

Statement by James Ransley

Thankyou Sir for allowing me to speak, my name is James Ransley. I currently live on the north eastern edge of Ashford 300 meters from the Parish boundary but was a resident of Wye, for around 5 years, until 2014. As a child I commuted from Wye to school in Canterbury for many years.

I have my own business producing bespoke furniture from a light industrial unit in Ashford and am not a homeowner, the points that I seek to raise stem from that perspective.

It is surprising to me that only 1.43 affordable units are to be supplied from the Occupation Road site and none on the remaining two sites. Particularly so as I attended all of the Local Plan examination, apart from a single afternoon session, and therefore understand the affordable housing need in the Borough is high and was considered to be 368 dwellings per year. The Borough Council concluded that there was no realistic prospect of meeting this need even with the affordable provision levels set out in policy HOU1.

The Occupation Road site

The light industrial unit that my business rents in Ashford is subject to an application to demolish the building and replace with some new high specification units. I have on several occasions in the last few years been asked to contact the landlord and ask if vacant units can be let, but they do not wish to let them as they have had the current application in mind. I am well aware, from personal experience, that there is a strong demand in the Ashford area for older/lower specification industrial units at market prices.

I do regularly look for available units and cannot recall seeing the buildings north of Occupation Road being marketed. I have walked Occupation Road and believe all the units to the South to have tenants. The distribution of tenants appears to be a 100% occupancy rate to those commercial buildings south of Occupation Road and 0% to those North of Occupation Road. (also Mr Fidgetts rebuttal figure 4, CD/25/e(3)) The appellant's evidence is ambiguous on the point of whether it was Wye Bugs wish to move sites or that of the appellant (CD/18p). Were the units North of Occupation Road marketed on reasonable terms I believe that many of them could be let in a short period of time. I may be interested myself.

For this reason, having read the NPPG guidance (Paragraph: 028 Reference ID: 23b-028-20190315), I do not believe it is appropriate to apply vacant building credit here. Absent any evidence of marketing by the appellant, the site appears to have been 'made vacant'.

I also believe that strategic Local Plan policy EMP2 is engaged at Occupation Road and I am unaware of any '*genuine and sustained attempts to let or sell it on reasonable terms*' The appellant has told us that Wye Bugs, a business use, has moved recently from North of Occupation Road to the South.

The ADAS site

The 'Condition'

- I have read the July 2009 surveyors report commissioned by the previous site owner, Imperial College. This document was submitted as part of a representation to a previous development plan. The report includes the following-

-'The ADAS unit Blocks A, B, C and D cannot be re-let on a full and repairing and insuring lease because of the floor and roof construction. The structural integrity of all the floor and roof slabs is compromised by the use of wood wool permanent shuttering. This method of construction ceased to be used after a tax office structural slab failed to support the design load. The replacement of the defective construction would require the existing superstructure to be removed and reinstated with either solid concrete floor slabs or composite steel and concrete floors. Both options would increase the foundation loads.....

.....The necessary repairs to bring the building back into a rentable condition will exceed the value of the building'

- I have watched numerous videos online of the interior of this building and its condition which show how completely derelict the building has become.

- I have checked the Valuation Office Agency ratings listing and I know that the rateable value of the site is £0. I believe, having done some research, that this likely occurs as a result of the exemption *'the property is in such a state of disrepair that a reasonable landlord would consider the repair costs to be uneconomic'*

The 'Period of non use'

I understand from a submission to a previous development plan process that Natural England were the last remaining tenant, of a part of the site, and chose to vacate the building on 31st March 2009. Savills, the agent for Imperial College, said this was with Natural England *'classifying them as unsuitable for occupation'*

The 'Intervening Use'

I am aware of no intervening use

The 'Owner's Intention'

That I am aware the Appellant has never raised the prospect of continuing the research use on this site or indeed any 'B' use. I have checked the Ashford Borough Council Planning Portal and am unable to find any applications for planning permission for a 'B' use since the 2009 surveyors report. I imagine that the works described in the surveyors report would be caught by the definition of 'building operations' given in the Town and Country Planning Act (1990 at Section 55 paragraph 1A). However in the time since 2009 there have been 3 applications/prior approvals seeking residential use. (There are no applications for business uses on the site since 1988)

I believe, as a reasonable man looking at the site objectively, that the use has been abandoned.

