

**BD16 CONSULTATION STATEMENT**

**Introduction**

This background document summarises the responses received following publication of the pre-submission consultation version of WNP and indicates how the plan has been revised. Consultation involved three processes.

a. Deposition of the plan, appendices and background documents on the Parish Council website with a request for comments.

b. Circulation of a Guide to the WNP and response forms to every household, business and landholder in the Parish.

c. Distribution of CDs with all documentation to the list of consultees provided by ABC.

The official consultation period was from January 29th until March 13th, but late responses have also been considered.

This report on the responses to the consultation document is divided into four parts.

1. Comment on response forms received from parishioners
2. Comment on separate responses received from parishioners
3. Comment on responses from statutory consultees and Imperial College London
4. Concluding remarks

Appendices include lists of consultees and businesses contacted (16a), a copy of The Guide (16b), detailed comments transcribed from response forms (16c) and letters received (16d).

**Summary of the main issues and concerns**

The following key issues were raised in responses to the pre-submission consultation and have been addressed in the revised plan.

1. Scale of development
2. Need for protection of the environment, particularly the SAC and wider AONB
3. Impact of development on traffic in Wye village and on rural roads
4. Parking
5. Impact of development on the historic conservation area
6. The permanent location of the secondary school
7. Community use of the Grade I Wye Campus buildings
8. Need to establish a clear village envelope and define green spaces
9. Promotion of business in general
10. Formulation of a flexible policy for WYE3
11. Developer contributions as a means to support projects
12. Fulfilment of Basic Conditions –conformity with Local Plan and National policy
13. Provision of affordable and local needs housing
14. Duplication in policies
15. Infrastructure constraints on development proposed
16. Mitigation of the impacts of development
17. Use of the ADAS site
18. Safety at the level crossing
19. Groundwater protection
20. The role of the river Stour

The plan document has been revised taking account of all responses received as presented in detail in the main text of this Consultation Statement.
1. **Response to the circulated response form**

Every adult living in the parish received a summary guide to the plan (BD16b) and a link to the full documents on-line, and was asked to complete a response form shown below.

**CONSULTATION DRAFT: COMMENT FORM**

30 January 2015 – 13 March 2015

If you’d like to complete the form on-line, please go to the parish council website: [http://www.wyewithhinxhillpc.kentparishes.gov.uk/](http://www.wyewithhinxhillpc.kentparishes.gov.uk/)

**Part 1: About the consultation draft plan**

1. Are you generally in support of the draft Plan? Yes/No/Don’t know/Other:

2. If you disagree with any part of the plan, what do you wish to see changed and why? (please give page reference either in the Guide or the Plan itself):

3. Are you generally in support of the draft Plan policies? Yes/No/Don’t know/Other:

4. If you disagree with a policy/ies, what is the policy number/s (ie WNP 7) and why do you disagree (please give a response for each policy you disagree with)?

(More over …)

**Part 2: About you**

5. What is the name of the person completing this response form? If you wish to remain anonymous please leave this blank.

   First name:   Surname:

6. What is your address?

   House name/number:
   Street:
   Postcode:

7. Are you (please tick all that apply):
   a. A resident
   b. Employed by a local business/organisations
   c. Owner of a local business/organisation
d. A landowner/agent for a landowner

e. Other – please state:

8. For residents
   a. What is your age (person completing response form)?
   b. What is your sex (person completing response form)? Male/Female

9. Have you any other comments for the Parish Council or about the consultation draft Plan?

If you need more space, please complete on a separate sheet of paper (headed with your name) and staple to the response form before submitting it. Please do not complete a new form. Please return your form to your patch-worker. Or for businesses/organisations etc based outside Wye, please send to: Wye Neighbourhood Plan Group, c/o Wye with Hinxhill Parish Council Office, Brook, Ashford, Kent TN25 5PF.

BY THE CLOSING DATE 13/03/15. Thank you for completing this response form.

In total, 729 people out of an adult population of 1,890 completed a response to the consultation draft – a 38.6% response rate. This is a similar response rate to some of the Neighbourhood Plan referenda elsewhere in the country.

Responses received have been summarised as follows

Q 1 Are you generally in support of the draft Wye 2030 Neighbourhood Plan?

Of the respondents, 88% (621/729) were generally in support with 8% (55) ‘don’t knows’ and 4% (29) opposed.
Q2 If you disagree with any part of the plan, what do you wish to see changed and why?

While the majority of residents were in agreement with the plan, some respondents who ‘generally agreed with the plan’, did disagree with some part as well. Even the most frequently cited ‘disagree’ (36 times) ‘traffic impact’ equates to <5% of responses. Only 3.4% (24) disagreed with the plan’s proposals on parking. The 147 ‘disagree’s fitted into 11 categories as charted below:

The full list of comments to Question 2 is presented in BD16c.
Q 3 Are you generally in support of the draft Plan policies? Yes

| Don’t know | 8% |
| No         | 5% |
| Yes        | 87% |

Q4 If you disagree with a policy/policies, what is the policy number and why do you disagree?

<table>
<thead>
<tr>
<th>Disagree policies</th>
<th>Number of Disagrees</th>
</tr>
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<tbody>
<tr>
<td>WNP 1 Five min village, greenspaces, views</td>
<td>6</td>
</tr>
<tr>
<td>WNP 2 Quality design</td>
<td>4</td>
</tr>
<tr>
<td>WNP 3 Traffic</td>
<td>1</td>
</tr>
<tr>
<td>WNP 4 Business development</td>
<td>1</td>
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<tr>
<td>WNP 5 Local needs housing</td>
<td>6</td>
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<tr>
<td>WNP 6 WYE3 mixed use/phased</td>
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<td>WNP 7 WYUJ detail</td>
<td>7</td>
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<tr>
<td>WNP 8 Naccott</td>
<td>2</td>
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<tr>
<td>WNP 9 Developer contributions</td>
<td>3</td>
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<tr>
<td>WNP 10 Countryside and environment</td>
<td>3</td>
</tr>
<tr>
<td>WNP 11 Phasing</td>
<td>1</td>
</tr>
<tr>
<td>WNP 12 Accessible housing</td>
<td>0</td>
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<tr>
<td>WNP 13 Density</td>
<td>4</td>
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<tr>
<td>WNP 14 Superfast broadband</td>
<td>0</td>
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<tr>
<td>WNP 15 Traffic analysis</td>
<td>6</td>
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<tr>
<td>WNP 16 Traffic calming and parking contributions</td>
<td>5</td>
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</tbody>
</table>

The highest numbers of disagrees (24) to a policy were for the WNP 7 relating to the former college or WYE3 site. The most common are set out in the table below. The ‘disagrees’ each amount to <1% of total responses.

| Housing numbers                                             | 2                   |
| Moving Free School to Edwardian college buildings            | 6                   |
| Proposals for ADAS                                           | 4                   |
| Community use of Grade I buildings                           | 6                   |
The full list of comments to this question is given in BD16c.

Q7 Status or role:
Of those who responded 99% were residents. Of these 12 were also employed by a local business, 29 also owned or managed their own business and 14 were also landowners or land agents. In addition there were responses from 2 employees, 4 business owners or managers and 3 landowners/land agents.

Q9: What is your age (person completing the response form)
The age range of people completing the response form was at the older end of the spectrum although a reasonable number of 30-49 year olds also completed a response ie 23% or 160 people.

![Age profile of those completing a response form](chart)

A comparison with 2011 Census profile (see below), which gives an overall percentage for each age group out of the total population, suggests that 16-29 year olds were under represented as respondents but that over that age there is a reasonable match with the Census’ Age Profile.

![Age profile (Census 2011)](chart)

Qu 10 What is your sex?
More women (56%) than men (45%) completed a response form. Men were grumpier.
Q 11 Have you any other comments?

A lot of the comments received were in support of points previously made. However a small number of people complained about the size of the type in the booklet. Positively, a lot of people took the time to praise the plan and the work of the parish council, although a much smaller number used it as a chance to re-emphasise their disagreement with the plan (7 in total). Parking and traffic came out as the main concerns.

Conclusion

The overwhelming response to the draft plan from residents, but also from businesses and landowners, is positive. Importantly, the responses have confirmed support for:

1. The scale of development proposed.
2. The importance of protection of the environment
3. The need for mixed development on WYE3 to replace lost business and education following College closure.
4. The critical assessment required to understand the impact of development on traffic in Wye.

There seems to be a general consensus that residents’ views have been listened to and the original proposals have been altered as a result.

However, some parishioners remain disappointed or angry. Some argue that the amount of growth proposed is too great, and will cause grid-lock, some that their exciting and innovative environmental proposals for co-housing and self-build have not been taken on board (the former has not, the latter has). Equally, someone else stated:

‘Many thanks to all those involved for their hard work and dedication. The plan allows a sustainable development within the village and considers environmental issues. Excellent.’

A small group found the print in the summary document (sent to every single household) was too small, although one lady in her 90s complimented the group on the clarity of its documents. This will be addressed in future publications.

A selection of the pros:

| A clean, comprehensive plan. Thank-you to everyone who has had a hand in producing it. |
| A very comprehensive document. I am pleased to see that the beauty and community feel of our village will be retained. |
A very well thought out document which is a massive step forward from some of the original proposals put forward by...

A selection of the cons:

- I feel that the Wye 2030 Neighbourhood Plan is far too complicated for the ordinary person to follow!!
- I have only one comment, 162 houses will spoil Wye and make what is a village into a town and will ruin the village. I ha...
- I think it is disgraceful Imperial has had these houses and flats empty for 9 years and they should be done before they a...
- I would like to thank everybody involved for their efforts in wanting to maintain a nice village to live in and seek the view...  

In attempting to work with the consensus view it was concluded that, based on the results of the circulated questionnaire, no major changes were needed to the draft plan.
2. Detailed responses received from parishioners

Copies of all letters, mostly scanned documents, are given in BD16d

Diana Pound
A valuable critique was received from Diana Pound. Her emphasis was on the failure of the draft plan to address environmental issues and provide sufficient protection for the environment and landscape within the parish and in Wye itself. Many of her comments echoed statements received on response forms and questions raised at workshops and public meetings. Many of her proposals have been incorporated into the revised plan. A copy of her letter and the responses made with respect to revision of the plan is given in BD16d.

Mr and Mrs Paterson
The letter highlights concern over the village envelope and in particular the site WYE01. The WNP group overlooked the fact that positive pre-submission consultation had been made for this site and also the adjacent surgery car park. The village envelope has been redrawn to include these sites. The need for definition of the village envelope indicative of 5min walk to the village centre and defining Wye as a village, has been overwhelmingly supported by parishioners and the red line has, therefore, not been altered significantly.

Anon 1
This correspondent raises issues that are in common with several negative responses received on comments forms eg traffic and too much housing. The Free School was supported in a previous questionnaire (See BD2). The points raised by Anon 1 are countered by positive comments received in other responses. On balance, no changes are required to the plan based on this letter.

Anon 2
This letter questions the use of the ADAS site as an area for renewable energy generation, favouring residential development. It should be pointed out that the ADAS site is on a SW facing slope so not inappropriate for a solar farm, proposed as a project for appraisal (WNP Appendix B). The decision not to propose the ADAS site for residential development was made because it lies well outside the 5 minute walking distance from the village centre. In view of its location and also the likely increase in traffic following development of the main campus site (eg including the permanent establishment of the secondary school) intensive business or residential use here would be harmful. The development of the ADAS site also goes against the core principles of the establishment of a concentric village and minimising environmental impact. Proposals to return the site to countryside as a managed woodland or that it be developed for renewable energy as outlined in Appendix B, including as a solar farm, have received strong support.

On balance, no changes are required to the plan based on this letter.

Ian Cooling
Two important points are raised in this response – the need for jobs and traffic flow along the lanes. The WNP has as a core objective the promotion of business activity (Policy WNP4). The activities encouraged are not just high tech – education, research, food production and tourism are specifically mentioned. Business opportunities are also encouraged through WNP7 dealing with sites on Occupation Rd in WYE3. The development of ADAS proposed in the WNP would not rule out small business units based alongside renewable energy generation. Workshop space is already available in the parish eg the under-used Sidelands Site owned by ICL along Upper Olantigh Rd.

Concerning traffic, the proposal made that the lanes into Wye should be improved to allow increased traffic flow is a potential means to mitigate the delays occurring at the level crossing. However, such improvements would require major sources of funding beyond the 106 and CIL income expected from the housing developments acceptable in Wye. As highlighted in the WNP, the narrow lanes should not be considered as appropriate alternative routes into Wye. For example, to avoid the railway crossing from Kennington (a direct route of 4.8km), taking the southern route through Naccolt would add 5.2km to the journey to Wye and using the northern route via Godmersham adds 10.7km.

On balance, no changes are required to the plan based on this letter.
3. **Responses from Statutory Consultees and Imperial College London**

In view of the detailed submissions made by certain consultees and responses required to each important point by the WNP group, the correspondence with inserted comments (in blue) are included in the main body of this BD.

**a. Response from Ashford Borough Council**

This response was in two parts – the first addressed issues about fulfilment of Basic Conditions and the second suggestions for improvement. Significant changes have been made to the pre-submission document based on the response from ABC. Changes are noted within the text of the ABC response below.

**Part 1 - Issues identified in meeting the Basic Conditions**

This part of their representation considers whether the policies contained within the draft Wye Neighbourhood Plan meet the basic conditions, notably if the policies conform to national and local planning policy.

**Policy WNP1a – village envelope**

Although the Tenterden & Rural Sites DPD relies on a strict definition of ‘built confines’, the introduction of the Localism Act (2011) now enables local communities to shape where they want to locate development through neighbourhood planning.

The ‘Village Envelope’ concept is in line with this in that it relies on local interpretation and knowledge of the village, its landscape setting and surrounding features to define a physical line on a map. This policy links directly to aspirations identified through consultation with local residents wanting a definite boundary. Although a departure from adopted local policy, notably TRS1, given the change in emphasis in national policy towards localism and the locally adopted ‘village envelope’ procedure, piloted recently in Challock, the Council considers the neighbourhood plan to be an appropriate vehicle to implement such a policy.

It is currently difficult to ascertain whether policy WNP1a as drafted will meet the basic conditions. On the one hand it tries to address development outside the village envelope, but also tries to protect green space within the village. It should either address issues within the village envelope or outside the village envelope but not both. Consideration should be given as to whether two separate policies would be a more beneficial way forward. If the ‘exceptional circumstances’ referred to within the policy are the same as that for policy TRS2 then this would be just a repeat of existing local policy. If this is the case, it would be more appropriate for policy WNP1a to focus on controlling development within the village envelope.

The WNP has been modified to address the comments about the envelope. It is correct that Policy 1a aims to support the objective to protect Wye’s sense of place and covers development within and outside the envelope conforming with TRS1 and TRS2. The protected areas (mostly falling within the envelope), as mapped in Appendix F, have now been designated as Locally Important Green Spaces according to NPPF Planning Practice Guidance paras 005 and 006 (revised 6/3/2014).

**Policies WNP1c, WNP7(m), WNP9, WNP16 - Developer Contributions**

There are several policy requirements within the draft WNP (WNP1c, WNP7(m), WNP9 &
WNP16) that require developer contributions to support projects and/or infrastructure. These are mainly set out within Appendix B as follows:

- A new pavilion;
- Refurbishment of the village hall;
- Electronic speeding signs;
- New off road parking area;
- Campus community project
- Community energy project on ADAS site;
- Creation of a ‘Green Orbital’ new cycle path links;
- Wildflower corridor;
- Riverside Park;
- Wye Community Farm;
- ‘Restoring our Landscape’ Project.

Although not set out within Appendix B, policy WNP9 additionally requires developer contributions towards:

- The enhancement of the surgery; and
- The provision of a day care facility for elderly residents of Wye

National policy requires the timely provision of infrastructure to achieve sustainable development. The principle of requiring developer contributions to meet development needs is established through policy CS8 and CS18 of the Core Strategy. Policy TRS19 takes this forward for the rural areas of the Borough by requiring all developments to make provision for additional infrastructure, community services and facility needs arising from the development.

The projects requiring developer contributions in the draft WNP are extensive. In the Community Infrastructure Regulations 2010, Regulations 122 and 123 outline strict legal tests that local planning authorities must meet in applying Section 106 requirements to any grant of planning permission. These are detailed within the NPPF paragraphs 203 and 204:

Paragraph 203: ‘Local planning authorities should consider whether otherwise unacceptable development could be made acceptable through the use of conditions or planning obligations. Planning obligations should only be used where it is not possible to address unacceptable impacts through a planning condition’.

Paragraph 204: ‘Planning obligations should only be sought where they meet all of the following tests:

- necessary to make the development acceptable in planning terms;
- directly related to the development; and
- fairly and reasonably related in scale and kind to the development’.

At the moment it is difficult to ascertain whether any of these projects will meet all of the tests from the information provided and therefore the Borough Council would be unable to apply them through the WNP policy. It is not clear what type of development this policy will be applied to. Evidence should refer to each of the tests, as well as providing delivery information, i.e. collaboration with delivery bodies, costs etc. It is also not clear which project relates to which WNP policy.

Section 106 monies cannot be used to retrofit existing problems within the local community. Where the legal tests are met, the s106 requirement should be included within site specific policies as part of
the mitigation package.

Where the projects are more aspirational, rather than projects that will make the development acceptable, once adopted, the Community Infrastructure Levy (CIL) would be a more appropriate mechanism to take these aspirations forward as the legal tests are more flexible.

In the light of the comments received, the submitted document includes a more considered approach to the allocation of appropriate financial support from developer contributions, Section 106 and CIL.

**Policy WNP5 – Local Needs Housing**

The Core Strategy identifies a need for affordable housing within the Ashford Borough. Policy CS12 requires all qualifying housing development sites to deliver a percentage of affordable housing to contribute towards this identified need. In contrast, future demand for local needs housing is difficult to quantify over the long term and may fluctuate over time. The Council therefore uses an ‘exceptions’ policy (TRS4 of the Tenterden and Rural Sites DPD) to deliver local needs housing on sites that would not normally be acceptable for residential development in policy terms.

This approach has been successful in the past in delivering the Borough’s local needs housing.

Policy WNP5 aims to utilise the requirements of policy CS12 to deliver local needs housing in Wye. As it currently stands this is contrary to local strategic policy as it would require the integration of local needs housing within the affordable housing element of a scheme. The Borough Council are currently reviewing the adopted approach to local needs housing through the preparation of the Local Plan 2030. The Council wishes to address this issue at a strategic level, but until such a policy is formulated and adopted it is considered premature to bring forward non-strategic policies on this matter through the neighbourhood planning process.

Policy WNP5 has been retained following discussions with Jennifer Shaw, Housing Strategy Manager. The following statement has been added to Background document BD5.

**The provision of Affordable housing in Wye and the Neighbourhood Plan** - The Local Housing Needs Survey undertaken in January 2013 by the Parish Council through Action for Communities in Rural Kent (ARCK) identified a need for 28 affordable homes, mostly immediately but some for three years’ time. It also identified the household size and tenure preferred. The main source of that affordable housing in the Plan period will come from the development of WYE1, 2 and 3 producing, in total 102 units and thus resulting in some 34 units of affordable housing in line with the Local Plan policy CS12 which the Plan supports, but subject to viability. The assessment shows the tenure mix should include a shared-ownership or equivalent ownership-entry tenure.

There is already a significant proportion (%) of social housing in the Parish but this has diminished with the Right to Buy. Nevertheless this housing provides a good size and type range of rented accommodation, including houses, flats and bungalows as well as sheltered housing; vacancies are let by Ashford Borough Council. ABC follow a choice-based lettings policy that primarily responds to a needs-based assessment, though within this it can give priority to those with proven local connections.

The Parish Council considers that to meet “Local Connection” households’ needs is important, however the shortage of sites makes the finding of an Exception Site very difficult, given environmental constraints and the local land ownership profile. It therefore sees one way of ensuring that improvement is made in the securing of homes for those needing housing with only limited housing need would be to apply a Local Lettings policy to the allocation of newly built social housing. Such an approach would mean that this need can be met on a foreseeable basis whilst the search for an Exception Site might limit any supply for a very long time.

**Policy WNP7 – Imperial College campus (WYE3) Allocation**

The main site allocation in the WNP is the Imperial College campus land that was allocated as site policy WYE3 in the Tenterden & Rural Sites DPD. Policy WNP7 sets out a series of detailed policy requirements for the redevelopment of the site that reflect the aspirations for a mix of uses set out...
in policy WNP6.

The draft policy is highly prescriptive, beyond what one might normally expect a development plan policy to be and may not be regarded a sufficiently flexible to meet the basic conditions test. The policy also reiterates the seeking of financial contributions from the development of the site for a range of local projects but without any clarity on the scale or justification for these contributions.

More generally, the policy would benefit from some additional clarification around some of the development requirements, for example around public access to Withersdane gardens, self-build accommodation, acceptable residential densities and the re-use of the former ADAS land for renewable energy.

Policy WNP7 (previously WNP11) has been revised to offer a more flexible approach to mixed development on WYE3 bearing in mind the constraints on the scale of development considered sustainable on the site. The detailed plans outlined in the pre-submission document are now included as indicative proposals in WNP Appendix G.

Policies WNP11 – Phasing

Table 6.2 shows ‘windfall’ sites and ‘change of use’ sites as being phased over the plan period. This would not meet the basic conditions as it would be contrary to the NPPF and could be interpreted as holding back development. It is recommended that this policy is removed as Table 6.1 provides an indicative number of dwellings that could come forward over the plan period.

Comments relating to WYE3 phasing are provided in Appendix 3.

Table 6.2 has been revised taking account of these comments. The number of windfall and change of use sites has been reduced to 50 in total.

Policy WNP10 – countryside and environment

It is noted that policy WNP10 is being used to reinforce reference to core environmental and sustainability policies, but the requirements are already adopted national policy or local planning policy or are a repeat of policy elsewhere within the draft WNP. It is recommended that this policy is removed.

Policy WNP10 has been removed to avoid duplication

Policy WNP12 – mobility access

Policy CS9 of the Core Strategy requires developments that are flexible, adaptable and with adequate living space to provide for a reasonable quality of life. The Council has adopted a Residential Space and Layout Standards SPD which sets minimum and advocated living space standards for residential development. Policy WNP12 links to this aspiration but it is not clear what quality assured standard will be applied to implement the policy. The Council uses ‘Lifetime Homes’ as part of the ‘advocated minimum’ standards which requires homes to be adaptable enough to meet the needs of people at various stages in their life, including age related or other mobility difficulties including wheelchair users. Policy WNP12 can be considered to be in general conformity to advocated standards as set out within the Residential Space and Layout Standards SPD.

However, it must be stressed that the Government are proposing significant changes which may affect this policy in the short term. Following the outcome of the Government’s Housing Standards Review, the Government has announced their intention to bring forward standards on access, water, and security in internal space within the Building Regulations’ system. These standards will underpin the Government’s high quality housing agenda.

In terms of accessibility within the home, Local Planning Authorities will only be able to use the Nationally Described Standards where they can be justified and are viable. An LPA will only be able to apply these ‘optional’ standards through the adoption of a policy in a Local Plan. Wheelchair accessibility standards are much higher than accessibility standards and the Government are proposing that local plan policies will only be able to apply these to affordable rent or social rent tenures.
The final interpretation of these proposals is reliant on the outcomes to consultation and the Deregulation Bill. The Government will issue a planning policy statement anticipated to be released before the pending election and to become statutory in the autumn. The statement will be applicable to neighbourhood plans. Housing Standards Review Technical Consultation states, ‘from the date the statement is made, neighbourhood plans should not set any proposals requiring compliance with technical requirements relative to the construction, layout and performance of new dwellings. Neither should they seek to apply optional Building Regulations requirements, where these are not a requirement of the Local Plan’.

In view of the high standards being set by ABC it is now considered unnecessary to include Policy WNP12 – it has been removed from the submitted document. However reference is made to the need for mobility access in the text of 6.3.2.

Policy WNP16 – Traffic calming and parking

Policy WNP16 as it currently stands is not acceptable as it requires developer contributions on all major sites regardless of whether there are any identified traffic impacts or not which is contrary to Regulation 123 of the CIL Regulations. This policy clearly links with policies WNP3 and WNP15 consideration should be given to drawing these policies together through a redraft.

Policy WNP3 is a core policy and aims to avoid significant increased in traffic on the road in and around Wye, policy WNP15 requires the analysis to determine whether development will impact on traffic flows. Where significant impacts have been identified and mitigation measures are needed, the requirements of policy WNP16 can be applied.

Given that protection against the impacts of increased traffic is addressed in core Policy WNP3, and in view of concerns about the redundancy of WNP16, it has been removed from the plan.
Part 2 - Recommendations on the draft

This section of the representation provides comments on the draft in ABC's capacity as a critical friend and focuses on recommendations / changes that are not critical to meeting the basic condition.

