Wye Neighbourhood Development Plan 2015-2030

Statement on behalf of Telereal Trillium

HPPC Ref: 30831
Date: August 2015
Contents

1. Introduction
2. Broad Strategy
3. Broad Location for new development
4. Range of future uses
5. Future masterplan
6. Design considerations
7. Summary and conclusions
1 INTRODUCTION

1.1 This statement sets out representations on behalf of Telereal Trillium, on the Wye Neighbourhood Development Plan 2015-2030, published June 2015.

1.2 These representations are put forward for consideration through the forthcoming process of Public Examination.

1.3 Telereal Trillium have exchanged contracts for the acquisition of the former Wye College Campus, Wye, Kent, from Imperial College, London; with completion on 16th October 2015. As the new owners of the land and buildings subject to Policy WNP11 of the submission version of the Wye Neighbourhood Plan, Telereal Trillium wish to participate in the process of Public Examination; this statement of representation is submitted, for consideration at the forthcoming examination.

1.4 Telereal Trillium commend the Parish Council on the thoroughness of the process of preparation of the Neighbourhood Plan; and agree that much of this will form a suitable basis for the preparation of a masterplan, to provide the context for re-use and development of the former Wye College Campus site, for a variety of uses including education, residential, business and community uses.

1.5 To provide the basis for preparation of a masterplan, the Neighbourhood Plan should be up to date, and provide sufficient flexibility, to enable the preparation of the masterplan, and the subsequent planning applications, to reflect changing circumstances, over the period to the first review of the Neighbourhood Plan, and beyond to the end of the plan period at 2030.

1.6 To ensure that the plan is up to date, and provides this flexibility, this statement sets out recommended changes to the Neighbourhood Plan, which it is considered will assist in enabling the Neighbourhood Plan to fulfill its role as an important part of the Development Plan for Wye.

1.7 Telereal Trillium are committed to working in partnership with the Parish Council and the local community to ensure that the former Wye College Campus makes the most effective contribution to the long term future of Wye, as a sustainable rural community. The detailed changes recommended to the Neighbourhood Plan are put forward in this context; Telereal Trillium acknowledge that the process of realising the former Wye College Campus assets in the most appropriate manner is a matter to be determined through the preparation of a masterplan, which will guide development over the period to 2030.
1.8 As the new owners of the former Wye College Campus, Telereal Trillium have taken the opportunity to comment on the submission version of the Neighbourhood Plan, to set out their own views on the strategy set out. This is considered important as the masterplan previously prepared by the former owners, Imperial College, London, has clearly had some degree of influence on the preparation of the Neighbourhood Plan to date. Telereal Trillium will be starting afresh with the preparation of a masterplan, in close consultation with the Parish Council and the local community; this statement provides the opportunity to set out a very broad overview of the direction to be taken, in embarking on the preparation of the masterplan.

1.9 The following sections of this statement set out a broad commentary on the Neighbourhood Plan, in its present form, and specific proposals for amendments to the wording of Policy WNP11, which deal specifically with the Imperial College London Campus at Wye. To ensure consistency throughout the Neighbourhood Plan, and to bring the Neighbourhood Plan up to date with the most recent changes in circumstances, we attach as an Appendix to the Statement a detailed schedule, setting out the changes which it is considered would be appropriate to be made to the Neighbourhood Plan, to reflect the suggested changes to the overall strategy, and to bring the Neighbourhood Plan fully up to date, while retaining the necessary flexibility to allow the Neighbourhood Plan to serve its purpose over the coming years.

