

**A. How should the RSS approach of allocating most housing growth in the Borough to the East Kent and Ashford Sub Region affect the housing strategy for Wye and other settlements in the eastern part of the Borough?**

**1. Wye Village Design Group (VDG) believes that Wye's contribution to housing growth must be considered very carefully, in view of the numerous special criteria and restrictions that apply to the village and surrounding landscape.**

2. The Core Strategy para 6.33 makes clear the Borough Council's statutory duty to protect both AONBs and emphasises that *"conservation of the natural beauty of the landscape and countryside is the nation's primary objective."* Wye is the only Tier 2 settlement that is wholly within an AONB.

3. The Core Strategy (para 6.33) also states that *"The Council has a statutory duty to protect the character of the AONBs and so, in accordance with Government guidance in PPS7, major developments will not be permitted in AONBs unless there are exceptional circumstances where a need is proven, no other sites or alternative provision are available and any detrimental impact on the landscape and environment can be moderated."* Under Section 85 of the CROW Act, the Borough Council has a duty to produce a management plan, and a statutory duty to conserve and enhance the AONB. The Borough Council duly adopted the First Revision April in 2009. This document states that: *"The policies of the AONB Management Plan will be reflected and in part implemented through policies in each Local Development Framework..."* **However, the DPD makes no reference to the Kent Downs AONB Management Plan 2009 – 2014 (Appendix 1.). The VDG believes that this omission is unsound, and national policy guidance should be reflected explicitly in the Tenterden and Rural Sites DPD (the DPD).**

4. The VDG is concerned with how Wye functions as a place to live, work and visit, the protection of its heritage, landscape and local character, and the quality of its built form. The VDG seeks to manage change, not prevent it, but notes that Core Strategy Policy CS8 only applies to the Ashford Growth Area. Therefore the scale of development relative to Wye's infrastructure capacity are related key issues.

5. The Core Strategy (Background v.) also states that the *"growth area agenda applies only to Ashford town and its immediate surrounding area"*, and that in the *"... rural area of the Borough, where the emphasis is on continued small scale change designed to protect the quality of the Borough's environment and heritage, balanced with the need to help foster strong local communities with limited growth in the most suitable locations."*

6. The Core Strategy (para 1.4) summarises the Community Strategy's aim to *"Protect the villages and surrounding countryside from any adverse impact of growth"* (of Ashford town).

**7. The Core Strategy Inspector recognised that Wye faced unique challenges and accordingly, he directed a relatively modest housing allocation to Wye in Phase 1. Yet given the lack of investment in infrastructure in the past, the impact of even this level of development is likely to cause serious problems.**

8. Having considered the environmental constraints of the AONB, SAC and NNR and the accumulation of infrastructure deficiencies in Wye, the VDG questions the capacity of the village to function as a Tier 2. settlement on an equal footing with Charing and Ham Street.

9. The Core Strategy para 1.26 refers to Ashford, and states that: *“From the outset of the debate about Ashford’s growth, the Council has emphasised the need for a capacity-led approach to development. This approach was set out in the Halcrow Report. It assessed the capacity for growth in terms of the environment, the economy and the community and identified critical infrastructure needed. If the required infrastructure does not come forward at the expected rate, this will of necessity limit the extent and pace of housing and employment growth that can be achieved if we are to plan for sustainable growth.”* **The Group agrees with this capacity led approach and contends that the same principle should apply to future development in Wye, and other rural settlements. However, the infrastructure contribution requirements that the Borough Council has added to WYE1 and WYE2 make no impact on the backlog.**

10. With regard to the western boundary of the Ashford Sub Region in the RSS this appears to have originated as a political anomaly. However the **Core Strategy Inspector’s allocation recognised the range and quality of community facilities and the significant investments that the Borough Council has provided in Tenterden. These facilities dwarf the limited offerings in Charing, Ham Street and Wye. The housing allocation reflects this disparity in provision and sustainability.**

11. The proximity of Ashford to Wye and the impact of growth on the surrounding countryside is another consideration. Urban fringe issues affect Wye more than Ham Street and Charing. For example, the Core Strategy (para 4.14) refers to an unspecified amount of enabling development on Wye’s parish boundary at Conningbrook Strategic Park. Currently the Urban Sites and Infrastructure DPD identifies potential sites for over 1,200 houses around Kennington, 300 at Hinxhill and an unspecified number around Willesborough. There are ten proposed housing sites on or near Wye’s parish boundary under consideration in the Urban Sites DPD. As an example of the potential impact of these sites, all of them are within the existing catchment area of Wye’s primary school.

12. The Landscape Assessment 2005 for the Stour Valley area D8 states that *“Any extension to Ashford would be very apparent”* and D13 notes the *“Fine long views to west north and east towards North Downs”*. **Yet despite the obvious sensitivity of the landscape around the Stour Valley, the inevitable impact of large urban extensions near Wye and the AONB**

do not seem to be considered specifically, or mitigated in either DPD. Nor do these DPDs assess, or give practical guidance on managing the impact of increasing traffic volumes on the quality of life.