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<tr>
<th>Page</th>
<th>Comment</th>
<th>Recommendation</th>
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<tbody>
<tr>
<td>4</td>
<td>The WNP specifies the plan period within the 'foreword', it would be beneficial to have this on the front cover and put in context within paragraph 1.5 which deals with monitoring and reviewing the neighbourhood plan.</td>
<td>Add text</td>
</tr>
<tr>
<td></td>
<td>Add text</td>
<td>Done</td>
</tr>
<tr>
<td>6</td>
<td>Plan Period</td>
<td>Provide explanation and commitment to a review of WNP before 2021.</td>
</tr>
<tr>
<td></td>
<td>Wye with Hinxhill Neighbourhood Development Plan (WNP) will become part of the development plan for the neighbourhood area once made. The draft must therefore be in general conformity with the strategic policies of the development plan currently in force in order to meet the basic conditions. The WNP has therefore been drafted to align with adopted policies within the existing development plan for the Ashford Borough and which relate to Wye (Core Strategy 2008, Tenterden and Rural Sites DPD and Saved Local Plan 2000 policies). Section 38A of the Planning and Compulsory Purchase Act 2004 requires neighbourhood development plans to ‘specify the period for which it is to have effect’. The WNP proposes to align the period covered by the plan to the emerging Local Plan 2030, that being 2011 – 2030. This has the potential benefit of long term planning over the next 15 years, but as the Core Strategy only covers the period to 2021 and it will be for the new Local Plan to set the strategic policy framework for the borough through to 2030. Therefore, once the new Local Plan is adopted, the WNP may need to be reviewed. Whilst the draft WNP is considered to meet the legal requirements in this respect it would be beneficial to provide an explanation and commitment to this within paragraph 1.5 which deals with monitoring and review.</td>
<td>Done</td>
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| 21 - 24 | The site assessments appraisal should be located within a background document rather than the main body of the plan. | Move to background document  
The WNP group considers that it is beneficial for parishioners to see the assessment within the body of the plan rather than as an appendix |
| 26 | **Policy WNP1a – village envelope**  
The WNP lists green areas of particular importance to the village. This aims to conserve valued community assets around the village.  
Paragraph 77 of the NPPF introduces a new designation of land as ‘Local Green Space’ preventing any new development other than in very special circumstances. Although Wye is already protected by AONB status it may be beneficial to utilise this new designation as part of this policy provided the land meets criteria as set out within the NPPF. Local Green Space must be identified on a Development Proposals Map. | Consider using Local Green Space designation.  
Agreed. A map designating Local Green Spaces is now provided as Appendix F |
| 27 | **Policy WNP1b – village views**  
Core national policy requires planning to recognise the intrinsic character and beauty of the countryside. Paragraph 6.33 of the Core Strategy sets out the Council’s approach to development in AONBs where the conservation of the landscape beauty is a priority. Wye is wholly within the Kent Downs AONB and policy WNP1b aims to protect locally distinctive views into, out of and within the village. Any inappropriate development may gradually erode this character to the detriment of Wye. Policy WNP1b conforms to policy TRS17 of the Tenterden and Rural Sites DPD requiring development in the rural areas to be designed in a way which protects and enhances the particular landscape character area within which it is located (including the two AONBs within the Borough).  
However, policy WNP1b uses the word ‘detract’ but no explanation is provided into what this means. | Explanation and / or example needed within supporting text to help define ‘detract’ as used within the policy.  
Our understanding of “detract” is now clarified in the text |
| 29 | **Policy WNP3 – traffic volumes**  
It is clear that the WNP is promoting sustainable transport options throughout the plan and that this policy seeks to minimise identified traffic issues specific to Wye and therefore should be supported. Policy WNP3 is inline with policy CS15 of the Core Strategy especially the need for developments that generate significant traffic movement to relate well to the primary and secondary road network and for those networks to have adequate existing capacity to accommodate the development. Similarly, policies TRS8, TRS9 and TRS14 of the Tenterden and Rural Sites DPD will not support new development or redevelopments unless they can demonstrate that the development will not generate a type or amount of traffic that would be inappropriate to the rural road network that serves it.  
There are currently some major issues with how the policy wording is drafted. No parameters are set to define how the ‘significant increase’ in the volume of traffic is to be quantified, i.e. against baseline data. Similarly, ‘severe queuing along the roads leading to the level crossing’, needs to be specific, road names, providing distances for example to enable a case officer to determine what an acceptable threshold is for different routes approaching the level crossing. Similarly, caveat needed within supporting text on how and when analysis needed, i.e. peak / off peak etc.  
Recommended that policy just refers to ‘new development’, this will then cover all development. | **Rewording needed**  
We would refer to BD4 for our detailed analysis of the impacts of traffic. The tipping point in queuing has been defined as that which leads to the failure of queues to clear when the crossing gates have been opened. Unfortunately this already occurs during peak times. Critical roads are now named in the policy WNP3 that includes part of the withdrawn Policy WNP15.  
Delete ‘housing, or businesses’ from policy wording. |
| 29 | **Policy WNP4 – business development**  
Policy WNP4 identifies appropriate employment sectors that the village would like to support. It does not constrain other sectors from coming forward rather to reinforce the importance of the selected industries to the economy of Wye. The WNP vision seeks to balance residential and employment uses and as such responded positively to employment growth as required by the NPPF. This policy is also in general conformity with strategic policies set out within the Tenterden and Rural Sites DPD that aim to improve and retain local employment opportunities.  
Policy should refer to ‘business’ as well. | **Add ‘business’ to policy wording ....particularly in business, education, research, food production and tourism...**  
In the WNP text business is considered generic and includes education, research, food production and tourism. |
| 30 | **Policy WNP6 – Masterplan of WYE3** |
The Core Strategy (paragraph 6.27) highlights the importance of educational facilities at the former Wye College site. However following an unsuccessful prolonged marketing campaign for educational uses the Borough Council now accepts the principle of a mixed use development on the WYE3 site. This is in accordance with core principles set out within the NPPF which promotes mixed use development to facilitate multiple benefits from the different uses as well as encourage the effective use of previously developed land.

It is recommended that the requirement for a masterplan is located within policy WNP7.

Any masterplan should be agreed with the Borough Council and this should be set out within the policy.

It is recommended that the requirement for a masterplan is located within policy WNP7.

Any masterplan should be agreed with the Borough Council and this should be set out within the policy.

<table>
<thead>
<tr>
<th>46</th>
<th>Policy WNP11 – Phasing WYE3</th>
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<tbody>
<tr>
<td></td>
<td>Whilst a masterplan approach is supported, the requirement for WYE3 to be phased over the plan period raises significant issues. Policy WNP11 shows WYE3 as delivering a total of 50 dwellings over a period of 15 years. This is not a practical solution in terms of enabling the timely delivery of infrastructure or realistic in respect of bringing forward the comprehensive development of the site. Although a relatively major development in village terms, 50 dwellings is not significant in terms of build out rate and has the potential to subject existing and new residents to prolonged periods of development disruption. Constraining or holding back this level of development would also be considered contrary to national policy.</td>
</tr>
<tr>
<td></td>
<td>There are two potential options available. The first is to not have any phasing and to see what development comes forward in the first 5 year prior to the review of the neighbourhood plan.</td>
</tr>
<tr>
<td></td>
<td>Alternatively, the delivery of WYE3 could start from 2020 but not be phased and still enable the development to be brought forward in a comprehensive way.</td>
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<tr>
<td></td>
<td>If a phasing requirement is necessary it should be set out within policy WNP7.</td>
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<tr>
<th>47</th>
<th>Policy WNP13 – housing density and layout</th>
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<tr>
<td></td>
<td>Policy WNP13 requires development not to</td>
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</table>
exceed 20 dwellings per hectare. Whilst the principle of this is acceptable the policy should state where it will be applied, for example on windfall sites, outside allocations.

The second and third points which form part of policy WNP13 support policy CS15 of the Core Strategy and paragraph 33 of the NPPF which seeks to give priority to pedestrian and cycle movements, and promotes public transport options. National policy also recognises the role for mixed use development has for reducing the need to travel.

As identified within paragraph 14.10 of the Core Strategy, new housing developments should provide open space and leisure facilities to meet the local needs they generate. This is taken forward through policy TRS19 for the rural areas of the Borough, requiring infrastructure provision to serve the needs of new development.

### Policy WNP14 – superfast broadband

Paragraph 9.25 of the Core Strategy (2008) identifies the need for new development to provide site service and communication infrastructure and to allow for future growth in service infrastructure. Paragraph 42 of the NPPF identifies high quality communications infrastructure as essential for sustainable economic growth as well as enhancing the provision of local community facilities.

Ashford Borough Council has an aspiration to bring forward a broadband policy as part of the Local Plan 2030. The Council want to ensure all new developments are fitted with fibre to the premises (FTTP) and is currently in consultation with KCC on how best to achieve this aim, especially in rural areas. Provision of broadband is a technical and heavily regulated area, it is not a statutory utility and therefore compelling developers to provide a service that needs to be delivered by a third party is complex. As a result, in order to achieve superfast broadband, we would recommend that the Wye neighbourhood plan utilises the work undertaken by the Ashford Borough Council Planning Policy Team in association with Kent County Council for the Local plan 2030.
Policy WNP15 – traffic analysis

WNP15 requires the analysis of traffic flow and travel plans and impact on the road network around Wye but there is no remediation if found to have adverse impacts. This requirement would be more effective if moved into WNP3.

Move requirement for analysis into WNP3.
Agreed, done

The Neighbourhood Plan should include scaled Ordnance Survey Maps for each allocation, and the village envelope.

OS maps needed
Not sure if this is essential. All our maps are to scale.

For clarity, aspirational projects could be presented in a separate background document which can be used once the flexibility of CIL is in place. Appendix B should just focus on those projects that meet the legal tests as set out in paragraph 203, 204 of the NPPF, and include evidence to justify their inclusion, including detailed information on how they meet each test.

Evidence needed
The projects to be supported have been prioritized and justified as an addition to Appendix B

ABC also provided a detailed report on the Strategic Environmental Assessment carried out on the WNP. All aspects of their report have been incorporated into a revised SEA.

b. Response from Imperial College London (ICL)

General comment

The response from ICL raises some issues that have already been addressed in the revised submitted WNP document.

1. The proposals in the WNP for allocation of developer contributions, 106 and CIL, have been revised, as also recommended by ABC.
2. Policy WNP7 concerning development of the WYE3 site has been amended (now Policy WNP11) to allow the developer more flexibility in the location of components of the mixed use (business, education and housing) required.

Specific points

It is the view of the Parish Council, that the response from ICL contains a number of statements that could be regarded as misleading or incorrect. A response to these is given in the comments made in blue text in the ICL document below. The Parish Council considers that the arguments made by ICL about the scale of development that could be sustained in Wye are not viable. Other consultees such as Natural England, the Environment Agency, Network Rail, KCC and parishioners have either agreed with the scale of mixed development proposed in the WNP, or questioned whether even this level of development should be permissible within a village in the AONB. Ashford Borough Council, the Local Planning Authority, considers the quantum of development proposed for WYE3 in the WNP meets
the basic conditions tests (i.e. is consistent with the strategic policies of the adopted Development Plan and the NPPF).

In conclusion, having thoroughly considered the ICL response, the scale of development proposed in the WNP has not been altered in the submitted version of the WNP.

Note that the response received from ICL shown below has been converted to a word document to allow comments to be inserted. This conversion has led to some changes in text and format from the original.

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**Imperial College London**

**Dear Sir/Madam**

**WYE NEIGHBOURHOOD PLAN (WNP) – DEVELOPMENT PROPOSAL AT WYE3**

We write to make representations to the Wye Neighbourhood Plan (WNP) in respect of the Imperial College London land holdings and in particular that designated WYE3.

Our representation identifies the importance of producing a Neighbourhood Plan that is in accordance with national planning policy when there is no up-to-date Local Plan (as in this case), and assesses the Parish Council’s approach to housing delivery over the entirety of the WNP period. We believe a review of these aspects, along with others identified below, are vital for Wye Parish Council to achieve a sound Neighbourhood Plan.

The draft Basic Conditions statement included in the pre-submission consultation version sent to all consultees (Background document BD14) specifies clearly how each WNP policy conforms to national and local planning policies. The response received from ABC, the local planning authority, whilst criticising certain points in the plan, indicates that the quantum of development proposed for WYE3 in the WNP meets the basic conditions tests (i.e. is consistent with the strategic policies of the adopted Development Plan and the NPPF).

The approach the WNP seeks to take is not in accordance with the recommendations set out in the Tenterden and Rural Sites Development Plan Document 2010 (the DPD). The Inspector identified that a masterplan should be produced to determine the scope and scale of development on the land allocated as WYE3. Imperial has spent considerable time and effort researching, preparing and consulting on such a masterplan. The unsubstantiated sketch proposals in the WNP cannot be said to fulfil the function of the masterplan as required by the Inspector.

The approach adopted in the WNP makes an objective assessment of the scale of development sustainable in the Parish. It takes careful account of environmental impacts and is based on detailed and widespread consultation. The WNP is not restricted to development on WYE3, but establishes core principles applicable to the whole of Wye and the surrounding parish.

We are concerned to note that there are significant passages of text contained within the WNP which have been taken from the Imperial Masterplan and Imperial consultants’ reports without agreement or acknowledgement. We ask that acknowledgement be sought for any of these passages which the Council wishes to retain in the WNP, and would be happy to discuss how the WNP could better take advantage of the evidence base laid out in the Imperial Masterplan.

Full acknowledgement is given in the submitted version.
Please note that this representation focuses on the principle of the WNP rather than specific details of the document. Therefore where these representations are silent this does not necessarily mean agreement, and Imperial reserves the right to comment on specific matters at a later date, once the principles of the WNP are sound. We believe that the WNP in its current form is not fit for purpose, for the reasons outlined below.

Neighbourhood Plans

A Neighbourhood Plan must meet the 'basic' conditions set out in Schedule 10 (Part 2) of the Localism Act 2011; notably these are:

Having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the neighbourhood plan if:

- The making of the neighbourhood plan contributes to the achievement of sustainable development
- The making of the neighbourhood plan is in general conformity with the strategic policies contained in the development plan for the area of the authority
- The making of the neighbourhood plan does not breach, and is otherwise compatible with, European Union Obligations
- Prescribed conditions are met in relation to the neighbourhood plan and prescribed matters have been complied with in connection with the proposal for neighbourhood plan.

The Basic Conditions Statement of the WNP demonstrates clearly how the plan fulfils the requirements of the Localism Act. Each WNP policy is checked against national and local planning policies. The comments received from ABC in response to the pre-submission draft indicate that the LPA considers the quantum of development proposed for WYE3 in the WNP meets the basic conditions tests (i.e. is consistent with the strategic policies of the adopted Development Plan and the NPPF).

Conformity with Local Plan and National Policy

The current WNP has been developed without sufficient regard to the most up-to-date national planning policies. It is important to note that the Core Strategy and the DPD are largely out of date since these documents were adopted prior to the introduction of the National Planning Policy Framework (NPPF) and Planning Policy Guidance (PPG).

National Planning Policy Framework (NPPF)

The NPPF was published three years ago. It identifies that Neighbourhood Plans must have had appropriate regard to national policy and demonstrate how the plan contributes to the achievement of sustainable development.

The NPPF outlines a clear requirement to deliver sustainable development and to widen the choice of high quality homes (paragraph 9). Paragraph 14 lays out how this relates to planning:

- ‘local planning authorities should positively seek opportunities to meet the development needs of their area;’
- Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless:
any adverse impacts of doing so would significantly and
demonstrably outweigh the benefits, when assessed against the policies in
this Framework taken as a whole; or

specific policies in this Framework indicate development should be restricted.'

The NPPF (paragraph 7) clearly outlines the three dimensions to sustainable development
and sets out the role of the planning system to meet these dimensions, these being:

- 'An economic role – contributing to building a strong, responsive and
  competitive economy, by ensuring that sufficient land of the right type is
  available in the right places and at the right time to support growth and
  innovation; and by identifying and coordinating development
  requirements, including the provision of infrastructure;

- A social role – supporting strong, vibrant and healthy communities, by
  providing the supply of housing required to meet the needs of present and
  future generations; and by creating a high quality built environment, with
  accessible local services that reflect the community's needs and support its
  health, social and cultural well-being; and

- An environmental role – contributing to protecting and enhancing our
  natural, built and historic environment; and, as part of this, helping to
  improve biodiversity, use natural resources prudently, minimise waste and
  pollution, and mitigate and adapt to climate change including moving to a low
  carbon economy.'

The WNP does not meet two of the dimensions for sustainable development: economic
or social. It does not currently proactively drive or support economic development and
does not provide a supply of housing to meet the needs of present and future generations.
There is an unnecessarily restrictive limit on the number of dwellings to be provided on
WYE3 which, as a result, does not support the sustainable growth of the settlement.

The WNP fulfils all three requirements through its support for mixed development including
business, education, housing and community facilities. Furthermore the development
proposed has been assessed critically to understand its impact on the sensitive local
environment and also sewage capacity (see response from Southern Water). The Housing
needs survey shows that the plan makes full provision for the anticipated population growth
within the Parish.

The NPPF core planning policies (paragraph 17) encourage the effective use of
previously developed land and support the focus of development in locations which are or
can be made sustainable. Wye is one of the most sustainable settlements in the Borough
and as a result should accommodate more than 1% of the total housing supply in the
Borough (discussed further in section five below), particularly when there is brownfield
land that can be developed and detailed evidence that WYE3 can comfortably
accommodate up to 200 dwellings (c.f. the Imperial Masterplan).

The statement about building on brownfield land is incorrect. The site allocated for
construction of 200 houses east of Olantigh Rd. in the ICL masterplan is on a greenfield site
that includes the Hop Garden field (see WNP Background Document BD12).

It is important to note that the NPPF introduced a change in emphasis from the
previous planning regime, by indicating that local planning authorities should plan
positively and use their evidence base to ensure their Local Plans boost housing
supply by meeting full, objectively assessed housing needs.

Planning Policy Guidance (PPG)

The NPPF identifies that Neighbourhood Plans must be in general conformity with the strategic policies in the Local Plan (paragraph 184). In the position where a Neighbourhood Plan is brought forward before an up-to-date Local Plan is in place, the PPG identifies that ‘the qualifying body and the local planning authority should discuss and aim to agree the relationship between policies in:

• The emerging Neighbourhood Plan
• The emerging Local Plan
• The adopted Development Plan

With appropriate regard to national policy and guidance’ (PPG Ref ID: 41-009-20140306).

Imperial’s view is that the WNP does not fulfil this requirement.

The Ashford Borough Council Core Strategy 2008 (the Core Strategy)

The current spatial objectives for the Borough are set out in the Core Strategy. The spatial objective for Tenterden and the Villages (Chapter 6) is ‘to sustain the vital and viable communities in Tenterden and the villages with the larger service centre roles that service the surrounding smaller villages and countryside’. Wye is identified as one of these larger centres and so to be in accordance with the existing Development Plan the WNP must ensure that it supports the role of Wye. The WNP only proposes to allocate four sites (WYE1, WYE2, WYE3 & the Old Brickworks site in Naccolt), equating to 110 dwellings and refers to a further 52 units which it believes will be delivered through change of use schemes and windfalls. Table 6.1 below is taken from the WNP and provides the indicative number of dwellings up to 2030.

Table 6.1 Indicative numbers of dwellings

<table>
<thead>
<tr>
<th>Development</th>
<th>NP proposals to 2030</th>
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<tbody>
<tr>
<td>Change of use</td>
<td>40</td>
</tr>
<tr>
<td>WYE1¹</td>
<td>27</td>
</tr>
<tr>
<td>WYE2²</td>
<td>25</td>
</tr>
<tr>
<td>WYE3</td>
<td>50</td>
</tr>
<tr>
<td>Windfall including rural sites</td>
<td>20</td>
</tr>
<tr>
<td>Total</td>
<td>162</td>
</tr>
</tbody>
</table>

There is no evidence to support the figures given for windfall sites. The NPPF identifies that ‘local planning authorities may make an allowance for windfall sites in the five year supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply’ (paragraph 48). On this basis if the WNP includes such a large proportion of supply from windfalls (52 as opposed to 50 on allocated sites) there needs to be evidence supporting this position.

In any case, the WNP’s indicative numbers result in an average of 10 new dwellings per annum. Imperial’s view is that this level of growth is not positive and will not maintain Wye’s position in the settlement hierarchy in accordance with Ashford Borough’s spatial objectives.
ABC has accepted the scale of Windfall and Change of use allocations made in the WNP. The majority of change of use sites are owned by ICL including a large empty hall of residence, Wolfson House (Upper Bridge Street); empty student accommodation, Squires (Olantigh Rd); locations of the former Economics department, Carruthers House, Bexley House and the Wolfson Lecture Theatre (High Street), and also within the Grade II listed buildings. The rate of growth proposed in the WNP is greater than that over the past 30 years. The Naccolt brickworks site for nine dwellings, is a good example of Change of use/Windfall coming forward in the Parish. However, in view of concerns expressed by ICL and the response from Natural England indicating that the scale of housing development is too large, both Windfall and Change of use numbers have been reduced by five.

On a separate note, there appears to be a discrepancy within the WNP and the Background Document 11: Policy WNP7 refers to delivery of ‘up to’ 50 units on WYE3, whilst document BD11 states that the WNP proposes 70 on a phased basis.

This typographical error in BD11 has been corrected.

The Core Strategy Policy CS6 contains the level of growth for Tenterden, Charing, Hamstreet and Wye. The WNP group in their response to how the WNP conforms to this policy (Section 2: Conformity of the WNP with Ashford Borough Council planning strategy) confirms that the Core Strategy ‘provides an indication of the number of new dwellings considered appropriate for Wye and this is reflected in the allocation made in the WNP’. Policy CS6 is out of date and does not represent an appropriate emerging distribution strategy. Indeed, as the sustainability of Wye has increased since Policy CS6 was adopted, a greater number of units should be proposed in the WNP, rather than simply reflecting the out of date policy. Please see below under Section 4 for more detail on sustainability.

Furthermore, WYE1, WYE2 and Naccolt Brickworks already have planning permission (37% of the total number proposed up until 2030). This results in only one allocated site (WYE3) for ‘up to’ 50 units over the remainder of the plan period till 2030.

The WNP is not simply focusing on housing but promotes sustainable mixed development in the Parish including business, education, community facilities and new dwellings. The WNP argues that development has to be considered in context, taking full account of environmental constraints, not least increase in traffic.

The Ashford Strategic Housing Market Assessment January 2014 (the Ashford SHMA)

The only available reasonably up-to-date evidence on housing need Ashford Borough have produced is the Strategic Housing Market Assessment dated January 2014 (the Ashford SHMA). This evidence is only referred to once in the WNP, yet this is the most relevant, available evidence that should have been used to inform the WNP.

Ashford Borough Council(ABC) are yet to publish a draft plan that is in accordance with the NPPF to set out their strategic priorities or a strategy for the distribution of development across the Borough. Consequently, it is Imperial’s view that production of a Neighbourhood Plan ahead of an up-to-date Local Plan is premature. However, if a Neighbourhood Plan is progressed at this stage it must be in accordance with the existing spatial objectives for Ashford Borough, the NPPF and PPG, and be based on up-to-date evidence, which the WNP is not.
Ashford previously had targets of 3,500 units (2001 – 2006) and 16,770 units (2006-2021), which resulted in a planned supply between 2001-13 of 11,326 units. Of these, only 7,335 have been delivered, resulting in an under delivery of 3,991 units (35% of the total supply) (the Ashford SHMA), and 87% have been in the Ashford urban area and Ashford town centre.

This is due to the existing plan for Ashford Borough which directs a significant amount of growth in and around Ashford. For example, the Core Strategy Policy CS2 identifies the provision of 16,770 dwellings in the Ashford Growth Area, compared to 1,180 in the rest of the Borough (93% of the planned supply to be directed to Ashford). The strategic allocations to the south of Ashford require provision of significant infrastructure which, with the values being lower in this area, have failed to be delivered. As a result housing delivery has stalled.

This would indicate that Ashford Borough need to review their distribution strategy and allocate greater numbers to settlements other than Ashford that score highly in sustainability terms and where housing will be viable and deliverable, such as Wye. There is no point in ABC claiming a 5 year supply on the basis of sites which will not be delivered, as has been the historic position.

If the strategy does not change, Ashford Borough will continue to fail to deliver the required number of homes. Consequently, if the WNP were adopted prior to the Local Plan it would restrict any such strategy and limit housing numbers in Wye to less than 10 units per year. This would force other less sustainable settlements and greenfield sites to accommodate the growth, which would not be in accordance with the NPPF.

**Housing Need in Ashford Borough**

The available evidence demonstrates both that there is a need for housing in the Borough, and that sites in Wye are well placed to contribute to meeting this need. The WNP should take account of Wye’s place within the Borough rather than viewing it in isolation.

**Housing Need**

There is a significant need for housing within the ABC area. The Ashford SHMA (Addendum 2014) identifies that the 2012 sub national population projections shows a need of 734 units per annum in the Borough. In addition, when adding in the historic under supply of 3,991 units the figure increases to 944 units per annum. This does not reflect unmet need in the surrounding authority areas or London, so this figure could increase further as part of the duty to cooperate. The Ashford SHMA identifies that, unsurprisingly, stronger economic projections result in a housing need of 833 dwellings per annum. When the undersupply of 3,991 units is added, this figure increases to 1,099 units per annum.

This evidence was available to the WNP group but it appears they have had little regard to it. The main housing evidence used in the production of the WNP appears to be the 2013 Housing Needs Survey. This document only focused on local need, asking local people to register an interest in a potential local needs housing scheme in the Parish. The document noted that the Parish Council wanted to assess the need for affordable housing as part of their WNP. The Housing Needs Survey only identified a local need for 28 affordable homes; however, this did not look at affordable need outside of the Parish Council area. The Ashford SHMA identifies that there is a shortfall of 6,253 affordable homes over the period from 2013 to 2030 (368 per annum). If you consider the proportion identified in the Housing Needs Survey against the shortfall set out in the Ashford SHMA it equates to only 0.44%. This demonstrates the significant need for affordable housing in the Borough.

It is normal practice for rural villages to focus on meeting their own or adjacent smaller settlements needs. The NPPF para 54 states that some market housing may be required to
facilitate affordable local needs housing but not for significant amounts and then only to meet local need.

Wye as a sustainable settlement
The Ashford Borough Council Core Strategy 2008 (the Core Strategy) identifies that after Ashford and Tenterden, the settlements of Wye, Hamstreet and Charing should accommodate the highest proportion of growth as these settlements scored ‘very highly’ on the matrix of sustainability indicators. Wye is an extremely sustainable settlement, having a railway station which has a direct link (only a 6 minute train journey) to Ashford International train station and fast trains to London, and a number of bus stops. It contains a significant number of services and community facilities (including a primary and secondary school) and as a result should provide more than a maximum of 10 dwellings per year. It is generally accepted that a settlement with 3,500 dwellings is required to support a secondary school. It should be noted that these enhanced rail services and the secondary school are new since the adoption of the Core Strategy and the DPD.

