 2005)	Grade II*	11/10/1963	1958
Cranbrook, Union Mill	Smock	1814	Grade I	09/06/1952	1960
Herne Mill	Smock	Inscribed 1789	Grade I	29/09/1951	1984
Margate, Drapers Mill	Smock	1845	Grade II*	22/02/1973	1968
Meopham Mill	Smock	c1819	Grade II*	22/08/1952	1958
Stelling Minnis, Davison's Mill	Smock	1866	Grade I	29/12/1966	1970
West Kingsdown Mill	Smock	1805? Moved here 1880	Grade II	01/06/1967	1958
Wittersham, Stocks Mill	Post	Inscribed 1781	Grade II*	04/06/1952	1979

6.4 Kent County Council's approach to the management of the windmills it owns is set out below:

- To maintain in full working order those mills that are in the best condition.
- To make the mills weatherproof and watertight so that those which are incomplete can be returned to working order over the long term, as funds become available.
- To keep those that are visually complete in an intact condition for as long as possible.
- To ensure all the windmills and their sites are made safe for the visiting public, adjacent residents, passers-by, and the volunteer teams and members of staff who use them.

Case Study: Windmills conservation programme

The Kent Windmills Programme was developed in 2019 to weatherproof and safeguard the eight historic windmills owned by Kent County Council. Each windmill is managed by a locally based team of volunteers who ensure the buildings are accessible to visitors during the spring and summer months. In 2020, KCC’s capital works programme funded a comprehensive scheme of repairs at West Kingsdown Mill which was featured on ITV Meridian News in March 2021. Repair works in progress include the construction of a new reeving stage at Meopham Mill, supported by a £25,000 grant from Historic England’s Heritage at Risk Emergency Fund. KCC’s capital programme is funding major repairs at Cranbrook’s Grade I listed Union Windmill (see image), involving the construction of a new 8-bladed fantail and four new sweeps. The aim is for Cranbrook Mill to be capable of milling flour by wind power again by the end of 2021.



6. Strategic Aim 2 continued

6.5 Five of the mills are ‘active’ in that their sweeps and fantails turn regularly, two are currently ‘static’ with no regularly working parts and one is being restored. The active mills are Union Mill, Cranbrook; Drapers Mill, Margate; Chillenden Mill; Stelling Minnis Mill and Meopham Mill. The static mills are Wittersham and West Kingsdown. A management approach of returning the mills to an active state where possible and stabilisation where not has been implemented very successfully. Meopham Mill was fully restored in 2025 and restoration of Heme Mill is underway. Management of the mills is only possible with the help of many volunteers in the windmill groups who assist with maintenance tasks and open the mills to the public.

6.6 In 2024, following a public consultation, the Cabinet member for Environment decided that KCC should divest itself of the windmills subject to ensuring that they have a sustainable future as community assets (Executive decision 24/000068). A fair and open process for divestment will be agreed; the method could potentially include freehold divestment, divestment through long lease or other appropriate means to achieve the executive decision.

Objective 6: KCC should seek to divest itself of the windmills it currently owns by a method that ensures that the windmills have a sustainable future in which they are appropriately cared for and maintained as community assets [also SA3].

Objective 7: *For any windmills remaining in KCC ownership and management, follow a management approach so that:*

- i) *Mills capable of milling flour (Drapers Mill, Margate, and Cranbrook Mill) remain able to do so.*
- ii) *The weatherproofing programme will be undertaken as needed on a rolling cycle.*
- iii) *Static mills will be returned to visual completeness subject to funding.*
- iv) *Static mills will be made active wherever possible. [also Strategic Aim 3].*

Objective 8: KCC’s relationship with the windmill volunteer groups will be strengthened and the groups and other interested parties will be supported through the divestment process [also Strategic Aim 3].

Archaeological archives

6.7 Archaeological archives are produced during archaeological fieldwork. They consist of a small sample of the material that was recovered - the pottery, metalwork, stone, bone, environmental samples and so on - and are retained permanently to act as a resource for further research. The research may be carried out to check the conclusions of the original excavators or to research new aspects of archaeology that were not considered during the original project. They include important objects which could be displayed in museums

6. Strategic Aim 2 continued
or galleries.

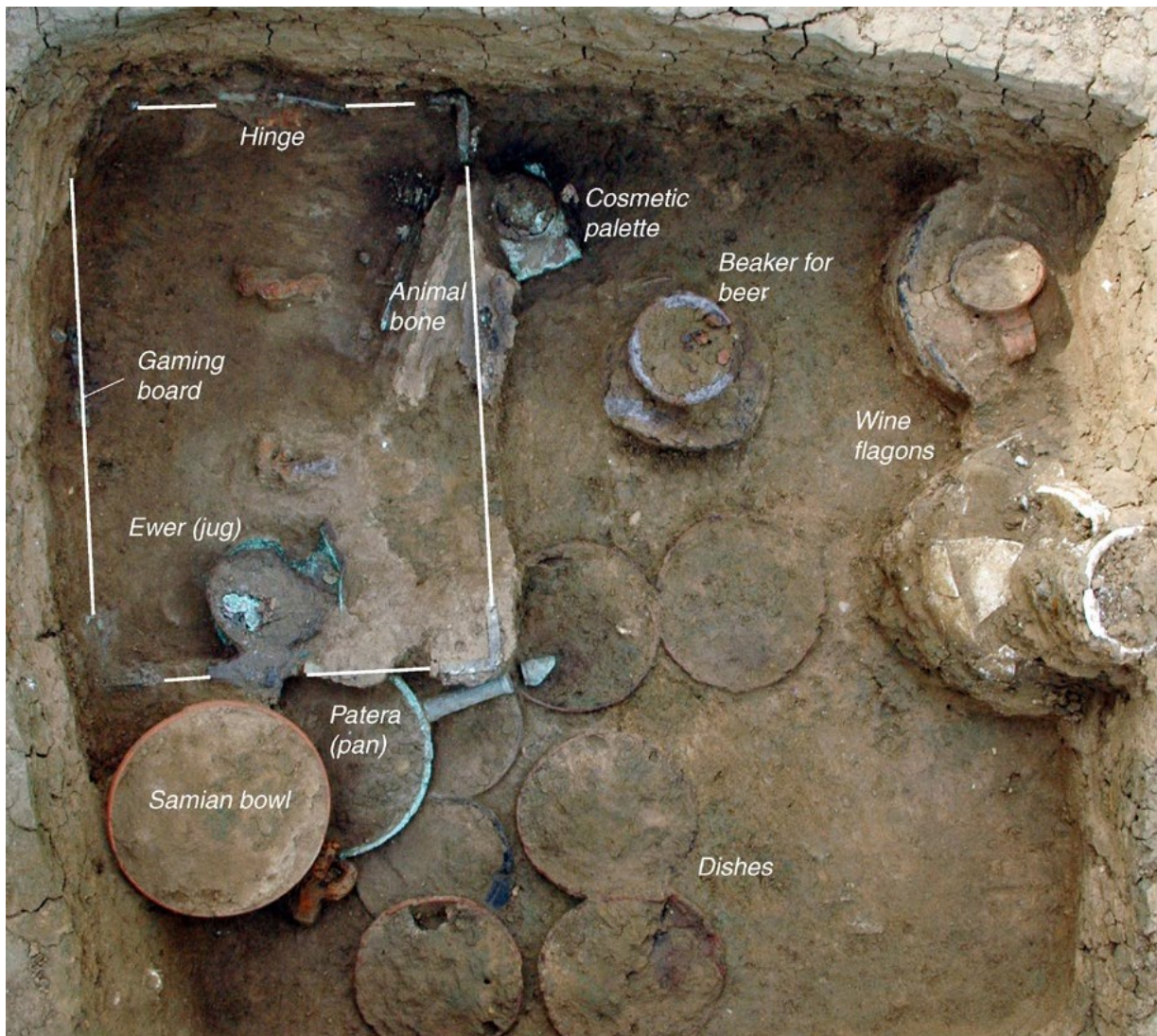


Figure 9 Archaeological archives: Roman vessels found during A2 widening (Courtesy of Oxford Archaeology).

6.8 In Kent, most archaeological archives will be generated by projects required as part of the development management process, but they will also include community excavations. Traditionally, archaeological archives are deposited in museums but in Kent almost all the museums are full and will no longer accept them. The archives are currently mostly retained by the original excavators.

6.9 KCC is the owner of more than 2,500 boxes of archive material deriving primarily from the High Speed 1 Channel Tunnel Rail Link project and has a direct responsibility to find a home for them. KCC is also responsible for the long-term deposition of archives from KCC road schemes and other development. KCC is keen to continue working with partners to develop a solution for all Kent's archives, as the retention and deposition of archaeological archives is regarded as national good practice and KCC also requires this in its archaeological specifications. As the main archaeological curator for Kent, KCC has a responsibility to help find a solution to the archives problem and improve access to information.

6.10 An assessment of archaeological archives has been undertaken - in 2020 this consists of approximately 23,000 boxes of material from Kent and Medway (based on a detailed 2015 assessment with a multiplier applied for time passed). Options for storage and display have been considered. The most cost-effective system (at time of writing) available for bulk archives is the Deepstore facility in Cheshire. However, conditions there are not currently suitable for specialist materials e.g. metalwork, textiles etc. so a separate facility would be needed for these materials. Discussions will be held with neighbouring authorities and Kent's museums and archaeological contractors to identify an approach to the specialist store. A project will be developed to make information on artefacts available online including a virtual gallery.

Objective 9: Assess options for the display and long-term storage of archaeological archives and ensure the KCC-held archives are placed in an appropriate repository [also SA3].



Figure 10 Anglo-Saxon brooch found at Saltwood Tunnel during archaeological excavations for HS1.

7. Strategic Aim 3

Increase awareness, knowledge and understanding of Kent's rich heritage and increase involvement in heritage activities amongst its local communities.

Community archaeology

7.1 Since 2006 the Heritage Conservation team has employed a community archaeologist usually through external funding. Highly successful Heritage Lottery Fund projects have been carried out at Shorne Woods Country Park (Shorne Heritage Project and Shorne HubCAP) and around Cobham (Cobham Landscape Detectives). The Community Archaeologist has been involved in a number of other projects across the county, some developed through the Heritage Conservation Service, and some developed by others with the service providing community archaeology expertise. These have included:

- Footsteps of Caesar Project - survey and excavation with the University of Leicester at Ebbsfleet (Thanet) and Worth. Focused on a site discovered on KCC's East Kent Access Road that is considered to connect with the invasion by Caesar.
- Command of the Heights - community excavation at Fort Amherst, Chatham for Medway Council.
- Rose Hill House - excavation of a 18th to 20th century house in Sittingbourne that involved direct participation of more than 300 primary school children from the adjacent school (as part of the Woodland Wildlife Hidden Histories project).
- Royal Military Canal - survey works to support advance work for a new cycle path with Ashford Borough Council.
- Boxley Warren Heritage project - running archaeology activities for the project for the Mid Kent Downs Countryside Partnership.
- Valley of Visions (Medway Valley), Darent Valley and Fifth Continent (Romney Marsh) - providing community archaeology support and activities for three landscape partnership schemes.
- Repton pond project at Cobham Hall - survey and excavation of a Repton pond feature at Cobham Hall, working on behalf of the Cobham Hall Heritage Trust.

7.2 There are enormous benefits from community archaeology for participants in terms of well-being and health but there are problems in securing sustainable funding to facilitate activities. It is also important to realise the public benefit of development-led archaeological work through improved information sharing and heritage interpretation, including local display of artefacts and public art. Similarly, the online HER, well-managed social media channels and publications allow a wide range of people to be aware of and contribute to knowledge of Kent's heritage.

Case Study: The 'Fifth Continent' Landscape Partnership Scheme Project

Since 2017 KCC has been providing community archaeology activities for the 'Fifth Continent' landscape partnership project, managed by the Kent Wildlife Trust and supported by the National Lottery Heritage Fund. Three projects are being carried out that involve working with volunteers - studying the original location of the port of Romney, researching the history of churches on the Marsh, and helping landowners to manage their heritage assets. Over 100 volunteers have taken part in the heritage activities which include excavation, surveys and research.