13. The large urban extensions planned south of the M20 rely heavily on a subsidised SMARTLINK bus service. In contrast there appears to be no matching proposal for the improvement to public transport to serve new development around the northern edge of Ashford.

### **B. Is delay in consideration of the future of the ICL sites WYE3 justified?**

1. The delay to date has been unnecessary and damaging for Wye. However, it is essential that the ICL sites are brought within a well prepared planning framework, and their future is not just left to the development control process. This should happen as soon as possible, as further delay will compound the problems already apparent, and frustrate the aims stated in the Core Strategy.

2. The Government's Objectives for the Planning System PPS 1 para 2 states that *"Good planning is a positive and proactive process, operating in the public interest through a system of plan preparation and control over the development and use of land."* Therefore it follows that, in the absence of control over WYE3 and other matters not in the public interest, Wye is experiencing bad planning, although there are mitigating circumstances behind this.

3. The current impasse is the result of Imperial College's persistent refusal to engage with the Borough Council and the community. In contrast the community has shown itself to be capable and more than willing to discuss ideas and move forward. Consequently there is no strategic plan and Wye remains exposed to a series of ad hoc development control decisions. Wye is a Tier 2 rural service centre: it is unsound to leave its future to chance.

4. The scale and intensity of the development pressure that Imperial College is targeting at Wye has been public knowledge since December 2005. The VDG regrets that this pressure has not been balanced with an Area Action Plan or Development Brief. The LDF system allows for Area Action Plans for *"areas where significant change or conservation is needed"* (PPS12 (2008): paras 5.4-5.6). Wye qualifies on both counts. Such a preparatory document would have informed the DPD, and checked the opportunistic and entirely predictable sporadic developments that we see today.

5. The DPD has taken years to emerge alongside the known development pressure on Wye. However, by focussing only on housing allocation the DPD has ignored the other fundamental considerations such as local employment, community infrastructure, access, recreation and the environment. In so doing the DPD has also ignored PPS1 Key principle 13 (i)

and fails to “...ensure that development plans promote outcomes in which environmental, economic and social objectives are achieved together over time.”

**6. In Wye the delay in the consideration of WYE3 has enabled the number of windfall residential units already approved to approach the total DPD allocation for Phase 1. Almost all the windfall applications have been made for buildings on the Imperial College estate outside the boundary of WYE3. None of these applications has provided any affordable housing or infrastructure contributions. VDG requests that the Inspector takes this reality into consideration.**

### **C. Is a masterplan for WYE3 the most appropriate approach?**

**1. Wye VDG believes that a masterplan or site based development plan would facilitate a co-ordinated approach across the ICL estate, and achieve a well considered balance of uses and development quanta.** It would help ensure that development occurs within the infrastructure limitations of Wye and would be the best way to enable a fully informed consultation with Wye’s population and give appropriate consideration to further community facility benefits that could arise. **It would therefore provide well researched guidance, against which the Borough Council could properly consider sequential development applications on ICL’s estate.**

**2. ICL’s built estate and landholding dominates the village.** Although only a relatively small part of WYE3 is previously developed land, even this is still a substantial area. Moreover, it is far in excess of the land area required to meet the housing allocation in the Core Strategy.

3. There is an obvious tension between the Core Strategy’s emphasis on “...continued small scale change”, and the developer’s expectations for WYE3 and other parts of the ICL estate. A carefully designed and well-managed masterplanning process would enable these differences of scale and expectation to be resolved, with full and fair public consultation.

4. PPS1 13 (vi) states that “Community involvement is an essential element in delivering sustainable development and creating sustainable and safe communities. In developing the vision for their areas, planning authorities should ensure that communities are able to contribute to ideas about how that vision can be achieved, have the opportunity to participate in the process of drawing up the vision, strategy and specific plan policies, and to be involved in development proposals.” However, **in the absence of any Imperial College representation at both the Community Workshops, the participants could not address the issue of WYE3 in any meaningful way.**

5. PPS1 (para 41) also states that “...parish councils, through parish plans, should play a key role in developing full and active community involvement in their areas.” In the case of Wye **the Parish Council has made commendable efforts to inform the public and facilitate engagement**

**throughout the RSS, Core Strategy, and DPD processes.** In parallel to all this external activity **the Parish Council initiated the Wye Parish Plan with the aim of encouraging ideas and informed debate within the community, and it achieved these aims.** Therefore it is regrettable that ICL's response to these opportunities has been wholly negative.

