



**Statement from SAVE Britain's Heritage**  
**Planning Appeal: APP/E2205/W3259450**

Leanne Palmer  
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Our reference: 21033

1<sup>st</sup> February 2021

Dear Ms Palmer,

**Planning Appeal APP/E2205/W3259450 by Telereal Trillium Ltd against non-determination of planning application 17/00567/AS - Former Wye College buildings, High Street, Wye TN25 4AH**

SAVE Britain's Heritage has been alerted at short notice to the above appeal and understand that submissions from interested parties are scheduled to be heard on 5<sup>th</sup> February 2021. We therefore request the following statement pertaining to Appeal A be submitted to the inquiry for consideration by Inspector David Prentis on this date.

Whilst SAVE Britain's Heritage supports the principal of securing the long-term reuse and restoration of this remarkable ensemble of historic grade I and II listed buildings for public use, we object to the approach to their conversion set out in this application which we consider will cause undue and substantial harm to their collective significance and setting. We therefore call on the Inspector and Secretary of State to dismiss these appeals for three principal reasons:

**Substantial harm**

Firstly, we consider the extensive internal alterations proposed will cause substantial and unnecessary harm to a major group of historic buildings listed both Grade I and Grade II. Wye College is a medieval foundation of outstanding architectural and historic importance, a point recognised in its listing, in part, at grade I as of a site of the highest national significance in heritage terms. Founded by a John Kempe, Archbishop of York in 1447, unlike so many similar institutions, the College survived the turbulence of the Reformation serving both for educational purposes and as a grand residence during succeeding centuries. Almost 600 years on, its evolution and survival is therefore nothing short of a miracle and reflects the

reverence of succeeding generations of Kentish people for the surpassing qualities of this wonderfully numinous place.

The applicant's proposed approach to converting these grade I and II buildings to residential apartments requires extensive subdivisions to their medieval fabric and alterations for modern service functions. We consider subdivision of the Grade I college quadrangle buildings to be wholly inappropriate for such a rare and significant set of medieval heritage assets. Similarly, the subdivision either side of the medieval great hall with its walls constructed of 15th century timber frames, plaster and daub infill panels will cause significant harm to the historic interest of this grade I listed structure.

The Secretary of State has a duty under Section 66 of the Planning Act (Listed Buildings and Conservation Areas) 1990 to "*have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.*"

Paragraph 193 of the National Planning Policy Framework (NPPF), 2019 states that: "*When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be).*" With regard to the substantial harm we have identified above, paragraph 194 of the NPPF states that such harm to assets of the highest significance, such as those listed at grade I, "*should be wholly exceptional.*"

### **Less harmful alternatives**

SAVE does not consider the harm identified above to be inevitable, especially considering the less harmful and more sensitive alternative scheme put forward during the planning process on behalf of the local community by the Wye Building Preservation Trust (WBPT). This alternative scheme, submitted in evidence to the inquiry, seeks to acquire the core group of historic buildings and operate them for community purposes, with enhanced public access and without the need for extensive and harmful alterations to the buildings through subdivision for flats.

Despite receiving little to no assessment by the appellant or council, the alternative proposals show that a community operated Building Preservation Trust can operate the core buildings on a sustainable and viable basis. Given both the quality of the buildings and their successful adaption for previous educational use, we believe that the WBPT's proposals can attract both heritage and educational funds, including Lottery Funds.

A notable example supported by lottery funding is Stoneleigh Abbey in Warwickshire where the most historic interiors were re-opened to the public whilst other less historically significant parts were converted to residential use.

With regard to securing optimal viable use, a key argument forwarded by the appellant to justify the impact of their proposed interventions, Planning Practice Guidance on the Historic Environment (2019) states the following:

*"If there is only one viable use, that use is the optimum viable use. If there is a range of alternative economically viable uses, the optimum viable use is the one likely to cause the least harm to the significance of the asset, not just through necessary initial changes, but also as a result of subsequent wear and tear and likely future changes. The optimum viable use may not necessarily be the most economically viable one. Nor need it be the original use. However, if from a conservation point of view there is no real difference between alternative economically viable uses, then the choice of use is a decision for the owner, subject of course to obtaining any necessary consents."* (Paragraph: 015 Reference ID: 18a-015-20190723)

The proposals submitted by the WBPT to the inquiry show that an alternative economically viable use is possible for these buildings which requires a less harmful degree of intervention. We therefore consider the appeal scheme does not represent the optimum viable use for these listed buildings.

**Insufficient consultation regarding community alternatives**

Finally, it is clear from the strength of local opposition that the council and applicant have failed to consult or sufficiently engage with the local community regarding the site's restoration master planning. The community understandably wishes to ensure that public access and use to the site is secured in any scheme, as there has been during many periods of the college's history. The requirement that the community be involved in shaping the masterplan for restoration is set out in the adopted Wye Neighbourhood Plan (2019) which carries statutory weight.

Consultation with the Neighbourhood Forum is therefore a requirement in the shaping of any application for restoring Wye College, and not a matter to be secured merely by planning condition at an undetermined later date.

For the reasons set out above, we request the Inspector and the Secretary of State dismiss this appeal in favour of the less harmful, viable and community led approach submitted by the WBPT.

Yours sincerely,



**Benedict Oakley**  
Conservation Officer