Objective 10: Promote understanding and enjoyment of Kent's heritage using multiple media channels including digital media (the online HER, KCC website and social media), print media (publications and press releases), with partners and through direct experience (community archaeology) [also Strategic Aim 2].

Objective 11: Develop and deliver a community engagement strategy and communication plan for the Heritage Conservation team [also Strategic Aim 2].



Figure 11 Shorne Woods Archaeology Group volunteers uncovering a section of the narrow gauge railway at the Country Park.

Metal detecting searching and chance discoveries

7.3 Since the 1990s, metal detecting has become a widely adopted hobby in England. It is covered by the legal requirements of the Treasure Act 1996 (<https://www.legislation.gov.uk/ukpga/1996/24/contents>) and also a voluntary recording scheme, the Portable Antiquities Scheme (<https://finds.org.uk/>). The Portable Antiquities Scheme (PAS) is overseen by the British Museum and run by Finds Liaison Officers (FLOs), who are hosted mainly by county councils, or county museums where they exist. Funding for this service is provided by a grant from the British Museum. The service is discretionary in terms of recording finds on the PAS database but there is a statutory role, alongside the coroners' service, in relation to reporting finds of Treasure under the Treasure Act. Additionally, in recent years, two other collecting hobbies have gained popularity; 'mudlarking', where riverine foreshore or estuary areas are searched with or without detecting equipment, and magnet fishing where magnets are used to collect mostly iron objects from waterways.



Figure 12 Objects discovered in Kent (Elham Cross, Matilda of Cornhill seal matrix) and recorded by the KCC Finds Liaison Officer.

7.4 Such hobbies can foster physical health, engagement with heritage, and in some cases provide valuable archaeological information. However, they also provide challenges that must be considered. All the hobbies mentioned above risk inadvertently, and occasionally deliberately, breaching the requirements of the Treasure Act and also legal requirements for access to land, particularly where members of the public are not aware of restrictions. Many finds of historical interest can go unreported and are sometimes sold. There can also be significant safety concerns such as the obstruction of waterways by magnet fishing or the discovery of unexploded ordinance (UXO) in the pursuit of artefact recovery.

7.5 Extensive outreach by archaeologists has taken place over the past three decades to help mitigate some of the above, particularly in the fields of best practice and recording of objects. The most recent policy document, [Code of Practice for Responsible Metal Detecting in England and Wales](#), was published by the PAS in 2017.

7.6 For the reasons outlined above it is proposed that metal detecting will only be undertaken on KCC owned land as part of an archaeological investigation or to search for a specific lost object. KCC should retain ownership of all finds found on its property in perpetuity except in certain circumstances (e.g. recent loss of a personal possession) which will be set out on the KCC website.

Objective 12: Agree and adopt a policy that metal detecting and ‘by eye’ searches will only be undertaken on KCC owned land as part of an approved project [also SA2].

Objective 13: Agree and adopt a policy that KCC should retain ownership of all finds found on its property in perpetuity unless special exemptions apply (e.g. loss of personal possession) [also SA2].

Objective 14: Agree and adopt a policy (to be discussed with river and coastal authorities) that magnet fishing will not be allowed on KCC owned land [also SA2].

Objective 15: KCC will work with coastal landowners to consider the benefits of a permit system for metal detecting in coastal and riverine foreshore areas.

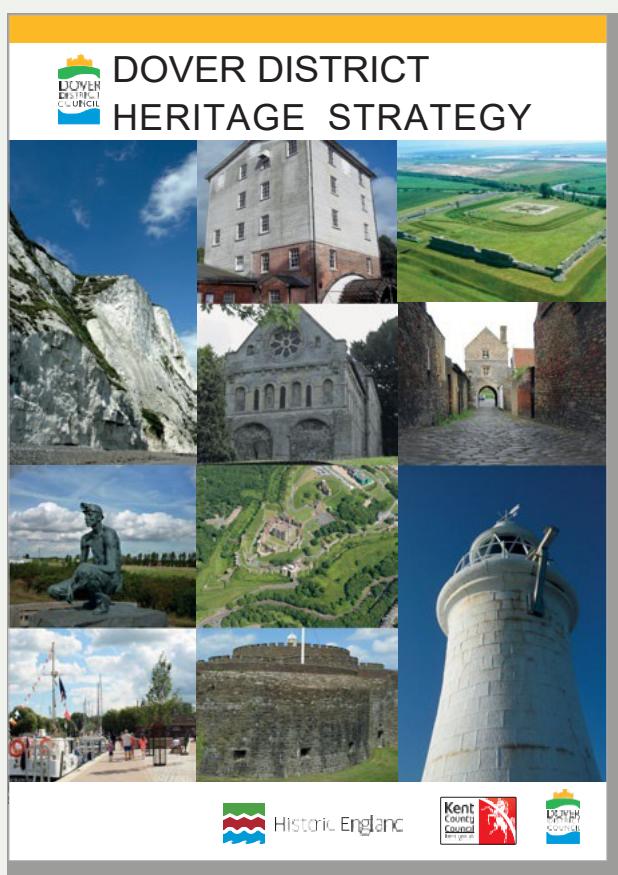
Supporting the development of robust heritage strategies

7.7 The NPPF guides Local Plans to set out a positive strategy for the conservation and enjoyment of the historic environment. The Heritage Conservation Service has worked with Dover District Council to produce the Dover District Heritage Strategy, which received a Royal Town Planning Institute South East award for planning excellence and is recognised by Dover District Council as having brought in millions of pounds in investment. A similar draft strategy has been prepared by KCC Heritage Conservation for Folkestone and Hythe District Council, and the service is contributing to other approaches to heritage strategies which are being followed by other local authorities such as Swale and Tunbridge Wells. Such strategies encourage the use of the historic environment in place-making and in seeking opportunities for public benefit and community value in development proposals. We will explore with partners whether preparation of a county-wide heritage strategy would bring benefits of scale and cost savings.

Objective 16: Explore developing a county level Kent Heritage Strategy to assist district authorities who could draw upon it as a framework for their own strategies as many issues and themes are commonly held [also SA1].

Case Study: Dover Heritage Strategy

In 2013 (updated in 2020) Dover District Council published the Dover Heritage Strategy, the result of a multi-year collaboration with KCC. The strategy was commissioned by Dover District Council and English Heritage to ensure that Dover's outstanding heritage plays its full part in life in the District in the future. It contains recommendations to ensure that decisions are taken based on a full understanding of the significance of Dover's heritage assets and to help shape decision-making. The strategy was awarded the RTP1 South East award for Excellence in Planning for Built Heritage) and has been used by Dover District Council to help secure £4.27 million NLHF funding.



8. Strategic Aim 4

Work towards the service becoming more financially self-sustaining.

Benchmarking and resourcing

8.1 In 2019, KCC Heritage Conservation carried out a benchmarking survey with equivalent teams across the south-east of England. This concluded that:

- i) in comparison with other curatorial services KCC Heritage Conservation is comparatively under-resourced for both its development management team and its Historic Environment Record team and;
- ii) there is scope for increasing income generation, particularly by charging for some aspects of the development management service and for Priority Searches for HER information.

Objective 17. Develop a cost recovery strategy for providing archaeological advice to developers for major planning applications and NSIP proposals [also SA1].

Objective 18. Develop a cost recovery strategy for the creation of HER records as a result of development related fieldwork [also SA1, SA3].

Objective 19: Determine and secure a funded approach to built historic environment advice [also SA1, SA2].

Objective 20: Develop a strategy to systematically review and monitor progress towards greater financial sustainability [also SA1, SA2, SA3].

9. Strategic Aim 5

Contribute to KCC's action to address climate change and adaptation.

9.1 Adapting to climate change is a priority for Kent County Council. Kent County Council recognises that our changing climate will continue to affect the county's historic environment. While the Council is no longer operating under a formal climate emergency declaration, we remain committed to understanding and managing the risks posed by a changing climate. Our focus is on resilience and adaptation, ensuring that heritage assets can withstand and respond to future environmental challenges.

Objective 21: Work with partners to develop approaches that improve the resilience of heritage assets to climate-related impacts.

With partners and subject to funding, we will investigate the likely impacts of climate change on Kent's heritage assets. This includes gathering the best available evidence on climate projections, identifying and quantifying potential risks, and assessing the vulnerability of different asset types. We will prioritise actions based on the severity and timing of these impacts and develop strategies to adapt and manage change effectively. An initial assessment was completed this year in an innovative project by the University of Waterloo, Canada. Further assessment will be undertaken in due course.

Objective 22: Assess, with partners, the vulnerability of Kent's historic environment to climate change and create an adaptation framework to guide future conservation efforts.

10. Our objectives at a glance

Strategic Aim 1

Continue to improve the high quality and timely historic environment advice provided to KCC, local authorities and other bodies involved in growth and change based on accessible and up to date information and understanding.

Objective 1. Continue to provide an archaeological service to Kent's planning authorities, developers and householders [also SA3].

Objective 2. Explore and determine the potential for requiring archaeological contractors who undertake archaeological assessments or fieldwork on KCC projects to be Registered Archaeological Organisations.

Objective 3. Continue to provide a historic built environment advice service on County Council and strategic matters in Kent [also SA3].

Objective 4: Continue to maintain and enhance the Kent HER, to meet the requirements of the LUR Act 2023 and NPPF and underpin decision-making in planning and development management [also SA2, SA3].

Strategic Aim 2

Ensure, working with new and existing partners, that KCC's historic assets are conserved, enhanced, enjoyed and valued by Kent's residents and visitors.

Objective 5. Work across KCC to coordinate information on heritage assets and finalise the Kent Highways Heritage protocol.

Objective 6. KCC should seek to divest itself of the windmills it currently owns by a method that ensures that the windmills have a sustainable future in which they are appropriately cared for and maintained as community assets [also SA3].

Objective 7. *For any windmills remaining in KCC ownership and management, follow a management approach so that:*

i) Mills capable of milling flour (Drapers Mill, Margate, and Cranbrook Mill) remain able to do so.

ii) The weatherproofing programme will be undertaken as needed on a rolling cycle.

iii) Static mills will be returned to visual completeness subject to funding

iv) Static mills will be made active wherever possible

[also SA3].

Objective 8. KCC's relationship with the windmill volunteer groups will be strengthened and the groups and other interested parties will be supported through the divestment process. [also SA3].

Objective 9. Assess options for the display and long-term storage of archaeological archives and ensure the KCC-held archives are placed in an appropriate repository [also SA3].

Strategic Aim 3

Increase awareness, knowledge and understanding of Kent's rich heritage and increase involvement in heritage activities amongst its local communities.

Objective 10. Promote understanding and enjoyment of Kent's heritage using multiple media channels including digital media (the online HER, KCC website and social media), print media (publications and press releases) and through direct experience (community archaeology) [also SA2].

Objective 11. Develop a community engagement strategy and communication plan for the Heritage Conservation team [also SA2].

Objective 12. Agree and adopt a policy that metal detecting and 'by eye' searches will only be undertaken on KCC owned land as part of an approved project [also SA2].

Objective 13: Agree and adopt a policy that KCC should retain ownership of all finds found on its property in perpetuity unless special exemptions apply [also SA2].

Objective 14: Agree and adopt a policy (to be discussed with river and coastal authorities) that magnet fishing will not be allowed on KCC owned land [also SA2].

Objective 15: KCC will work with coastal landowners to consider the benefits of a permit system for metal detecting in coastal and riverine foreshore areas.

Objective 16: Explore developing a county level Kent Heritage Strategy to assist district authorities who could draw upon it as a framework for their own strategies as many issues and themes are commonly held [also SA1].

Strategic Aim 4

Work towards the service becoming more financially self-sustaining.

Objective 17. Develop a cost recovery strategy for providing archaeological advice to developers for major planning applications and NSIP proposals [also SA1].

Objective 18. Develop a cost recovery strategy for the creation of HER records as a result of development related fieldwork [also SA1, SA3].

Objective 19: Determine and secure a funded approach to built historic environment advice [also SA1, SA2].

Objective 20: Develop a strategy to systematically review and monitor progress towards greater financial sustainability [also SA1, SA2, SA3].

Strategic Aim 5

Contribute to KCC's action to address climate change and adaptation.

Objective 21. Work with partners to develop approaches that improve the resilience of heritage assets to climate-related impacts.