6. The Borough Council had the results of Phase One of the Parish Plan in 2007. The Parish Council timed the initiative to inform both the Core Strategy and the DPD. **However, since 2007 Phase Two of the Parish Plan project has remained stymied by ICL's refusal to communicate and work with the framework that Phase One provided.**

**D. Would the DPD strategy achieve the best balance between the development of greenfield sites and previously-developed land?**

**1. In view of the size and complexity of the WYE3 site, an objective evaluation of the proposed WYE1 and WYE2 greenfield sites will only be possible in the context of an agreed and co-ordinated strategy for the whole of Imperial College's estate.** The sequence applies regardless of whether the future use of WYE3 is agreed to be educational, or some alternative mixed use development.

**2. It should also be noted that only a relatively small part of WYE3 is previously developed land,** and much of the area was last used for hop and fruit growing, and intensive horticulture under glass.

**3. Is there sufficient consideration in the DPD to the possibility of replacing jobs lost in Wye following the closure of the College?**

**4. Wye VDG supports the Borough and Parish Councils' preference that the principal educational role of the College facilities are retained (para 6.95), and would like to see provision for educational and/or other appropriate employment generating uses within the village.**

**5. Notwithstanding the statement in the Wye Village Design Statement (page 7) regarding the importance of the College to the local economy, the closure of the College in 2009 has probably had less actual impact on local employment than might be assumed.**

6. ICL announced its decision to close the Agricultural Sciences department at Wye in August 2004. The number of jobs at the College has been in decline since then, but the DPD does not consider the rural employment question. Nor does it attempt to analyse how the village has adapted and what other employment is now available. Wye appears to have assumed a more typical rural employment profile, with most of its jobs provided by small businesses and self-employment. As train services have improved, an increasing number of residents now commute to London. Horticulture remains important to the local economy. The five largest employers in the parish are now Palmstead Nursery, BCP Certis (biological crop protection), Wye Primary School, Wye Surgery and Wye Co-op.

7. As the DPD does not provide a base line assessment of Wye's current employment situation it is impossible to say how many jobs are needed, or what types of jobs are needed. Nor does the DPD consider the age profile of the parish and identify how many people are of working age. **What is certain is that the intellectual assets and expertise that was centred on Wye College in 2000 is now dispersed and lost. Wye VDG therefore hopes that the DPD could help to replace this high-grade local employment.**

**8. Many of the College staff who lost their jobs since 2000 did not live in Wye.** Several of the catering and domestic staff were employed by agencies and travelled in by minibus. Over nine years a significant number of all staff grades took early retirement, and are therefore not in need of replacement jobs. Given the specialist nature of the research work at Wye, most of the younger academic staff were obliged to move far away in search of new posts. Others transferred to the University of Kent, or Imperial College in London. **The net impact of the closure of the College on local employment levels is therefore probably less than may be supposed.**

9. The related impact on local retail businesses in terms of loss of trade is not known, and this has been overlaid by the recession. Contrary to expectations only one shop has closed in Wye in recent years. This was not the result of a business failure, but the activation of an old change of use from antique shop to residential. The permission pre-dated Local Plan policy RE2 and could not be challenged. In 2009 two new shops opened in Wye, a new bakery and a shoe shop. Wye still has three pubs, two banks and a post office, and the farmers market established in 1999 remains buoyant. There are no vacant shops. These signs of economic stability suggest that **Wye's role as a rural service centre has weathered the closure of the College, and is sustained by its large catchment area.**

10. With regard to the availability of non-educational employment sites, the Borough Council's Rural Housing and Employment Sites Background Paper (2009) is out of date. This paper identified numerous unimplemented planning consents relating to B1/B8 sites across the borough. The total includes 389 m<sup>2</sup>is in the parish of Wye with Hinxhill (para. 5.6). Subsequently, in March 2010, Imperial College gained change of use and full planning permission for a further 2,070m<sup>2</sup> of B1 use at Sidelands. This is a 1ha former poultry unit in open countryside, one mile from the village centre. **Wye VDG asks the Inspector to note that this unimplemented consent for additional general employment space is already in place.**

#### **E. Do the housing sites WYE1 and WYE2 represent the best strategy when considered against reasonable alternatives?**

**1. As stated above a meaningful evaluation of WYE1 and WYE2 will only be possible in the context of an agreed and co-ordinated strategy for the much larger WYE3 site, and a masterplan that covers the whole Imperial College Estate.** That said, of all the sites

**Tenterden and Rural Sites DPD  
Issue No. 8: Wye Village Design Group**

discussed at the Community Workshops WYE1 and WYE2 have the least number of constraints.

2. Wye VDG recognises that local needs housing is outside the scope of the DPD. However, it is illustrative that of the five possible exception sites that the Parish Council identified in 2009, the Borough Council did not consider any to be suitable for a local needs scheme. This emphasises how well defined the boundaries of the settlement are, and the constraints on peripheral land around Wye.

**3. Finally, Wye VDG would welcome the opportunity to offer its expertise to work with all stakeholders, including the Borough Council and Imperial College London, to find the best future strategy for Wye and for all concerned.**