Although improving links to London, the increased rail service has led to extended delays at the level crossing. The secondary school (which both WNP and the ICL masterplan integrate into their proposals) will undoubtedly increase traffic significantly when it reaches full size. The scale of provision of housing should take into account the need for mixed development and infrastructure constraints. Robertsbridge in East Sussex has a well established secondary school with 600 students and 1052 households. Wye has 1100 households and a secondary school also planning for 600 students.

Wye within the Borough settlement hierarchy
Background Document 805 of the WNP briefly refers to the Ashford SHMA but identifies that the land supply in and around Ashford needs to be increased to meet this projected demand. This is reiterated within the WNP itself, which states that ‘the planned substantial expansion of housing in Ashford to the south and west means that, in terms of allocations within the Borough, there is no reason to expand the Wye housing stock other than to meet local considerations’ (paragraph 2.2). However, the market in Ashford is not delivering and therefore future supply needs to be further distributed to other sustainable settlements.

It is not the case that Wye only needs to meet local needs, as the NPPF requires that ‘sufficient land of the right type is available in the right places and at the right time to support growth’ and ‘supporting strong, vibrant and healthy communities by providing the supply of housing required to meet the needs of present and future generations’. Wye is identified as a ‘Tier 2’ settlement within the settlement hierarchy (paragraph 2.6, DPD), and the Core Strategy paragraph 2.37 notes that these settlements should continue to serve their local area by retaining vital and viable centres and reducing the need to travel. Given this, Wye should contribute to meeting housing need Borough-wide. Based on the evidence in the Ashford SHMA and a minimum (unsupported) requirement for 734 units per year, if the WNP were to be adopted in its current state, Wye with Hinxhill Parish Council would only contribute 1% to the minimum total supply in the Borough. This figure is far too low given Wye’s position.

Wye3: land suitable for development
The WYE3 site is located within the village of Wye, approximately 1 mile east of the A28, the main road linking Ashford and Canterbury. WYE3 itself is divided into three parts. Two parts lie either side of Olantigh Road; to the west of Olantigh Road lies the historic College buildings, laboratories and Student’s Union building and to the east is the Kempe Centre, ADAS buildings and glasshouses. The third part, further east off Coldharbour Lane, contains Withersdane Hall and a number of other buildings
previously used as student accommodation. The combined area of these three sites is approximately 25 hectares. The historic College buildings (which are partly Grade I and Grade II Listed) form a significant feature of the centre of the village. The ADAS buildings, which are in a poor condition, form the northern boundary of the site.

Policy WNP7 in the WNP identifies WYE3 for a mix of uses including education, business, community infrastructure and housing. The total site is only identified for 50 units (up to 30 dwellings on land east of Olantigh Road, up to 13 dwellings west of Olantigh Road and up to 7 dwellings north of the Kempe Centre). In addition the policy consists of a ‘wish list’ of community infrastructure requirements. Imperial opposes this policy, notably for its restrictive nature and the low housing number when there is detailed evidence that the site can accommodate a greater number.

The ICL Masterplan’s proposals include large scale housing on a greenfield site (mainly the Hop Garden field).

The current policy for the site is set out in the DPD. Policy WYE3 identifies that the long term future of the buildings, facilities and land at the Imperial campus should be subject to a marketing campaign for educational and related research and business use for a minimum of 6 months with the aim of securing a future use for the site. A marketing campaign took place for 12 months rather than the recommended 6. This exercise was unsuccessful and did not generate any firm offers and as such was formally signed off by ABC planning policy manager Simon Cole.

Policy WYE3 goes on to state that if the marketing campaign is unsuccessful on all or part of the WYE3 areas, then ‘a masterplanning exercise’ encompassing all of the WYE3 areas shall be undertaken in order to establish the nature, scale, location and mix of any alternative uses to deliver a high quality, mixed use development.

This masterplanning exercise was undertaken, and a comprehensive masterplan submitted to ABC in autumn 2014. The masterplan proposed a high quality mixed use scheme, with up to 200 dwellings. It demonstrated that the site can comfortably accommodate far more dwellings than proposed in the WNP, which proposes a density of between 10 – 30 dwellings per hectare. This density would not result in the effective use of previously developed land which is a core principle contained with the National Planning Policy Framework (NPPF) and as anticipated by the Inspector examining the Tenterden and Rural Sites DPD.

With regards to other potential development opportunities in and around Wye, the DPD identifies that ‘outside the Imperial College land, there are few opportunities for new housing development that would not have a significant impact on the character of the village or its setting’ (paragraph 5.21). Conversely therefore, development on the Imperial land will have no significant impact on the character of the village or its setting.

Within the Background Document BD5 Employment and Housing, it is acknowledged that following an independent assessment for ‘areas of potential change,’ WYE3 is the major means of providing land suitable for development (section 5.2). The Imperial Masterplan demonstrates that the site can accommodate a range of uses including a significantly greater housing number than identified in the WNP, thus helping to contribute to meeting both the market and affordable housing needs of the Borough, rather than just the existing residents of Wye.

Slaugham Parish Neighbourhood Plan

Slaugham Parish provides a useful parallel, as the WNP is in exactly the same position as Slaugham, in that Ashford have no up-to-date Local Plan and the restrictive housing target in the WNP is not based on up-to-date evidence.

In the Independent Examiner’s Report for the Slaugham Parish Neighbourhood Plan 2013-2031 (January 2014), the Inspector noted that, given the need to boost housing supply, the rural nature of the Parish in the Area of Outstanding Natural Beauty (AONB),
and the lack of an up-to-date district level Local Plan, it would be useful for the Parish to make an 'objective assessment of the level of residential development it needs as part of the neighbourhood planning process' (paragraph 9.10). The Inspector went on to identify that it was not clear how the housing figure was derived and that it did not appear to be based on the most available and up-to-date evidence (paragraph 9.11). As the Inspector for Slaugham noted, 'given the sensitivity of the local area in relation to the High Weald AONB it is particularly necessary to justify a figure so that this can be weighed up in the overall balance' (paragraph 9.11).

It is considered that the failure of the Slaugham Neighbourhood Development Plan was not due to an under-provision of housing, but to inadequate consultation and lack of assessment of environmental impact. These criticisms do not apply to the WNP.

The WNP seeks to plan for Wye in isolation, without any reference to its need to contribute to the economy and housing supply of the Borough as a whole. Finally, whilst Imperial does not agree with the overall level of housing proposed in Policy WNP7, the specific wording used is also unnecessarily restrictive, with the use of 'up to' when identifying specific housing numbers for each part of the site.

As a general comment on Sections 2, 3 and 4 we reiterate that Basic Conditions are clearly met by the WNP. ABC has not criticised the scale of housing proposed, indicating that that the LPA considers the quantum of development proposed for WYE3 in the WNP meets the basic conditions tests (i.e. consistent with the strategic policies of the adopted Development Plan and the NPPF).

The mixed development indicated in the WNP would enhance Wye’s sustainability and role as a local hub more than a focus on housing alone as argued by ICL. Finally, the scale of development proposed in the WNP takes account of the sensitive environment (both natural and built) in the Parish.

2 Transport

The section on estimation of traffic from an active Wye College in Background Document BD4 is fundamentally flawed. It ignores the 2006 link flow data around Wye which shows the percentage effect of the College activity at that time. Instead it refers solely to the Plumpton example. Plumpton is not a direct comparator to Wye, as it offers a range of courses for under 16s and non-degree vocational courses for under 18s as well as degrees. Therefore this data should only be used as part of the mechanism to derive trip generation from the College. Guidance suggests that, as trip rate assessment is a statistical process, it is incorrect to only take one example. Instead, an agglomeration of a range of data should be used to arrive at a typical trip rate.

The WNP identifies that the road network is consistent with a village environment and that the busiest access points in the village converge at the level crossing. However, it does not note that when the gates are closed traffic does begin to build, but as soon as the gates open the queue disperses. The WNP currently identifies that the level crossing is a reason to limit housing targets but it fails to recognise that this is not the only way in and out of the village. In practice there are four routes out of the village, but the assessment set out in BD4 appears to load all of the generated traffic onto the level crossing. If there are delays at the level crossing it is reasonable to assume that drivers will use alternative routes. Therefore the assessment overplays the impacts of the level crossing.

An appropriate approach for transport is set out within the Imperial Masterplan. This was included in Imperial's Environmental Impact Assessment (EIA) scoping application, which was agreed as an appropriate approach by ABC for assessing traffic impacts on the village.

The WNP traffic analysis (BD4) takes full account of all the traffic data available, including the 2006 data that were limited to the roads adjacent to the WYE3 site. Once again, we thank ICL for providing data from their own traffic surveys. The traffic generation as
reported in ICL’s own masterplan was modelled onto level crossing closure data collected in January 2014. The analysis confirmed two important facts, 1) at certain times during the week traffic already fails to clear the crossing before gates close again, and 2) the scale of development proposed in the ICL masterplan would lead to such severe traffic build up occurring on a regular, probably daily basis.

Network rail, Natural England and many parishioners continue to raise concerns about the level crossing in their responses to the consultation document. The WNP analysis of traffic flow follows DfT guidance when there are few appropriate sites for comparison on the TRICS database. Plumpton College, as recommended by KCC Highways, is a very good match to the former Wye College. If Plumpton has some younger students this would lead to more not less traffic as suggested by ICL. The need for statistical significance argued by ICL is misleading. Their approach is analogous to an attempt to compare the capacities of small vans by including data for articulated trucks to ensure all forms of transport are included. The inclusion of inappropriate data does not improve the accuracy of their assessment although it does support their argument for an inappropriate scale of development.

The contention by ICL that... “In practice there are four routes out of the village.” is misleading. The roads leading into Wye other than those using the level crossing, from the North, East and South are country lanes all of which include single track sections with passing places. The narrow lanes cannot simply be considered as appropriate alternative routes into Wye. For example, to avoid the railway crossing from Kennington (a direct route of 4.8km), taking the southern route through Naccolt would add 5.2km to the journey to Wye and using the northern route via Godmersham adds 10.7km.

Village Centre

Objective 1 of the WNP states that ‘A good indicator of a sustainable settlement is the location of housing within a 5 min walk, or about 400m, from the centre’. This does not appear to be based on any guidance and is unacceptably arbitrary. It is then used in Policy WNP1a as a limitation for development; however as a 400m boundary is not based on guidance or evidence, Imperial questions how it can be used as a justification to restrict development.

The objective goes on to define the centre of the village as the Bridge Street/Church Street junction, but there is no reasoning provided as to why this location is appropriate. This locates the nominal ‘centre’ some distance from the core community and retail facilities, and the historic core of the village.

It would be more appropriate if a weighed approach had been taken, perhaps, considering the centroid of the various core facilities and deriving a centre in that way. As defined currently, it appears the definition is specifically intended to arbitrarily exclude areas of brownfield land on the WYE3 site.

The designation of the village centre in the WNP is based on the provision of all essential facilities within 5min walk (c. 400m) of that point. Application of “Walkscore” assessment is increasingly used for site valuation. It is the aim of the WNP to promote a concentric village with the best walkscore as indicated by a centre within 5 min walk, rather than with an expansion of residential sites into greenfield land as proposed by ICL (see BD12).

Deliverability
PPG identifies that for proposals and policies to be implemented in Neighbourhood Plans they must be deliverable. The NPPF requires that 'the sites and the scale of development identified in a plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened' (PPG Ref ID: 41-005-20140306).

The WNP Policy WNP7 currently contains a long wish list from renewable energy generation to provision of cycling routes and footpaths. These aspects, in combination with the affordable housing provision and financial contributions, could threaten the deliverability of the WNP. No economic assessment of the 'wish list' has been made in relation to the WNP's proposed limit of 50 dwellings.

The requests for developer contributions have been revised in the submitted version of the WNP to take account of deliverability.

3. Conclusion

In the Examiner's Report for the Slaugham Parish Neighbourhood Plan the Inspector found that the 'target it sets for the Plan Period is not based on sufficiently robust evidence......as much of the Parish Council falls within the AONB, a robust assessment of need and of suitable and available sites was required to ensure that the policies and proposals in the Plan would contribute to the achievement of sustainable development, have regard to national policy and guidance and generally conform to the strategic policies in the development plan' (three of the 'basic' conditions set out in Schedule 10 (part 2) of the Localism Act 2011). Given that the proposed housing number in the WNP is not based on robust evidence and there is no up-to-date Local Plan, the WNP in its current state will fail on the same three tests.

It is Imperial's view that production of a Neighbourhood Plan prior to any publication of ABC's emerging Local Plan is premature. There is no development plan that shows Ashford's direction of travel and, as the adopted strategy has failed to deliver the necessary housing in Ashford, the Borough Council will clearly need to review their strategy. The WNP in its current form would set an inappropriate cap on housing development in one of the most sustainable locations in Ashford Borough.

We strongly urge the Parish Council to reconsider the WNP as, among other issues, it currently:

• Fails to conform with local and national planning policies
• Fails to take into consideration the most up-to-date and relevant evidence
• Fails to properly consider Wye's role in the Ashford Borough and the level of Borough-wide housing need

See general comments at the start of this document.

We look forward to commenting on a new version of the WNP which takes all of these points into account.

Yours faithfully

Jenny Wilson

Wye Project Director
c. Natural England

In their response, Natural England expresses concern about the scale of development proposed. They highlight that the development is within the AONB and falls within the designated zones of influence for the SSSI. The WNP is based on its SEA and the parish council considers that the plan is for environmentally sustainable development. The sensitivity of the local environment has been further pointed out in revisions made to the plan, also following comment from parishioners including Diana Pound (see above). Specific comments on the Natural England response are shown below

From: Lister, John (NE)
Sent: 13 March 2015 16:07
To: katy.wiseman@ashford.gov.uk; clerk@wyeparish.info
Subject: 143791 - Wye Neighbourhood Plan

Dear Sir/Madam

Thank you for consulting Natural England on your Neighbourhood Plan (NP). Much of the plan is welcomed. The following comments focus on what appear to be outstanding issues in the draft NP:

In paragraph 1.6.1 the plan indicates a need for 28 affordable homes. No further need appears to be defined or justified in the document on the basis of recent local assessments. The reference to Policy CS6 in para 2.4.1 - indicates that Wye should provide sites for the development of 110 dwellings in the period 2006 to 2021, with 50 dwellings in Phase 1 (2006 to 2013) and 60 dwellings in Phase 2 (2014 to 2021). The subsequent para indicates a “shortfall of 65 dwellings allocated within Wye (in the period up to 2021)”. Table 6.1 indicates capacity for some 162. This account is not immediately clear and I can find no simple assessment of what has been completed, what has outstanding consent and what needs to be allocated. A table would be helpful.

The numbers relate to allocations made for 2006 to 2013 in the TRSDPD for 25 dwellings on WYE1 and 20 on WYE2. These houses have not yet been built (planning permission has now been granted for 27 on WYE1 and 25 on WYE2). The shortfall represents the difference between the total up to 2021 and the allocations to WYE1 and 2. The WNP has to take account of the allocations unbuilt for WYE1 and WYE2, the shortfall up to 2021 and any further housing to be built up to 2030. The WNP is proposing 100 dwellings in addition to the allocation on WYE1 and WYE2 of which 50 will be new build on the WYE3 site and 50 change of use/windfall (reduced from 60 in the consultation draft).

In reaching conclusions about the numbers of houses the WNP includes significant windfall and change of use numbers in addition to the new build on WYE3. The sites on WYE3 for housing have been assessed based on their location predominantly on brownfield land. Expansion of building into greenfield sites is unacceptable.

The WNP proposals are for mixed development in Wye in order to promote sustainability of the settlement, restoring activity at least to that observed when Wye College was fully operational. Business, education and housing are all included in an approach that conforms to NPPF policies requiring sustainable development. Ashford Borough Council (the LPA) considers the quantum of development proposed for WYE3 in the WNP meets the basic conditions tests (i.e. is consistent with the strategic policies of the adopted Development Plan and the NPPF.

All of the proposals set out in the NP fall within the AONB.

This fact is highlighted throughout the plan and in particular in Background Document BD3. Protection of the AONB has been balanced by proposals for sustainable mixed development in Wye.
The National Planning Policy Framework (NPPF), para 116 indicates that planning permission should be refused for major developments in these designated areas (AONBs) except in exceptional circumstances and where it can be demonstrated they are in the public interest. Consideration of such applications should include an assessment of:

- the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;
- the cost of, and scope for, developing elsewhere outside the designated area, or meeting the need for it in some other way; and
- any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.

If a plan is to be deliverable - similar tests should be applied to allocations. Have the allocations sought by the NP, been subject to the tests set out in NPPF?

The plan has been subject to Strategic Environmental Assessment and as such fulfils NPPF conditions. In reaching the scale of development proposed the WNP has taken account of the activities carried out in Wye when the College was operational. We understand the concerns raised by Natural England and have, therefore, set a clear limit on the scale of development considered sustainable. We have used an objective approach to quantify impacts on traffic, but acknowledge in our SEA that it is difficult to reach a quantitative assessment for the impact of the scale of development on the sensitive protected environments in the Parish. The WNP has been led by the establishment of equivalence with the time when the College was fully active – this remains the extant planning permission for the site (see BD4).

The sum total of development in the plan is significant and it would be appropriate to secure at least a broad brush assessment of landscape and visual impact (in close cooperation with the AONB Unit) of the proposals, both individually and collectively

The WNP Policies WNP1a, WNP1b, WNP8 and WNP11 all support the need for landscape and visual impact assessment.

Para 5.5 notes that the Old Naccolt Brickworks site goes against ABC guidance for growth since it is unsustainable, requiring car trips to all facilities. The plan should include sufficient justification for the proposals.

A planning application for Naccolt Brickworks has now been approved by ABC.

We welcome recognition in Policy WNP 10 - Countryside and Environment - that (inter alia) the impact of new development on the Wye and Crundale Downs SAC, NNR and SSSI must be specifically addressed in planning application documentation. However our impact risk zones cover the Wye settlement and indicate that, since the scale of housing may exceed 100 units, potential impacts on the designated habitat should be screened.

This statement is in agreement with the principles stated in the WNP. Environmental impacts have been assessed by modelling traffic flows and through the completion of the SEA.

We note the larger Wye College sites include components of BAP habitat that should be protected and enhanced. This should be reflected in relevant policies.

This point will be made in the revised plan.

Due to the current pressure of consultations on land-use plans, I have not been able to spend the time I would have wished to review and comment on your Neighbourhood Plan or to consider associated documents. Nevertheless, I hope you find these comments helpful.

If there are issues I have not covered, please let me know and I will respond as quickly as possible. If discussion would be helpful, please give me a call.

If you wish to comment on the service provided by Natural England, please use the appended form.

<<NE Feedback Form- 2015.pdf>>

Yours faithfully,
d. Network Rail

The response from Network rail reaffirms WNP’s concern over traffic at the level crossing. It indicates that there are problems now that need to be addressed, even before the development proposed. The Parish Council has taken careful note of the additional comments in the response and has begun discussions with Network rail on safety issues and car parking. On balance no changes are required to the plan based on this letter.

Network Rail Consultation – Wye Neighbourhood Development Plan

Thank you for consulting with Network Rail in relation to the draft Wye Neighbourhood Development Plan (WNDP). This letter will present Network Rail’s consultation response in relation to the draft WNDP.

Wye Level Crossing

The safety of the operational railway and of those crossing it is of the highest importance to Network Rail and railway crossings are of a particular interest in relation to safety. Of particular concern to Network Rail in relation to safety of Wye level crossing is the risk of the crossing keeper being struck by local drivers rushing to beat the gates, especially evident during the school run period.

The level crossing at Wye Station and queuing issues are referenced on a number of occasions within the draft WNDP.

Network Rail would welcome discussion with the Parish Council and Ashford Council in relation to potential improvements which could be introduced to improve the safety and operation of the crossing.

Development Management Plan – Proposed Allocated Sites

WYE 02 and WYE 10 are located in close proximity to Wye Station however they have all been determined as unsuitable for development. Network Rail would be grateful if the Wye Neighbourhood Plan Group could let Network Rail know if the stance on these sites changes.

The draft WNDP states that Wye 05 site is not considered suitable for residential
development, but would be suitable for car park extension. The site adjoins the station car
park which is under Network Rail’s ownership. Network Rail and Southeastern (who
manage the station) would be keen to discuss any potential proposals for the site to be
used as an additional car park with the Wye Neighbourhood Plan Group and Ashford
Council.

**Developments adjacent to the Operational Railway Land and Infrastructure**

If any development sites have the potential to impact on Network Rail’s land, assets and
operational railway infrastructure, the Wye Neighbourhood Plan Group and potential
developers should be aware of and consider Network Rail’s standard guidelines and
requirements when developing sites located adjacent or in close proximity to Network Rail’s
land, assets and operational railway infrastructure. For this information please visit
[www.networkrail.co.uk/aspx/1538.aspx](http://www.networkrail.co.uk/aspx/1538.aspx). Please let me know if would like more specific
information on these standard guidelines and requirements.

Thank you for giving Network Rail the opportunity to comment on the draft Wye
Neighbourhood Development Plan. I would be grateful if the Wye Neighbourhood Plan
Group could consider the comments made within this letter.

If you require any further information or have any queries please do not hesitate to contact
us on 0207 9047247.

Yours sincerely,
Elliot Stamp
Town Planner

e. **The Environment Agency**

Two responses were received from the EA, both highlighted the need to focus attention on water
sources in the Parish. The comments received provide a clear focus on the impact of development
on water resources and have been incorporated into the text of the revised WNP, BD3 and Appendix
E.

**To: Wye Neighbourhood Plan Group**

Thank you for the opportunity to comment on the Wye Neighbourhood Development Plan
First Consultation Draft.

I am responding on behalf of the **East Kent Catchment Improvement Partnership** (CIP).
The East Kent CIP brings together public, private and third-sector organisations to work
collaboratively to improve the health (quality) of surface and ground waterbodies.

The stated aim of the East Kent CIP is to improve the local water environment so that there
are multiple benefits for society including:

- more wildlife habitat;
- safeguarded water resources – surface and ground water;
- less flood risk;
- sustainable farming and water-based economic activity, such as tourism;
• better recreation opportunities, such as access, fishing, boating;
• cleaner bathing beaches and shellfish areas;
• and a better chance to adapt to climate change.

This makes economic sense and the partnership wants to involve local organisations, communities and businesses in the identification of realistic, sustainable solutions, securing funding and carrying out agreed actions.

The Water Framework Directive (WFD) is the legislation that sets overall water quality targets. There are five classifications for rivers: High, Good, Moderate, Poor, Bad. The aim is to get all waterbodies to Good status.

The River Stour at Wye is at Moderate status. The main issues that are currently stopping the Stour achieving Good status are:

• Low fish populations, due to structures, such as weirs and dams, which obstruct fish migration.
• High phosphate levels due to point-source discharges from wastewater treatment works, and diffuse run-off from urban areas and agriculture.
• Low flows due to abstraction for public supply, commerce and agriculture.
• Modifications to natural conditions due to human intervention, such as flood risk management, milling and urbanisation.

We are pleased to see that proposals within the Neighbourhood Plan recognise the river as an important community asset. It could be a stated aim of the Plan to help the Stour achieve Good status.

You will be aware that the mill at Wye has sluices that cause the river to ‘back-up’. The characteristics of the river are completely different upstream and downstream of this structure. This has negative implications for upstream water quality, and obstructs fish passage. We are keen to work with the mill owners and the local community to find a solution to this. It would be great if this was reflected in the Plan.

The river is often under-valued, particularly by those seeking to maximise benefits from land-based activities. Arable cultivation often stretches to the very edge of the water. This can cause increased siltation and problems with chemicals and nutrients associated with agriculture. The removal of riverside trees, such as alders and willows, can result in higher water temperature and loss of shelter for fish and birds. The ‘Restoring our Landscape’ proposals go some way to addressing this issue and are welcomed.

The Plan allows for the development of brown-field sites. It is possible there may be historic contamination at some of these proposed locations. Remediation of these sites prior to development may help improve the quality of groundwater.

Water is one of our most precious natural resources. Water is abstracted from the River Stour and associated ground-waters for public supply and other uses, such as irrigation. Most of East Kent is “Water Stressed”. We seek to ensure water is used wisely. The CIP is keen to see water conservation techniques incorporated into all new development and retro-fitted into existing buildings if possible. In addition, education of residents of all ages could promote the link between water use and the health of the river.

New development will be required to ensure that sustainable drainage schemes (SuDS) are implemented on site. These reduce the risk of surface water flooding, can contribute to reducing flood risk from rivers and streams, and can help improve water quality. Well
designed, they can make a positive contribution to the landscape and can provide important habitat.

We are aware that there has been surcharging of the foul drains in the village, particularly at the foot of Bridge Street. This can result in raw sewage coming out of the drains. The Plan could seek to address this issue.

So, to conclude: we are generally in support of the draft Neighbourhood Plan and its policies. There are certain areas – as highlighted above – that could be strengthened to give more weight to the water environment.

Barrie Neaves  
Catchment Co-ordinator East Kent

Dear Mr Mansfield

Thank you for consulting us on your draft Neighbourhood Plan (NHP) and associated documents. We have the following comments to make, which we hope you will find useful.