Objective 22. Assess, with partners, the vulnerability of Kent's historic environment to climate change and create an adaptation framework to

guide future conservation efforts.

11. How we will deliver this strategy – our medium-term plan

Strategic Aim 1

Continue to improve the high quality and timely historic environment advice provided to KCC, local authorities and other bodies involved in growth and change based on accessible and up to date information and understanding.

What (objective)	Why (rationale)	By when (timescale)	What will success look like?
Objective 1. Continue to provide an archaeological service to Kent’s planning authorities, developers and householders [also SA3].	Requirement of NPPF and other policy (see 1.7-1.9)	Ongoing	Targets met; heritage protected.
Objective 2. Explore and determine the potential for requiring archaeological contractors who undertake archaeological assessments or fieldwork on KCC projects to be Registered Archaeological Organisations.	Improve standards in commercial fieldwork and reduce time spent commenting on WSIs and reports.	Prepare report by December 2026.	Decision taken.
Objective 3. Continue to provide a historic built environment advice service on County Council and strategic matters in Kent [also SA3].	Requirement of NPPF and other policy (see 1.7-1.9)	Ongoing	Targets met; heritage protected.
Objective 4. Continue to maintain and enhance the Kent HER, to meet the requirements of the LUR Act 2023 and NPPF and underpin decision-making in planning and development management [also SA2, SA3].	Requirement of NPPF and other policy (see 1.7-1.9)	Ongoing	2025 HER Audit Action Plan implemented according to schedule. Ensure HER meets appropriate standard when LUR Act guidance published.

Strategic Aim 2

Ensure, working with new and existing partners, that KCC’s historic assets are conserved, enhanced, enjoyed and valued by Kent’s residents and visitors.

What (objective)	Why (rationale)	By when (timescale)	What will success look like?
<p>Objective 5. Work across KCC to coordinate information on heritage assets and finalise the Kent Highways Heritage protocol.</p>	<p>To conserve heritage assets in line with statutory requirements and good practice, and to provide guidance on developing designs and maintenance solutions which balance heritage conservation with cost and other relevant factors.</p>	<p>Draft proposal by 2026</p>	<p>Heritage assets conserved and managed effectively.</p>
<p>Objective 6. KCC should seek to divest itself of the windmills it currently owns by a method that ensures that the windmills have a sustainable future in which they are appropriately cared for and maintained as community assets [also SA3].</p>	<p>Reduce long-term maintenance and capital costs for KCC. Increase potential for funding from other sources. Meet listed building requirements and ensure community inclusion.</p>	<p>Divestment approach prepared by March 2026.</p>	<p>Divestment of the windmills is achieved where possible and the windmills are maintained in good active condition as community assets.</p>
<p>Objective 7: For any windmills remaining in KCC ownership and management, follow a management approach so that:</p> <ul style="list-style-type: none"> i) Mills capable of milling flour (Drapers Mill, Margate, and Cranbrook Mill) remain able to do so. ii) The weatherproofing programme will be undertaken as needed on a rolling cycle. iii) Static mills will be returned to visual completeness subject to funding iv) Static mills will be made active wherever possible [also SA3]. 	<p>To conserve heritage assets in line with statutory requirements and good practice and manage them in most cost-effective way.</p>	<p>Ongoing</p>	<p>Heritage assets conserved and managed effectively.</p>

Strategic Aim 2 continued

What (objective)	Why (rationale)	By when (timescale)	What will success look like?
Objective 8. KCC's relationship with the windmill volunteer groups will be strengthened and the groups and other interested parties will be supported through the divestment process. [also SA3].	Volunteer groups contribute to heritage asset management and community is involved.	Ongoing	Volunteer groups involved in day-to-day mill management and developing future approaches.
Objective 9. Assess options for the display and long-term storage of archaeological archives and ensure the KCC-held archives are placed in an appropriate repository [also SA3].	To conserve heritage and environmental assets for the benefit of Kent residents. Appropriate management of heritage assets in line with NPPF.	Catalogue HS1 archive by December 2026. Prepare project plan for deposition and where appropriate display of KCC held archaeological archives by March 2027. Agree plan for Kent wide approach to deposition and display of archaeological archives by 2027.	KCC held archaeological archives deposited in secure repository by 2028.
Objective 10. Promote understanding and enjoyment of Kent's heritage using multiple media channels including digital media (the online HER, KCC website and social media), print media (publications and press releases) and through direct experience (community archaeology) [also SA2].	Increase awareness and understanding of Kent's heritage and KCC's role in conserving it.	Continue to promote heritage through multiple media channels; see also Objective 11 on the following page.	Increased awareness of heritage and KCC's role.

Strategic Aim 3

Increase awareness, knowledge and understanding of Kent’s rich heritage and increase involvement in heritage activities amongst its local communities.

What (objective)	Why (rationale)	By when (timescale)	What will success look like?
Objective 11. Develop a Community Engagement strategy and Communication Plan for the Heritage Conservation team [also SA2].	Increase awareness and understanding of Kent’s heritage and KCC’s role in conserving it.	Draft Community Engagement strategy and Communication Plan by December 2026	Communication strategy prepared and agreed.
Objective 12. Agree and adopt a policy that metal detecting and ‘by eye’ searches will only be undertaken on KCC owned land as part of an approved project [also SA2].	Provide clarity for searchers and KCC officers.	Stakeholder consultation undertaken and policy agreed by December 2026.	Clarification of policy and policy acted upon.
Objective 13. Agree and adopt a policy that KCC should retain ownership of all finds found on its property in perpetuity unless special exemptions apply [also SA2].	To conserve heritage assets for the benefit of Kent residents.	To be included in consultation and policy for Objective 12.	Heritage assets conserved.
Objective 14. Agree and adopt a policy (to be discussed with river and coastal authorities) that magnet fishing will not be allowed on KCC owned land [also SA2].	Conservation of heritage assets and Health & Safety considerations.	To be included in policy for Objective 12.	Heritage assets are conserved and public safety maintained.
Objective 15. KCC will work with coastal landowners to consider the benefits of a permit system for metal detecting in coastal and riverine foreshore areas.	Provide clarity for searchers and KCC officers.	Report prepared by December 2026.	Public consultation undertaken and policy agreed.
Objective 16. Explore developing a county level Kent Heritage Strategy to assist district authorities who could draw upon it as a framework for their own strategies as many issues and themes are commonly held [also SA1].	Requirement of NPPF and other policy (see 1.7-1.9) To ensure a strategic approach to heritage conservation across the county.	Develop project outline & seek resources by December 2026.	Project outline prepared and decision taken as to whether to proceed.

Strategic Aim 4

Work towards the service becoming more financially self-sustaining.

What (objective)	Why (rationale)	By when (timescale)	What will success look like?
Objective 17. Develop a cost recovery strategy for providing archaeological advice to developers for major planning applications and NSIP proposals [also SA1].	To improve sustainability of service and provide stability in capacity to meet service.	Develop draft strategy and undertake stakeholder consultation by December 2026.	Heritage Conservation service is more financially sustainable and stability of capacity improved.
Objective 18. Develop a cost recovery strategy for the creation of HER records as a result of development related fieldwork [also SA1, SA3].	To improve sustainability of service and provide stability in capacity to meet service commitments.	Develop draft strategy and undertake stakeholder consultation by December 2026.	Heritage Conservation service is more sustainable and Historic Environment Record backlog is reduced.
Objective 19. Determine and secure a funded approach to built historic environment advice [also SA1, SA2].	To improve sustainability of service and provide stability in capacity to meet service commitments.	Develop draft strategy by December 2026.	Heritage Conservation service is more sustainable.
Objective 20. Develop a strategy to systematically review and monitor progress towards greater financial sustainability [also SA1, SA2, SA3].	To assess effectiveness of cost recovery strategy.	Review strategy by December 2027	Effectiveness of cost recovery strategy is assessed and improvements made as required.

Strategic Aim 5

Contribute to KCC’s action to address climate change and adaptation.

What (objective)	Why (rationale)	By when (timescale)	What will success look like?
Objective 21. Work with partners to develop approaches that improve the resilience of heritage assets to climate-related impacts.	To help mitigate the effects of climate change.	Prepare draft strategy and action plan by 2027.	Strategy prepared actions agreed.
Objective 22. Assess, with partners, the vulnerability of Kent’s historic environment to climate change and create an adaptation framework to guide future conservation efforts.	To provide information to help guide decision-making.	Prepare, subject to funding, draft assessment by 2027.	Assessment prepared.

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Appendix 2 Background information to Executive decision 24/000068 – windmill divestment

- 1.1 KCC owns eight historic windmills having saved them from destruction in the 1970s and 1980s as owner of last resort. Financial responsibility for the maintenance and management of these eight windmill properties rests solely with KCC, apart from small-scale investment by the mill groups. The annual cost to the Council of maintaining the windmills portfolio in a safe structural and mechanical condition is considerable. Management of the mills is only possible, however, through the work of the Friends volunteer groups who carry out small scale maintenance tasks, operate the mills and open them to the public.
- 1.2 A strategic review of KCC's windmill assets was undertaken in 2022-23 (as part of a wider review of KCC's assets) by a task and finish group comprising officers from Infrastructure, Environment and Circular Economy and Finance (see report for ETCC on 15 11 2023). Five key considerations were evaluated:
 - A) The heritage value of the windmills,
 - B) Current arrangements for managing the windmills,
 - C) The potential for divestment of the windmills,
 - D) The potential for alternative uses for the windmills,
 - E) KCC's current financial situation.
- 1.3 Divestment of each of the eight sites was identified as the most financially advantageous option for KCC. This could allow KCC to save the annual costs associated with maintaining the buildings in a safe and accessible condition.
- 1.4 As divestment of the mills would be a change to the policy set out in the adopted Heritage Conservation Strategy, a public consultation was undertaken which ran for nine weeks from 28 November 2023 until 29 January 2024. The consultation invited residents, windmill and heritage volunteer groups, and other interested parties to provide views on the proposal to seek alternative arrangements for the ownership of these windmills.
- 1.5 The consultation, which received 2,330 responses, showed minimal public support for divestment of the mills - further details on the consultation and its findings can be found at <https://letstalk.kent.gov.uk/windmills-consultation>
- 1.6 The consultation results were considered alongside an options appraisal of:
 - Do nothing - rejected because it did not address the cost burden to KCC
 - Retain the windmills but reduce the financial input - rejected because options for income generation were limited.
 - KCC divests itself of the windmills – determined as the recommended option, owing to the reduction of future capital expenditure – then estimated at a total of £657,700 minimum for ongoing maintenance and minor repairs. over a five-year period from 2024 to 2029. In the long term if all the windmills were divested there would be savings to the revenue budget of between approximately £124,000 and £220,000 per annum

- 1.7 Consequently, on 2nd August 2024 the Cabinet Member for Environment took the decision that 1) KCC should seek to divest itself of the windmills it currently owns by a method that ensures that the windmills have a sustainable future in which they are appropriately cared for and maintained as community assets and 2) the Heritage Conservation Strategy is updated to reflect this. The decision was taken on the basis that it would allow alternative ownership arrangements for the eight historic windmills which KCC owns to be explored, with the aim of reducing KCC's long term financial obligations. It was noted that the council is sensitive to the importance that communities and volunteers place on windmills and wish to work with those who are committed to them to secure their future. More detail on the decision is available from <https://democracy.kent.gov.uk/ieDecisionDetails.aspx?Id=2892>
- 1.8 Officers have been exploring the most effective way to divest, based on the local circumstances of each windmill, and mitigating as far as possible the concerns raised during the consultation. Considering the unique character of each windmill, as detailed in Table 1 below, it is expected that each mill will require its own tailored divestment pathway. A fair and open process for divestment will be agreed; the method could potentially include freehold divestment, divestment through long lease or other appropriate means to achieve the executive decision. Interest will be invited from any suitable party, encouraging proposals for long-term stewardship and community benefit to safeguard the windmills' future. Initial meetings have been held with the volunteer mill groups, tenants and significant interested parties. Future management of the mills could involve the establishment of one or more charitable trusts; however, this is dependent on proposals received and the evaluation process to ensure any proposals for sustainable

Table 1 – Characteristics of the windmills

Windmill	999-year lease/ restrictive covenant	Within another property or surrounded by another property	Mill building only in freehold	Vehicle access [*restricted]	Mill volunteer group
Chillenden	No	Yes	No	Yes	Yes
Davison's, Stelling Minnis	No	No	No	Yes	Yes
Drapers, Margate	No	No	No	Yes	Yes
Herne	No	No	No	Yes*	Yes
Meopham	Yes	Yes	Yes	Yes*	Yes

Stocks, Wittersham	Yes	Yes	Yes	No	Yes
Union Mill, Cranbrook	No	Yes	Yes	Yes*	Yes
West Kingsdown	Yes	Yes	Yes	Yes*	No

1.9 Work will continue to identify the most effective way to divest, based on the local circumstances of each windmill, and mitigating as far as possible the concerns raised during the consultation. Support will be provided to the volunteer mill groups, tenants and other interested parties. A divestment plan will be brought back to Environment and Transport Cabinet Committee for information and discussion.

