

Wye

8.1 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. In a letter of 27 May 2010 to local authorities, the Minister has announced the intention of Government to abolish Regional Strategies and for local authorities to consider housing and planning matters without the framework of regional plans. Clearly it will be for the Inspector to consider the weight to be given to this ministerial statement and to the South East Plan, which is the most recently adopted part of the development plan.
2. **We support both the South East Plan and the adopted Core Strategy** (which is unaffected by the ministerial statement) **in their emphasis that the rural parts of the Borough should not be the focus of general growth targets.**
 - Ashford and other main settlements in the sub-region should accommodate most new development (Policy EKA1 of the South East Plan), not rural villages. In making its recommendations, the Panel which examined the Plan commented that “we note that there is no separate allowance for the rural areas beyond the Ashford urban area within the East Kent and Ashford sub-region. However, as there are no sizeable settlements here and Ashford itself is clearly the growth focus, we do not suggest any changes.” (Panel Report, para. 18.50).
 - In the rural parts of Ashford Borough development should be restricted to what is genuinely needed to ensure the economic and social well being of rural residents and workers and to build sustainable and balanced communities (Core Strategy para. 1.29).
3. **The Parish Council and Wye Future Group consider therefore that the housing strategy for Wye and the east of the Borough should be to limit development to meeting local housing needs only, rather than to accommodate Borough wide growth, which should be concentrated within the Ashford urban area,** in accordance with the adopted development plan (South East Plan and Core Strategy).
4. Unfortunately, there is no evidence that the Borough Council has undertaken any housing needs based work to identify the appropriate housing strategy for Wye and the eastern part of the Borough to inform and support this DPD. There is no mention of any such evidence in the Housing and Employment Background Paper and there appears to be no published report into rural housing needs, other than the 2005 Ashford Borough Housing Needs Survey, which is now clearly out of date.
5. **In addition to local needs, other considerations which must be taken into account include the availability of local services and facilities, access to jobs and the capacity of settlements to accommodate development, particularly considering issues of environmental and infrastructure capacity.** These matters are commented on in the Parish Council’s Issue 3 statement.

8.2 Is delay in consideration of the future of the ICL sites WYE3 justified?

6. **The Parish Council and Wye Future Group consider that there has already been too much delay in dealing appropriately with this important issue.**
7. The Parish Council is disappointed that the Borough Council has not tackled the issue by examining proactively the potential for future education provision at Wye or by investigating the potential for other employment generating uses and the impact any development may have on determining an appropriate housing strategy. The scope of the DPD is too narrow and there is a lack of emphasis on the importance of achieving a sustainable balance between houses and jobs across the Borough.
8. A fundamental reason for the continuing delay is the fact that Imperial College has consistently refused to engage with the local community to determine the future of the campus.
9. ICL, for example, refused invitations to attend the community workshops in March 2008 and March 2009. It claimed in 2008 that it would be premature to meet in such a forum. The Parish Council wrote to the Director of Property Management of ICL in November 2008 alerting him to the next workshop but received no reply until a further letter was sent and copied to the Rector. The Parish Council was then informed that ICL had nothing to add to Savills' submissions at the Issues and Options stage of the DPD process. In the face of this obduracy the Parish Council enlisted the help of the local MP, Damian Green, who in 2009 was granted an audience with ICL's Chief Operating Officer but without any outcome. Thereafter, the Chairman of ICL's Council, Lord Kerr, failed to take up a request to meet parish councillors who expressed their concern at the impasse. In the meantime, ICL is happy to seek to dispose of its assets on a piecemeal basis (for example the current care village application at Withersdane).
10. The Parish Council and Wye Future Group are extremely unhappy with the continual delay and have been willing throughout the period since closure became a possibility - and then a reality - to find a sustainable and appropriate future for the campus.
11. **The Parish Council and Wye Future Group do not support further unnecessary delay. However, neither do we support a rushed disposal of assets through the planning application process in the absence of a proper consideration of the opportunities to meet the future needs of Wye.**
12. **The Parish Council and Wye Future Group support the stated preference of the Borough Council to retain the campus for education uses.** Whilst it is acknowledged that the exact form and nature of that education use may require a reorganisation of current land assets, a decision can only be taken after a full and comprehensive assessment of the viability of such uses and a proper marketing exercise. Marketing needs to be flexible and imaginative and to allow consideration of multi-user occupancy on the part of more than one educational institution, including ICL, to make full use of the assets available.