1.10 Section 2 of this statement sets out our commentary on the broad strategy for Wye; Section 3 deals with the question of broad locations for new development; Section 4 outlines the range of future uses considered appropriate for re-use/redevelopment of the former Wye College Campus; Section 5 deals with the future masterplan preparation process; and Section 6 sets out our commentary on the sections of the Neighbourhood Plan dealing with design considerations. Section 7 then sets out our summary and conclusions.
COMMENTARY ON BROAD STRATEGY FOR WYE, AND CONTRIBUTION OF THE FORMER WYE COLLEGE CAMPUS SITE

2.1 Telereal Trillium (hereafter TT) acknowledges the sensitivity of the location of both Wye, and the former Wye College Campus, within the Kent Downs Area of Outstanding Natural Beauty. As noted in the Neighbourhood Plan, this does not preclude development, but nonetheless will influence its location, scale, and design. The analysis of views within, and out of, Wye (figure 2.3) provides a useful starting point, for consideration of the relationship of the former Wye College Campus, to the surrounding countryside.

2.2 TT agree that a landscape led approach is appropriate for the development of a masterplan, to guide future development; this landscape led approach will take account both of views into and out of Wye, and the most appropriate form of landscape treatment, which it is agreed will include a focus on the use of appropriate native species.

2.3 The Listed Buildings are of both local and national significance; the Listed Building legislation places an obligation on the owners to comply with the statutory duties, to maintain the Listed Buildings in good order, ensure that any alterations and adaptations do not harm their character and appearance as a Listed Building, and that any new development does not cause harm to their settings.

2.4 To ensure the long term maintenance of Listed Buildings, it is important to ensure that they have a long term economically viable use; this will be an important consideration, in identifying appropriate long term uses for the Listed Buildings.

2.5 A significant part of Wye is also a Conservation Area; again, this requires development to meet the statutory test, that development should preserve or enhance the character and appearance of the Conservation Area.

2.6 The other strand of the broad strategy for Wye, and the former Wye College Campus, is the desirability of securing a long term future for Wye, as a sustainable rural community. This will require consideration of the 3 strands of sustainability – social, economic, and environmental.

2.7 The social and economic aspects involve consideration of appropriate uses for future development, these are set out in Section 4 of our statement below.
2.8 With regard to environmental considerations, two key factors can be highlighted in the current Neighbourhood Plan – transport considerations, and renewable energy/sustainable construction.

2.9 Looking firstly at transport considerations, TT agree that new development should make a positive contribution towards reducing use of the private motor vehicle, through encouraging the use of more sustainable modes of transport – public transport, cycling and walking. TT consider that the Neighbourhood Plan as presently drafted places too much emphasis on walking, in particular with the somewhat arbitrary reference to a 5 minute walking distance/approximately 400 metres, from a notional centre of the village. TT consider that the Neighbourhood Plan should take a more flexible approach to the location of new development, in particular the availability of brown field sites for development (see our further comments at Section 3 below); with particular regard to encouragement of cycling, as a sustainable mode of travel. This is acknowledged extensively elsewhere in the Neighbourhood Plan (reference to improving cycling facilities, location on national cycle network route 18, see figure 2.6 of Neighbourhood Plan).

2.10 TT consider that new development also offers the opportunity to encourage higher levels of utilisation of both bus and rail services to Wye – the importance of which is acknowledged elsewhere in the Neighbourhood Plan.

2.11 Accordingly, our schedule of proposed changes recommends amendment to the strategic approach to location of new development at Wye, to address in a broader sense achieving a pattern of development better related to all modes of sustainable travel.

2.12 With regard to sustainable energy generation, and sustainable construction methods, TT agree that these will be important considerations, to be achieved where financially viable; in connection with new built development, within the framework of the masterplan to be developed in due course.

2.13 The proposal for a solar farm, as a freestanding entity, at the former ADAS buildings is not supported, however there may be scope for such energy generation methods to be incorporated within new built development at this site, see our further comments at Section 3 below on suitable locations for new built development.
2.14 There will also be scope for new development to achieve the highest standards of sustainability, in terms of construction, and energy efficiency measures.

3 SUITABLE LOCATIONS FOR NEW DEVELOPMENT

3.1 The Neighbourhood Plan acknowledges that the buildings and land forming the former Wye College Campus are suitable for new built development, including conversion of existing buildings, or redevelopment, as appropriate; with some areas of undeveloped land also being suitable for new development.

3.2 The broad approach to be adopted by TT will be to explore options for new development, with a focus on re-use or redevelopment of brown field sites, at an earlier stage in the programme, where appropriate.