We have no major concerns with your draft NHP, however we would recommend the following points a), b) and c) are incorporated into Appendix E to highlight those additional policies within the Ashford Borough Council Core Strategy that need to be considered when developers are considering development in the Wye area. In addition point d) below should also be incorporated within the plan.

a) **Groundwater protection** The boundary of the proposed area where development may take place overlies a Principal Aquifer. The NHP allows for the development of brownfield sites. There is likely to be historic contamination at some of these proposed locations. As such we would recommend that reference is made to the Ashford Borough Council’s (ABC) Core Strategy (CS) Policy CS21 requiring the protection of groundwater. We would expect any development applications where potentially polluting historic uses to be supported by a preliminary risk assessment and where appropriate, remediation of the site is carried out prior to any development taking place.

b) **Water conservation** Water is one of our most precious natural resources, and the South East of England is “Water Stressed”, so we are keen to ensure water is used wisely. As such, water conservation techniques should be incorporated into the design of all new development. All new homes should be designed to achieve a minimum water efficiency of 105 litres per person per day (this is also in accordance with the ABC CS 10. This policy also details the requirements for Non residential developments. Please note that the new Building Regulations are soon to be introduced and these will assimilate the Code for Sustainable Homes requirements. The minimum water efficiency will be 105 litres per person per day. Reference should be made to the proposed new regulations within Appendix E as a minimum.

c) **Surface water drainage** All new developments (ABC CS 20) will be required to ensure that sustainable drainage schemes (SuDS) are implemented on site to reduce the risk of increasing surface water flooding off site. ABC have a SuDS Supplementary planning Document. Such schemes should be carried out in accordance with this SPD. It should also be noted that any application in excess of 1 hectare (Flood Zone 1) will be required to be supported by a site specific flood risk assessment, although the Lead Local Flood Authority (Kent County Council) will be the statutory consultee for such site as of 6 April 2015.

d) **Water Framework Directive (WFD)** We agree with the comments made by our colleague Barrie Neaves (Catchment Co-ordinator East Kent) made on behalf of the East Kent Catchment Improvement Partnership (attached). We especially agree with his comments regarding the objectives of the Water Framework Directive and would recommend that your NHP identifies the importance, benefits and objectives within it. The
plan should support the aim of WFD to achieve “Good” status for the Great Stour. We would also look for developers contributions towards achieving the objectives of WFD for the Great Stour, whether through Section 106 agreements or CIL if ABC adopt this approach.

For your information only

Appendix B Projects and developer contributions, 4 Environment.

We note on the first project 1. Community Energy, there is the possibility of the use of Ground Source Heat Pumps. If these are proposed then we will require further details of any such system prior to any works being carried out. These details should include the following:

- Type – open or closed system
- Planned depths and area of the system
- If open – plans for abstraction and discharge points (appropriate licence and consents required)
- If closed – the type of fluid used within the system.
- Any risk assessments conducted into possible effects on the aquifer from heat changes, spillages, abstraction of water etc.

The design, selection of heat transfer fluid, materials used, and method of construction of this type of system should address the issues of potential leakage/avoiding pollution and means of detecting and/or registering loss of heat transfer fluid.

Please also note that temperatures changes caused within the subsurface may lead to undesirable effects on any residual contamination present, such as enhancing vapourisation of hydrocarbons. This risk will need to be assessed during the design of any prospective system. In high concentrations and doses, monoethylene glycol is toxic to humans, animals and ecosystems. Its use should thus be avoided in vulnerable situations, for example:

- In the inner source protection zone of public water supplies.
- Within a distance corresponding to <50 days groundwater travel time or 50 metres (whichever is the greater) from a water well used for potable water supply or food processing.
- In the vicinity of nature reserves, fisheries and aquatic habitats that are supported by groundwater flow – especially registered sites of special scientific interest (SSSI) and other designated conservation sites (SPA, SAC, RAMSARs).
- In loops that are installed directly in lakes, ponds or rivers (or in the banks / beds thereof).

We would recommend the use of low toxicity fluids, such as propylene glycol or ethanol. Other proprietary brands are available, which claim lower toxicity and equivalent or better hydraulic performance, based on vegetable extracts or organic salts such as potassium formate.

The carrier fluid will usually be pre-blended with a corrosion inhibitor and may also contain a scale/slime inhibitor/mobiliser and/or a biocide to hinder biodegradation and biofilm growth. The toxicity of these additives should be considered by the user: they should not contain hazardous substances and their potential toxicity and environmental persistence should not be worse than the anti-freeze itself.

It is important to monitor carrier fluid at regular intervals to identify coolant biodegradation or breakdown. Note that, when anti-freeze solution is replaced in a ground loop system, the used carrier fluid should be disposed of responsibly and via a documented and approved disposal route. Anti-freeze solutions should not be discharged to the ground, to soakways, to sewers, to drains or similar.

Poor installation practices can lead to geo-environmental and water pollution risks so we expect installers to abide by the guidance issued by recognised industry trade associations, including:
We hope you find our comments useful. If you have any queries, please do not hesitate to contact me.

Kind Regards

Jennifer Wilson
Planning Specialist (KSL - Kent)
kslplanning@environment-agency.gov.uk

f. Canterbury Council

No changes needed.

Subject: Wye neighbourhood plan

To Wye Parish Council

Thank you for the opportunity to comment on the Wye Parish Plan. Having reviewed the document we consider that there will be no impact on Canterbury District, so we have no objection to the plan.

Regards

Cathy McNab
Planning Policy
Canterbury City Council

g. Southern Water

The letter received raises important issues about the village envelope and provision of essential services. Their assessment of the existing capacity of sewage infrastructure and its ability to meet the forecast demand for the development proposed indicates that the local sewerage system has limited capacity. Their assessment provides another example of the need for caution in the scale of development proposed. The alterations in wording proposed have, therefore, been incorporated into revised Policies WNP1a and WNP11 in order to comply with NPPF directives.

Dear Sir/Madam,

Wye Neighbourhood Development Plan – Pre-submission

We welcome the opportunity to comment on the above document.

Southern Water is the statutory sewerage undertaker, providing wastewater services for Wye. Southern Water has a statutory duty to serve new development, and is committed to ensuring the right infrastructure in the right place at the right time in collaboration with developers, the Parish
Council and the local planning authority. The adopted Wye Neighbourhood Development Plan (NDP) and adopted Ashford Local Plan will inform Southern Water’s investment planning. Adoption provides the planning certainty required to support investment proposals to Ofwat, the water industry’s economic regulator. Investment proposals are prepared every five years through the price review process. Last year’s price determination will fund the investment programme for the period to 2020. There will be another price review in 2019, covering the investment period 2020 to 2025.

Strategic infrastructure, such as extensions to wastewater treatment works, can be planned and funded through the price review process, and coordinated with new development. However, Ofwat takes the view that local infrastructure, such as local sewers, should be funded by the development if specifically required to service individual development sites. To this end, the principle is that new development needs to connect to the sewerage system at the nearest point of adequate capacity. This may require off-site infrastructure if the nearest point is not located within the immediate vicinity of the development site. Southern Water would take future income from customers into account, so that the developer would only need to fund a proportion of the total cost.

Please find following our response, which seeks specific policy provision to facilitate and support the provision of any requisite infrastructure.

Yours faithfully,

Clare Gibbons
Development Manager

Policy WNP1a Additional development outside the village envelope Page 26

Southern Water understands the desire to protect the countryside and local green/open spaces. However, we cannot support the current wording of the above policy as it could create a barrier to statutory utility providers, such as Southern Water, from delivering its essential infrastructure required to serve existing and planned development.

It would be useful to know the criteria for drawing the settlement boundary as we consider Wye Wastewater Treatment Works (WTWs) is an integral part of the settlement. The WTWs provides essential wastewater services for the population of the village and so it has a functional connection with Wye. Also Wye WTWs comprises plant, buildings and hard standing that do not reflect the character and openness of the countryside. Southern Water may need to undertake development at Wye WTWs to meet the needs of development or stricter environmental standards. We are keen to ensure that any future infrastructure development in these circumstances would not be unduly restricted by inappropriate or highly restrictive policies. Paragraph 157 of the National Planning Policy Framework (NPPF) is clear that there should be positive planning for ‘the development and infrastructure required in the area to meet the objectives, principles and policies of this framework’. Paragraph 177 of the NPPF emphasises the importance of ensuring the timely delivery of infrastructure to support development and the application of any countryside policies in the determination of any planning application may prevent this.

Paragraph 76 of the NPPF sets out that neighbourhood plans can identify green areas of particular importance with the intention of ruling out ‘new development other than in very special circumstances’. Paragraph 88 of the NPPF explains that special circumstances exist if the potential harm of a development proposal is clearly outweighed by other circumstances. Southern Water considers that should the need arise, the provision of essential wastewater or sewerage infrastructure (e.g. a new pumping station) required to serve new and existing customers or meet stricter environmental standards, would constitute special circumstances. There are limited options available with regard to location, as the infrastructure would need to connect into existing networks. The National Planning Practice Guidance recognises this scenario and states that ‘it will
be important to recognise that water and wastewater infrastructure sometimes has locational needs (and often consists of engineering works rather than new buildings) which mean otherwise protected areas may exceptionally have to be considered'.

We made similar representations in respect of the Arundel Neighbourhood Development Plan and the examiner agreed that utility infrastructure can represent very special circumstances. Similar wording to our proposed amendment below is included on page 13 of Locality’s ‘guide to writing planning policies which will address the issues that matter to your neighbourhood plan’ by Tony Burton.

To ensure consistency with the NPPF and National Planning Policy Guidance, we propose the following amended wording to policy WNP1a:

Additional development outside the village envelope, as defined in Figure 4.1 and beyond 5min walk (ca. 400m) from the centre of the village (the Church Street/Bridge Street junction), will only be supported where exceptional circumstances have been demonstrated or it is essential to meet specific necessary utility infrastructure needs. The following green spaces within the village will continue to be protected from development, unless it is essential to meet specific necessary utility infrastructure needs and no alternative feasible site is available.

Policy WNP7 The Imperial College London Campus at Wye

Page 35

The Neighbourhood Development Plan identifies that the above site could be used for a mix of uses, including housing. In line with paragraph 162 of the National Planning Policy Framework (NPPF) and the National Planning Practice Guidance, we have undertaken an assessment of the existing capacity of our infrastructure and its ability to meet the forecast demand for this proposal. That assessment reveals that the local sewerage system has limited capacity. This is not a constraint to development providing there is planning policy support for the provision of the necessary local infrastructure.

If development is permitted to proceed where there is inadequate capacity in the sewerage network, then the system would become overloaded, leading to pollution of the environment. This situation would be contrary to paragraph 109 of the NPPF, which requires the planning system to prevent both new and existing development from contributing to pollution.

There is a risk that the necessary local sewerage infrastructure will not be delivered in time to service the proposed development, unless delivery is supported by planning policies and subsequently in planning conditions. This is endorsed by the core planning principles identified in the NPPF, notably to: ‘proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs’ and ensure that plans ‘provide a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency’. Our approach is also supported by paragraph 21 of the NPPF, which requires that planning policies should recognise and seek to address any lack of infrastructure. The National Planning Practice Guidance specifies that ‘Adequate water and wastewater infrastructure is needed to support sustainable development’.

To ensure consistency with the NPPF and National Planning Practice Guidance, as well as being supported by the examiners for the Worth (Kent), Kingston (Sussex) and Arundel (Sussex) Neighbourhood Development Plans, we propose the following additional criteria for policy WNP7:

In this regard development proposals for this site shall:

a) Provide for the continued use of part of the site for education.....

n) Provide a connection to the nearest point of adequate capacity in the sewerage network, as advised by Southern Water.
Policy WNP10 Countryside and environment

Page 44  Southern Water understands the desire to protect green and other spaces. However, we cannot support the current wording of the above policy as it could create a barrier to statutory utility providers, such as Southern Water, from delivering its essential infrastructure required to serve existing and planned development.

Paragraph 76 of the National Planning Policy Framework (NPPF) sets out that neighbourhood plans can identify green areas of particular importance with the intention of ruling out ‘new development other than in very special circumstances’. Paragraph 88 of the NPPF explains that special circumstances exist if the potential harm of a development proposal is clearly outweighed by other considerations.

Southern Water considers that should the need arise, the provision of essential wastewater or sewerage infrastructure (e.g. a new pumping station) required to serve new and existing customers or meet stricter environmental standards, would constitute special circumstances. There are limited options available with regard to location, as the infrastructure would need to connect into existing networks. The National Planning Practice Guidance recognises this scenario and states that ‘it will be important to recognise that water and wastewater infrastructure sometimes has locational needs (and often consists of engineering works rather than new buildings) which mean otherwise protected area may exceptionally have to be considered’.

We made similar representations in respect of the Arundel Neighbourhood Development Plan and the examiner agreed that utility infrastructure can represent very special circumstances. Similar wording to our proposed amendment below is included on page 13 of Locality’s ‘guide to writing planning policies which will address the issues that matter to your neighbourhood plan’ by Tony Burton.

To ensure consistency with the NPPF and National Planning Policy Guidance, we propose the following amended wording to policy WNP10:

b) Existing green and other spaces should be preserved and enhanced and proposals for any development on the land will be resisted other than in very special circumstances, for example, it is essential to meet specific necessary utility infrastructure needs and no alternative feasible site is available.

New policy on the provision of infrastructure

Southern Water is the statutory sewerage undertaker providing wastewater services to Wye. Southern Water has a statutory duty to serve new development, and is committed to ensuring the right wastewater infrastructure in the right place at the right time in collaboration with developers, the Parish Council and the planning authority. The adopted Wye NDP and adopted Ashford Local Plan will inform Southern Water’s investment planning. Adoption provides the planning certainty required to support investment proposals to Ofwat, the water industry’s economic regulator. Investment proposals are prepared every five years through the price review process. Last year’s price determination will fund the investment programme in the period to 2020. There will be another price review in 2019, covering the investment period 2020 to 2025.

Although there are no current plans, over the life of the NDP it maybe that we need to provide new or improved infrastructure. Page 8 of the National Policy Statement on Wastewater states that ‘Waste water treatment is essential for public health and a clean environment. Demand for new and improved waste water infrastructure is likely to increase in response to the following main drivers: More stringent statutory requirements to protect the environment and water quality; Population growth and urbanisation; Replacement or improvement of infrastructure; Adaption to climate change. The Government is taking measures to reduce the demand for new waste water infrastructure to complement these approaches and ensure that the natural and man-made systems
are able to function effectively together to deliver a wide range of ecosystem services and other benefits to society’.

Accordingly, we seek policy provision to support new or improved utility infrastructure. Such policy provision would also be in line with the main intention of the National Planning Policy Framework (NPPF) to achieve sustainable development, for example, one of the core planning principles contained in paragraph 17 of the NPPF is to ‘proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs’. Also paragraphs 157 and 177 of the NPPF require positive planning for development and infrastructure necessary in an area.

To ensure consistency with the NPPF and other government guidance and facilitate sustainable development, we propose the following additional policy:

**New and improved utility infrastructure will be encouraged and supported in order to meet the identified needs of the community, subject to other policies in the development plan.**

Such a new policy is considered unnecessary given the changes made in revised policies WNP1a, WNP8 and WNP11.

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**h. Response received from Kent County Council.**

May 15th 2015

Dear Linda,

Re: Wye Neighbourhood Development Plan Pre-submission consultation January 2015 [Regulation 14]

Kent County Council (KCC) has considered the Wye Neighbourhood Development Plan (WNDP) consultation documents and at this moment in time, provides general comments regarding:

1. Planning Policy
2. Highways and Transport
3. Education
4. Development Contributions
5. Heritage
6. Biodiversity

The County Council reserves the right to comment formally on the submitted version of the WNDP when it is published by Ashford Borough Council (ABC) under Reg. 16 of The Neighbourhood Planning (General) Regulations 2012.

**1. Planning Policy**

The County Council welcomes the positive approach taken by Wye and Hinxhill Parish Council towards enhancing the sustainability of Wye, and in respect of paragraph 184 of the National Planning Policy Framework, recognises the Parish Council’s commitment towards the inclusion of policies consistent with adopted local planning policy (in particular, the adopted Ashford Borough Core Strategy 2008 and Tenterden and Rural Sites DPD 2010).

The County Council also notes reference made to ABC’s *New Local Plan to 2030* and advises that the Parish Council should remain cognisant of emerging local planning policy and to continue to engage with ABC to further ensure policy consistency.

It is encouraging that KCC considers that the WNP adequately addresses National and
2. Highways and Transport

KCC believes there to be no evidence to support the Parish Council’s speculation of increased traffic passing through the proposed junction 10a of the M20. It is therefore recommended that the associated statement on page 16 of the WNDP is removed.

Although the comment about Junction 10a is speculative, the potential increase in traffic is a cause of concern amongst parishioners and must be raised.

With regards to Policy WNP 15 (page 48) the County Council considers that the threshold for traffic modelling is considerably low and should therefore be increased. An appropriate threshold should be considered in light of the sensitive location of Wye and the level crossing.

KCC recognises that traffic modelling was not undertaken for WYE 1 and WYE 2 for a total of 27 and 25 dwellings respectively and therefore suggests that the threshold should be increased to 20 workers and/or 50 dwellings.

The threshold for critical analysis of traffic implications is not considered to be too low. The Parish Council was concerned that modelling was not carried out for the WYE1 and WYE2 sites. KCC support for the modelling approach, in principle, is noted.

The County Council also recommends that the supporting text associated with Policy WNP 16 (page 48) is altered to (please note additional wording is added in **bold**):

*Where significant new housing development takes place (10+ houses) developers will be expected to fund traffic calming and parking improvements through the Section 278 Highway Agreement process. Details of any improvements should be agreed with Kent County Council whom is the Local Highway Authority.*

As WNP 16 has been absorbed, the statement about funding has been inserted into the text for the revised and expanded Policy WNP3.

3. Education

The WNDP proposes 162 new dwellings between 2015 and 2030. These are phased at 82 units in 2015-20 and 40 units in both 2020-25 and 2025-30.

**Note that policies now propose 152 new dwellings.**

The local maintained primary school, Lady Joanna Thornhill Endowed Primary School, is forecast to exceed capacity until at least 2018-19. Reliable pupil forecast data beyond that is not available although it is anticipated that there may be fluctuations in the roll around the school capacity of 420 children. 162 dwellings are likely to produce 45 additional primary pupils in total. The school in its current format will be unable to sustain such an increase in demand. There is also little scope to expand capacity at the school. The nearest alternative schools are situated at Kennington, Brook and Challock. There is an independent primary school in Wye but necessity would dictate that the majority of parents are likely to seek maintained school education.

KCC are correct in raising the issue of school places in Wye. Their response overlooks the fact that the 2013 primary school travel plan demonstrated that c. 50% of pupils came from the Ashford area with 45% from Kennington. The influx of primary school pupils from sites to the west of the
railway line exacerbates queues at the level crossing during the school run. The increase in pupils likely to come from sites in Wye planned to be within walking distance of the school, will have a slight moderating effect on traffic flow. The Kennington schools should have capacity to take on the pupils starting formal education who may have opted to attend Wye Primary but may not be able to do so because of lack of proximity to Wye.

The Tenterden and Rural Sites DPD (2010) indicates that housing numbers are actually planned to be 45 in the period 2008-16 with further new housing post 2016 dependent on eventual use of the Wye College land. If there is not going to be an educational use of the land beyond that required for Wye Secondary Free School then the area is due to be master planned and to incorporate a degree of housing. The housing quantum, though, will be less than suggested in the WNDP. Fewer houses could be more sustainable in educational terms and thus favoured by KCC Education.

The Imperial College London Masterplan in fact argues for 200 houses on the WYE3 site alone. The WNP proposes 152 in total within the village.

Notwithstanding the secondary free school, KCC (supported by the Borough Council) is currently securing developer contributions for the new secondary school at Chilmington Green. Wye Free School may be able to accommodate pupils from the area in time but only when its continued future and location is confirmed and the school is established. For now, new housing will attract developer contributions for secondary education as with all developments within the borough.

KCC confirm the frustration felt by the Parish Council that the permanent site for the Free School has yet to be confirmed. The revised WNP is now flexible on the location for the school on the WYE3 site, although favouring use of the unoccupied Edwardian Buildings.

If the WNDP promotes further housing the Parish Council would have to work constructively with KCC to find a solution to mitigate the effect of additional housing on school provision. As a neighbouring landowner to the school and the Trustee of further land adjoining the school, it is well placed to assist in finding workable solutions, and/or should assist in ensuring sufficient off-site facilities can be made available to enable the school to be expanded.

4. Development Contributions

KCC considers the use of development contributions (Appendix B) to meet parish aspirations rather than address objectively assessed infrastructure needs arising from new development. The County Council would welcome the opportunity to work with the Parish Council and ABC regarding the appropriate use of development contributions, particularly to ensure compliance with the statutory tests set out in the Community Infrastructure Levy (CIL) Regulations 2010 (as amended). KCC would, for example, seek contributions for additional primary pupil facilities to mitigate the impact of new development.

With regards to Appendix B of the WNDP, KCC recognises that the Parish Council will receive a total of 25% of the CIL receipts (in accordance with Reg. 59A of the CIL Regulations 2010 (as amended)). However the figures (in particular, the rate quoted per household) could be considered misleading and it is recommended that they are tempered to reflect the true situation.

The comments on Section 106 and CIL in the consultation document have been altered in the revised WNP to reflect the concerns of both KCC and ABC.

5. Heritage

The publication of WNDP is welcomed as Wye is a historic town with origins dating back to the Roman period and has significant association with the medieval collegiate.

However, the County Council considers that the WNDP has little detail on the prehistoric
and historical background and historic importance of Wye. There are extremely important sites in the settlement focus dating from the Prehistoric Period and Roman and early medieval sites nearby. Therefore KCC suggests that the WNDP should refer to the Kent Historic Environment Record (HER) and the associated recorded archaeological sites and Listed Historic Buildings. The WNDP should be supported by evidence of a formal HER search in order to ensure soundness of the WNDP in relation to archaeology.

The County Council would welcome the inclusion of reference to the Historic Towns Survey for Wye (KCC and English Heritage, 2005) which was produced as supplementary guidance for Local Plans and provides an assessment of the development of Wye as a medieval market town.

The WNP has been revised to highlight the need for conservation of archeological sites in the parish.

6. Biodiversity

Although the WNDP refers to the Kent Downs Area of Outstanding Natural Beauty (AONB) and national and international designations afforded to the Wye and Crundale Downs, there is a lack of reference to other designated areas. The Parish holds areas of ancient woodland, Local Wildlife Sites, Biodiversity Action Plan habitats and has two Biodiversity Opportunity Areas present within the Parish boundary. Therefore KCC would welcome the identification of these areas to provide broader context for the value of the Parish’s natural environment.

All important designated areas are now mentioned in the WNP.

Due to the limited allocation of sites and locations there is little scope for the WNDP to ensure the delivery of the enhancement, restoration and re-creation of habitats within the Parish. The County Council therefore recommends that the inclusion of identified habitat networks within Wye as this could lead to support the delivery of some of the identified projects.

With reference to section 5.3 and Policy WNP 7, the County Council advises that an ecological impact assessment, along with the development and implementation of any necessary ecological mitigation measures, are incorporated into the policy wording. It is recommended that the following bullet point is added to Policy WNP 7:

‘n) Adequately assess the ecological value of the site and the potential for ecological impacts to arise as a result of the development proposals, demonstrating that the impacts can be avoided, mitigated or, as a last resort, compensated for.’

The revised WNP includes this statement in the revised Countryside and environment policy WNP8

The policy is improved.

In relation to section 5.5 and Policy WNP 8, KCC suggests the inclusion of specific consideration of the potential for ecological impacts within the site and the adjacent Naccolt Pit Local Wildlife Site. The County Council also considers it essential that ecological survey work is undertaken to ascertain the ecological value of the site in order for this to be considered in planning decisions.

Therefore KCC recommends the inclusion of the following text (in bold) to the policy wording:

‘The re-development of the former Naccolt Brickworks for residential use with up to 8 dwellings to the west and the renovation of the cottage to the east of Oxenturn Road will be supported, if it can be demonstrated that significant ecological impacts will be afforded, mitigated or compensated for…’

Also suggested is the deletion of:

‘…The surrounding woodland areas should be retained and a management strategy determined before planning permission is granted.’
To be replaced with:

‘….The adjacent Naccolt Pits Local Wildlife Site shall be protected, retained and enhanced and a management plan secured within any planning application.’

Regettably, the response from KCC is now out of date. Planning permission has now been granted for the Naccolt brickworks site. The policy for this site developed for the WNP is now only included as part of Background Document 13.

With regards to section 6.2 and Policy WNP 10, the County Council suggests the consideration of all potential ecological impacts to be incorporated into the policy wording and suggests the following rephrasing:

‘a) Development proposals shall adequately address the potential for ecological impacts to arise, giving appropriate consideration to protected and designated species and designated areas, including Wye and Crundale Downs SAC, NNR and SSSI. The mitigation hierarchy shall be followed to avoid, minimise and, as a last resort, compensate for any identified ecological impacts,’

This statement has been added to revised policy WNP8.

I trust you find the above comments useful and should you require any further information or clarification on any matter, please do not hesitate to contact me.

Yours sincerely,
Paul Crick
Director of Environment, Planning and Enforcement

4. Concluding remarks

The responses received have led to improvements to the consultation draft of the plan. In particular ABC provided clear guidance about the need to adjust aspects of the document to conform more fully with basic conditions. Comments from Natural England, KCC and other parties impressed the need for more careful consideration of environmental and infrastructure impacts. Importantly, the scale of mixed development proposed was considered broadly acceptable. The comments received from ABC in response to the pre-submission draft indicate that the LPA considers the quantum of development proposed for WYE3 in the WNP meets the basic conditions tests (i.e. is consistent with the strategic policies of the adopted Development Plan and the NPPF). It was concluded that no major changes were required to the scale of development proposed.
Bodies that the Parish Council consulted – list provided by ABC

(Updated 8th December 2014)

Below is a list of statutory consultees as referred to in paragraph 1 of Schedule 1 of the Neighbourhood Planning (General) Regulations 2012. The Regulations require qualifying bodies to consult any consultation body (as listed below) whose interest may be affected by the proposals of the Neighbourhood Plan. Most of the contacts below must be consulted, however we feel that there are a number that are discretionary and these have been marked up with an *. Note that the Parish Council consulted all bodies and Imperial College London as the major land owner.

- A local planning authority, county council or parish council any part of whose area is in or adjoins the area of the local planning authority.