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From: Mr John Moreland, Chairman of the Water Supply Short Focused Inquiry (SFI)

To: Scrutiny Committee – 13 May 2026

Subject: Short Focused Inquiry – Water Supply

Classification: Unrestricted

1. Introduction

- a) County Council, at its meeting on 18 December 2025, called for Scrutiny Committee to establish a Short Focused Inquiry (SFI) following a major water supply failure in Tunbridge Wells and surrounding areas. Scrutiny Committee subsequently agreed to establish the SFI on 22 January 2026.
- b) The purpose of the SFI was to examine the causes, handling and impacts of the December 2025 water supply failures affecting Tunbridge Wells and the surrounding areas along with subsequent Kent-wide supply interruptions in January 2026.
- c) Oral evidence was gathered from the following areas across KCC:
 - Education
 - Adult Social Care
 - Resilience and Emergency Planning
 - Economy
 - Flood and Water Management
 - Strategic Planning and Infrastructure
 - Public Health
 - Marketing and Resident Experience
- d) Oral evidence was gathered from the following external organisations:
 - National Farmers Union
 - DryWells Action
 - Staplehurst Emergency Planning Group
 - South East Water
 - Affinity Water
 - Small group of Parish Councils
- e) In addition, the Committee received written evidence from the following:
 - Tunbridge Wells Borough Council
 - Swale Borough Council
 - Head of Kent Resilience Team
 - Several Parish Councils by way of questionnaire
- f) The recommendations and findings of the Inquiry are set out in the report contained in Appendix 1.

2. Next Steps

- a) Once formally considered by the Scrutiny Committee, the report and recommendations should be submitted to the Leader and relevant Cabinet Members along with a request for a formal response to the recommendations within two months.

3. Recommendation:

That the Scrutiny Committee note the Short Focused Inquiry Report into Water Supply, and confirm that it be submitted to the Leader and relevant Cabinet Members along with a request for a formal response to the recommendations within two months.

4. Appendices

Appendix 1 - Water Supply Short Focused Inquiry Report

5. Background Documents

None.

6. Contact details

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Kent County Council

Water Supply Short Focused Inquiry (SFI) Report



May 2026

1. Introduction and Scope

1.1. Introduction

- 1.1.1 A significant water supply incident affected the South East Water infrastructure in Tunbridge Wells and surrounding areas in late November and December 2025. The incident involved water quality concerns, resulting in a loss of supply for some customers and the issuing of a Boil Water Notice once supply was partially restored. The incident had a wide impact on local services and communities, with issues continuing as water quality restrictions and recovery measures were put in place.
- 1.1.2 Following this incident, County Council, at its [meeting on 18 December 2025](#), called for Scrutiny Committee to establish a Short Focused Inquiry (SFI) following a major water supply failure in Tunbridge Wells and surrounding areas. Scrutiny Committee subsequently agreed to establish the SFI on [22 January 2026](#).
- 1.1.3 Further water supply disruptions occurred in January 2026, affecting South East Water and Southern Water infrastructure. These disruptions extended over approximately two weeks and involved a broader geographical area than the December incident, affecting multiple districts across the county. The water supply failures placed pressure on existing operational, service continuity and coordination arrangements across a broad range of sectors, including education, adult social care, businesses, agriculture and rural communities. It was agreed at the Scrutiny Committee meeting on 22 January that these disruptions would also be included in the Inquiry.
- 1.1.4 The aim of the Inquiry was to consider a range of evidence from different sectors and organisations to examine the handling and impacts of the water supply failures that occurred and to develop recommendations to Kent County Council's Executive to ultimately improve emergency resilience should similar incidents occur in the future. The recommendations include actions within Kent County Council's control, alongside recommendations that the Executive may wish to pursue with external organisations.
- 1.1.5 The SFI undertook a series of informal evidence gathering sessions during March and April 2026, to consider the impacts of the incidents, the effectiveness of response arrangements, and the wider system implications arising from the disruptions. It assessed the adequacy of water companies' preparedness and operational response and identified areas that could strengthen local and regional resilience, customer protection, and accountability.
- 1.1.6 The Inquiry Group would like to record its thanks to everyone involved in the evidence gathering for their time and commitment in contributing to this Inquiry.

1.2. Inquiry Membership

1.2.1. The membership of the inquiry consisted of the following KCC Members:

Mr John Moreland (Liberal Democrat Group) - Chairman
Mr Wayne Chapman (Reform UK Group)
Mr Spencer Dixon (Reform UK Group)
Ms Sarah Emberson (Reform UK Group)
Mr Jamie Henderson (Reform UK Group)
Mr Stuart Jeffery / Mr Stuart Heaver (Green Group)
Mr Thomas Mallon (Reform UK Group)
Mr Mark Mulvihill (Reform UK Group)
Ms Claudine Russell (Conservative Group)
Mr Geoff Samme (Liberal Democrat Group)
Mr Paul Thomas (Restore Britain Group)

1.2.2 Mr Heaver replaced Mr Jeffery as the Green Group Member towards the end of the Inquiry.

1.2.3 The membership of the Inquiry included Deputy Cabinet Members, this was considered appropriate given that its primary focus was on how Kent County Council and partner agencies responded to the water incidents. During the course of the Inquiry, Mr Henderson was appointed Cabinet Member for Environment, Coastal Regeneration and Public Health. Following his appointment, he did not attend any further evidence-gathering sessions and made no contribution to the final report.

1.3. Scope

1.3.1. The scope of the inquiry was:

1. To review the lessons arising from previous water outages in Kent (2022 - 2025), and whether these have been adopted by the water industry.
2. To make recommendations on how KCC can support the water industry in Kent to improve their resilience planning and incident response processes, in the event of similar incidents in the future. This will consider KCC's role as a statutory consultee on planning applications and include the effect planning and housing growth has on water infrastructure.
3. To identify measures to improve resilience in the water supply infrastructure within Kent, and how the water industry can embed this learning.
4. Review communication channels between water companies and KCC Members.
5. To identify improvements to water infrastructure / processes relating to KCC services such as schools and care homes.
6. Provision for farms / livestock and the equity between urban and rural communities.

2. Background and Context

2.1. Definitions

- 2.1.1. **Category 1 Responding Agency** - An organisation defined under the Civil Contingencies Act 2004 as having primary responsibility for emergency preparedness and response, and subject to the full range of civil protection duties under the Act. Kent County Council (KCC) is a Category 1 responder, alongside police, fire, and NHS bodies.
- 2.1.2. **Category 2 Responding Agency** - An organisation defined under the Civil Contingencies Act 2004 as a *co-operating responder* that supports emergency preparedness and response but does not lead it. Category 2 responders are required to co-operate with Category 1 responders, share information, and assist with planning where their services are affected. Water companies are Category 2 responders.
- 2.1.3. **Local Resilience Forum (LRF)** - a multi-agency partnership, established under the Civil Contingencies Act 2004, that brings together organisations and responsibilities for emergency preparedness, response, and recovery within a defined geographic area (linked to police force areas) in England and Wales.
- 2.1.4. **Kent and Medway Resilience Forum (KMRF)** - The LRF for Kent and Medway through which Category 1 and 2 responders coordinate emergency planning, response, and recovery across Kent and Medway.
- 2.1.5. **KMRF Water Supply Disruption Plan** - sets out the multi-agency response for Kent which is designed to enable responding agencies to support people and communities during periods of water supply disruption.
- 2.1.6. **Resilience & Emergency Planning Service** - KCC service responsible for ensuring the Council effectively prepares & plans for, responds to, and recovers from incidents (including water outages) affecting Kent and the Council. It does so by working with colleagues across the Council, and with partner agencies in the KMRF.
- 2.1.7. **Strategic Coordinating Group (SCG) - Gold Command** - A senior, strategic multi-agency command group convened during serious or widespread incidents.
- 2.1.8. **Tactical Coordinating Group (TCG) - Silver Command** - A tactical level multi-agency group responsible for implementing SCG strategy and coordinating operational responses on the ground. The TCG reports to the SCG.
- 2.1.9. **Vulnerable People & Communities Cell (VPCC)** - A command cell established to identify, support, and safeguard vulnerable residents during incidents. The VPCC reports to the TCG.

- 2.1.10. **Media and Communications Cell** - A dedicated multi-agency coordination group responsible for public messaging, media handling, and internal communications during an incident. The cell reports to the SCG and members attend TCG.
- 2.1.11. **Duty Emergency Planning Officer (DEPO)** - The on-call KCC officer who acts at the point of contact for alerting KCC to an incident. The DEPO is responsible for activating KCC resources, alerting local authorities and the voluntary sector, and representing KCC in at initial Tactical Coordination Group meetings.
- 2.1.12. **Extraordinary Cross Directorate Resilience Forum (Ex-CDRF)** - An internal KCC coordination forum convened during incidents to ensure an effective KCC response, cross directorate awareness, decision-making, and resource allocation.
- 2.1.13. **Priority Services Register (PSR)** - The Priority Services Register (PSR) is a free UK wide service which provides extra advice and support, including when there's an interruption to electricity, gas or water supplies. It helps utility companies to look after customers who have extra communication, access or safety needs for everyday and during supply disruptions.
- 2.1.14. **Ofwat** - Independent economic regulator for the water and wastewater industry in England and Wales, responsible for protecting customers by overseeing prices, performance, investment and long-term resilience of water companies.
- 2.1.15. **Drinking Water Inspectorate (DWI)** - Government body responsible for regulating and ensuring the quality and safety of public drinking water in England and Wales, by independently monitoring water companies' compliance with drinking water standards and taking enforcement action where necessary.

2.2 Water Services in Kent

- 2.2.1 Water services in Kent, and across England, are delivered through a nationally regulated system of geographically appointed monopoly providers, in which clean drinking water and wastewater services are often provided by separate companies which are statutorily appointed water or sewerage undertakers under the Water Industry Act 1991. All water companies are regulated by Ofwat, which oversees pricing, investment, service standards and long-term resilience to ensure consistency, affordability and the protection of customers and the environment nationwide.
- 2.2.2 The principal provider of clean drinking water across most of Kent is South East Water. The company supplies water to a range of urban and rural areas,

including Maidstone, Canterbury, Ashford, Sevenoaks, Tunbridge Wells, Dover, Folkestone and the Medway towns. In addition to South East Water, a limited number of properties in Kent are served by other water supply companies due to historic infrastructure arrangements and geographic boundary locations including Affinity Water (south east Kent), SES Water (small area of west Kent including Edenbridge), and Thames Water (small area of north west Kent). Responsibility for wastewater collection and sewerage infrastructure across almost the entirety of Kent lies with Southern Water, but who also provide drinking water to residents.