3.3 In some instances, there are areas of brown field land/existing buildings, whose re-use or redevelopment would not have an impact on the overall strategy, to be developed through the masterplan. In other instances, the future use of land and buildings will best be developed through the masterplan.

3.4 The former ADAS buildings are identified as a brown field site in the Neighbourhood Plan; it is acknowledged that this site is well screened, and that its development would not have any adverse impact on the AONB. TT consider that this site should be identified as an early opportunity for redevelopment for new housing; this housing would seek to achieve the highest standards of sustainability, in terms of both sustainable construction, and use of alternative sustainable energy generation, and could perhaps be carried out at a low density, reflecting the provisions in the Neighbourhood Plan which seek to encourage a lower density of development, at the edge of the village.

3.5 The former ADAS buildings are a substantial complex of permanent buildings, presently disused; and, regrettably, attracting trespass and vandalism. They are in a state of total disrepair and are at the end of their economic life. They cause harm to the character of the area, and are a serious health and safety issue for the adjoining school. The complex of buildings lies immediately adjoining the present home of the Wye Free School, which is to be retained in its present location at the Kempe Centre. Accordingly, its redevelopment for housing will provide new homes close to the permanent location of the Wye Free School;
and in a location which is easily accessible on foot, or by bicycle, to the other facilities of the village. The site is located on the present route of National Cycle Route Network 18, as noted above; there are also proposals, noted in the Neighbourhood Plan, for further off route cycle ways to be developed, between Wye, and villages to the north, as part of a long term strategy of providing improved cycle routes between Canterbury and Ashford.

3.6 For these reasons, it is considered that the former ADAS building should be identified as a development opportunity for new residential development.

3.7 Figure 6.4 of the Neighbourhood Plan indicates areas for new housing development, on the east site of Olantigh Road; including land to the north of the Kempe Centre. This land is now likely to be used for expansion of the Wye Free School; accordingly, new development at the former ADAS buildings could be regarded as a substitution for development of this area for new housing development.

3.8 The area to the east of the Kempe Centre is shown on Figure 6.4 as an area for new housing; the boundary to this area appears to be defined in relation to the 5 minute/400m walking distance, we consider that more flexibility is required over the boundary in this location, given that the Neighbourhood Plan covers the period to 2030. It may be that at this stage a more strategic symbol to indicate this as a location for new residential development, rather than a specified boundary, would be appropriate, and our detailed schedule of proposed changes reflects this suggestion.

4 FUTURE USES CONSIDERED APPROPRIATE FOR THE FORMER WYE COLLEGE CAMPUS

4.1 TT agree with the provisions of the Neighbourhood Plan, with regard to the range of potential uses for redevelopment of the former Wye College Campus; but propose in addition to explore the possibility of developing a residential care home/extra care housing, as further detailed below. Our comments on the range of potential future uses is set out below.

a) Wye Free School

4.2 Wye Free School is a critical part of the overall strategy for the former Wye College Campus. It has recently been announced that the preference of Wye Free School is to remain in the Kempe Centre, its present location; and that an expansion plan, involving new
buildings on land immediately to the north, will be the subject of a future planning application. TT confirm that they are in full agreement with this strategy, and that appropriate contractual arrangements are currently being finalised, for a 30 year Lease.

4.3 The Neighbourhood Plan in its present form proposes that the Wye Free School should be located, on a long term basis, in the Listed and Edwardian buildings, although it acknowledges that there might be other possible locations, including the Kempe Centre, it is considered that now that this matter is settled, the Neighbourhood Plan must be amended to reflect the up to date position. Our schedule of proposed changes reflects this position.

b) Community Uses

4.4 The Neighbourhood Plan sets out the community's aspirations for additional community uses, including:

- Village Hall improvements
- Community use of some existing former Wye College Campus Buildings

4.5 Appendix B to the Neighbourhood Plan, Projects and Developer Contributions, acknowledges that, where contributions are sought from developers to assist in the provision of these facilities, the associated planning obligations will only be lawful where all of the following tests are met:

- Necessary to make the development acceptable in planning terms;
- Directly related to the development;
- Fairly and reasonably related in scale and kind to the development

4.6 TT confirm their willingness in principle to assist in the provision of additional community facilities, in conjunction with new built development, in a manner which accords with the statutory tests outlined above.