Ashford Borough Council Mr Simon Cole, Ashford Borough Council, Civic Centre, Tannery Lane, Ashford, Kent, TN23 1PL

Shepway District Council Planning Policy, Shepway District Council, Civic Centre, Castle Hill Avenue, Folkestone, Kent, CT20 2QY

*Tunbridge Wells Borough Council, Planning Policy, Tunbridge Wells Borough Council, Town Hall, Royal Tunbridge Wells, Kent, TN1 1RS

*Swale Borough Council Ms G Harris, Swale Borough Council, Swale House, East Street, Sittingbourne, Kent, ME10 3HT

*Rother District Council Mr David Marlow, Rother District Council, Town Hall, London Road, Bexhill-on-Sea, East Sussex, TN39 3JX

Canterbury City Council Mr Adrian Verrall, Canterbury City Council, Council Offices, Military Road, Canterbury, Kent, CT1 1YW

*Maidstone Borough Council, Ms Sue Whiteside, Maidstone Borough Council, Maidstone House, King Street, Maidstone, Kent, ME15 6JQ

Kent County Council Planning and Enforcement, Kent County Council, Sessions House, County Hall, Maidstone, Kent, ME14 1XQ

East Sussex County Council, Planning Policy, County Hall, St. Anne’s Crescent, Lewes, Sussex, BN7 1SF.

Brook Parish Council Mrs T Block, Brook Parish Council, The Briars, The Street, Hastinge, Ashford, Kent, TN25 5HU

Hastingleigh Parish Council Mrs T Block, Hastingleigh Parish Council, The Briars, The Street, Hastinge, Ashford, Kent, TN25 5HU

Brabourne Parish Council Mrs Susan Wood, Brabourne Parish Council, 14 Sandyhurst Lane, Ashford, Kent, TN25 4NS

Elmsted Parish Council Mrs T Block, Elmsted Parish Council, The Briars, The Street, Hastinge, Ashford, Kent, TN25 5HU

Mrs T Block is clerk for three Parish Councils, Hastinge, Brook and Elmsted
Crundale Meeting
Mrs A Parrett, Crundale Meeting, Sole Street Cottages, 5 Sole Street, Crundale, Canterbury, Kent, CT4 7EP

Boughton Aluph & Eastwel Parish Council
Mr. Martin Hoplins, Boughton Aluph & Eastwel Parish Council, 336 Sandyhurst Lane, Boughton Aluph, Ashford, Kent, TN25 4PE

Godmersham Parish Council
Mrs S Gaskain, Godmersham Parish Council, Rhode Court, Selling, Kent, ME13 9PS.

Mersham & Sevington Parish Council
Mr. Geoff Eaton, Mersham & Sevington Parish Council, 84 Roberts Road, Great Stone on Sea, New Romney, TN28 8RJ

Waltham Parish Council
Ms L Saxby, Verne Cottage, Kake Street, Waltham, Canterbury, CT4 5SB.

- The Homes and Communities Agency
  Miss J Wallace, Arpley House, 110 Birchwood Boulevard, Birchwood, Warrington, WA3 7QH.

- Natural England (Consultation Service)
  Hornbeam House, Elecra Way, Crewe Business Park, Crewe, CW1 6GL.

- The Environment Agency
  Barrie Neaves, Environment Agency, Orchard House, Endevour Park, London Road, Adlington, West Malling, Kent, ME19 5SH

- English Heritage South East Region
  English Heritage South East Region, East Gate Court, 195-205 High Street, Guildford, GU1 3EH

- Network Rail Infrastructure Limited
  Town Planning, 1 Eversholt Street, London, NW1 2DN

- The Highways Agency
  Highways Agency (Planning), Federated House, London Road, Dorking, RH4 1SZ

- The Marine Management Organisation
  Marine Area Manager, Marine Management Organisation, Fish Market, Rock-A-Nore Road, Hastings, East Sussex, TN34 3DW.

- Any person to whom the electronic communications code applies, or who owns or controls electronic communications apparatus situated in any part of the area of the local planning authority.

  O2
  Arlington Business Centre, Millshaw Park Lane, Leeds, Yorkshire, LS11 0NE

  T-mobile (UK) Limited
  Hatfield Business Park, Mosquito Way, Hatfield, Hertfordshire, AL10 9BW
Vodaphone The Connection, Newbury, Berkshire, RG14 2FN.
Orange Customer Services, 60 Cheapside, London, EC2V 6JS
Three Mobile Customer Service
Hutchinson 3G Limited, PO Box 333, Glasgow, G29AG
Hutchinson3G Mr M Davies, Hutchinson3G, 5 Hester Road, London, SW11 4AN
Mobile Operators Association (MOA)
Ms Ginny Hall, Mono Consultants Limited, 48 St. Vincent Street, Glasgow, G25TS

- Where they exist a Primary Care Trust, licensee under the Electricity Act 1989, Licensee of the Gas Act 1986, sewerage undertaker and water undertaker.

Ashford Primary Care Trust Templar House, Tannery Lane, Ashford, Kent, TN23 1PL
EDF Energy Assett Management
EDF Energy Networks, Bircholt Road, Maidstone, Kent, ME15 9XH
UK Power Network Mr Peter Hargreaves, UK Power Network, Newington House, 237 Southwark Bridge Road, London, SE1 6NP
British Gas Transco South East 2 Leesons Hill, Orpington, Kent, BR5 2TN
South East Water Mr Lee Dance, South East Water, Rocfort Road, Snodland, Kent, ME6 5AH
Affinity Water (South East Region) Mr John Mayne, The Cherry Garden, Cherry Garden Lane, Folkestone, Kent CT19 4QB
Southern Water Mr J Spence, Southern House, Yeoman Road, Worthing, West Sussex, BN13 3NX

- Voluntary bodies whose activities benefit all or part of the neighbourhood area
- Bodies representing the interests of different racial, ethnic or national groups in the neighbourhood area
• Bodies representing the interests of different religious groups in the neighbourhood area and
• Bodies representing the interests of disabled people in the neighbourhood area.

The following Ward Members should also be informed:

Saxon Shore Ward Member  william.howard@ashford.gov.uk; jane.martin@ashford.gov.uk
Downs North Ward Member  mariottuk@aol.com (Doug Marriott)
Weald East Ward Member  paul.bartlett@ashford.gov.uk
North Willesborough Ward Member  andrew.mortimer@ashford.gov.uk; bob.davidson11@googlemail.com
Kennington Ward Member  philip.sims@ashford.gov.uk
Boughton Aluph & Eastwell Ward Member  winston.michael@ashford.gov.uk
Wye Ward Member
Kennington Community Forum  chris.f.morley@gmail.com
KCC Member  andrew.wickham@kent.gov.uk

Local businesses consulted

In addition to the guide and response forms being delivered to home addresses, the following businesses were contacted either directly or through Wye Business Association

http://wyebusiness.org.uk/


The plan documentation as CDs was also passed to Mrs Sutherland Chairperson of the WBA for reference and distribution.
Dear Residents of Wye with Hinxhill Parish,

After the questionnaire, the surveys, the meetings and the workshops here at last is our Neighbourhood Plan (WNP): we need to know if it is what you want to go forward.

This Guide is designed to show the main features of the WNP. However, you are strongly encouraged to read the plan in full and all supplementary documents. Comments are sought from all residents in the Parish, local businesses and organisations, and statutory bodies. The period allowed for consultation is from January 30th until March 13th 2015. A comments form is enclosed and is also available on line from the PC website

http://www.wyewithhinxhillpc.kentparishes.gov.uk/default.cfm?pid=9478

All comments will be considered before any revisions are made following approval by the Parish Council at its April 2 meeting.

• Ashford will then carry out its own consultation based on the revised plan.
• Based on ABC’s response there may be further revision before the WNP is submitted for public examination.
• If approved, WNP will go to a Referendum of the residents of the parish – probably at the end of 2015.
• If the Plan is supported by a simple majority of those who vote in the Referendum, it will become a statutory document which will have to be followed by developers within the planning system. The Borough Council will be required to use WNP as the basis of their future planning for the parish.

In this Guide we will introduce you to the key sections of the Plan.

• Copies of WNP and supporting documentation will be available from the Library, Churches, Village Hall, Methodists Hall, and in Ashford’s Gateway centre.
• All the documents are also available on the PC website.
• Patch workers throughout the Parish are distributing this guide and the Comment Forms to every resident. They will collect your comment form and also keep in touch while the process continues, bringing you updates and other news.
• We hope that we can get a successful Plan in place as it is the surest way to protect the village from over development, whilst ensuring its continuing economic importance, and as a vibrant and energetic community.

Tony Shoults Chairman Wye with Hinxhill Parish Council January 26th 2015
Outline of this guide

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MAPS provided with this Guide

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Giving us comments Please complete the Comments form handed out with this guide – as many forms as you like depending on whether all in your household feel the same or differently. Please put your name on them unless you wish to remain anonymous. We might need to contact you to follow up what you have said.

When you comment please make reference to the particular policy number that deals with your area of concern.

Remember all documents are available online

http://www.wyewithhinxhillpc.kentparishes.gov.uk/
Key features of the WNP

It is a plan for future development and land-use planning in Wye until 2030.

- It is based on wide consultation; the household survey and workshop output, and detailed research into traffic, parking, employment and the housing needs of residents.
- A number of additional appendices and background documents provide detailed evidence to support its conclusions and show how the Plan has been produced.
- This Guide gives the key conclusions of what we propose – the Vision, Principles, Core Objectives and Policies.
- The Policies are needed to ensure that our objectives are implemented.
- The Policies have to be drafted so that they can be applied by Planning Officers as Planning Applications are considered.

The Neighbourhood Plan is:

- A blueprint for sustainable development and must not be a block on development
- Not a wish list of projects but a planning policy document

The Neighbourhood Plan should not repeat or conflict with local or national policy but integrate with the local planning context:-

- Ashford’s Core Strategy and Local Plan
- The Tenterden and Rural Sites Development Planning Document
- The National Planning Policy Framework

National and Local policies are not repeated in the WNP.

The main WNP text includes:

- Our approach to the Plan and making sure it conforms to ABC and Government policy
- Background to the Parish and Wye
- Planning context
- Our Vision and Principles
- Objectives and core policies
- Site and general policies

Supporting Documents are provided:

- Appendices covering various issues supporting the main text including Parish projects, a matrix of local planning policies and The Village Design Statement 2000 guidelines.
- Background Documents describing research undertaken and evidence gathered to prepare the plan including The Questionnaire, Community Engagement, Environmental assessment, Traffic Appraisal, Employment and Housing, Local housing needs, Rural Economic Assessment, Our place project, and Consultation with landowners.
Our Vision

The overall aim is to retain Wye as a vibrant village hub within the Parish and AONB

- Wye should remain a distinct settlement with definite boundaries.
- It should be a balanced community providing some local employment and should not become purely residential.
- Any development should respect the rural landscapes surrounding Wye, so that it retains its rural character.
- The environment should continue to make the community feel safe.
- The vibrant community should continue to enjoy many activities.
- Any changes should respect Wye’s history and its historic buildings, but should enable most of the needed facilities and amenities to be provided in the village.

1. **The principles that the Neighbourhood Plan must support**

These were derived from the Village Design Statement and refined at the workshops.

*Change and new development in Wye*

- New development should be proportionate to the character and nature of a village
- Development should be concentric around the historic centre with residents able to walk to the centre within five minutes.
- New homes should be built in clusters easily linked to the centre of the village.
- Developments should be assessed within the constraints of the existing infrastructure and not result in excessive growth.
- A fit for purpose business hub sympathetic to the local environment, to promote economic growth and local employment, should be created.
- Change should be undertaken with environmental consciousness, applying CO₂ neutral principles and building to the highest sustainability standards.
- The role of Wye as a hub for the parish and surrounding neighbourhood should be protected and enhanced by mixed development in the village.

*Design of development*

- Wye’s position in the AONB and with a Conservation Area must be protected
- The scale and height of developments and buildings should be appropriate to their context.
- The height and density of any new buildings should decrease from the centre of the village to the perimeter
- Particular care should be taken in the Conservation Area to ensure that alterations and new buildings relate in architecture and scale to their surroundings, and make a satisfactory contribution to the historic core of the village.
- Vehicle parking and movement should be specifically addressed for all new developments.
- Developers should be encouraged to involve local people in early discussions for any proposed new developments of significant size or impact.

**Objectives and their linked Core Policies**
The Principles provide the basis for the six key objectives of the WNP. Each of the objectives is complemented by a Core Policy (WNP Policies 1-6) that will apply across all future developments. The focus of these policies is on Wye itself, but impacts on the surrounding parish and highly protected landscape are highlighted.

Objective 1: Protection of the village of Wye’s sense of place within the parish and its surrounding countryside

The concept of a concentric village with the centre within easy walking distance is a cornerstone of the protection of Wye’s status within the AONB. A good indicator of a sustainable settlement is the location of housing within 5 min walk, or about 400m, from the centre of the village, defined as the Bridge St/Church St junction. This concept allows a village envelope to be designated to enclose development to 2030, as shown in MAP 1. Development within this area will allow pedestrians to have good access to essential facilities e.g. the primary school, medical centre and train station, but will preserve the surrounding countryside.

MAP1. The village envelope defining the built confines of Wye to 2030
Policy WNP1a Additional development outside the village envelope as defined in MAP1 and beyond 5min walking distance (ca. 400m) from the centre of the village (the Church Street/Bridge Street junction), will only be supported where exceptional circumstances have been demonstrated. The following green spaces within the village envelope (see MAP 1) will be protected from development.

- Churchfield Green
- Allotments
- Churchyard and burial ground
- The College Green and College Gardens
- Sports fields – the cricket field Horton’s Meadow, Village Hall recreation ground and also Wye College playing field
- Havillands meadow
- Green spaces in established housing developments
  - Little Chequers
  - Long’s Acre
  - Churchfield Way and the Forstal
  - St. Ambrose Green
  - Jarman’s Field

Policy WNP1b Developments that detract from the following views into, out of and within the village, will not be supported. These views are shown in MAP 2

a) Views to the West
   - The North Downs from Bridge St
   - The Downs and Stour Valley from Churchfield Way
   - Panoramic views to the northwest from Churchfield Green
   - The Downs from Olantigh Rd

b) Views to the East
   - The Crown and Downs viewed from the Kempe Centre
   - The Crown and heritage buildings viewed from Golden Square

c) Views into Wye
   - Views from the Downs (east and west), Naccolt, Stour Valley and Boughton Aluph church also need to be preserved and enhanced.

Projects on the improvement of the green infrastructure within and around Wye are proposed – enhancement of views and the edges of developments are addressed specifically in Site Policies.

Policy WNP1c Developer contributions will be sought to support projects to improve riverside access, green infrastructure and landscape improvement.
Objective 2  Protection of Wye’s conservation area and architectural heritage

The community, through the household survey, has strongly supported the existing VDS 2000. The Village Design Statement (Appendix E and BD8) is currently recognised as Supplementary Planning Guidance by ABC and continues to provide clear guidelines for design and development. Policy WNP2 promotes the key design principles of the VDS.

Policy WNP2

Proposals for all forms of new development must plan positively for the achievement of high quality and inclusive design, at the same time demonstrating they have sought to conserve local distinctiveness and the aesthetic qualities of traditional rural settlements and buildings found in the Kent Downs AONB.

- Applications proposing unsympathetic designs which fail to respect the connections between people and places, or are inappropriate to its location, or pay inadequate regard to issues of renewable energy technologies, landscape and biodiversity considerations will be refused.
- Each development proposal should include a statement and illustrations demonstrating how the principles and guidelines of the VDS have been addressed.

Objective 3  Protection against the impacts of increased traffic

Traffic flow through Wye, parking difficulties and queuing at the level crossing were the most frequently highlighted issues in the household survey and have been analysed in detail. Appropriate
development is encouraged, but proposals for new business activities or housing must ensure that they will not create unacceptable levels of congestion, damage the quality of life in the Parish or the character of Wye. There must be no harmful impacts on the sensitive, protected environments within the parish such as the Wye and Crundale Downs, or on Wye itself as a tourist centre within the AONB. Traffic management has been earmarked as the priority for developer contributions.

**Policy WNP3** New developments of housing, or businesses will only be permitted if they will not cause a significant increase in the volume of traffic leading to:

- Severe queuing along the roads leading to the level crossing as identified by the failure of queues to clear when the gates are open, or
- Creation of highway safety issues because of the overuse of rural roads leading to Wye.

**Objective 4** The promotion of business activity

Section 2.2 outlines the need to replace employment opportunities lost after the closure of Wye College, which supported many of the village’s retail and commercial activities. Further loss of retail premises is unwanted as set out in the Core Strategy. Strengthening the economic sustainability of Wye, including the growth of tourism, supports the village as an active Tier 2 hub for surrounding settlements, a conclusion supported by the NLP Rural Economic Assessment. Any development must, however, be sustainable in conforming with the need to protect the sensitive environment around Wye.

**Policy WNP4** Proposals for business development to replace jobs lost through the closure of the College, particularly in education, research, food production and tourism will be supported providing that they conform to Policy WNP3.

**Objective 5: To integrate new affordable and general needs housing within mixed developments.**

The WNP accepts the existing ABC policy that developments of more than 15 dwellings should include 35% of affordable housing. The household questionnaire (BD1) identified support for affordable and Local Needs Housing. The latter was confirmed in two housing surveys. Analysis of available sites (section 2.4) failed to identify any suitable exception sites for Local Needs Housing. The integration of housing needs with affordable housing in mixed developments is, therefore, the approach supported by the Parish Council.

**Policy WNP5** Local Needs Housing should be met by integration within the affordable housing component of any new developments in Wye.

**Objective 6: To achieve the mixed re-development of WYE3**

In recognition of the importance of WYE3 and in particular the need to replace employment opportunities lost to the parish after the closure of the college, the following overarching policy aims to guide the future development of the site during the lifetime of the WNP.

**Policy WNP6** Development proposals for the WYE3 site should deliver a mix of uses, including education, business, community infrastructure and some housing. Given the scale of the site in relation to the village, such development should be delivered in a phased manner subject in the first instance to an agreed and adopted masterplan for the site as a whole. Development of the WYE3 site must support the concept of a walkable, concentric village.
Site Policies

During preparation of the NP, planning permission was granted for 25 houses on WYE2. Similarly, residential development of the WYE1 site was approved in principle for 27 dwellings in September 2014. Additional sites considered were the ADAS site on WYE3 and the former Naccolt brickworks site. Both sites lie outside the confines of the built up area of the village of Wye. In addressing the allocation of land for additional development the WNP has considered the following

- The availability of brownfield sites (see BD12)
- Alternative uses for built areas
- Appropriate housing densities
- Designation of the village envelope (Policy WNP1a)
- Ashford’s rapid residential expansion to the South means that any new housing in the parish has only to meet local considerations

5.1 WNP Policy for WYE3

The major landholdings of Imperial College London at Wye, now surplus to their requirements, represent the key areas with potential for redevelopment in the parish. For many years the economic and social vitality of the Wye has focused in large part around the presence of Wye College. The re-development of the former college site (WYE3) therefore represents a tremendous opportunity to shape Wye for the future, preserving and enhancing the vitality and sustainability of the historic village and surrounding Parish

Objective 6 is to achieve a mixed use re-development of WYE3 in order to ensure the continued viability of the village and a thriving sustainable community here. The major concerns for the Parish arising from any redevelopment of such a significant landholding in this relatively modest-sized village are

- the impact of the proposed re-development of the WYE3 site on traffic flow (in particular queuing at the level crossing),
- that any additional house building occurs only within walking distance and at the edge of the existing envelope, ie in the region of 400m from the village centre and
- the impact on the environment receives particularly careful consideration as part of the planning application process given the highly protected landscape in which these areas of land lie.

Proposals for the establishment of the Secondary School, new low intensity business opportunities, including the re-use of Withersdane, and provision of community space in the main campus will, taken together, result in a level of traffic equivalent to that from the earlier activity at the College and have therefore received support from the community as part of the preparation of WNP. The establishment of the school in particular will maintain Wye’s heritage as a centre of learning. Even with these developments there will remain an area of redundant brownfield land within WYE3 where housing may represent the most appropriate land use.

It is essential that the WYE3 site is considered as a whole and that its redevelopment is the subject of an inclusive Masterplan approach in the first instance and is compliant with Policy WNP7. Piecemeal applications should not come forward if they will prejudice an integrated solution for what is the major site for development in the village. Policy WNP7 addresses the overall redevelopment of the campus landholding.
Policy WNP7 The Imperial College London Campus at Wye

The Imperial College London landholding at Wye (WYE3) is proposed for a mix of uses, including education, business, community infrastructure and housing. In this regard development proposals for this site shall:

a) Provide for the continued use of part of the site for education through the establishment of a secondary school on the site occupying part of the Edwardian buildings and laboratories on Olantigh Rd, together with the provision of playing fields on the Hop Garden field (MAP3) and associated parking. Any such development should include the adoption of a travel plan to limit the use of cars to bring staff and students to and from the site prior to the commencement of any such development. Detailed design should be submitted to and agreed by the local planning authority and the highways authority for the entrance to the school and the Occupation Rd/Olantigh Rd junction in agreement with the developers of the remaining Occupation Rd site prior to the occupation of the buildings for this use.

b) Redevelop the Kempe Centre as a business hub (B1 or A2), retaining the parking areas to the

MAP3 Proposals for the East of Olantigh Rd site
north and east of the Centre and the existing landscaping and pleached limes in particular which provide screening from neighbouring residential developments.

c) Retain and enhance the existing commercial land use along the southern side of Occupation Road for employment use (B1). Existing units here should be renovated or replaced with commercial premises of similar scale, footprint and massing and should be designed to complement their setting and improve the appearance of the entry route into the village from the North Downs Way.

For (b) and (c), adequate parking provision for such commercial floorspace should be provided as part of any such redevelopment.

d) Incorporate the continued use of the land south of Occupation Rd for horticultural businesses. The use of the ADAS site for renewable energy will be supported as a continuation of Wye’s history at the forefront of rural based research and development.

e) Develop the Grade 1 and unused Edwardian buildings of Wye College as a community centre with various facilities, and a visitor centre with limited, associated accommodation. Such development would require provision of a new pedestrian and vehicular access route into the site. Small scale B1 use would also be supported here to encourage the development of a thriving community hub in these historic buildings in the heart of the village.

f) Retain the Withersdane site for institutional, residential (C2) use, subject to traffic generation being compatible with the highway constraints of Scotton Street and the upgrading of footpath links between the site and the village to ensure mobility scooter access. The gardens and trees here should be retained to maintain the character of the site and should be open to public access at certain times of the year.

g) Redevelop land east of Olantigh Road and north of Occupation Road as shown on MAP3 for up to 30 dwellings at a range of densities of 10-30 dph appropriate to their edge of village location and a maximum height of two storeys.

MAP4 Proposal for the West of Olantigh Rd site.
h) Redevelop the area west of Olantigh Rd for up to 13 residential dwellings, as shown on MAP4, with a density in the range 20-30 dph reducing towards the village boundary. The design of the dwellings should be sympathetic to the scale and character of the listed buildings along Olantigh Rd, and be set back from the road to enable the provision of road frontage landscaping appropriate to its edge of village context.

i) Redevelop area to the north of the Kempe Centre as shown on MAP3 for up to 7 residential units. Design should ensure that the new dwellings reflect the character and appearance of the area including the other developments to the east of Olantigh Rd.

j) All additional landscaping provided across the college landholdings should be of high quality given its setting with the AONB, be comprised of species appropriate to this area of the Kent Downs and of a design, scale and format appropriate to its setting. Applications should demonstrate how proposed landscaping has been designed to enhance views from the AONB.

k) The provision of cycling routes linking the new development here with the village centre should be delivered as part of the redevelopment of this large site. In addition, new footpath links should be established through the site linking to the arboretum with Occupation Rd.

l) Financial contributions from the development of WYE3 will be sought to support the projects described in Appendix B with major commitments allocated to parish community infrastructure, improvement of the ADAS site and the round the village cycle path.

5.2 The Old Naccolt Brickworks Site

The site in Naccolt, the hamlet to the south of Wye, has remained partly derelict since the closure of the brickworks. Part of the site, to the west of Oxenturn Rd, was used by Wyecycle the pioneering recycling initiative, but this activity has now stopped. Local residents would welcome appropriate development of the site for residential use rather than a continuation of general industrial activity.

Policy WNP8 Naccolt Brickworks site

The re-development of the former Naccolt Brickworks for residential use with up to 8 dwellings to the west and the renovation of the cottage to the east of Oxenturn Rd will be supported. Any development here must be well screened from the AONB, the road and nearby dwellings. The surrounding wooded areas should be retained and a management strategy determined before planning permission is granted.
6. General Policies

6.1 Community and well-being

Policy WNP9 Where significant new housing development takes place (10+ houses) developer contributions will be sought specifically towards

- improvements to the village hall complex,
- the enhancement of the surgery and
- the provision of a day care facility for elderly residents in Wye.

6.2 Countryside and environment

Policy WNP 10

a) The impact of new development on the Wye and Crundale Downs SAC, NNR and SSSI must be specifically addressed in planning application documentation.

b) Existing green and other spaces should be preserved and enhanced.

c) For developments of more than five houses, a landscape strategy should be submitted which will incorporate the following details: (i) existing and proposed hard and soft landscaping; (ii) a condition survey of all existing trees and hedgerows; (iii) an outline of the measures to be taken to protect existing trees and hedgerows during construction; (iv) consideration of both near and distant views of the development from the principal public vantage points showing existing landscaping and that proposed to be established after 10 years; and (v) details, where appropriate, of how those areas to be retained for open space and/or woodland will be managed in the future.

d) Proposals for renewable energy generation systems (Low and Zero Carbon Technology), will be supported as long as they do not detract from the conservation area and the AONB, specifically where they:

- are in keeping with the scale, form and character of their surroundings;
- do not significantly adversely affect the amenities of residents in the area;
- do not significantly increase vehicular traffic flow in the village.

6.3 Housing

The overall numbers of new houses including all areas of potential change identified in the parish are set out below in Table 1. Windfall levels are indicative and are based on the history of development applications in the parish, while change of use numbers are derived from the numbers of college buildings likely to come forward for change of use to dwelling houses from lecture rooms, offices and student accommodation during the lifetime of the NP.