2.3 Overview of Incidents in November / December 2025 and January 2026

- 2.3.1 On Saturday 29 November 2025, a significant outage occurred at South East Water's Pembury Water Treatment Works due to a failure in the water-treatment process that was eventually traced to a problem with a batch of coagulant chemicals, resulting in a complete shutdown of the Pembury Water Treatment Works and the loss of water supply across the Tunbridge Wells area. At the outset, South East Water anticipated that the issue would be resolved the same day. However, as the outage continued into a second day, its scale and duration prompted the establishment of a multi-agency Tactical Coordinating Group (TCG) to manage the developing situation and coordinate partner agency activity in response to the ongoing loss of supply.
- 2.3.2 Approximately 25,000 properties were affected by the outage. These included a wide range of critical infrastructure and community facilities, such as the local hospital, care homes, GP surgeries, dental practices, schools and early years settings, alongside businesses and residential properties. The breadth and nature of those impacted highlighted the potential risks to public health, vulnerable individuals and essential services, reinforcing the need for a coordinated multi-agency response.
- 2.3.3 By the morning of 2 December, around 10,000 properties had been restored to supply and South East Water had set out plans to resupply the remaining affected areas. However, during the TCG meeting held that day, South East Water reported a further issue at the Pembury Treatment Works which necessitated the shutdown of output once again. In light of this escalation and the continued uncertainty around restoration timescales, Tunbridge Wells Borough Council and Kent County Council jointly took the decision to declare a Major Incident.
- 2.3.4 A number of Kent County Council services were directly involved in the response, including Resilience and Emergency Planning, Public Health, Highways, Health and Safety, Infrastructure, and Marketing & Resident Experience.
- 2.3.5 Following the declaration, formal strategic and tactical coordination arrangements were implemented, with both Councils sharing responsibility for

chairing the Strategic and Tactical Coordinating Group meetings. In addition, two specialist cells were established and chaired by Kent County Council: a Media and Communications Cell to manage public information and messaging, and a Vulnerable People and Communities Cell to identify and support those most at risk as a result of the outage.

- 2.3.6 On 3 December, South East Water was able to begin resupplying the network, although this was accompanied by the issue of a Boil Water Notice. While running water was restored, the notice meant that continued coordination by Kent and Medway Resilience Forum partners remained essential. This included ensuring residents, businesses and critical infrastructure had access to bottled and tankered water; delivering clear and consistent public health messaging; managing and mitigating impacts on schools, care homes and medical facilities; and providing support to affected businesses.
- 2.3.7 Another incident occurred in January 2026 involving more widespread water supply disruptions. The most significant disruption occurred from around 10 January, when a combination of severe winter weather, freezing temperatures and power outages led to burst water mains, reduced treatment capacity and rapidly declining storage levels. This was exacerbated by the halting of bulk water transfers from the Southern Water network to South East Water due to infrastructure issues. As a result, water pressure fell significantly, leaving thousands of properties without supply or experiencing intermittent service across large parts of Kent, including Tunbridge Wells, Maidstone, Canterbury and Swale.
- 2.3.8 The Kent and Medway Resilience Forum collectively declared a Major Incident on 12 January 2026. This enabled enhanced emergency coordination to protect vulnerable residents and support critical infrastructure, including hospitals and care settings. Numerous schools across Kent were forced to close due to a lack of running water, and some healthcare providers cancelled appointments or moved to virtual delivery. Bottled water stations were established at multiple locations and tanker vehicles were deployed to maintain supplies to priority sites and support recovery of the network. Despite partial restoration, some areas continued to experience low pressure or repeated outages for more than a week.
- 2.3.9 These incidents attracted significant public, political and regulatory scrutiny. Ofwat and the Drinking Water Inspectorate initiated investigations into South East Water's operational resilience, incident management and customer support arrangements, with widespread calls for greater accountability and increased investment in infrastructure.

3. Evidence Gathering

3.1.1 The Inquiry undertook an intensive evidence gathering programme spanning five weeks, involving informal briefing sessions with a range of KCC Officers, key stakeholders and interested parties. The Inquiry also reviewed written information provided by external organisations and responses to a Parish Council questionnaire.

3.1.2 The Inquiry had access to background documents including:

- Notice of Ofwat's proposal to issue an enforcement order and impose a penalty on South East Water Limited
- KMRF - Water Supply Disruption Plan
- Emergency Planning for Schools in Kent 2026-2028
- KMRF Multi Agency Debrief Report – West Kent Water Disruption February 2025

3.2 Informal Briefing Sessions

Schools – Wednesday 18 March 2026

Led by KCC Officers in Education and Infrastructure

3.2.1 Schools reported a range of challenges arising from recent water supply disruptions, affecting their ability to operate safely and consistently. These included issues with the clarity and timeliness of information provided, uncertainty over the duration and extent of outages, and difficulties in planning mitigations such as the provision of bottled or tankered water. Concerns were also raised about inconsistent guidance and practices across schools, which caused confusion for parents and pupils, particularly where boil water notices were in place.

3.2.2 In addition, challenges were identified in relation to differences in site infrastructure, with some schools lacking on-site storage or contingency options, limiting their ability to remain open. The impact on vulnerable pupils, including those attending special schools, was highlighted as a key consideration, alongside the need for clearer communication, better preparedness and improved coordination to support decision-making during future incidents.

Adult Social Care – Tuesday 24 March 2026

Led by KCC Officers in Adult Social Care

3.2.3 Discussion centred on the limitations of the Priority Services Register (PSR), with significant gaps identified between registered data and actual vulnerability, requiring Adult Social Care, the NHS and voluntary groups to identify and support individuals during incidents. Members raised concerns about the accuracy, format and timeliness of data provided by water

companies, including delayed updates and overoptimistic restoration estimates, which hindered effective contingency planning. Challenges around bottled and grey water provision were also discussed, particularly the suitability of packaging, delivery failures, safeguarding risks and insufficient volumes for care settings.

- 3.2.4 The briefing further emphasised the need for stronger multi-agency coordination, earlier engagement with local voluntary organisations, and clearer best- and worst-case planning, all of which informed recommendations on data sharing, partnership working and engagement with water companies.

Resilience and Emergency Planning – Thursday 26 March

Led by KCC Officers in Infrastructure and Emergency Planning

- 3.2.5 The briefing drew attention to a series of interrelated failures in alerting, coordination and operational capacity that had a direct bearing on the Inquiry's recommendations. In a number of instances, notifications from water companies did not reach key responders, meaning the Council was required to step in and alert other responding agencies. Members noted that information shared during incidents was frequently delayed, inconsistent, or provided in formats that were difficult to use, slowing decision-making and the identification of vulnerable residents.

- 3.2.6 Issues with alternative water provision were explored in detail, including poorly sited bottled water stations, limited accessibility in rural areas, and the absence of a robust distribution model. Further concerns were raised about public communications that were overly optimistic and not aligned with operational reality, as well as the limited capacity of some partner organisations to sustain prolonged emergency responses. Ongoing infrastructure vulnerabilities and the reliance on inter-company bulk water transfers were also highlighted.

- 3.2.7 Together, these issues informed recommendations aimed at strengthening water company obligations, improving realistic scenario planning and communications, enhancing preparedness across partners, and ensuring sufficient capacity for large-scale, prolonged incidents.

Businesses and Farming – Monday 30 March 2026

Led by KCC Officers in Economy and attended by the National Farmers Union

- 3.2.8 Businesses and farming representatives outlined a range of challenges including poor and inconsistent communication from the water company, uncertainty over the duration and scope of outages, and limited business-specific guidance, particularly in relation to boil water notices and the safe operation of commercial equipment. Hospitality, retail and other water-dependent sectors were especially affected, with pre-Christmas timing exacerbating financial losses and disruption to trade.

- 3.2.9 In addition, challenges were highlighted around the suitability of mitigation measures, with bottled water provision insufficient for commercial and

agricultural needs, particularly in rural areas. The farming sector raised concerns regarding animal welfare, high daily water demand, and the lack of clarity around priority access for livestock businesses. Broader issues were also identified around fragmented communication channels for non-household customers, and the need for improved preparedness and long-term resilience planning, including clearer protocols, better data, and greater support for infrastructure solutions to reduce the impact of future incidents.

Flood / Water Management and Local Plans – Wednesday 1 April 2026
Led by KCC Officers in Strategic Planning and Water Management

- 3.2.10 The Inquiry received background information on how water supply, water efficiency and flood management is currently addressed through local plans, and the limited role of Kent County Council in influencing, rather than determining, planning policy. Concerns were raised about the lack of alignment between spatial planning and water resource management, including the fact that water companies are not statutory consultees and are not required to provide supply capacity assessments for major developments.
- 3.2.11 Members highlighted the resulting inconsistency across districts, the absence of mandatory consideration of water availability at application stage, and the limitations of planning tools. The proposed Strategic Development Strategy was identified as a potential opportunity to better align growth with infrastructure capacity, alongside the need for stronger national policy and statutory requirements to ensure future development is supported by sustainable and resilient water supply.

Parish and Town Councils – Wednesday 8 April 2026
Attended by representatives from interested Parish Councils

- 3.2.12 Parish and Town Council representatives reported widespread impacts from water supply failures, particularly in rural areas, including prolonged outages, low pressure and unsafe water requiring boil notices. Communication from water companies and local authorities was consistently described as poor or absent, with councils often relying on informal networks, social media and local knowledge to keep residents informed. Parish Councils outlined stepping in on a voluntary basis to support residents, including purchasing and distributing bottled water, coordinating welfare checks and setting up local distribution points, frequently without timely information or clear escalation routes.
- 3.2.13 Key issues raised included poor access to bottled water stations, lack of support for vulnerable residents and livestock owners, and inconsistent application of priority registers. Parish council representatives called for clearer and earlier communication, direct engagement with local councils, improved coordination between agencies, better use of local venues and volunteers, and stronger forward planning to improve the resilience and reliability of the water network and emergency response arrangements.

Public Health and Marketing and Resident Experience (MRX) – Friday 10 April

Led by KCC Officers in Public Health and MRX

- 3.2.14 Public Health and MRX highlighted serious weaknesses in the handling of recent water supply outages, particularly around protection of vulnerable residents and the quality of information provided. While Public Health intervention was triggered appropriately, concerns were raised about poor water company preparedness, unreliable data, limited engagement in multi-agency response structures and weaknesses in the Priority Services Register.
- 3.2.15 MRX reported significant communication failures, including reluctance to operate in emergency mode and inconsistent public messaging, leading to confusion and frustration. Recommendations focused on improved data sharing, clearer and consistent communications, stronger water company engagement during incidents, better identification of vulnerable residents, and more robust multi-agency planning to reduce reliance on reactive responses.

Community and Action Groups – Monday 13 April 2026

Attended by Dry Wells Action Group and Staplehurst Emergency Help Team

- 3.2.16 Community and action groups described repeated and prolonged water outages with significant impacts on residents, businesses and rural communities, and a strong sense that lessons were not being effectively learned. Local groups played a critical role during outages, establishing water distribution points, carrying out welfare checks and supporting areas well beyond their own communities, often filling gaps caused by delays or failures in official provision.
- 3.2.17 Members highlighted poor communication from the water company, including over-optimistic restoration times, conflicting information and a lack of clarity around bottled water use, which made planning and volunteer coordination difficult. Communities called for clear, pre-agreed emergency plans that activate immediately, fixed and accessible water distribution sites identified in advance, better use of local knowledge, and structured engagement with community groups, while stressing that voluntary support should complement, not replace, water company responsibilities.

Water Companies – Wednesday 15 April 2026

Attended by representatives from South East Water and Affinity Water

- 3.2.18 The water companies outlined the causes of the November / December 2025 and January 2026 incidents, the notification processes followed, and their internal incident management arrangements. It was acknowledged that prolonged incidents placed pressure on staffing and that informal engagement during the January outage contributed to uncertainty about when formal multi-agency arrangements were activated. Members raised concerns about the consistency and timeliness of information provided to partners, the

accuracy of restoration forecasts, and the impact this had on emergency planning and communication with residents.

3.2.19 Members also questioned how effectively vulnerable residents were identified and supported, the operation of Priority Services Registers, and how quickly urgent issues on the ground could be escalated and resolved. Concerns were raised about advance planning and communication for bottled water distribution sites, engagement with parish councils and community groups, and reliance on Local Resilience Forum structures to coordinate responses. Water companies described planned improvements, including dedicated senior incident rotas, clearer scenario planning, enhanced engagement with local partners, and further review of emergency response procedures. Further written information was subsequently provided following the briefing and this is outlined below at 3.3.11.

3.3 Written Information

3.3.1 The Inquiry also received additional written information from the following representatives:

[Head of Kent Resilience Team/Chair of the KMRF Lessons Identified and Lessons Learned Group](#)

3.3.2 There have been two formal KMRF debriefs relating to water disruption. Whilst the KMRF can share lessons and request feedback it cannot compel water companies to attend debriefs or act on recommendations. Although the Civil Contingencies Act requires water undertakers, as Category 2 responders, to cooperate and share information, there are no enforcement powers available to the KMRF.