13. **Over the past two years Imperial College has failed to seize the opportunity to undertake a comprehensive marketing exercise for the Wye campus as a whole.**
14. All of the marketing undertaken to date by Imperial College has only been for the main site north. This has accommodation for only about 80 students and marketing it as the “main campus” or as “Wye campus” is clearly not the same as marketing all three major sites including Withersdane (where halls of residence and other academic facilities are located) and the other major site in the village (which is opposite the main site north and includes the former Defra offices).
15. There appears to be interest for future educational use at the campus judging by objections to the current care village application at Withersdane (part of WYE3). While the extent and nature of any interest needs to be properly and thoroughly examined, it has been pointed out by phoenixwyecollege that the loss of the Withersdane facilities will frustrate the re-establishment of the rest of the campus as a centre of Higher Education, or indeed any other purpose for which residential users are an integral part.
16. **The Parish Council and Wye Future Group are deeply concerned about the current policy vacuum and the danger of planning on a piecemeal basis only through the development management process, where in the absence of a current third party right of appeal, the community is effectively excluded. We believe that past delay in considering the future of the ICL WYE3 sites has been unnecessary, as is further delay. The only delay that can possibly be justified is any that is genuinely required to ensure a commercially viable and acceptable community outcome.**

8.3 Is a masterplan for WYE3 the most appropriate approach?

17. **There is no doubt that Wye campus (i.e., all of the landholdings set out in the diagram accompanying Policy WYE3 and described in para. 6.96) is a significant strategic site**, both for the Borough as a whole (in terms of the academic and business offer it has provided for many years) and for the local Wye community (in terms of providing local jobs and contributing to the cultural life of the village).
18. Any decision taken on the long-term future of the campus and the future uses associated with the large landholdings will have a significant impact on the future and character of Wye as a rural settlement and on the development strategy for the Borough as a whole.
19. Appendix 1, pages 73-76 contains a list of ICL's landholdings in and around the village. Those comprising WYE3, while integrally related, embody different characteristics. They form a very significant proportion of Wye's developed area. Furthermore, they impact on the rest of ICL's huge estate. There is a need for a co-ordinated, well-researched approach across this whole estate involving a well considered balance of uses and development quanta. This would provide a benchmark, against which the Borough Council could properly consider future, disparate development applications anywhere on the ICL estate.
20. **For these reasons the Parish Council and Wye Future Group support a proper, comprehensive examination of the future of the important strategic site comprising WYE3 and have done so ever since it became clear that Imperial College intended to close its operations.**
21. **The proper approach for the future of such a strategic site is for it to be determined through the development plan process.**
22. PPS12 clearly states that planning for strategic sites can be dealt with through core strategies, AAPs or site based DPDs.
23. Spatial planning provides a means by which the future long term needs of settlements can be determined to achieve sustainable development meeting the needs of local communities. Producing a DPD which plans for the future of strategic sites ensures that services can be effectively co-ordinated and plans are based on the community's views.
24. Indicative masterplanning is an essential component of allocating strategic sites through the DPD process and more detailed masterplanning can be adopted by local planning authorities as a SPD to assist in delivery. Masterplanning is particularly useful in helping to develop proposals from site criteria contained within a policy to defined and deliverable proposals. Again, PPS12 highlights that masterplanning is a valuable tool in providing site specific detail (para. 4.7).
25. **The Parish Council's and Wye Future Group's preference has been for this DPD to set out a robust policy framework for the future of the Wye campus, supported by community based masterplanning work, in partnership with the Borough Council, Imperial College and other stakeholders.**

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26. Clearly, if the Inspector determines that this DPD is currently unsound, there will be an opportunity for the Borough Council to revisit its approach to the Wye campus and undertake masterplanning work to inform a resubmitted DPD.
27. **In the absence of a proper planned approach to the Wye campus in the current DPD, the Parish Council and Wye Future Group support a policy approach which sets in place a future framework for positive action.** This involves, in summary:
 - The owner to conduct a marketing exercise based on commercially realistic terms, and under the scrutiny of the local planning authority and of independent and qualified outside experts;
 - If there is no interest, then the owner should assess viability, to be subject to independent assessment;
 - If alternative uses are justified by the results of the viability assessment, a masterplanning exercise to be undertaken by the Borough Council with full community participation;
 - The results of this exercise to inform a review of policy WYE3 and the preparation of SPD to guide the delivery of the policy.
28. The Parish Council and Wye Future Group recognise that this approach will result in further delay, although our view is that this work could begin immediately and does not have to wait until a review of the Core Strategy.
29. Unless the Inspector feels she has sufficient evidence available to her to propose a more positive policy at this stage, the approach set out above appears to be the only sensible way forward.
30. **Allowing Imperial College to dispose of its landholdings in a piecemeal way through the development management system is not an option which the Parish Council and Wye Future Group support.**
31. Such an approach is likely to impact negatively upon the adopted development plan spatial strategy in various ways:
 - It undermines the stated objective of the Ashford Core Strategy, of retaining a high quality, knowledge based presence in the area.
 - In supporting alternative forms of development, whether involving a care village, housing development or other forms of development, it is likely to be contrary to the strategy focus on Ashford in this part of the Borough and involve a level of development well above meeting local needs.