4.7 Accordingly, the rate and amount of additional community buildings/uses provided will be related to the amount and rate of delivery of new built development. These are matters which will be explored further through the future preparation of a masterplan.
c) Residential development

4.8 New housing will be an important contributor to the future of Wye as a sustainable rural community. The Neighbourhood Plan acknowledges that the population of Wye has fallen in recent years; this is an inevitable result of a combination of falling household size, which is linked to the ageing population structure of Wye, and the rate of new residential development failing to keep up with the resulting fall in population.

4.9 Given the sensitive location of Wye, within the AONB, lower rates of development, historically, would not be deemed unusual; however, the availability of the former Wye College Campus buildings, and land, for redevelopment, offers an opportunity for development which enables the population of Wye to be stabilised, or perhaps benefit from a small increase.

4.10 New housing brings numerous benefits. There will be an increased population, to support local community facilities, and local services; the Neighbourhood Plan notes with regret the loss of retail outlets in Wye in recent years. The establishment of Wye Free School means that Wye now has a full range of educational establishments, within the settlement; accordingly, Wye represents a highly sustainable location for new housing development, with the need to travel minimised by facilities being in close proximity.

4.11 TT are not approaching the matter of new housing with a specified level of built development in mind; this is considered to be a matter best developed through the evolution of the masterplan, as the precise nature and scale of individual development opportunities is clarified, as further detail emerges. TT sees the immediate opportunity being to make best use of brownfield sites, and is content to leave the overall quantum of new residential development to be addressed in the next review of the Neighbourhood Plan, in the light of completion of the masterplan, and experience of the rate of development in the preceding years.

4.12 TT see the principle opportunities for new residential development/uses as including:

- Former ADAS buildings
- Listed and Edwardian buildings, in conjunction with community uses
- Redevelopment of other existing Wye College buildings
d) Residential Care Home/Extra Care Housing

4.13 Wye has a population age structure weighted towards the older age groups; the aspiration of the Neighbourhood Plan to provide a day care centre for the elderly is noted. TT have identified an opportunity for the development of a residential care home/extra care housing, through the redevelopment of existing former Wye College Campus buildings; this would meet both local needs, and the wider need for additional specialist accommodation for the elderly. The need for such accommodation, on a district wide basis, is highlighted in the 2014 Ashford District Strategic Housing Market Assessment; which notes the long term trend of an increasingly aged population, and in particular the growth in the number of people aged 85 plus, in need of special care.

4.14 TT confirm that they will explore the possibility of the inclusion of day care facilities for the elderly, as part of such a development; this, as for all other aspects of future development at the former Wye College Campus, will be the subject of detailed discussions with the Parish Council and local community, prior to the submission of any planning applications.

e) Business Floor Space

4.15 TT confirm that they are happy to look at the retention and provision of floor space for both existing and new businesses; subject of course to the commercial viability of such arrangements. At this stage, it is intended that discussions will be held with existing occupiers of former Wye College Campus buildings, with regard to their own aspirations; consideration will be given to both existing and further short term letting of existing buildings, for business purposes. Subject to the establishment of market demand, at viable rental levels, TT confirm their intention to include business accommodation within the long term strategy for the former Wye College Campus land and buildings.

5 MASTERPLAN PROCESS

5.1 The preparation of a masterplan is agreed as a pre-requisite to establishing the long term development strategy for the former Wye College Campus land and buildings. While it is agreed that there will be some development opportunities which can be realised at an early stage – where these will not affect the overall strategy, as the Neighbourhood Plan
acknowledges – the main development opportunities should be guided and directed by an agreed masterplan.

5.2 TT agree that this masterplan should be developed in partnership with the Parish Council and the local community, and, subject to agreement of all parties, would propose that this be informed by a joint working group, with representation of the relevant local parties.