If abandonment is not accepted and it is believed that the use remains extant then I am unaware of any '*genuine and sustained attempts to let or sell it on reasonable terms*' as required by EMP2.

The Wye College site

I attended university and studied 'International Securities, Investment and Banking.' I am therefore aware that in higher education in the UK in almost all institutions have 'terms'.

For example the Imperial College term dates for 2020-2021

3rd October (2020) to 18th December (2020) 76 days

9th January (2021) to 26th March (2021) 76 days

24th April (2021) to 25th June (2021) 62 days

Giving a total of 214 days

$214/365 = 59\%$ of the year

This figure assumes students remain across the weekend, which is frequently not the case.

The provided assessment of the potential impacts on Stodmarsh assumes full occupancy of all available bed spaces year round, which represents a theoretical maximum extant position. That figure is then deducted from the appellants calculation for the proposed development. That calculation chooses to use the 2.4 residents per dwelling assumption, rather than the maximum number of beds in the proposed scheme which is 170. It does not seem to be consistent with the precautionary principle to use what I will describe as a 'real world proposed figure' and deduct a 'theoretical maximum extant figure'.

If this were traffic modelling, the extant use traffic position would be established by comparison to real world traffic figures from comparable extant sites. I am aware of no reason why assessment of nitrates should differ from the established approach seen with traffic modelling.

The extant 'existing residents 91' (CD/25/a(2) page 17 and 18 of 178 pages) used by the appellant needs to be reduced to reflect the discontinuous occupation and other factors, such as whether it is realistic to assume a college would always operate at full capacity.

Viability

I note that the valuation by Strutt and Parker, supporting the viability assessment, was produced on the 4th April 2017 (CD/14/q page 10 of 28). I am aware that there are numerous other comparators in the local area that are now available.

The appellants viability appraisal was based on a site wide average of £309 per square foot.
(CD/14/q page 8 of 28)

At the time of the Strutt and Parker Appraisal Ramsfield in Wye and Blackwall Road (adjoining the Parish boundary) on the North East Ashford urban edge were starting to complete. Sales at Ramsfield were in the range of £309-379psf with a mean of £345psf. At Blackwall Road the range was £305-315psf with a mean of £311psf. The scheme at Wye selling at a premium of around £30psf over a north east Ashford urban edge site.

Currently there are two large residential schemes selling on the north east Ashford Urban edge. Available sales data for Conningbrook Lakes (adjoining the Parish boundary) show a range of £342-369psf with an average of £357psf. Eight of the nine sales are terraced units. The other site is Hinxhill Park (50m from Parish boundary) for which I currently only have marketed prices. The value range there is £336-374psf.

If I look at publicly available sales data in Wye for the past 12 months then I can find 9 sales where the sqft area is also available. They range in value from £314-404psf with a mean of £355psf. If I remove the two highest and two lowest outliers then the range is £334-374psf with a mean of £350.

I do not believe that it is appropriate for there to be no claw back of deferred S106 until 'Base development Value – B' (CD/37c page 25 Schedule 3) is achieved which I believe to be equivalent to an average of around £366psf. Which is £57psf above the £309psf that the appellants viability assessment is based upon.

I am aware of no attempts to let or sell the college in the past 5 years and we know, from the incoming Italian University at Withersdane, that there has been demand from higher learning providers for space in the village very recently. I am also aware that the Parish Council took pre application advice from ABC on their WYE571 proposal for the listed College buildings. The approach by the PC to TT on the subject was rebuffed.

All Appeal Sites

I understand from my attendance at the Local Plan that the Development Plan was assessed against the NPPF-2012 and not against the most recent version. I believe that HOU1(part 2) and IMP2 are inconsistent with NPPF-2019, as paragraph 64 of the NPPF contains no exemption to the 10% affordable housing requirement on either viability grounds or due to vacant building credit.

In summary I believe that all schemes result in an unjustified inadequate provision of affordable housing against the relevant policy requirements.

Thankyou for your time,