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

32. The principle of giving a preference to the development of previously developed land before considering greenfield options is sound. However, most if not all of the brownfield options that emerged during the DPD process and were put to the community, involve the erosion of the Wye campus assets. The local community believes strongly that a priority should be given to the proper consideration of these assets in a holistic way. To enable this to happen, any allocation of any part of the campus for housing development would be premature.
33. The Parish Council and Wye Future Group believe that, whatever housing sites are considered suitable and deliverable, a robust phasing approach must be taken in the adopted DPD. Until the future of the Wye campus is properly determined, land resources to meet local housing and employment needs should be carefully husbanded, to ensure that development to meet longer terms needs is not released too early. The Parish Council and Wye Future Group agree with the Borough Council that a large majority of previous Local Plan allocations have been developed (too) rapidly and a stricter approach is needed in the future.

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

34. In the Parish Council's Statement on Issue 3, the Council shares the concerns of the Core Strategy Inspector that access to jobs has not been properly factored in when determining the housing distribution strategy (see Inspectors Report para. 4.207). Achieving a local balance of houses and jobs and distributing development to influence travel to work patterns is an essential ingredient of achieving sustainable development.
35. In terms of meeting future employment needs, the 2008 Employment Land Review (ELR) is based on ensuring that future supply meets the overall Borough demand for employment growth rather than looking at meeting the job needs of individual settlements. The ELR also focuses on employment associated with B1-B8 use classes although significantly it does recognise that the education sector has grown strongly in Ashford, although currently under represented compared with the South East average (1998-2006). It does not address the loss of employment provision associated with Wye College. Its conclusions that there is no need for further employment allocations in the rural areas, including Wye, therefore needs to be read within this context.
36. The conclusions of the ELR are repeated in the DPD as justification for there being no need for allocations for future employment (para. 5.33). Considering that the DPD then goes on to say that Wye College has been important to the local economy of Wye and the wider economy of the Borough and that its future is uncertain (para. 6.94), it is surprising that the DPD does not recognise the importance of the Wye Campus to local employment and the rural economy in section 5.30-5.35.
37. Our position is that all efforts should be made to secure the future of an educational establishment at site WYE3 and hence secure local employment for those with the range of skills previously employed by the College. In so far as policy WYE3 seeks to put in place a process for replacing jobs lost by safeguarding the site and investigating a viable use which generates local employment, we support the policy and the Borough Council's approach.
38. If an educational use proves not to be viable, we would continue to support an alternative use or mix of uses which provides for local employment, with the overall objectives of achieving a balance between housing and jobs at Wye and minimising out-commuting travel to work patterns.

8.6 Do the housing sites WYE1 and WYE2 represent the best strategy when considered against reasonable alternatives?

39. Elsewhere, the Parish Council has sought to express its reservations regarding the Borough Council's approach to the distribution of housing in this DPD. In particular, it is considered that the Council has not properly assessed the local housing needs at Wye, nor has it sought to analyse what forms of development are required to achieve a balance between houses and jobs. In the absence of a proper approach, the Council has apportioned development using a broad settlement hierarchy approach, varied in the case of Wye to take account of legitimate landscape and other environmental factors.
40. Notwithstanding concerns regarding the overall approach, the Parish Council and Wye Future Group consider that WYE 1 and WYE 2 do represent the best housing options among the alternatives put to the community by the Borough Council during the community workshops.
41. However, **a comprehensive masterplanning exercise for ICL's WYE3 sites is key to Wye's future and WYE1 and WYE2 should be assessed within this context.**
42. Furthermore, WYE1 has been identified by Kent County Council as having high potential for archaeological remains. It is essential that an assessment is carried out before the allocation is confirmed in this DPD.
43. As regards WYE 2, a more specific policy requirement for a landscape boundary is required. KCC's concern that developments with more than 50 dwellings should have a secondary access is a serious constraint.

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