5.3 The starting point for the masterplan will be to achieve a full appreciation of the current village assets, and needs, coupled with a space audit of the existing buildings, within the former Wye College Campus.

5.4 The masterplan will then be developed, through consideration of the most appropriate uses for existing buildings, including the Listed and Edwardian buildings and through consideration of the most appropriate locations for new development.

5.5 Where the masterplan proposes new community uses/buildings, it will be important to ensure that these are viable, and can be funded through development/other sources of income, and maintained in the longer term, from income from lettings etc. It is anticipated that there will be scope to achieve the joint use of both existing and future buildings provided as part of the Wye Free School Project.

5.6 It is acknowledged that much study, and consideration, has gone into both the Neighbourhood Plan, in its present form, and the emerging proposals for a masterplan prepared by Imperial College. While the latter masterplan will not be progressed, the background studies which informed it will nonetheless form a valuable part of the preparation of the new masterplan. The timetable for preparation of the masterplan should taken account on the one hand of the need for full public consultation, and sufficient time to consider realistic alternatives; while on the other hand, not being a factor which would delay the most appropriate use or redevelopment of existing buildings, the future of the Listed Buildings being of particular importance, to be established at an early stage. Accordingly, the aspiration of TT is that a new masterplan can be prepared and approved, within a timescale of approximately 12-15 months.

6 DESIGN

6.1 Policy WNP 11, the Imperial College London Campus at Wye, sub section (h) requires that:
“The design of all new buildings across the site should pay particular regard to innovation in material and form, and should where possible embody elements such as green roofs and non reflective materials to limit the visual impact of additional development on the surrounding AONB. Any development should provide a connection to the nearest point of adequate capacity in the sewerage network, as advised by Southern Water.”

6.2 TT confirm their commitment to achieving a high level of design, and a willingness to consider both innovative, and traditional building forms and materials, as appropriate, given the setting of the site within the AONB, and the location of part of the site within the Conservation Area, and having regard to the setting of the Listed Buildings, both on site, and in the local area.

7 SUMMARY AND CONCLUSIONS

7.1 Telereal Trillium are committed to working in partnership with the Parish Council and the local community to ensure that the former Wye College Campus makes the most effective contribution to the long term future of Wye, as a sustainable rural community. The detailed changes recommended to the Neighbourhood Plan are put forward in this context.

7.2 It is agreed that the most effective means of realising the potential of the former Wye College Campus assets is through the preparation of a masterplan, to guide development over the period to 2030, within the overall context of the Neighbourhood Plan.

7.3 The sensitivity of the former campus land and buildings is acknowledged, with regard to their location within the Area of Outstanding Natural Beauty, and given that the former campus lies partly within the Conservation Area, and includes important listed buildings.

7.4 It is agreed that new development should make a positive contribution towards reducing use of the private motor vehicle, through encouraging use of more sustainable modes of transport – public transport, cycling and walking. However, it is considered that the Neighbourhood Plan as presently drafted places too much emphasis on walking, in particular the somewhat arbitrary reference to a 5 minute walking distance approximately 400m, from a notional centre of the village; which is considered should be removed from the Neighbourhood Plan.
7.5 The former ADAS buildings, which are identified as a brown field site in the Neighbourhood Plan, are considered to be suitable for new residential development, at a density reflecting their edge of village location.

7.6 The Wye Free School has now committed to a long term future in the Kempe Centre, with expansion onto adjoining land; accordingly, the Neighbourhood Plan should be amended to reflect this natural position.

7.7 Other uses appropriate for the former Wye College Campus site will include community uses, business uses, and a combination of conversion and redevelopment/new build, for new houses. Scope will also be explored for development of a residential care home/extra care housing, meeting acknowledged needs at the district and local level. Such development could include day care facilities for elderly people.

7.8 Detailed changes pursuant to these general principles are set out in the schedule at Appendix A, for consideration for amendment to the Neighbourhood Plan prior to the forthcoming process of Public Examination.