Table 1 Indicative numbers of dwellings for phased development up to 2030

<table>
<thead>
<tr>
<th>Development</th>
<th>NP proposals to 2030</th>
</tr>
</thead>
<tbody>
<tr>
<td>Change of use</td>
<td>40</td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td>----------------</td>
<td>------</td>
</tr>
<tr>
<td>WYE1</td>
<td>27</td>
</tr>
<tr>
<td>WYE2</td>
<td>25</td>
</tr>
<tr>
<td>WYE3</td>
<td>50</td>
</tr>
<tr>
<td>Windfall incl. rural sites</td>
<td>20</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>162</strong></td>
</tr>
</tbody>
</table>

\( ^a \) Planning application under consideration December 2014  
\( ^b \) Planning approved 20-08-2014  
\( ^c \) Eight dwellings already proposed on the Old Brickworks site Naccolt. Permission for one change of use on the east side of the road, was granted October 2014.

The high numbers allocated to Change of use is considered realistic given the developments already under consideration by Imperial College London for Wolfson House (Upper Bridge St), Carruthers House and Wolfson Lecture theatre (High St) and unused Edwardian buildings on the WYE3 Campus North site (see site policy WNP7). This increase in housing equates to about 50 additional dwellings in the Parish every 5 years. This reflects the recent growth in the Wye housing stock since the 1990s and the long held approach to quanta of development in this parish adopted by the Local Planning Authority.

**Phasing** In seeking to protect and enhance the character of the village, the incremental development of Wye to reach the targeted number of new dwellings requires a policy on phasing to minimise impacts on the environment and traffic in particular. Phasing of new development will be essential in order to ensure that the village does not lose its character and that growth is organic. Housing should be developed in 5 year slices of about 50 units, with greater numbers at the start of the period. This target would allow some viable business relocation to be planned, releasing land for housing.

**Policy WNP11** New housing on all sites should be planned and approved on the basis that about 50 new units are delivered every 5 years.

Based on this approach, projected completion of building on sites WYE1 and WYE2 will occur within the period 2015-20. The sites within WYE3, would be expected to be phased throughout the plan period to 2030. It is expected that there will be a higher rate of building completion in the first five years. The impact of development will be assessed every 5 years to ensure that the village infrastructure is able to absorb the new housing in addition to increased business activity.

**Tenure and housing type** The household survey (BD1) identified a strong preference for a balanced mix of housing types (tenure and size) in any development as supported by CS13. In conjunction with surveys carried out through the “Our Place” project (BD10), results indicate a growing need for housing with enhanced ease of access. These views are reflected in Policy WNP12.

**Policy WNP12** Not less than 10% of housing within new developments should be designed for mobility access suitable for elderly or disabled people.

**Density and Layout** Housing density has been identified as a critical issue for any new developments, particularly on the edge of the village. The importance of green routes through the
village to preserve character and link amenity spaces has been to the forefront of workshop discussions on the environment. The development of village infrastructure that supports the Core policies WNP1b and WNP2 is reinforced by WNP13 and WNP14.

Policy WNP13  Density and layout

a) Densities should reflect the existing pattern of housing at 20-30 dwellings per hectare (outside the higher densities at the core of the village). Densities in developments on the edge of the village should not exceed 20dph.

b) Development will be encouraged to provide links with safe walking and cycling routes to the village centre, facilitating access to schools, the surrounding countryside and station - minimising the need for car use. The loss of existing footpaths and cycleways will be resisted. New development should be built round the idea of a walkable village with integrated adequate pathways directly connecting to the centre of the village.

c) Major developments should provide new green amenity spaces, reflecting and extending the existing network of accessible green space running through the village.

Policy WNP14  On sites allocated for development in the Plan all new properties should be served by a superfast broadband (fibre optic) connection installed on an open access basis. All new buildings should be served with this standard of connection when available unless it can be demonstrated through consultation with British Telecom that this would not be either possible, practical or economically viable.

Traffic and Transport

The study undertaken by the Council allows an objective assessment of the amount of development that will be acceptable, allowing the village to operate without major disruption and not impacting severely on the quality of life of residents and businesses. In support of Core Policy WNP3, Transport Policy WNP15 further requires that Developers must demonstrate through traffic modelling, that their proposals will not have such adverse impacts.

Policy WNP15  Any application for development of business activity (involving more than 5 workers) or residential development of more than 10 dwellings must be supported by

- Traffic analysis including modelling of traffic flow at the level crossing and travel plans that encourage walking or cycling within the village.
- Analysis of impacts on the roads leading into and within the village, schools access and effects on neighbouring residents’ convenience.

The Parish council will provide access to its modelling studies to facilitate this purpose.

Policy WNP16 Where significant new housing development takes place (10+ houses) developer contributions will be sought to fund traffic calming and parking improvements.

7. Parish projects identified for developer contributions

Contributions from developers under Section 106 and the Community Infrastructure Levy (CIL) can make the difference to the impact of future development on the village, by providing improvements to the village as part of the development contract and in general to meet needs caused by the development. ABC and KCC have standard requirements currently, including:-
• 35% social housing on larger suites ABC
• School places KCC
• Allotments ABC
• Sports and play provision KCC and ABC
• Cemeteries KCC
• Traffic improvements KCC

When CIL is introduced by ABC it will mean larger contributions are available to Wye’s projects if WNP is approved. In general Wye has not benefited from these provisions when larger new developments have taken place and the benefits have gone to Ashford and their projects. Possible projects were discussed at the workshops and amongst particular groups and the following have been identified as priorities in the order shown. Specific proposals or outlines have been prepared and are presented in Appendix B.

i. Improvements to the Village hall

The village hall needs modernisation and its extension/renewal would also be a viable approach to meet demand and provide more appropriate accommodation for certain sports. Proposals are being devised and include

• Construction of a third hall or pavilion
• New roof with solar panels
• Upgrade of plumbing and interiors
• Landscaping

ii. Traffic calming and parking

*Speed indicators* The NP questionnaire identified traffic speeding into and through Wye as a major safety issue. The new housing, business and education activities supported by our plan will increase the need for improved traffic calming and management. New electronic speeding signs are needed on each of the gateways into Wye – Scotton St, Oxenturn Rd., Harville Rd and Bramble Lane.

*New parking places* Following general restriction of speed in Wye, the need for more off road parking was also highlighted in the questionnaire (see BD4 including a recent parking assessments). Ownership of Churchfield Green has now been passed to the Parish Council from ABC. There is sufficient space on the green to construct an off-road parking area running alongside Churchfield Way for up to 20 cars.

iii. Grade I buildings for community use

This is a major project which it is hoped will attract funding from the Heritage Lottery Fund but will also need other contributions if it is to be used by a variety of community activities. The following possible users/uses have been identified

• Visitors centre with historic rooms open for the public and for exhibitions
• Village Library relocated giving it more space
• Parish Council Office, information and meeting place
• Old Hall for concerts and events
• Chapel and special rooms for Weddings and celebrations
• Old Lecture Theatre for films etc
• Accommodation for summer and field courses
• Space as base for numerous community organisations

iv. Environment projects

These have been thoroughly planned by the Environment Group and include the

• ADAS community energy project
• Extended or orbital cycle route
• Re-greening of Wye
• Riverside Park including orchard and paddling area
• Development of the Community farm
• Restoration of the Landscape, including planting and wetlands

An aerial view of Wye village from the north – a community worth protection
(Image kindly provided by High –Flying Productions)
8. Concluding remarks

In summary, the WNP contributes to the achievement of sustainable development in the framework of national and local planning policies by:

a) protecting the AONB and local habitats by focusing development within the village envelope and by the promotion of the use, recovery and restoration of previously developed sites;

b) protecting community assets that enhance the quality of life in Wye village;

c) locating new development within easy walking distance of existing village facilities, close to bus stops, to minimise traffic congestion and thus the related emission and pedestrian safety concerns;

d) protecting and enhancing the historic environment of Wye by encouraging high quality development that responds to the distinctive, Kent Downs character and protecting open spaces within the built up area and

e) encouraging flexible working in the parish by improving the electronic infrastructure, promoting sites for commercial development and educational use, by allocating new housing, helping local businesses and organisations.
### Background Document 16c

**Detailed comments from response forms**

**Question 2**

**Q2 If you disagree with any part of the plan, what do you wish to comment...**

| 1. | **Objective 3 (page 7) is continually fudged.** |
| 2. | **I think the idea of a 400m concentric development is unrealistic, there is very little space within this 400m zone. This area needs to be extended considerably.** |
| 3. | **P9. (b) I disagree with the plan to move the secondary school to the Edwardian buildings on Olantigh Road for the following reasons: - The school is already well established in the Kempe Centre and should stay where it is, with additional educational buildings, including the Sports Centre, built at the rear or the side of Kempe Centre. - The proposed playing fields (hop gardens) will be easily accessible avoiding unnecessary crossing of Olantigh Rd several times a day for PE lessons / sports fixtures by large groups of school children. - If needed, new, larger entrance to the rear of the building can be created directly from Olantigh Road. - Noise and light pollution to surrounding residential area will be minimal.** |
| 4. | **P9. (b) I don’t think that moving the secondary school to the Edwardian buildings on Olantigh Road is a good idea. My daughter goes to the school and her friends and teachers are quite happy to have the school on the existing site. There is plenty of space at the back and the side of the Kempe Centre to build additional educational buildings that are needed. The school badly needs a sports centre, which could be positioned next to the sports playing fields. Like most facilities of these type, they will probably be available to the local residence when not in use by the school. Also, I would be concerned for the safety of the children if the school is positioned across the road and they have to cross.** |
| 5. | **1. I think the plan is too late for much of its stated intentions. eg Wye 3 having a maximum of 50 new houses when planning permission has already been submitted for 200 new houses.**  
**2. In reference to 6.1 (Community and well-being) and business development, I feel that a far greater way of achieving this aim, and also reducing traffic (which from experience is only really an issue is at Lady Joanna school drop-off and collection time), would be to support the new housing proposed. By increasing** |
| 6. | **I feel that the 5 minute walking distance to the village centre is dependent on who is walking and how fast. The lorry turning circle is dependent on the size of the lorry and how many are turning at one time. The roads to the turning circle are insufficient in size for lorries to pass. I do not agree with a large amount of small houses. Larger houses on bigger plots is what the village requires. The survey conducted with regard to the roads and traffic was insufficient as the roads into the village are the problem. One road is a small country road and the other is faced with the railway crossing which is shut more than it is open.** |
| 7. | **N/A** |
| 8. | **WNP7 paragraph a The secondary school seems to have been pushed through at all levels with little regard for the good of the village. Part use of the old buildings is not practical, there is not enough parking for the school and despite all assurances to date the traffic generated by the part opening of the school is already detrimental to the village. No transport plan has been put to the public as promised and against NP own policy.** |
| 9. | **WNP 1a Perhaps there is a bit too much emphasis on new developments being within** |
Q2 If you disagree with any part of the plan, what do you wish to comment...

walking distance of the village centre, which would, for example, rule out well screened and low-in-the-landscape (i.e. relatively unobtrusive) development along Olantigh Road down to the old ADAS. Who is going to go down there to use the playing fields? OK to re-locate playing fields down there if that were to liberate some existing playing fields for development (all within 5 minutes walk of the village centre!!!!!!)

10. Policy WNP1a Page 5. 'Exceptional circumstances' in respect of development outside of the village is a very loose phrase and open to wide interpretation. I would like to see a statement that the green fields around Wye, Naccolt and Hinxhill that are currently designated as agricultural land will not under any circumstances be considered for development. My greatest concern is salami tactics where slivers of land get developed leading to clusters by stealth or the growth of existing clusters under the radar. This was evident in a recent land sale in Naccolt where the estate agent handling the sale clearly positioned a parcel of agricultural land as being ripe for future housing development (vie

11. Paragraph 2.1.2 I would like the section about the cycle path/footpaths to be removed and to be put into a section of its own after views and green spaces. People walk and cycle a lot around Wye and we should acknowledge and prioritise this form of travel (ie. put it in the plan before roads). SECTION 2. I would suggest should also have a paragraph relating to the river. In particular reference should be made to the Water Framework Directive and the fact that the river is in a poor state. You will find some information here which is still relatively in date: http://jasperbouverie.com/2013/11/16/cleaning-up-the-river-stour/ Paragraph 2.1.5 Reference could be made to the fact that buses travel along A28

12. Would like to see less houses built.

13. See letter dated 12 March 2015

14. I am very surprised that the Plan does not include any mention of expanding the Station Car Park at Wye Station. The existing Car Park is full on almost every weekday. The number of people commuting to London for work, as well as those travelling to London for family reasons, leisure, shopping etc., has increased very significantly since the commencement of the High-Speed train service from Ashford International to London St. Pancras in 2009. This service, which has regular and easy connections from the village, mean that London is now under an hour's journey from Wye. Parish Cllr Richard Bartley is well aware of the situation with the Station Car Park, and has raised the need for expansion previously

15. I think the Plan lacks a strategic overview of traffic and transportation issues.

16. Please see my email

17. WNP1a - The Wye College playing field is stated as being part of the village envelope but this is not the case. WNP1b - Views. The site of the old MAFF Regional sub-centre often referred to as the 'ADAS' site offers the best opportunity for housing development which would not be seen from either the Crown or the Stour Valley. It is regarded as outside the village envelope but is only a couple of hundred metres from Scotton street. I appreciate that the inclusion of this site for development may increase the envelope, creating a precedent, however development here instead of on Occupation Road and the famous Russell Laboratories would be preferrable. Proposing the site for more woodland when it is

18. Policy WNP7, P9 (Guide) Junction with Olantigh Road and Occupation Road very inadequate for proposed housing development and business units. Very unsuitable to have housing developments between school and playing fields.

19. Overall the plan fails to address the wider issues. It concentrates almost exclusively on
### Q2 If you disagree with any part of the plan, what do you wish to comment...

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<td><strong>20.</strong></td>
<td>Whilst the most important points are being targeted, it is vital that a) quality of building, b) design of 'clusters' ie Chequers Park is good example as it has housing for first time buyers leading up to large houses. People can down-size and children who leave Wye after University can return later when married with children, c) developments should have open areas for children to play or elderly to relax and socialise. d) There must be space between front door and path, firstly for children and pet safety but also to avoid narrow streets with parked cars. e) The level crossing should be dealt with now f) Doctor's surgery needs extra parking space.</td>
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<td><strong>21.</strong></td>
<td>If so many new houses will be built, meaning a much larger population in Wye, one should think of a public indoor swimming pool and sports centre, which could be opposite the new Free School. As there will be many families with children, so it would be good to keep them in the community rather than have them spend their money using the facilities in Ashford or elsewhere.</td>
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<td><strong>22.</strong></td>
<td>Policy WNP7 (a) school in wrong place - should be in S Ashford. Policy WNP7 (e) These facilities should be with the new village hall. We do not need to facilities like this.</td>
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<td><strong>23.</strong></td>
<td>Policy WNP7 para (a) the school is wrongly located in Wye it should be sited in South Ashford. Policy WNP7 para (e) These facilities should be built into a dedicated village hall and WNP 16/7/I shuld be modified to meet this need. This is an unaffordable project.</td>
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<td><strong>24.</strong></td>
<td>The proposed growth will result in traffic congestion and crossing delays that will be unacceptable in the future. Development should only be allowed if these problems are addressed. Developers should contribute to costs of crossing improvements.</td>
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<td><strong>25.</strong></td>
<td>I do not agree that a business hub is wise. Only small retail business/shops for Wye Parish in central hub. Wye village should be protected. No loss of green spaces. Concerned about traffic, parking and the level crossing.</td>
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<td><strong>26.</strong></td>
<td>1. ADAS site should be returned to woodland with cycle path and picnic areas. 2. Kempe Centre would be a great venue as a leisure facility - squash courts, gym, café for whole community. Possibly use old swimming pool/gym area of Wye College as a business hub?</td>
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<td><strong>27.</strong></td>
<td>Disagree with parish council taking over Grade 1 Building. Possible future millstone financially for coming generations. No known business plan. Any advance on 50 dwelling should be resisted also without detailed traffic plan.</td>
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<td><strong>28.</strong></td>
<td>Fully in support.</td>
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<td><strong>29.</strong></td>
<td>A good plan.</td>
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<td><strong>30.</strong></td>
<td>Para 3 Page 3 Principles - Height of development should be restricted throughout the village to normal housing height to ensure views are maintained. Early discussions with developers - how is developer going to be measured with respect to views of local people and how is implementation of views to be monitored?</td>
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<td><strong>31.</strong></td>
<td>7ii Not clear if Churchfield Way proposal for off-road parking - if this essentially means shifting pavement so more space to park as cars currently do - ok, but not agree to a new facility on the green - can Gregory Court car park be used more - it has the capacity.</td>
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<td><strong>32.</strong></td>
<td>7 iii The plan refers to possible extra parking on Churchfield Way. Full details should be given before any response from villagers can be made. It would be better to publicise existing parking available off Churchfield Way at the car park which is underused.</td>
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<td><strong>33.</strong></td>
<td>Please see enclosed letter. 7 Parish Projects ii Traffic Parking: instead of reducing Churchfield Green convert the island near St Gregory Court to a parking space and extend it as faras the co-op parking space. Remove vegetation, grass to straighten the pavement.</td>
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<td>Q2 If you disagree with any part of the plan, what do you wish to comment...</td>
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<td>Please do not alter the green. Also the pavement along the green.</td>
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<td>34. Building of more houses within the boundary line [disagree].</td>
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<td>35. Page 14 Section 7. I cannot see the point of parking on Churchfield Green when the Gregory Court car park is so under used.</td>
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<td>36. Page 15 section 7ii Traffic calming and parking. We should include increasing off-road parking with the use of the 'Old Goods Yard' and the field at the bottom of Churchfield as additional car parks allowing the station car park as a drop off area.</td>
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<td>37. Page 15 iii - Listed buildings should be part of Wye Academy. With so much of the planning proposals based around increase of traffic etc and parking by using the listed buildings as proposed visitors centre etc would turn Wye into a huge 'destination point' which would result in the uniqueness and charm of Wye being lost and become a conurbation.</td>
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<td>38. I am not sure how any further residential or business development will fail to impact on the traffic congestion at the level just because they can walk to the centre within 5 minutes does not mean that they will not drive.</td>
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<td>39. I support it because I believe it is the best option.</td>
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<td>40. Objective 1: Limiting development to 5 minutes walk from the centre of the village. There is no parking available now.</td>
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<td>41. Page 12/13 New housing to be limited to a maximum of 50.</td>
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<td>42. Wye cannot be viewed as part of a conurbation. It is a rural community and as such to allow the inevitable increase in traffic and parking would be the destruction of the village as is known now.</td>
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<td>43. The fields to the east of Jarmans Field are shown on Map 1 as being outside the village, therefore not protected from housing development. I only support small development within the village and none that will enlarge the village footprint/enveloped.</td>
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<td>44. I wish the college re-instated as a college. Imperial should be stripped of ownership, the way they have just left whole site to rot and fall apart.</td>
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<td>45. No house building. No development.</td>
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<td>46. Unable to comment as above. If it involves houses being built in the village, I think access by road in and out of the village needs improving first as increased road use will deteriorate roads further and lead to more and longer delays at the crossing and more accidents on unkempt country roads in and out of the village.</td>
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<td>47. No houses at all.</td>
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<td>48. The traffic (which will be generated) has not been fully considered. You will see where I live and we already have great difficulty getting off the estate. You have to take your life in your hands!!</td>
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<td>49. Many many cars crowding/parking along Olantigh Road. People are lazy and do not use allocated parking (for example Havilands and Bramble Lane).</td>
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<td>50. P10 paragraph I do have concerns about eh number of patients at Withersdane if licence is granted for a rehab centre. I understand a licence for 300 patients has been applied for! The number must be proportional to village numbers and manageable in turns of amenity.</td>
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<td>51. Map 1 - The village boundary should be extended to the north to encompass the ADAS site for future residential led development.</td>
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**Q2 If you disagree with any part of the plan, what do you wish to comment...**

52. Section 5.1 re Withersdane Hall: concerned to hear that a licence has been applied for up to 300 residents/patients at any one time. Feel this number is far too high considering how near to the village the centre will be.

53. Two issues: 1. ADAS site 2. Renewables

54. But consider ADAS site suitable for more than adequately spaced housing as is well screened from village centre and as near it as other developments and other sites. I fear that as it stands it will be rejected because Imperial and ABC will favour more houses and if these bodies select other sites, they may be less suitable than the ADAS site. I also feel it is too good a site for solar panel ground units which should be on poorer ground. In view of trees already screening site, it is not necessary to use space by returning it to woodland.

55. I think the DEFRA area should be used for new housing as it is secluded and would not spoil the village so much.

56. I am opposed to the establishment of the 'Free School' in Wye (51a) I do not think the proposals for the Grade 1 Buildings are practical (7iii).

57. As long as council protect the 50 Home plan.

58. The issue of parking and vehicle movements needs to be strengthened. New developments need to have off-road parking.

59. I have concerns at the assumption that Imperial owned brownfield land should automatically be used for housing or commercial use. I question the village's need for housing particularly as WYE1 + 2 have permission for a total of 52 houses already. It is not the responsibility of the community of Wye to ensure the financial gain of imperial College. Can we assume that the other built developments will take place unless specifically mentioned in the NP?

60. 7 ii Traffic Calming and Parking. Nibbling away at Churchfield Green for parking seems to set a bad precedent. Several clear signs are needed around the centre of the village to direct people coming from the NE and S to the Free Parking behind Gregory Court. At present only people coming from the West see the free parking notice.

61. WNP16 Under 7 ii parking, reference is made to the ownership of Churchfield Green having now passed to the Parish Council. Given the exhilarating view specifically for pedestrians from Churchfield Way across to the downs, it seems perverse for the Council to envisage immediately spoiling it by creating car parking spaces along the edge of the Green. Under BD4. 4.3 the under-use of Gregory Court car park is noted. I would suggest that this should be addressed before any new car parking spaces are created on the Green.

62. Para 5 ADAS site. Should be used for business purposes. For example car workshop, builders yard, light engineering etc. This is outside 5 min walking area, which will not interfere with village. Also all services are already provided to ADAS site.

63. Para 5. It seems a shame that the ADAS building can't be used perhaps for light industrial/offices. Even if it had to be rebuilt the mains services (electricity, water etc) are already in situ and the site is a reasonable distance from the village centre.

64. Map 3 Rear boundaries of Scotton Street properties/WYE3 site to be planted with screening bushes/trees to screen any commercial buildings from view.

65. No building at all.

66. Page 3.3 Kempe Centre too high. Not to encourage new builds of this height. No new buildings like Havilands don't in any way fit in with the village. Get traffic sorted before
Q2 If you disagree with any part of the plan, what do you wish to comment...

<p>| 67. | I admire the work that has gone into the NP which is excellent. |
| 68. | It fails to reflect sustainability in all its aspects. Most likely not as disagree with Policy WNP 7a School and number of houses on WYE3 limited to 50 only. No discussion on community centre has been held with village. WNP1a - what is meant by exceptional circumstances - this is too vague and provides a convenient loophole - include protection of covenanted land. WNP3 Objective 3 has no comment on the traffic the free school will create or how that can be managed. WNP 5 - Affordable to whom? The reality is most affordable housing is still far too expensive and those with local connections often just cant afford to buy in villages brought up in. It sounds good but in reality is just empty words. We h |
| 69. | I think too many cars parking and also on pavement. |
| 70. | Very concerned about he level of traffic through Little Chequers and parking. It is already bad with cars/vans parking on paths so people with push-chairs and mobility scooters can’t get past. |
| 71. | I believe that an unnecessary upper limit has been placed on WYE3 housing numbers. I find the proposed numbers are arbitrary and lack viability of delivery (WNP7). The 50 tick campaign was ill thought through and has unfortunately adversely influenced the plan policies. |
| 72. | Community should be spared any costs of the maintenance of Grade 1 buildings and there should be no commitment for community use now or in the future. |
| 73. | No way should the parish council take on cost of maintenance of Grade I buildings for community use. Leave the onus of maintenance to Imperial. The use of facilities within the Edwardian building should be only option for the future of the Free School in Wye. |
| 74. | WNP10 6.3 p12 The plan suggests 162 additional houses, this then suggests 324 more cars. Until something is done about the level crossing Wye cannot cope with the extra traffic. |
| 75. | Traffic has increased and will increase further. A by-pass of Wye and a new rail crossing should be considered. |
| 76. | I think that the level crossing/traffic management matter should be a priority consideration in all and any decisions made regarding Wye. I will always have to drive into Wye (as we live on the outskirts) and I find it is getting progressively worse. Consideration needs to be made of the use of the ‘feeder’ roads also to get to the schools etc such as the Brabourne Road as this is getting busier and busier with no improvements being made to the road/verges. |
| 77. | Primarily 1) Better consideration of road infrastructure for example linking Olantigh Road to the A28 with a new river and rail bridge to alleviate traffic in Wye and leave room for future expansion in the decades ahead of 2030. 2) More consideration of local businesses, offices, workshops etc. |
| 78. | If more thought is given to the people on the fringe of the parish. |
| 79. | In the ideal world! |
| 80. | I have read the draft plan through and on the whole both support it and applaud the considerable hard work that has been carried out by many individuals so far. Generally it seems to be a balanced approach to the demands for development - in the broadest sense of the words- whilst attempting to retain the character that makes the village a pleasant place to live and work. |</p>
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<td>81. Naccolt brickwork site to remain industrial to contribute and assist with local employment.</td>
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<td>82. It is my considered opinion that any development in Wye should essentially be small-scale to avoid upsetting its delicate balance between conserving a rural village environment and the need for more local affordable housing and maintaining - again small scale - business development. A potential conflict of interest between WNP3,4&amp;5 The type of development proposed means horrific traffic congestion ie Scotton Street, until Wye changes its infrastructure, parking, driving, just getting around the village will be chaotic.</td>
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<td>83. Guide P10 Para d - I would need additional information to be persuaded that the land to the south of Occupation Road would be best used for horticultural businesses. Given the policy WNP 1a, this would be an ideal site for additional housing or more employment intensive activities.</td>
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<td>84. 1. Restricting on road parking at lower part of Scotton Street 2. Restricting parking to East Side of Oxenturn Road only 3. Widening Churchfield Way ie reducing grass verge where on road parking is allowed at West End due to bus and lorry usage - traffic cannot pass safely.</td>
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<td>85. 1. Don’t want car park on Churchfield Way Green. No need - new school should supply space. 2. Why not put houses on ADAS - you have all the utilities. 3. Too many children from outside of Wye - causes traffic problems.</td>
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<td>86. I support the plan completely.</td>
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<td>87. Map 4 No car park on the allotments. Why will it be needed there? Only reason is for the development of the school - which should not have been given permission as drive ... away from their local schools (with spaces) and into Wye with its village road infrastructure. Why should the Free School use the Edwardian buildings? Surely not fit for purpose for a modern secondary school? All improvements to road infrastructure to .... additional traffic. This wasn’t needed when it was a University so why is it needed now? The village hall is bit off the side of the village. Rather have developments of less than 10 houses than be extended further.</td>
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<td>88. My only concern is that Bramble Farmhouse is within the village envelope and yet Blackberry Cottage and Branmble Lane garage is not. The premises are the same distance to the village as Bramble Farmhouse! Can someone explain why as we can be in the middle of Wye in under 5 minutes.</td>
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<td>89. I do not support the application regarding new housing. The village cannot meet the needs for new houses of this scale regarding traffic! Parking! Train crossing, and not least of all the doctor’s surgery!!! Try getting an appointment in a 2 week wait.</td>
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<td>90. The plan should give equal priority to pedestrian and car traffic (Objective 3)</td>
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<td>91. 6.4 Traffic and Transport ii Proposal of extra parking on Churchfield Green. This Green is the centre of the village and putting a car park on there will ruin this aspect of the village. Allow permit parking or residents to build drives on (Bridge Street) to help with parking problems.</td>
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<td>92. Pages 2-3 The only part I disagree with is in section 3 bullet point 2 that development should be concentric and residents should be able to walk to the centre within 5 minutes. While I recognise the lack of pavements on the lanes stretching out to the main roads, I would welcome new housing developments along them even though it would slightly increase traffic into the village (and I live on Bridge Street where on-street parking is minimal for residents!)</td>
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Q2 If you disagree with any part of the plan, what do you wish to comment...