3.3.3 Lessons from the [February 2025 debrief](#) following disruption in Tonbridge and surrounding areas focused primarily on improving planning and engagement. These included reviewing and updating the KMRF Water Disruption Plan, particularly around activation triggers and water distribution arrangements, and encouraging greater attendance by water company representatives at multi-agency planning meetings. Whilst the Water Disruption Plan was updated and consulted on, the November / December 2025 and January 2026 incidents showed that ongoing issues remain.

3.3.4 The debrief held in February 2026, following the Tunbridge Wells incidents in December 2025 and January 2026, identified further challenges. These included the need for water suppliers to provide more complete and realistic information at the outset of incidents, particularly around best- and worst-case durations, as outages have frequently exceeded even the stated worst-case scenarios. Additional lessons related to the identification and management of alternative water distribution sites, improving flexibility for rural communities, and building on positive practice in supplying water directly to vulnerable residents. The statement also notes learning from community-led responses

where residents organised their own water distribution when formal support was delayed.

- 3.3.5 Lessons from the February 2026 debrief have yet to be formally risk-assessed and circulated. Both South East Water and Southern Water attended the debriefs and contributed positively, but the extent to which lessons have been fully embedded is not yet clear. A task-and-finish group meeting scheduled in May 2026 will bring water providers together to review collective learning from recent incidents and update the KMRF Water Disruption Plan. Until this work is completed and the revised plan is tested, it remains difficult to assess the level of sustained engagement and learning by water companies.

Swale Borough Council

- 3.3.6 The incident caused significant disruption and uncertainty for residents, businesses, and council partners in Swale due to inconsistent and delayed information from the water company. Initially, it was unclear whether Swale was affected at all, making it difficult for the Council to offer reassurance or practical advice. Residents experienced outages that were often only confirmed retrospectively, while limited and ineffective public communications heightened community frustration and anxiety. Vulnerable residents, including those on the Priority Services Register, received bottled water deliveries without clear explanations, raising concerns about coordination and awareness of available support. As a result, council officers and partners were frequently forced into a reactive response rather than being able to plan proactively.
- 3.3.7 The incident also highlighted clear differences between rural and urban areas in terms of impact and response. Rural communities were harder to identify and support quickly due to the lack of early, accurate postcode-level data, whereas urban areas were generally prioritised in communications and initial response efforts. Swale was sometimes overlooked in favour of neighbouring boroughs considered more severely affected. Confusion was further compounded by the absence of clear mapping of pumping stations, reservoirs, and supply areas, particularly where rural communities were served by infrastructure located outside their administrative boundaries.

Tunbridge Wells Borough Council

- 3.3.8 Tunbridge Wells Borough Council reported that older and vulnerable residents, including those on the Priority Services Register, were particularly affected. While bottled water deliveries were made, delays, missed deliveries and practical accessibility issues reduced their effectiveness, and limited walk-up distribution sites disadvantaged residents without access to a car.
- 3.3.9 The disruption had serious consequences for public services, businesses and the local economy. Several schools were forced to close due to the lack of water for hygiene and sanitation, with confusion over postcode coverage leading to precautionary closures at a critical time in the academic year.

Health and care facilities were prioritised but still faced operational risks, including delayed provision of alternative water supplies to care homes, dentists and a dialysis centre, requiring additional multi-agency intervention. Local businesses, particularly small and independent traders concentrated in the town centre, were significantly impacted. Many were without water for around six days and without potable water for approximately two weeks, with hospitality venues required to close entirely. Indicative evidence suggests borough-wide economic losses in the low tens of millions of pounds, with compensation widely regarded as inadequate relative to losses incurred.

3.3.10 The incident also placed sustained pressure on council resources over an extended period. Council officers supported strategic and tactical coordination arrangements, managed environmental health issues, operated a bottled water station, provided public toilet facilities, supported schools and care settings, and delivered extensive public communications. Significant senior officer time and unplanned costs were incurred across council services and partner organisations. Although the incident was predominantly urban in nature, the density of the population, concentration of businesses and traffic congestion amplified impacts across Royal Tunbridge Wells.

South East Water – Response provided on 20 April 2026

3.3.11 Following the Informal Briefing Session on Wednesday 15 April, South East Water provided written information in response to questions asked by the Inquiry. In this it outlined its approach to incident management and communications during the recent outages, noting that regular updates were issued to MPs and councillors throughout the incident. An independent incident review has since identified opportunities to improve communications during future events. The company acknowledged that there were isolated issues relating to doorstep water deliveries, confirming that appropriate action was taken where processes were not followed. While contractual arrangements require third-party delivery partners to receive site-specific and operational briefings, South East Water confirmed that these partners are not currently trained in recognising vulnerability or medical needs. The company also confirmed awareness of voluntary sector support through Local Resilience Forum (LRF) arrangements, with voluntary organisations providing assistance during the incidents.

3.3.12 In response to concerns about resilience and emergency response capacity, South East Water stated that it operates a fully staffed 24/7 incident management rota, field response teams and a continuously monitored central control room. The company recognised the need for stronger external engagement and is developing a new role within its incident management structure to improve liaison with LRF partners. Issues with communication affecting non-household customers supplied via Castle Water were attributed to an internal communication breakdown, despite existing processes and dedicated support channels. South East Water confirmed that it does not currently undertake full condition assessments of all treatment works but instead relies on performance and failure monitoring, with Hazard Reviews now being introduced across all sites under a Drinking Water Inspectorate

legal requirement. Seven treatment works in Kent, including Pembury, are subject to regulatory legal instruments.

3.3.13 South East Water set out its current emergency water provision arrangements for a range of sectors, prioritising hospitals, care homes, schools and prisons through tankering and bottled water, in line with regional guidance. Some sectors, such as GP practices, dentists and food processing facilities, are not currently classified as vulnerable sites, although contingency arrangements are under review. The company confirmed that there is no mandated minimum treated-water storage resilience standard, something it has raised with regulators. On longer-term resilience, South East Water confirmed that the Broad Oak Reservoir is fully funded, currently in the design phase, and expected to be operational by 2035. Interim measures include significant investment between 2025 and 2030, upgrades at key Kent treatment works, increased alternative water capability, expanded staffing and the creation of a dedicated maintenance team.

3.3.14 Regarding the specific failure at Pembury Treatment Works, South East Water confirmed that a full review is underway at all sites using coagulant chemicals, with completion due by mid-May 2026. Any issues identified will be progressed through its Incident Recovery Action Plan, with funding requests raised where necessary. Additional online monitoring for coagulant control has already been installed at Pembury as part of measures intended to prevent a recurrence of the incident.

3.4 Parish Council Questionnaire

3.4.1 During the course of the Inquiry a questionnaire was sent to Parish and Town Councils in Kent asking for their views in relation to their experiences during the failures. **A summary of responses received is set out in Appendix 1.** 53 Parish and Town Councils completed the questionnaire, of which 29 confirmed they were affected by a water supply failure in December 2025 and January 2026. Following this and as referred to above, interested Parish Councils were invited to meet with the Inquiry to discuss the issues further on 8 April.

3.4.2 Responses demonstrated that water supply failures were recurrent and, in some cases, prolonged, with significant impacts on residents, local services and businesses. Many communities experienced complete loss of supply, intermittent pressure, boil water notices and poor-quality water, often over several days and with some areas experiencing issues regularly during 2025. These incidents affected essential local facilities, including schools, GP surgeries and businesses, and were seen by respondents as symptomatic of limited infrastructure resilience rather than isolated events.

3.4.3 Communication failures were identified as the most significant concern. The majority of Parish and Town Councils reported poor or non-existent communication from South East Water and minimal contact from Kent County Council, often learning of outages through residents, councillors or social media. As a result, parish councils frequently became the primary source of

information for their communities, creating challenges for elderly, vulnerable and digitally excluded residents.

- 3.4.4 In the absence of effective coordination and support, Parish and Town Councils and volunteers stepped in to provide local assistance, including distributing bottled water, establishing ad hoc water stations and supporting vulnerable residents. Significant difficulties were reported with access to official water distribution points, particularly in rural areas. Overall, respondents expressed low confidence that lessons have been learned and emphasised the need for earlier notification, clearer roles, better coordination and sustained investment to improve resilience and prevent recurrence.

4. Key Issues and Recommendations

- 4.1.1 Evidence gathered throughout the Inquiry demonstrated that the water supply failures experienced across Kent during winter 2025 / 26 were not isolated operational incidents. Systemic issues were identified across communication, vulnerability identification, emergency logistics, rural and agricultural provision, leadership arrangements, community engagement, sector specific resilience, spatial planning alignment and accountability. Communication failures delayed escalation decisions, increasing pressure on vulnerable residents, schools and rural communities, while data gaps resulted in greater reliance on voluntary action, raising concerns around equity and consistency. Long standing infrastructure constraints further increased the likelihood that localised incidents escalated into multi day events. Taken together, these factors explain the scale and severity of the impacts experienced and reinforce the need for coordinated, system wide reform rather than isolated or single issue responses.
- 4.1.2 The following recommendations have been developed with due regard to the investigations being undertaken separately by the Kent and Medway Resilience Forum.

4.2 Communication, Information and Public Messaging

Communication from South East Water

- 4.2.1 Communication from South East Water was widely viewed as inadequate by stakeholders involved in the Inquiry. Concerns were raised about delays in communication, inconsistencies in messaging, and the repeated revision of information, particularly during the early stages of the outages when timely clarity was most critical.
- 4.2.2 Conflicting evidence has been provided to the Inquiry regarding whether South East Water followed the agreed communication protocols at the outset of the incidents. South East Water reported that it complied with established arrangements and engaged appropriately with the Local Resilience Forum. However, the Kent and Medway Resilience Forum reported that this did not occur. Local Authority representatives described limited engagement through expected channels and a lack of timely operational information, contributing to uncertainty about the status, scale and likely duration of the incidents.
- 4.2.3. This lack of clarity was further compounded by apparent confusion regarding communication routes. South East Water stated that it engaged with the Local Resilience Forum and that information was disseminated through this forum. In contrast, Local Authorities reported that communication was not occurring through other expected channels, significantly limiting their ability to plan and coordinate effective responses. Although South East Water engaged with the LRF and multi- agency cells, engagements with some specific cells, such as the Vulnerable Communities Cell, was limited and could have been improved.

4.2.4 South East Water acknowledged during the Inquiry that the use of over-optimistic restoration timescales contributed to additional disruption to emergency responses and a loss of public trust. While initially reluctant to commit to the routine provision of explicit best-case and worst-case forecasts, the company accepted that doing so would better support Local Authority emergency planning and agreed this was an area requiring improvement.

4.2.5 More broadly, despite South East Water's view that it communicated effectively through its established channels, all stakeholder groups represented in the Inquiry reported a lack of clear, timely and usable communication. The Inquiry therefore concluded that South East Water's communication arrangements were not as effective in practice as the company considered them to be.

Communication from Kent County Council

4.2.6 Stakeholders also reported dissatisfaction with communication from Kent County Council and partner Local Authorities. While internal communication between officers was generally described as effective, dissemination of information to external stakeholders was felt to be insufficient during the incidents. That said, existing incident response procedures allocate the responsibility for communicating with parish / town councils and local community groups to borough / district councils, with no requirement for Kent County Council to duplicate this work.

4.2.7 Concern was expressed regarding KCC assuming greater responsibility for public-facing communication in future incidents. This was attributed to reliance on information supplied by the utility company and concerns regarding potential reputational or legal risk should information later prove inaccurate, incomplete or become outdated.

4.2.8 Nevertheless, the Inquiry noted that KCC is a large organisation with established communication networks and significant convening power. While recognising the limitations faced by the Local Authority where information is controlled by a third-party utility, stakeholders nonetheless expected clearer, more visible and more consistent communication from KCC during the outages.

Information Sharing and Multi-Agency Coordination

4.2.9 Beyond organisational communication, the Inquiry identified wider weaknesses in information sharing and coordination. Information relating to affected areas, restoration timescales and operational plans was not consistently available at the pace or in formats required to support rapid and effective decision-making.