<p>| 93. | Grade 1 listed buildings sure area a project (not a policy so far?) |
| 94. | Yes I disagree with the plan. There has been no explanation of the cost of re-doing the old historical buildings of Wye College. As a tax payer we should be given a detailed account of this!! Before we know what's happening our taxes will go sky high! |
| 95. | Additional infrastructure - Should the NP not be saying we do not want any extra infrastructure. If it does not contain this then how are we going to protect our village from the points itemised in the NP general summing up? We feel very strongly that this should be a policy. |
| 96. | I think the village envelope is too narrow. More use should be made of brownfield sites. |
| 97. | Page 35 Point d - ADAS - is it certain this site could/or will be used for renewable energy generation? It is such an eyesore that if this does not materialize fairly promptly, it should be used for housing rather than using land closer to the open countryside in Wye 3. Page 45 - second paragraph re TRAFFIC appears contradictory. It says that traffic will &quot;increase significantly&quot; but then says &quot;the impact of building up [to] the numbers specified will not be severe.&quot; It is also not in line with what is said on p16 regarding traffic. |
| 98. | Restore all the derelict buildings and turn them into homes and educational buildings. |
| 99. | There are a lot of College buildings that could be restored for residential use, before embarking on these cluster housing developments. |
| 100. | I think it would be more realistic to extend development to within 15 minutes walking of centre rather than 5 minutes. |
| 101. | See attachment |
| 102. | More thought and action regarding access to and from village. |
| 103. | Objective 3 Traffic. I am in favour of keeping the level crossing gates. I walk along Olantigh Road during the time the children are arriving at the Free School. I have seen parents as many as 29 one morning, speeding along the road and turning into Occupation Road still at great speed. I am fed up with being told that no cars enter Occupation Road and park and that this does not happen. It does happen and the school and parish council must get together to resolve this problem. |
| 104. | Generally happy with plan but significantly more emphasis should be given to the existing infrastructure ie principally roads being the limiting factor for any future development. The 'Free School' is an example of overly intensification of use 'parachuted' in without control which will have a significant effect on road capacity over the new few years and therefore should be used to limit the amount of additional development on other sites. |
| 105. | Although generally support draft NP I feel that more emphasis should be given to the present infrastructure being the limiting factor to future development. |
| 106. | Congratulations to those involved - you've done a wonderful job. |
| 107. | Objective 2 'pay inadequate regard to issues of renewable energy technologies!' I would be concerned that insisting on installation of such technology might possibly increase costs of building and price local people further out of the market. |
| 108. | with regard to ADAS site, how would the proposed woodland be managed? Would the proposed 'solar farm' not be a blight in an area of AONB and how would that be managed? |
| 109. | It is a bit unrealistic to require all new housing to be within 5 minutes walk of the centre - 10 minutes is real, and more closely reflects the current limits of the village. |</p>
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| 131. | My concerns still remain in respect of increased traffic through the village. the congestion at the crossing which filters back to Havillands Place making exit right to
### Q2 If you disagree with any part of the plan, what do you wish to comment...

| 132. | Not sure what you mean by Occupation Road becoming a "green route" as it is already a farm track used by farm vehicles and then also a bridleway/footpath. It needs to remain both! |
| 133. | The green should not become a car park. It was given to the village to be left as an open space for all to enjoy, get rid of the unsightly verses and use them to park on. |

**Responses to Question 4**

<p>| WNP1 | 1. As I alluded to above, I do not agree with Policy WNP1a's stipulation about keeping development within the small envelope of 400/5 mins walk. I feel that there are many suitable fields/areas further afield that should be built on if we want to keep all the fantastic amenities like regular trains, restaurants, estate agents etc. I fear there are not enough residents to support these and I would be devastated and might as well move to a cheaper area if the train timetable was reduced. |
| 2. | WNP1a Centre best defined by Church Street: Churchfield Way intersection. WNP11 (and 7) In view of the exceptional circumstances of WYE3, a small number of additional houses should be allowed on condition if an adequate contribution to object III of WNP 16. WNP16 Projects on page 14-15 proposal III should be given top priority and Project I lower priority. The third hall in particular will probably not be needed if proposal III goes ahead (see note under qu11) |
| 3. | WNP1b Excellent that destruction of views has been included. Looking down Churchfield Way some very tall trees do obliterate the N Downs. 5 Site Policies. Brownfield sites: Instead of adding housing return them to nature eg grass. We have too many houses. Housing densities. Not too dense. People have a right to adequate living space. 6.3 Housing - each new house adds one or two cars (except for old or disabled people). The long queues at the level crossing will get longer and longer. Incoming cars are already finding it difficult to find parking space. Their numbers will increase |
| 4. | p26 village envelope p26 WNP1a - development and distance from village centre. Fig 2.4 p14 view of Wye. See letter on all points. I have written to WPC chairman. |
| 5. | Page 26 Wye village envelope WNP1a detailed letter re distance development sent separately to parish chairman. |
| 6. | Policy WNP1c - I'm all for encouraging access to the countryside but very careful consideration must be given to disturbance wildlife when doing so since the Stour is already under pressure and will become more so with 20,000 houses in Ashford. Policy WNP11 - I still think 162 houses in 15 years is too high - site and tenure: please can we think more about 1 bedroom flats - and not always look at houses which take up more space! |
| 7. | WNP 1 For reasons given overleaf and above. Also if businesses are allowed in the village centre it will attract vehicle movements for staff and for customers visiting the business. |
| 8. | WNP 1b page 5 - b - would like to see views from the Cricket Field and New Flying Horse car park added. WNP2 page 7 - Objective 3 Protection against |</p>
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<td><strong>WNP2</strong></td>
<td>9. WNP2 page 7 - Objective 3 Protection against the impacts of road traffic. The increase in traffic at Olantight Road created by the Free School has increased greatly in the time it has opened. All promises of the School's Traffic Plan are currently flouted by parents who arrive in numbers and drop their children off door to door. The evidence being that the playground gates have to be opened to allow cars to turn round. The School is not enforcing its original traffic plan. It should be stated in the Neighbourhood Plan that if the Free School remains in Wye then there must be a condition that forces</td>
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<td><strong>WNP3</strong></td>
<td>10. Policy WNP3 p7 I believe that the current traffic difficulties are already worse than when the college was in full swing and the growth in student numbers at the Secondary School will inevitably make matters worse. Cars parked legally in really silly places plus the railway crossing often means that the traffic is already calmed to the point of immobility.</td>
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<td>11. Obje 3 Policy WNP3 p7 I think any new developments of housing will inevitably increase the volume of traffic. New residents may well be within walking distance of the village, but that is no guarantee that they will not use their cars! We already have a problem with parking especially on Bridge Street and buses are often unable to get through.</td>
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<td>12. WNP3 - &quot;Developer contributions for traffic management&quot; - contributions through 'planning gain' can lead to over development of infrastructure ie more capacity than needed for the development in question. This will encourage further development and should be avoided at all costs.</td>
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<td>13. WNP3 - &quot;significant increase in traffic&quot; sounds too woolly. Concern generally at traffic levels/parking issues (WNP15). Can't see much mention of level crossing and its impact.</td>
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<td><strong>WNP4</strong></td>
<td>15. WNP4 No general business.</td>
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<td><strong>WNP5</strong></td>
<td>16. WNP5 No</td>
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<tr>
<td><strong>WNP5</strong></td>
<td>17. WNP5 Local Needs and affordable housing - I would like to see 50% rather than the proposed 35%.</td>
</tr>
<tr>
<td><strong>WNP5</strong></td>
<td>18. WNP5 p7 The PC needs to go further to provide affordable housing for young people who would not ordinarily qualify for council provided housing. Relying on a proportion of development where &gt;15 are proposed will not go far enough. If analysis of 'available sites' has not identified sites, we should look at other sites or methods of providing housing for young people to stay in the village. WNP16 Developer contributions: I would like to see required an aspiration to improve the balance between cars and pedestrians - wider</td>
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</table>
pavements, improved drop kerb and crossing arrangements with a strategic vision informed by how people can safely navigate the village. Particular emphasis on the young (going to scho
d
19. 5.1 page 8  Secondary school statement is misleading as it doesn't take into account the already increase in traffic from growth in housing and the primary school since the earlier activity of the college. Many do not support the Free School. Grade 1 buildings for community use - great but needs robust funding from outside parish resources. WNP3 p7 "traffic management has been earmarked as the priority for developer contribution" This statement encourages through planning gain the over improvement of infrastructure which in turn will encourage future development.

20. 5.1 Need co-housing and self-build (requirement and not just suggestion)! 6.3 As above. 7.0 iv More detail please! Sustainability is merely tacked on at the end as a token!

21. In 5.1 why not plan for retirement flats on the Map 4 west of Olantigh road site? There is a need for 1 or 2 bedroom flats for purchase in Wye. Perhaps more units than the 13 family sized units could be accommodated.

WNP6

22. WNP6 9c should conform to village plan. Education, tourism, plan research.

23. WNP6 (Objective 6) Level of traffic cannot be assumed to be equivalent to previous traffic using college ... students were residential, the new school is transient - the statement is without foundation.

24. WNP6.1 I disagree with the proposal for developers to contribute towards the provision of a day care facility for elderly residents. I'm aware this arose from a PPG wish list but I think it does not have any robust research nor foundation underpinning the type and range of activities and support needed for aging in wye.

25. 6.3 Housing: I agree 10% should be disabled access but I disagree strongly with newbuilds being used to encourage more elderly people to the village by accommodating their needs. The village will be over-burdened (doctors, social care) and under-used (schools, pubs, clubs etc) if it continues to age. All new housing should have a covenant like Jamran's field and Stonegate - but for under 40's not over 60's. This will bring families to the village, with kids walking to school, so less car traffic too. WNP11 (6-3 housing) - I would suggest a maximum of 10 houses per year, not the "higher rate of completion in the first 5 years". This is to ensure a gradual, steady flow of children requiring pre-school,

26. 6.3 page 12 - too late and I feel that the plan should support Wye3 and respond to its impact rather than obstruct it. 6.4 page 14 - be realistic about when & why traffic exists and support the commuters who make up an increasing proportion of the community. Introduce automated railway crossing and fast trains stopping at Wye.

27. 6.4 Traffic and transport - Make Churchfield way a one way street so pedestrians feel safer and grass verges are preserved, and also allowing the traffic to flow in (through Churchfield Way) and out (through Bridge Street) of the village. Ensure free and unrestricted off road parking in all car parks. Add a footpath on Bramble Lane.

WNP7

28. WNP7 5.4.4 I disagree with 50 additional new houses for WYE3, but understand in the light of Imperial's application and national policy guidance that some development will go ahead. My main objections are: the familiar
re the traffic (bearing in mind WYE1 and particularly WYE2) which has a detrimental effect on quality of life. Also, Wye should not be considered in isolation from Ashford which will be significantly expanded including towards Wye (Conningbrooke etc).

29. Much of the plan policies are sound but I am not in support of the WNP7 housing numbers. The provision of parking seems inadequate to serve the proposed secondary school, the 'community use' buildings and the Kempe Business Centre.

30. WNP 7 a Development of Edwardian buildings for education - hope ABC will not be expecting any kind of financial support from Wye PC. And I fear no travel plan limiting traffic to and from the school will be enforceable, particularly in bad weather - rather ‘pie in the sky’ and as above, feel plan does not make best use of ADAS land.

31. WNP 7 a,b,e The concept of the Free School in the Edwardian part of College seems inappropriate for these Grade II buildings. The modern Kempe centre creates a sense of suitability for a school. The multiple blocks of the Grade II area seem more appropriate for a small business grouping. I agree with Councillor Bouverie's statement that the onus should be placed on Imperial to find a use for the Grade I buildings and obtain funding for their upkeep.

32. WNP7a School is in the wrong place. Poor access leading to high traffic. Should be at centre of catchment not at periphery. Wrong side of level crossing! Should be in Ashford!

33. WNP 7 Disagree with Imperial allowing the Free School into the Edwardian Buildings. This should be used as a residential college and some parks to be made available for public use - meetings etc.

34. WNP7 I think the school is an excellent asset for the village but I am concerned that Imperial College seem to be 'dragging their heels' over access to old Wye College buildings. A new school sports hall and MUGA would be great for community use.

35. WNP 7 - I am concerned about the school being split over 2 sides of the road and wonder if it would not be better to build the school incorporating the Kempe Centre. I understand they wish to build a sports hall as well as a MUGA and this would then be for shared community use in the evenings and weekends, improving facilities in the village.

36. WNP7 Why should the hop field be playing fields - the village already has ... on the football field and by the primary school would be of very little value to schools as an educational tool - local (the old arboretum) woodlands here much higher biodiversity. Car park on Map 4 - for reasons already given and road infrastructure improvement. Free school should not have been given permission if ex

37. WNP 7 - I don't understand the need to build housing behind the Kempe Centre when the ADAS site would appear to be a more obvious site with utility services and vehicle access already in place. I would like to see the squash courts retained for community use and the old swimming pool which could provide a lido type facility.

38. WNP7 The old ADAS site could better be developed for housing- an arboretum is unnecessary and we are surrounded by green spaces. Solar power is too speculative. It is a wasted opportunity. Add in more sports facilities. Plant more trees eg along street, Golden Square...
39. WNP7 - ADAS site. Too expensive to return to woodland. Services on site and screened should be a solar farm.

40. WNP7. ADAS site very suitable for housing development, brownfield etc and not visible from main view-points. Village envelope could be extended or re-arranged.

41. Policy WNP7 Page 9. It seems illogical to protect the ADAS site from housing development. The site is built-up; it has sufficient screening from the road that could be further enhanced if need be; it would not interfere with views to or from the downs indeed far less so than the existing eyesore. It would provide homes near to the school thereby reducing car use. It supports a cluster development. The village centre is within easy walkable distance (6 minutes if not 5). Whilst the focus on renewable energies and scientific research is laudable; a solar farm has significant impact on the landscape without providing sufficient jobs or infrastructure gains to warrant the ADAS site being used for

42. WNP7 'brownfield sites' may be rich habitats. Page 3 design and development; Developers should take (take out encourage) 7 Parish projects iii Should be amended to reflect Cllr Bouverie's suggested wording. This really doesn't allow detailed comments and is far too general.

43. WNP7 - The Travel Plan - how will enforcement of a traffic plan to 'limit' vehicular movement be enforced? There is no system in place. There has been increased traffic in the last year due to school and increased congestion at peak hours. WNP 15 Interactive signs not required - level crossing slows traffic. - Parking at Churchfield Green will create further congestion in busy area. Consider ABC car park. Traffic calming is better achieved through on-road parking not off-road.

44. WNP7 a Occupation Road/Olantigh Road already traffic jams because of coaches/cars to and from school. Village is already a no go area when schools turn out. Never had this problem with Wye College.

45. WNP7 e Not entirely convinced for the need of community centre and visitor centre.

46. WNP7e / para 5.4.3. Comment. Generally speaking I consider that Wye currently has sufficient community space. While the ideas put forward within the Campus Community Project all look very exciting I am worried about the ongoing financial drain this may place on parish resources - particularly if the Parish Council were to be responsible for funding the constant repairs and maintenance that will be required to keep these important Grade 1 Buildings in favourable condition. WNP8 / para 5.5 The Old Naccolt Brickworks Site. Comment. The land surrounding the Naccolt Brickworks site has been designated as a Local Wildlife Site (site ref AS45) i.e. it is considered to be of county wildlife importance.

47. WNP7e I am strongly opposed to the use of the Grade 1/Edwardian buildings as a community centre. Imperial needs to find a use for these buildings, not the village. It is both impractical and non-financially viable for the village to attempt to cover the on-going maintenance costs/overheads of a Grade 1 listed building. Heritage Lottery funding would be short-term and therefore inadvisable.

48. WNP7e Who owns and runs the community centre?

49. My concerns surrounding the re-use of the old part, Grade 1 listed, college
buildings and specifically surrounding WNP7 e; I cannot believe that we (the village) can impose, demand or dictate that these buildings should be re-used as a community centre or indeed anything else for that matter. The buildings belong to Imperial College (like it or not) and they have a right to re-use these buildings as they see fit. That said, I acknowledge that in the context of this document, suggestions, or a blueprint for their future use is integral to a rounded village. Do 'we' need all of that space for community use? (it is a large chunk of building) ... who is demanding extra space for community use? - which org

50. WNP 7e Village should not take on the burden of maintenance and upkeep of Grade 1 listed buildings, so use as a community centre should not be policy. Agree that they should be developed sympathetically and in a way that facilitates public access.

51. POLICY WNP7 section E Wye already has plenty of community buildings. Favour wording which puts the onus on Imperial to find a use for these buildings. Suggest “To develop the Grade 1 buildings in a way which will be sympathetic to their history and which will facilitate public access.” WNP13 Density and Layout How will a policy be formulated prescribing an off-road cycle route. Wye needs fully functional green infrastructure. A bit of green dressing around new build isn’t going to do that needs to focus on road, power, sewage, water infrastructure WNP10 Countryside and Environment Housing should be prescribed to be built at highest Code for Sustainable Homes Level 5 and mixture of self build an

WNP8
52. WNP8 No more than eight plus cottage. We do not want to link up with Ashford.

53. WNP8 / para 5.5 The Old Naccolt Brickworks Site. Comment. The land surrounding the Naccolt Brickworks site has been designated as a Local Wildlife Site (site ref AS45) i.e. it is considered to be of county wildlife importance.

WNP9
54. I disagree with the scope of WNP9 being restricted to a day care facility for elderly residents - provision should be made for any disabled residents (irrespective of age) and improved provisions considered for the children of the parish.

55. Policy WNP9 - Community and well-being. This is a comment - not a disagreement. the policy refers to developer contributions to physical resources but consideration will also be needed for the human resources necessary to support the increased population ie more Drs as well as enhanced surgery.

56. WNP 9 Loads more costs are feasible on the "developer" leading to poor quality and corner cutting. Ultimately these costs will be borne by the new house occupiers.

WNP10
57. WNP10 Countryside and Environment Housing should be prescribed to be built at highest Code for Sustainable Homes Level 5 and mixture of self build an

58. WNP 10 - 6.3 Housing - I notice the original agreement for 150!! houses has now gone up to 162!!! by 2030 how many more? WNP 16 -7 ii Parking I thought the whole point of the parish council taking over the Churchfield Way green space is to be able to keep it that way. The first thing the PC wants to do is develop a car park on it. The parking in Wye is sufficient. The problem is outsiders coming into the village twice a day for schools. Do not
use our greenspace for outsiders' convenience.

| 59. WNP 10 6.3 | It isn't stated in the WNP if it covers the proposed development of the site to the side of 1 Cherry Garden Crescent. However, as stated in my and the residents rejection to the plans, this cul de sac cannot support further development in terms of existing services and access for emergency services and responders as well as waste clearance. The site is notoriously difficult to access whenever fairly minor works are carried out to residents properties, therefore access would be restricted causing stress to the residents |
| WNP11 | 60. As a nation we need to build far more housing so policy WNP11 is grossly inadequate for us to play our part. Houses prices in Wye are far too expensive and strangling new development will only exacerbate this, preventing y |
| 61. | Policy WNP11 - I still think 162 houses in 15 years is too high - site and tenure: please can we think more about 1 bedroom flats - and not always look at houses which take up more space! |
| 62. WNP11 (and 7) | In view of the exceptional circumstances of WYE3, a small number of additional houses should be allowed on condition if an adequate contribution to object III of WNP 16. |
| 63. WNP 11 | Time scale too slow. All the businesses will close at that rate. WNP7 - ADAS site. Too expensive to return to woodland. Services on site and screened should be a solar farm. |
| WNP13 | 64. WNP13 Density and Layout How will a policy be formulated prescribing an off-road cycle route. Wye needs fully functional green infrastructure. A bit of green dressing around new build isn’t going to do that needs to focus on road, power, sewage, water infrastructure WNP10 Countryside and Environment Housing should be prescribed to be built at highest Code for Sustainable Homes Level 5 and mixture of self build an |
| 65. WNP13 | a. Density reduced to less than half proposed density. b. No development will do away with car use. People will not walk or cycle to local facilities. Huge traffic increase of car use already caused by Free School. |
| 66. WNP13a | Accept affordable housing required, but couples moving in - hopefully will see their income prospects improve and want to more up; and up but no larger properties available so present 3 beds converted to 4 etc. WNP3 How will the Grade 1 properties be maintained by the village? WNP 13b Wye needs cycle paths connecting with Ashford and Godmersham urgently now present routes will suffer from additional traffic introduced as development takes places - odds of a serious accident get worse now. Also, appears to be little provision for children to cycle (particularly to Free School) School - which could reduce car trips and becomes more relevant if WNP11p13 is implemented. |
| 67. WNP 13 | I would add a clause d) new housing should be architecturally in keeping with the character of Wye as an historic village. In terms of housing numbers (Table 1 under 6.3) I would back a larger number on WYE3 than 50 if it enabled the historic parts (Grade 1 especially) to be well preserved and possibly endowed with trust funds. |
| WNP 14 | 68. WNP 14 Satellite broadband connection is a good alternative and easily installed. |
| WNP15 | 69. WNP15 - I think that there should also be a limited high speed service from Wye (at least at peak times). This could reduce traffic from those that currently drive to Ashford for the train. Also there should be consideration for a school drop off point on the Ashford side of the crossing. The school run times present the worst traffic, but this could reduce if more people from the village use the school ie if more houses are built. |
| 70. WNP15 Traffic - The amount of cars, coaches using Olantigh Road is unacceptable, for small roads were not built for the amount of use and that is with only two years of students. |
| 71. WNP15: I do not think that the Plan as a whole, and WNP15 in particular, adequately address the current traffic issues in the village, let alone the inevitable growth in traffic that will result from the proposed residential, academic and business development contained in the plan. I would like to see a more coordinated and comprehensive traffic plan for the village as a whole, rather than leaving traffic issues to be considered on an ad hoc, development by development basis. |
| 72. WNP3 - "significant increase in traffic" sounds too woolly. Concern generally at traffic levels/parking issues (WNP15). Can't see much mention of level crossing and its impact. |
| 73. WNP 15 Interactive signs not required - level crossing slows traffic. - Parking at Churchfield Green will create further congestion in busy area. Consider ABC car park. Traffic calming is better achieved through on-road parking not off-road. |
| 74. COMMENT RATHER THAN OBJECTION! Don't disagree with WNP 15 (traffic policy) but I am concerned that the studies to date do not accurately reflect the increase in volumes resulting from the additional housing, educational and commercial activity. Calming measures for the village are also vital. |

| WNP16 | 75. WNP 16/2/I The hall extensions/modifications should be built to meet the needs of WNP16/2/iii thus taking away the need to fund the up-keep of the unwanted Edwardian Buildings, the continued maintenance costs of which would be horrendous. |
| 76. WNP 16/7/I The new village hall should be built to meet the needs of WNP 16/7/iii - we do not need duplication of these facilities. |
| 77. WNP16 Projects on page 14-15 proposal III should be given top priority and Project I lower priority. The third hall in particular will probably not be needed if proposal III goes ahead (see note under qu11) |
| 78. WNP16 Developer contributions: I would like to see required an aspiration to improve the balance between cars and pedestrians - wider pavements, improved drop kerb and crossing arrangements with a strategic vision informed by how people can safely navigate the village. Particular emphasis on the young (going to scho |
| 79. WNP 16 -7 ii Parking I thought the whole point of the parish council taking over the Churchfield Way green space is to be able to keep it that way. The first thing the PC wants to do is develop a car park on it. The parking in Wye is sufficient. The problem is outsiders coming into the village twice a day for schools. Do not use our greenspace for outsiders' convenience. |

Disagree with a policy ‘other’: 86
An increase in the number of residents will be detrimental to the quality of life in Wye.