4.2.10 Variability in data quality and messaging created challenges for coordinating responses, planning mitigations and providing clear, consistent information to

residents, service users and stakeholders. This affected schools, care providers, businesses and community organisations alike.

4.2.11 The Inquiry identified a clear misalignment between the utility company's view that engagement with the Local Resilience Forum was sufficient, and the Local Authorities' experience that this did not meet their operational needs.

Recommendation 1:

KCC should:

- a) Review multi-agency provision for communicating with Parish Councils and local communities and identify where KCC can support lower tier authorities in engaging with these groups.**
- b) Ensure multi-agency communications are reflected in internal KCC crisis communications plans.**
- c) Develop clear communication channels for direct and rapid communication with KCC Members.**
- d) Recommend that water companies develop a centralised communication system for businesses and farmers.**
- e) Recommend that water companies use consistent language across their communication channels and provide best and worst-case scenarios at the outset of an incident.**
- f) Request that water companies commit to proactive and consistent engagement with local authorities during a crisis including, in particular, with any cells established by the KMRF, rather than engaging with the LRF alone.**

4.3 Identification and Support of Vulnerable Residents

4.3.1 Evidence consistently demonstrated that existing approaches to identifying vulnerability were insufficient for large-scale, prolonged outages. Reliance on self-registration through the utility companies' Priority Services Register meant that many residents known to statutory or voluntary services were not visible to water companies at critical points. Vulnerability also evolved during incidents, with residents becoming at risk over time due to declining health, exhaustion of coping mechanisms, or changing caring responsibilities.

4.3.2 The Inquiry heard that voluntary and community organisations often identified unmet need earlier than formal systems, yet intelligence sharing was ad hoc and reactive. This resulted in parallel processes, inefficiencies, and an increased risk of residents falling through gaps in provision. The evidence

supports the need for dynamic, multi-agency vulnerability frameworks rather than static registers held by individual organisations.

Recommendation 2:

KCC should:

- a) **Recommend that water companies improve Priority Services Register arrangements to enable simpler third-party referrals.**
- b) **Recommend that water companies establish reliable data-sharing mechanisms with responding agencies during incidents. This would assist with identifying developing vulnerability during an incident.**
- c) **Recommend that water companies ensure appropriate staff receive training on vulnerability, safeguarding and accessibility, and that alternative water provision is appropriate for education, care, and health settings.**

4.3 Emergency Water Distribution and Alternative Supply

4.3.1 Alternative water provision arrangements were a significant source of difficulty. Bottled water distribution models, designed primarily for short-duration domestic outages, did not scale effectively to multi-day incidents affecting whole communities, rural areas or institutional settings. Distribution points were frequently poorly located, volumes were insufficient for high-demand users, and delivery methods raised safeguarding, accessibility and dignity concerns.

4.3.2 Members also heard that there was limited clarity over escalation thresholds, including when bottled water ceased to be viable, and when tankered or alternative supply should be triggered. In practice, this led to delayed interventions and heightened risk to services already operating with limited tolerance for disruption.

Recommendation 3:

KCC should:

- a) **Recommend that water companies adopt flexible distribution models, agreed in advance with local authorities, parish councils and community groups, with clear escalation triggers and alternative water provision is tailored to domestic, institutional, commercial and agricultural needs.**
- b) **Recommend that water companies liaise with local authorities (including KCC) and Parish / Town councils to maintain an up to date, regularly reviewed list of suitable sites for alternative water**

distribution and ensure rural communities are properly mapped and considered in planning and response arrangements.

- c) Remind utility companies that alternative water deliveries to households and vulnerable residents must be made accessible where it is safe and appropriate to do so.**

4.4 Businesses, Farming and Rural Water Use

- 4.4.1 The farming sector was disproportionately exposed to water supply interruptions due to very high daily water requirements, animal welfare considerations and rural access constraints. Evidence demonstrated that emergency provision models were not designed for livestock or agricultural operations, and that bottled water schemes were wholly unsuitable for sustained agricultural use. Communication failures compounded these risks by limiting farmers' ability to plan mitigation or secure alternative water sources.
- 4.4.2 Rural geography further amplified vulnerability, with long distances to distribution points, limited tanker access and sparse infrastructure redundancy. While many farms have invested in on-site storage or water harvesting, these measures cannot substitute for coordinated, system-level planning. The Inquiry highlighted that agriculture currently sits outside many emergency water assumptions despite its importance to food supply, animal welfare and the rural economy.

Recommendation 4:

KCC should:

- a) Recommend that water companies, working with local authorities and rural stakeholders, identify high-water-use agricultural sites and businesses to prioritise during outages and plan realistic alternative supply options beyond bottled water.**
- b) Recommend that water companies improve communication channels with the customers of licensed retail water suppliers (such as Castle Water) who were left without service information or compensation clarity.**

4.5 Engagement with Communities, Parish Councils and the Voluntary Sector

- 4.5.1 Community groups and Parish Councils were critical to the response, particularly in rural areas, providing welfare checks, local intelligence, reassurance, and practical distribution support. However, this local knowledge was under-used despite communities often responding fastest. Engagement

was often informal and dependent on existing relationships rather than embedded within formal response plans.

- 4.5.2 There appeared to be a disconnect between district and borough councils and more localised authorities, such as town and parish councils, as well as the voluntary sector operating at that level. While existing multi-agency protocols set out that boroughs and districts are responsible for liaising with local communications networks, this is an area where KCC can provide support and coordination, but cannot and should not assume responsibility.
- 4.5.2 Where early and structured engagement occurred, outcomes were demonstrably better. Where it did not, communities reported feeling isolated and under-informed. The evidence supports formalising community engagement arrangements to ensure consistency, equity and effective use of local knowledge across the county.

Recommendation 5:

KCC should:

- a) **Encourage and support District and Borough Councils to more formally integrate parish and town councils and voluntary sector partners into incident response arrangements. This should include maintaining up-to-date contact lists, clearly defined roles, and earlier activation of these partners during incidents. KCC should also engage with wider local authorities and the Kent Association of Local Councils (KALC) to agree how best to support parish and town councils and local action groups, including the effective and safe use of local volunteers during future water outages, and to encourage the adoption of community-level incident response plans where appropriate.**
- b) **Recommend, through KMRF partners, that all Parish and Town Councils prepare and regularly review an Emergency Response Plan, using the guidance provided by KMRF - [Building Community Resilience | Kent Prepared](#)**

4.6 Impacts on Schools, Care Settings and Public Health

- 4.6.1 Education, care and health-critical settings experienced disproportionate disruption due to low tolerance for uncertainty and heightened safeguarding and infection control risks. In several cases, closures occurred not because of absolute loss of supply, but due to insufficient clarity on safety thresholds, duration of disruption or viable contingency options.
- 4.6.2 Public health evidence highlighted that inconsistent interpretation of water quality advice amplified anxiety and contributed to overly cautious operational decisions. This demonstrated the need for clearer, sector-specific guidance aligned with operational realities and infrastructure constraints.

Recommendation 6:

KCC should:

- a) Strengthen sector-specific contingency guidance, supported by accurate infrastructure data and clear decision-making thresholds, with priority given to SEND schools, care homes and health-critical services.**
- b) Update the Schools Emergency Planning Guidance with water-specific prompts to enable decision making (e.g. assessing day-start water sufficiency; contingency triggers) while avoiding rigid one-size thresholds, and request that schools include a water outage scenario in their emergency plans.**
- c) Maintain a register of each KCC maintained school's water infrastructure (tanks, capacity, access constraints, mains-only sites) to speed deployment decisions.**
- d) Agree with water companies practical contingency options for different site types (e.g. realistic volumes for toilet flushing; alternatives for mains-only secondary sites).**

4.7 Planning, Infrastructure and Long-Term Resilience

- 4.7.1 Planning, water resource management and emergency response operate within different statutory and regulatory frameworks, and the Inquiry identified the lack of alignment between these systems as a significant risk to long term resilience. There is currently no statutory requirement for water or other utility companies to be formally consulted on planned development, creating a risk that housing and commercial growth proceeds without adequate supporting infrastructure. This limits the ability of Local Authorities to ensure that development is underpinned by resilient water supply, particularly in areas experiencing sustained growth and water stress. Members identified this disconnect as a key area for continued national advocacy.
- 4.7.2 The Inquiry noted with concern that some Borough and District Councils' Local Plans were published some time ago and may not reflect the current issues with water supply infrastructure.
- 4.7.3 Recurrent outages were presented as symptoms of networks operating with limited headroom, compounded by housing growth, ageing assets, climate volatility and increased reliance on inter-company bulk water transfers.
- 4.7.4 The Inquiry consistently highlighted and noted with concern the connection between emergency response challenges and long-term infrastructure pressures linked to insufficient capital investment and asset maintenance.

Recommendation 7:

KCC should:

- a) **Support the recommendations within the Cunliffe Review and Defra's 2026 White Paper, [A New Vision for Water](#), for national policy change, making water companies a statutory consultee for new development and advocates for statutory consultee reform to be implemented at pace. KCC will continue to use the Strategic Development Strategy to embed county-wide expectation on water resilience.**
- b) **Recommend District and Borough Councils continue to engage with utility companies as part of the planning process for a planning development, ensuring implementation of National Planning Policy Framework reforms to strengthen engagement and cooperation.**

4.8 Accountability, Learning and Assurance

- 4.8.1 Communities and Members expressed concern that similar issues have arisen following previous incidents and that confidence in sustained improvement remains limited. While water companies acknowledged failings and outlined improvement plans, the absence of transparent, measurable tracking mechanisms restricts public and Member assurance.
- 4.8.2 KMRF multi-agency debriefs have taken place (with future debriefs planned) and have identified learning and areas for improvement. Embedding these consistently will require ongoing coordination across organisations with differing responsibilities and governance arrangements.
- 4.8.3 The Inquiry has therefore concluded that water companies must take greater responsibility for leading the management and communication of water supply disruptions. Clearer utility-led ownership is required to ensure pressures do not default to KCC and partner organisations in future incidents.

Recommendation 8:

KCC should:

- a) **Monitor the delivery of agreed improvements, commitments made by water companies, and evidence of enhanced performance during future incidents, to support ongoing Member scrutiny. The KCC Resilience and Emergency Planning Service should report progress to a relevant KCC committee with provision for representatives of water companies and/or the KMRF to provide annual updates.**
- b) **Request water companies familiarise themselves with KCC and KMRF emergency plans and be asked to provide briefing sessions for KMRF partners to support shared understanding of respective roles and response arrangements.**

- c) Request water companies provide their detailed Emergency Response Plan to the KMRF, providing as much detail as possible in the public domain.**

5. Conclusion and next steps

- 5.1 Following the SFI, the Inquiry has developed the above recommendations. The findings and recommendations must be considered in the context that Kent County Council was involved in the response to the water supply incidents in its role as a Category 1 responder under the Civil Contingencies Act 2004. The Inquiry is clear that responsibility for the operation and maintenance of the water supply network, and for the provision of timely, accurate and operationally useful information, sits with the water companies. Where these responsibilities are not effectively discharged, pressure is displaced onto Local Authorities and partners in a way that is neither appropriate nor sustainable.
- 5.2 Despite the challenges identified, the Inquiry also noted areas of relative strength. Internal mobilisation across KCC was rapid and effective, cross-directorate working was strong, and voluntary and community sector responses provided critical support where formal systems were under strain. Response arrangements improved during repeat incidents as lessons were rapidly applied. These strengths provide a foundation on which future improvements can be built.
- 5.3 The findings and recommendations of the SFI, once noted by the Scrutiny Committee on 13 May 2026, are to be submitted to the Executive. In accordance with relevant Scrutiny regulations and the KCC Constitution the Executive must report in a reasonable timeframe to explain how it will respond to the recommendations.

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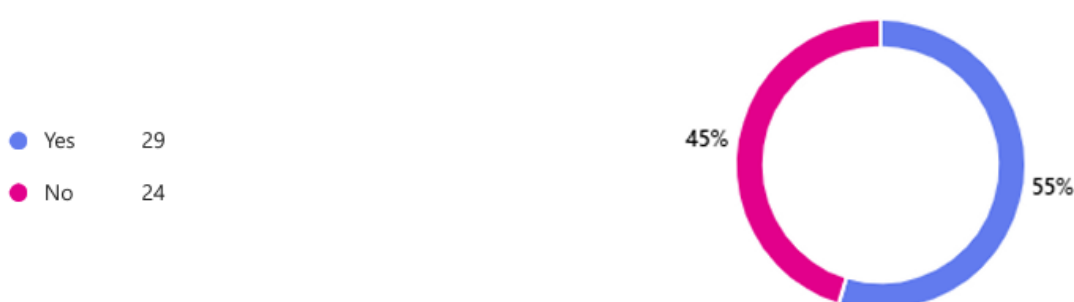
Kent County Council Short Focused Inquiry – Water Supply

Summary of Responses to Parish/Town Council Questionnaire

- 1. Which Parish or Town Council are you responding on behalf of?
Please also provide your name.**

53 Parish and Town Councils responded.

- 2. Was your Parish/ Town affected by a water supply failure in 2025/26?**



(End of questionnaire for those responding 'No')

- 3. How was your Parish/Town affected by water supply failure in 2025/26? (length of time affected, how many times over what period)**

Summary of written responses:

Many Parish and Town Councils reported significant water supply failures throughout 2025/26, with the most severe disruption occurring in January 2026. Communities experienced complete loss of supply, prolonged low pressure, boil-water notices, and poor-quality water. Outages ranged from a few hours to several days, with some parishes affected for one to two weeks and others experiencing multiple incidents over the year, often lasting two to three days.

Essential facilities, including doctors' surgeries, schools, campsites, and local businesses, were affected, leading to closures and loss of income. Intermittent supply was common, with water returning briefly before failing again, creating uncertainty and disruption, particularly for vulnerable households.

Long-standing issues were highlighted in locations where residents have endured chronic low pressure and unreliable supply for many years. Overall, respondents described a pattern of recurrent disruption, limited resilience, and poor communication, with many councils receiving little or

no formal notice of outages, restricting their ability to support residents effectively.

4. Please rate the quality of communication you received from the water company between 1, for none at all, to 5, for very good.



5. Please rate the quality of communication you received from KCC between 1, for none at all, to 5, for very good.



6. Please offer any further comments about the communication and/or quality of advice received from the water company and/or KCC. If you were reliant on information being provided other than from the water companies or KCC please specify the source of this information.

Summary of written responses:

The majority of Parish and Town Councils reported poor, inconsistent, or non-existent communication from South East Water during water supply failures. Many councils and residents received no direct communication at all, while others only received updates if they had proactively registered for text alerts. Even where updates were received, these were often late, inaccurate, overly optimistic, or contradicted conditions on the ground. In

some cases, water company representatives initially denied there was a problem, and call handlers lacked the information needed to respond to enquiries. Statements about water quality were also questioned, with assurances that brown water was safe despite being unpalatable.

Most councils reported receiving no information about water supply failures, beyond occasional notifications from KCC Highways relating to road closures caused by burst mains. As a result, Parish and Town Councils often learned of outages through residents or social media rather than official channels. Several respondents noted that local authorities did not proactively identify affected parishes or contact Clerks to assist with local communication and coordination, leaving councils unclear about their role and responsibilities during incidents.

Consequently, communities relied heavily on parish councils, local councillors, and social media networks for information. While this worked for some residents, it disadvantaged elderly, vulnerable, and digitally excluded people. Parish Councils repeatedly stepped in to bridge communication gaps.

7. Were you, as a Parish/Town Council, actively involved in the supply of information about the water supply failure to your residents?



8. Were you, as a Parish/Town Council, actively involved in the supply of support services following the water supply failure to your residents?



9. If your answer to question 7 or 8 was yes, could you please provide more detail about the supply of information and support services you provided to your residents?

Summary of written responses:

In the absence of consistent support many Parish and Town Councils took direct action to support their residents during water supply failures. This included Parish Councillors personally purchasing bottled water from local supermarkets, organising ad-hoc deliveries, and distributing supplies locally, particularly to residents without cars or internet access. Some councils established temporary local water stations in village halls or community centres, often relying entirely on volunteers and without assistance from statutory bodies or the water company.

Parish Councils also acted as the primary source of information for residents. Updates were shared through parish websites, Facebook pages, WhatsApp groups, village noticeboards, emails, and direct phone calls. Clerks and councillors frequently liaised with South East Water, MPs, district councillors, and neighbouring parishes to obtain information that could then be passed on locally. In several cases, councils arranged lifts to distant water collection points, supported Emergency Help Teams, or worked with volunteers to maintain communications and respond to residents' queries.

Despite these efforts, councils consistently reported that they were severely constrained by poor or late information from the water company, making it difficult to provide reassurance or plan support effectively. Some councils described feeling "helpless" due to the lack of reliable updates, while others noted that elderly and vulnerable residents still missed out on supplies due to registration issues or limited communication channels.

10. Were any KCC services in your Parish/ Town affected by the water supply failure? If so, please explain in more detail what the service was and how it was affected?

Summary of written responses:

Most Parish and Town Councils reported that they were not aware of any KCC services being directly affected by the water supply failures, or that no information was provided to enable them to make such an assessment. Many respondents replied with "no", "not known", or "unsure", often citing the lack of communication as the reason they could not confirm whether services were impacted. This absence of information meant that councils were largely reliant on local knowledge rather than official updates. Several councils reported that primary schools had to close due to loss of water supply, disrupting pupils, families, and staff. In addition, some parishes

experienced numerous emergency road closures on highways as a result of burst water mains, causing further local disruption.

11. Did you experience issues accessing bottled water stations in your Parish/ Town?



12. Could you please provide more detail of the issues you faced?

Summary of written responses:

Respondents reported serious difficulties accessing emergency water supplies, with many parishes stating that no water stations were provided at all, despite requests or prior agreements. Where stations were established, they were often located far from affected communities. These locations were not accessible for elderly residents, those without transport, or people responsible for livestock, and were described as overcrowded, poorly managed, and prone to running out of supplies. In some cases, stations closed when residents still needed water or were only opened after local need had passed.

As a result, Parish Councils and volunteers were forced to intervene. Councils set up their own distribution points, organised bottled water deliveries after repeated attempts to contact the water company and used village halls to store and distribute supplies. Councillors and volunteers frequently staffed water stations themselves. In several cases, bottled water deliveries took many hours to arrive, often late in the evening, placing additional strain on local staff and volunteers.

There were also significant gaps in provision for specific groups. While household supplies were sometimes available, respondents reported little or no provision for businesses or farming livestock, and poor delivery to residents on priority or vulnerable registers. Some residents had to travel to neighbouring towns to obtain water.

13. Were you aware of the correct escalation channels (water companies, District Council, KCC etc.)?



14. What are the key learning points or improvements that you would like to see if a future event occurred?

Summary of written responses:

Respondents consistently identified communication failures as the most critical issue requiring improvement. There was strong consensus that information must be faster, more accurate, and more transparent, with honesty preferred over overly optimistic statements. Parish and Town Councils stressed the need to be formally notified immediately when supply interruptions occur, with ongoing updates and realistic timescales for restoration so that councils can inform residents effectively. Communication must reach all residents, not just those on social media, ensuring elderly, vulnerable, and digitally excluded people are not overlooked.

There was also a strong call for clearer coordination, roles, and accountability during incidents. Water companies were urged to better understand the geographical impacts of failures, particularly in rural areas, and to take direct responsibility for emergency actions such as bottled water distribution, especially for those on the priority register, which was widely reported as being poorly implemented. Parish Councils requested clear escalation routes, dedicated emergency contact points, better-informed call handlers, and improved coordination between water companies, KCC, and other stakeholders.

Finally, respondents emphasised the need for better emergency planning and resilience. This includes pre-agreed, locally accessible water stations in suitable locations such as village halls, sufficient provision to reduce congestion, and clearer guidance on how councils can assist during prolonged outages. There were also calls for preventative action, including timely repair of burst mains, investigation of persistent low pressure issues, and investment to prevent recurrence.

15. Please add any further comments you believe may be relevant to this Inquiry including any lessons learned/ improvements needed.

Summary of written responses:

Respondents raised serious concerns about the long-term resilience of the water network, describing infrastructure as outdated and already under strain. Many felt that recent and planned housing growth has not been adequately matched by infrastructure investment, leading to reduced pressure, intermittent supply, and repeated outages. Examples were given where new developments benefit from upgraded mains while existing communities continue to experience poor or unreliable supply, particularly in rural areas. There was a strong view that access to clean, uncontaminated water is a basic right and that responsibility for funding and delivering infrastructure upgrades must be clearly agreed and enforced.

There was also widespread concern about the lack of clarity, transparency, and preparedness during outages. Respondents called for clear guidance on how long supply can be interrupted before bottled water is provided, what procedures trigger emergency support, and the need to plan for non-potable water requirements alongside drinking water. Repeated outages within short periods, coupled with poor communication, have undermined confidence in contingency planning and emergency management. In some cases, unfixed burst pipes and deliberate diversion of water to other areas were reported, with little or no explanation, leading to perceptions of unfair treatment of rural communities.

Compensation was described as inconsistent and unclear, with similar impacts resulting in different outcomes for residents. Persistent low-pressure issues and erratic performance of key assets, such as pumping stations, were seen as requiring urgent investigation. Parish Councils stressed the importance of developing local resilience plans, improving coordination between water companies, local authorities, and developers, and ensuring communities are notified early and accurately when issues arise. Overall, respondents expressed strong concern that without decisive action, these problems will continue to recur, particularly as further development places additional strain on the system.

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By: Anna Taylor, Assistant Democratic Services Manager (Scrutiny)

To: Scrutiny Committee

Subject: Work Programme

Summary: This report gives details of the proposed work programme for the Scrutiny Committee and gives members some.

1. Introduction

- a) Any Member of the Council is entitled to give notice that they wish an item relevant to the functions of the Committee (which is not an excluded matter) to be included on the agenda for the next available meeting. On receipt of such a request the item will be included for discussion at the next available agenda setting meeting.
- b) The definition of an excluded matter referenced above is:
 - a. Any matter relating to a planning or licensing decision,
 - b. Any matter relating to a person in respect of which that person has a right of recourse to a review of right of appeal conferred by or under any enactment,
 - c. Any matter which is vexatious, discriminatory or not reasonable to be included in the agenda or discussion at a meeting of the Scrutiny Committee.
- c) The Scrutiny Committee has the ability to 'call-in' decisions made by the Cabinet or individual Cabinet Members. Any two Members from more than one Political Group may give notice within five clear working days from the publication of a decision taken of their intent to call-in the decision along with their reasons.

2. Recommendation

The Scrutiny Committee is asked to consider and note the report.

Contact Details

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Work Programme - Scrutiny Committee May 2026

Items identified for upcoming meetings

Date requested	Item
September 2025	VAT & Business Rates on private school fees
September 2025	Following OPRN discussion – Relative cost of market-provided versus KCC-owned care homes under the new contract.
December 2025	Family Hubs. Issue details - 23/00092 - Kent Family Hub Model - Implementation Agenda for Scrutiny Committee on Tuesday, 19th December, 2023, 10.00 am

Work Programme

18 June 2026	
Item	Item background
One year on	Leader Report one year on.
Budget Monitoring	

1 July 2026	
Item	Item background
Scrutiny Committee meeting as Crime and Disorder Committee	Statutory requirement

23 September 2026	
Item	Item background
Report back on SFI – Water Supply Recommendations	
Grooming Gangs in Kent	Links to Kent Safeguarding Children Multi-Agency Partnership. Most appropriate representatives and partner organisations to be identified.
Family Hubs	Ensuring consistency across the county and measuring output.

21 October 2026	
Item	Item background
Kent Flood Risk and Water Management Committee Annual Report	Constitutional Requirement

9 December 2026	
Item	Item background
Kent Education Provision Plan	Impact of VAT and Business Rates on KCC
Selective Education	Cost of Kent Test Selection Process to KCC

27 January 2027	
Item	Item background
Final Draft Budget & Budget Monitoring half yearly	Constitutional Requirement

Provisional Future Items

June 2027 – Budget Monitoring year end

July 2027 – Scrutiny Committee meeting as Crime and Disorder Committee

November 2027 – Kent Flood Risk and Water Management Committee Annual Report

January 2028 – Final Draft Budget & Budget Monitoring half yearly