As above - where "5 min rule" is expressed in policy.

As above no info, so cannot comment. More houses and affordable housing is needed as houses prices in the village are shocking.

As being an elderly person - the shops are difficult to walk to no optician and only one dentist.

Difficult not to support, but there appear to be internal conflicts between the policies primarily those of development.

I disagree with the scope of WNP9 being restricted to a day care facility for elderly residents - provision should be made.

I have serious reservations about restricting the number of house to 50 on the WYE3 site.

I would like the ADAS site to be redeveloped before any farmland is used for housing.

I am concerned that any increase in traffic will inevitably mean further delays at the level crossing which are already severe.

I am generally in support but have grave reservations about traffic. I do not believe that Wye can take much more traffic.

I believe that every possible brownfield site should be developed to meet Government requirements. ABC will make the town look beautiful.

I would like to see the ADAS site to be redeveloped prior to any farmland being used for housing.

If more thought is given to the people on the fringe of the parish.

If this goes ahead it will change the village character. What happened to the 50 plan, housing for local needs.

Is there a contingency plan if the Withersdane plan fails? Traffic problems are already acute. It seems that that can only get worse.

Just don't want Wye turned into a town - we have lived here for nearly six years and love it being just a village.

Make land available for 'self build'.

More focus should be on design of housing and materials used rather than total number.

Not building where it would spoil the views to the Church and Downs. That doesn't leave many places to build on Wye.

Primary school is full Wye surgery is over-loaded Railway crossing - traffic can't cope

Retain Wye College as a seat of horticultural/agricultural learning by strongly encouraging Hadlow College (Make it worth their while) to relocate to Harville Road and Bramble Lane.

Self-build, co-housing - where have they gone!

The Government and local policies are easy to interpret/misinterpret, dependent on who is reading them. Wye village

The people that agreed on WYE2 do not live close to the road as I do.

The proposal of the school does not appear to have been dealt with in equal terms to other developments and seems to

The railway crossing needs to be addressed as a matter of urgency Wye Surgery School - primary school is oversubscribed

The situation we now endure with regards to the railway crossing is intolerable. Any plan for a change in the number of

There is not a single mention of maintenance. Wye is a mess because roads, pavements, drains, hedges, houses, college

There should be a specific policy concerning infrastructure improvements which should cater for any and all planned

Unfortunately, overall the Plan is very confusing and unclear. For example the presentations do not appear to adequately

With above exceptions.

With the school traffic too its too much squashed into one area. Use another site for the build.

WNP seems to support the original developmental proposal of IC. Of course Wye should not stagnate, and small increase

searching for parking places and a run of 300 extra for the surgery - mainly I suspect commuters.
Wye has enough problems without more traffic and housing.

‘Agree’ with policies:

Generally agree.

Good policies.

I am grateful for all the work that has gone into producing this report.

I appreciate the hard work and consideration relating to this plan and support it wholeheartedly. Naturally as time passes...

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Background document 16d Letters from parishioners

(Please note conversion from pdfs has in some cases, caused formatting distortion)

Response from Diana Pound

This detailed response raises many opportunities to improve the WNP document. Comments made on environmental issues echo responses from several other parishioners and have led to alterations to the WNP document. The response below is marked with comments in blue to indicate how the WNP group and Parish Council respond.

13 March 2013

Dear WNP Group

Wye Neighbourhood Plan

General Comments

I can see a lot of hard work has gone into this and the majority reads clearly and well (unlike many policy/planning documents). So congrats to you all for that.

Maps are less clear so see attached some suggestions about them.

The maps in the plan have been revised to improve clarity and consistency

At the workshops a number of us frequently expressed the aspiration for Wye to build on its environmental heritage and become an exemplar of sustainably for a community this size. This exciting positive vision seems to be lost from the document?

I do note that sustainably policies and text are there but they do not form a coherent package and an exciting vision for sustainably. In this context the policies tend to be protectionist in tone rather than positive and visionary. This may be a necessary result of the constraints of writing a NP, but I had understood that planning had shifted from protectionist/negative statements (what we want to protect and what we don’t want to happen) to positive (what we want to improve and do want to happen). I have heard on the grapevine that other NPs are setting this positive forward focused tone about celebrating and looking after valued heritage and natural assets, whilst seeking to
enhance the quality of the built and green environment, and the sustainably of how life functions within that.

Sections of the plan have been reworded as recommended to present a more aspirational and positive view.

I have gone through the document as thoroughly as limited time allows and made a range of detailed comments. I am aware that those on the NP group have expertise around the built environment and landscape, and that people like Jae will have responded in relation to energy, waste and water sustainability. I have therefore mainly focused on my area of expertise which is about functional and attractive landscape, biodiversity and Green Infrastructure.

A general comment in relation to this is that there is nothing in the plan about looking after the river and catchment within the parish. The river is protected as a chalk stream under the Water Framework Directive/Regs so there should be something on that as well as the designated biodiversity sites.

The importance of the river has also been highlighted by the EA. More text is included on the river and water in general in the revised plan.

Please see detailed comments attached.

In the time I have available I have not had a chance to look at the supporting ‘B’ documents.

Some background documents do cover points raised and this is indicated in the tabulated comments below.

I have done this at considerable speed so I hope it all makes sense. Do please ask if not.

Regards

Diana

Diana Pound. BSc, MSc, CEnv, CIEEM
Specific text/content comments

<table>
<thead>
<tr>
<th>Page</th>
<th>Section</th>
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<th>Bullet</th>
<th>NP Text</th>
<th>Comment/Suggestion</th>
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<tbody>
<tr>
<td>4</td>
<td>Foreward</td>
<td>1</td>
<td>3</td>
<td>‘Protecting Green Space’</td>
<td>Can this be changed to protecting and enhancing green space AGREED MODIFIED</td>
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<tr>
<td>4</td>
<td>Foreward</td>
<td>4</td>
<td></td>
<td>‘manage change carefully, while protecting what is good’</td>
<td>This reads as about protection only. Can this text say something like: ‘protecting what is good and enhancing it further to deliver quality of life for all and long term sustainability’ AGREED MODIFIED</td>
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<td>6</td>
<td>1.6</td>
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<td>‘has strong community cohesion’</td>
<td>Wonder what evidence there is top back up this statement? My perspective is that the damage from the previous Imperial proposal and the 50☑️ campaign damaged social capital and cohesion Now restored</td>
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<td>7</td>
<td>1.6.1</td>
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<td>There has been some delay in getting the NP out – are there more up to date figures now?</td>
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<td>8</td>
<td>1.7</td>
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<td>Graph</td>
<td>I thought I recalled some questions about sustainability and if so can they be included? I certainly know a lot of us commented in this regard.</td>
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<td>9</td>
<td>1.7.1</td>
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<td>TRSDPD</td>
<td>First use of acronym and its not explained Provided</td>
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<tr>
<td>10</td>
<td>1.8</td>
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<td>Bullet</td>
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<td>Was there no environmental assessment eg of ecology, hydrology, rural land use assessment, landscape character assessment etc - and of the parish not just village. This information exists. Information in the SEA</td>
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<td>10</td>
<td>2.1.1</td>
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<td>‘European Special Area of Conservation’</td>
<td>Sentence needs to clarify the SAC is designation for biodiversity conservation - otherwise could be understood to be built environment conservation especially given the following sentence AGREED MODIFIED</td>
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<tr>
<td>10</td>
<td>2.1.1</td>
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<td>‘in the Conservation Area’</td>
<td>Suggest add a word to differentiate with the nature conservation area of previous sentence: ‘in the built Conservation Area’ AGREED MODIFIED</td>
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<td>13</td>
<td>2.1.2</td>
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<td>‘Any development will need to be observant of the statutory protections of the local landscape and conscious of their impact on such a sensitive context’</td>
<td>This language is weak. Any developer would have to comply with statutory planning requirements so might as well say that eg. Any development will need to comply with the statutory planning requirements of the nature conservation designations and the AONB</td>
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<td>Page</td>
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<tr>
<td>13</td>
<td>2.1.2</td>
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<td>‘The grassland adjacent to Wye...’</td>
<td>UNCLEAR WHERE THIS IS SO SAY THE ‘SSI Grassland is rich in...’ AGREED MODIFIED</td>
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<tr>
<td>13</td>
<td>2.1.2</td>
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<td>There should be something in this para about the landscape Character of the Landscape Description Unit (LDU). I can provide the doc - it was done some years ago and showed that the landscape around Wye was degraded – and its got worse since. AGREED MODIFIED</td>
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<td>15</td>
<td>2.1.3</td>
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<td>‘This network...’</td>
<td>IN WHAT SENSE IS THERE A NETWORK? TO DESCRIBE SOMETHING AS A NETWORK SUGGESTS FUNCTIONAL LINKS AND IF SO WHAT ARE THESE FOR AND WHAT EVIDENCE IS THAT BASED ON? EG IS IT A FUNCTIONAL NETWORK FOR PEOPLE MOVEMENT AND USE, ECOLOGICAL FUNCTION, FLOOD CONTROL ETC. AS FAR AS I AM AWARE THEY ARE ISOLATED BITS OF GREEN SPACE THAT DO NOT CURRENTLY FUNCTION AS A NETWORK AND THAT IS WHY I THINK WE NEED TO ENHANCE THE FUNCTIONALITY BY PLANNING IN MULTI FUNCTIONING GREEN INFRASTRUCTURE! Network through walkways</td>
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<td>18</td>
<td>2.2</td>
<td>1 ii</td>
<td></td>
<td>‘that meet existing business needs’</td>
<td>THIS IS MISLEADING. SUGGEST DELETE THIS PART OF THE SENTENCE. I KNOW OF TWO BUSINESS THAT HAVE BEEN LOOKING FOR SPACE IN WYE IN THE LAST FEW MONTHS – ONE LAST WEEK. THEY COULDN’T FIND ANYWHERE AND HAVE GIVEN UP AND GONE ELSEWHERE. I IMAGINE THIS IS BASED ON WYE BUSINESS ASSOCIATION INFO BUT WBA ONLY KNOWS WHAT ITS MEMBERS NEED - BUT NOT ABOUT THE NEW BUSINESS THAT WANT TO LOCATE HERE BUT CAN’T FIND SUITABLE PREMISES. ALSO IF THE PREMISES MEET EXISTING BUSINESS NEEDS THERE IS NO IMPERATIVE FOR IMPERIAL TO PROVIDE MORE COMMERCIAL/BUSINESS SPACES - AND EXISTING PLACES CAN ARGUE THEY CAN CONVERT TO HOUSES. AGREED, MODIFIED</td>
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<td>18</td>
<td>2.2</td>
<td>2 i</td>
<td></td>
<td>‘improvements in vehicle access are with new or wider rural roads are constrained by the AONB’</td>
<td>THIS SUGGESTS THEY ARE WANTED BUT CONSTRAINED. I WOULD ALSO ARGUE THEY ARE UNDESIRABLE! WIDER ROADS MEANS MORE RAT RUNS, MORE DEVELOPMENT PRESSURE, AND LOSS OF RURAL FEEL.</td>
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<td>‘U3A group’</td>
<td>FIRST USE OF ACRONYM SO SHOULD BE EXPLAINED AGREED MODIFIED</td>
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<td>2.3.2</td>
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<td>Apart from performances I don’t the parish church has any useable community spaces? &lt;br&gt; Used for meetings</td>
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<td>20</td>
<td>2.4.2 and Map 2.2</td>
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<td>The text under 2.4.2 talks about the sites shortlisted as suitable for development but the map under is of the original list of possibilities. This means that anyone who doesn’t know this will assume that Wye 1 is Wye 01, Wye 2 is Wye02, and Wye 3 is 03. &lt;br&gt; So there needs to be a map of the locations discussed in this para as well as a map of the long list sites. &lt;br&gt; Clarified</td>
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<td>23</td>
<td>Table 2.1</td>
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<td>Suggest put in date of site assessments at top of column because if you read Wye 14/Wye 3 it suggests that the full evaluation is still to happen – I presume this refers to what has already happened &lt;br&gt; AGREED modified</td>
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<td>23</td>
<td>Table 2.1</td>
<td>Row last col</td>
<td>Withersdane – suitable for establishment as a care home</td>
<td>Wye 15/Wye 3; I am not up to date on village happenings but if this hasn’t got pp for a care home by a specific developer this is too narrowly stated eg what if another proposal/developer wanted it for a conf centre or retreat or something else? &lt;br&gt; AGREED modified</td>
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<td>2.4.4</td>
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<td>A renewable energy generation facility such as solar farm &lt;br&gt; Suggest drop ‘such as solar farm’. As far as I am aware no feasibility study has been done and so this is too specific. Eg: as I recall at the workshops there was discussion about this area being a location for rural/artisanal crafts, a farm shop and a visitor café? &lt;br&gt; AGREED modified</td>
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<td>24</td>
<td>3.1</td>
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<td>Vision</td>
<td>This vision is disappointing and uninspiring especially after some of what was discussed at the workshops. It reads like a dry set of principles/policies not a vision to inspire and give a sense of pride and direction! &lt;br&gt; I end up writing quite a few of these for projects we do based on what people actually say in workshops and using their language where possible, so I had hoped for a vision something along the lines of: &lt;br&gt; The village of Wye and the surrounding parish is an exemplar of a community transitioning to</td>
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<td>sustainably. The village nestles in the landscape and retains and looks after its characterful heritage with all new build respecting and enhancing Wyes sense of identity. Business here thrives with a particular welcome to green enterprises and sustainable landuse practices. The walkable village has plentiful village shops and services and an active and inclusive community welcoming and providing for all ages. The landscape and nature within the village and parish are cherished and enhanced for the next generation. It is a great place to live.</td>
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<td>The vision has been agreed for some time so reluctant to alter at this stage</td>
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<td>‘should be protected’</td>
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<td>This illustrates my point that the tone of the NP is about protection and hanging on to what we value not about embracing the future and working towards something positive and exciting – and in keeping with its past, heritage and landscape</td>
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<td>3.2.1</td>
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<td>Change should be undertaken with environmental consciousness applying CO2 neutral principles and building to the highest sustainability standards.</td>
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<td>This is weak language suggest something like:</td>
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<td>All new building, renovations of community buildings, and other changes should apply the highest sustainability standards at the time of application and apply CO2 neutral principles AGREED modified</td>
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<td>Developers should be encouraged to involve</td>
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<td>This is weak language. Suggest delete the following words:</td>
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<td>Developers should be encouraged to involve</td>
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<td>Also what counts as ‘significant’ and who decides? This probably needs clarifying or developers could just say we didn’t do it because we didn’t change it as significant! Can it say significant in the view of the PC?</td>
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<td>There is national policy on this and depending on the new government this could be strengthened.</td>
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| 25   | Ob 1    |      |        | Protect the village ..... | Needs to look for improving things not just protecting them. Suggest add the following words:  
  
  Protect and enhance the village ... AGREED modified |
| 26   | Ob 1    |      |        | 'is drawn within the boundaries of gardens' | Why? Helpful to have an explanation Just explaining where it is drawn |
| 27   |         |      |        | Project focusing on this policy | Suggest change to:  
  
  Projects supporting this policy AGREED modified |
| 27   | WNP1c   |      |        |              | Welcome this policy but would like to see a new policy on Green Infrastructure setting out a GI plan for the village. The community has been able to agree where new buildings go but not where new GI goes, how it functions, and how it links in and out of the surrounding countryside (in a way that is in keeping with the landscape character principles of the Landscape Description Unit).  
  
  Would therefore like a policy that sets out village GI and that developers will plan positively to enhance the biodiversity, flood mitigation, wellbeing and recreation functions and benefits of GI within their development and ensure it links in with a village and surroundings GI.  
  
  AGREED modified Green Spaces now designated |
| 28   | WNP2    |      |        | ...high quality and inclusive design.. | Suggest change to  
  
  ...high quality and inclusive built and landscaping design ... AGREED modified |
| 28   | Ob 3    |      |        | Protection against the impacts ... | Protection against and mitigation of the impacts..... AGREED modified |
| 28   | Ob 3    |      |        | ... no harmful impacts on the sensitive.... | Suggest use stronger language and either list all features or none. Eg the river, SNCI, SSSI, ancient woodland, ancient/park landscapes,
## Comment/Suggestion

### AONB.
If you just pick out one (Wye and Crundale Downs) it relegates the others to be less important and there not.

**AGREED modified**

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<td>36</td>
<td>WNP7</td>
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<td>Who and what defines ‘high quality’? This could be just aesthetic and fancy planting but from a Green Infrastructure perspective high quality should be that it is genuinely functional and delivers flood mitigation, recreation, wellbeing, functional biodiversity networks etc. Suggest add in sentence that they should demonstrate how the landscaping is functional and high quality in this sense.</td>
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<td>44</td>
<td>WNP10</td>
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<td>See point above in relation to WNP7</td>
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<td>47</td>
<td>6.3.3</td>
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<td>See point above in relation to WNP7* The policy for WYE3 has been modified</td>
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<td>49</td>
<td>7</td>
<td>a</td>
<td>previously developed sites.</td>
<td>Suggest add <em>Previously developed sites and landscapes.</em> <strong>AGREED modified</strong></td>
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### Format comments

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<td>11</td>
<td>Maps</td>
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<td>Could all maps have the same orientation? Understanding maps is a form of ‘literacy’ and difficult for many people - the constantly changing orientation threw me one or twice and I am very ‘map literate’.</td>
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<td>11</td>
<td>Maps</td>
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<td>This could be to do with different printers but the colour coding of the legend and the map are different and hard to read. Also the smudged grey going up the hill to the Downs would be read as ‘main settlement area’.</td>
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<td>11</td>
<td>Maps</td>
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<td>Orientate to the North to be consistent</td>
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<td>Fig 2.5</td>
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<td>Suggest a photo in spring/summer from these vantage point – these winter shots don’t do justice!</td>
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<td>Fig 2.6</td>
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<td>Bullet style seems muddled</td>
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<td>22</td>
<td>Table 2.1</td>
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<td>Suggest put in date of site assessments</td>
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because if you read Wye 14/Wye 3 it suggests that the full evaluation is still to happen – I presume this refers to what has already happened
Also suggest put in header row repeat so it heads all pages the table spans.
Font size suddenly changes here – and elsewhere in the doc seeming to give some bits higher importance because they are in larger font!
Orientate this to North being up the page – it will make little difference to the amount of paper used by the map but will make a difference to those who want to read the map and locate themselves
Realise this map may not be possible to re-orientate in which case suggest a map of Wye above it to locate it

All maps, diagrams and formatting have been checked and modified where necessary in the revised plan.

Process comments

Scenarios have been adapted and developed during the last two years
If there have been significant changes since been further community engagement? The have led to changes being made.

Mr and Mrs Paterson
Dear Chairman

**Objections to Draft Neighbourhood Plan**

We have read the document and have the following comments -

**Village Envelope**

We have studied the map on P26 and in particular the alignment of the red line marking the proposed Village Envelope. You have explained the reason for the tightness of the line, as drawn.

We seek a re-drawing of the line in relation to our paddock where we hope to obtain permission to build three detached houses. Pursuing this, months ago we obtained from Ashford Borough Council a favourable response when we sought a Pre-Application Opinion in Writing, after the opinion of Wye Parish Council had been given, which was also favourable. Whilst such an Opinion is not binding in law, we understand that it gives guidance that the planning decision makers confirm that they would consider such an application as it has merit, rather than it being dismissed as an unfeasible project.

We appreciate that the site has an access problem, but by reducing the width of our double garage, access can comfortably be created through our large garden. We will be submitting such an application within the next few months, despite ongoing negotiations with the site’s previous owners over a badly drafted overage agreement.

The scheme uses land with built and permitted development on three sides and would fall within the Windfall Development definition, provided for within the Draft.

The tight boundary, as drawn, also excludes the Surgery car park extension. Planning permission was granted there over three years ago after they acquired additional land to the south east. Whilst a start has been made, I understand that there are financial constraints which have prevented completion of the work at this stage.

The line is drawn outside the proposed Wye1 and Wye2 sites, so why not the Surgery car park extension, currently at much the same stage in the planning process?

It seems extraordinarily inconsistent to seek to define the village envelope as being well inside the boundary of one site already recognized as worth considering for development and another for which development permission already exists – particularly since the Neighbourhood Plan is the brainchild of Wye Parish Council which has been asked its opinion and which has supported both developments.

We hope common sense will prevail and that the next draft will show the amendment to the present alignment of the Village Envelope as requested.
Criteria for limiting development to a defined distance from the ‘Village Centre’.

Policy WNP1a states that development outside a 400m (or a 5 minute walk from the Church Street/Bridge Street junction) will only be supported in exceptional circumstances. The line drawn is on an “as the crow flies” basis, but few have a straight walk to the junction. I have spent some time walking to it from different starting points at a reasonable walking pace. It is self evident that any boundary relating to both time and distance depends entirely upon the speed of travel - the current world 400m record is held by Michael Johnson at less than 44 seconds! As a reasonably fit man of 71, I can walk from my own house next to Wye Surgery to that junction comfortably in five minutes, but the distance is nearer 500m than 400m, let alone 400m (try as I may, I cannot fly like a crow!)

The Wye1 site (for which development permission exists) falls outside that definition and Fig 5a on P.38 showing the Wye3 site clearly indicates the defining line as reaching only the Olantigh Road/Occupation Road junction. Your own house, Chairman, is certainly further than 500m. Wye Surgery (which may be seen by some with medical anxieties as their village centre) is well outside such an area for the great majority of residents - but only by the same distance as our proposed development. And all of the houses below the railway line are well outside the envelope.

The point we are trying to make is that whilst we understand the good intention of trying to limit future village sprawl, this tool is a clumsy and inconsistent method. Such a restriction may be appropriate for villages smaller than Wye which have developed more concentrically. But in a community of this size and with such an irregular shape, your proposed criteria are unrealistically restricting. We believe they should be reconsidered.

Views and Viewpoints in and around Wye

Figure 2.4 on p.14 at its foot shows a long arrow implying that there is a view of the Withersdane settlement from the rear of the Surgery, but this is not a view in any real sense. Even after the severe pollarding of the poplar trees on the Imperial College estate, currently without their summer foliage, it is only possible to see Withersdane because your eye is drawn to the white cladding on the current scaffolding. There certainly is a more distant view from further down Oxenturn Road when approaching from Naccolt, but the tree screen of windbreak poplars and the trees within the Withersdane site itself obscure any view until you are well outside the village.

I believe the arrow should therefore be rotated anti-clockwise and redirected so it emanates more from the south and since the most southerly poplar tree belt isn’t even shown, the map needs to be extended southwards to show the true position.

Protection of The Crown

Unless we have missed something, there is no mention of permanent protection for the chalk cut Crown, the iconic ‘brand image’ of Wye. We think that if it is appropriate to do so in the Neighbourhood Plan, provision should be made for the permanent protection of the Crown itself and its supporting chalk pit. It may be that adequate protection already exists but it would be a great shame to overlook this, if it were needed?

We have great admiration for your team and the efforts that have produced the draft, which, needless to say, has our overall support. Keep up the good work!

Yours sincerely

Ian Cooling’s letter
I have two concerns about the Pre-submission Consultation Document (the paper) as presently drafted. The first concerns jobs, especially for village youngsters and the second is traffic management into and out of the village, rather than within the village.

Jobs for village youngsters

In a series of submissions to the Parish Council and Ashford Borough Council, members of the Wye Business Association, individually and collectively, pointed out that Wye has lost over 1000 jobs across the last 20-25 years.

By no means all of these are accounted for by the loss of College jobs. The closure of ADAS, Stonegate egg-packers and Taylor’s garage also removed a significant number of jobs (and consumers) from the village economy.

Of the jobs that have been lost, the ones that carried the greatest social penalties for the community were the low-paid, semi-skilled jobs.

As a skim down the list of contents of the document will quickly demonstrate, the whole matter of jobs, employment and the village economy across the board is peripheral to the paper as a whole. It is my view that this is a core element of any future commercial and economic plans for the village. All the scattered, passing references to jobs and employment should be gathered together as a single theme.

WYE3 creates a once-in-a-lifetime opportunity to replace these lost jobs. There are only passing references to jobs and employment in Section 5.1 such as a Business Hub” and “Low intensity business opportunities”; neither is defined.

Experience elsewhere within the Borough and Kent more widely, would indicate that the Business Hub is likely to be populated by the likes of consultancies, web design and other IT-related activities, financial partnership and so on. Nothing at all wrong with any of these, but office-based jobs like these do not address the wider youth employment and such opportunities as apprenticeships.

There is one site within WYE3 tailor-made for the creation of such jobs’ and that is the ADAS site. It has good road access and is fully serviced with utilities. The present derelict buildings have no future other than demolition. This would clear the site for the construction of a number “low intensity
business opportunities” like those in the small business estate by Wye station or the one in the grounds of the former cottage hospital in Wileshborough

Anon 1
Policy WNP Ib Page5
b) Views to the East.
Would like to see views from The Cricket Field and New Flying Horse Car park added.

Policy WNP2 Page 7
Objective 3 Protection against the impacts of increased traffic.
The increase in traffic at Olantigh Road created by the Free School has increased greatly in the time it has been opened. All promises of the School’s ‘Traffic Plan’ are currently flouted by parents who arrive in numbers and drop their children off door to door.
The evidence being that the playground gates have to be opened to allow cars to turn round. The School is not enforcing it’s original traffic plan.
It should be stated in the Neighbourhood Plan that if the Free School remain in Wye then there must be a condition that forces the School to enforce it’s ‘traffic plan.’ Currently there is no protection from the School re traffic, only wishy washy words.
The village have been treated very badly on this. We need protection from the School who have been arrogant and weak in their control of traffic generated by their presence in Wye.

Additional Infrastructure
Should the Neighbourhood Plan not be saying we do not want any extra infrastructure. If it does not contain this then how are we going to protect our village from the points itemised in the NP general summing up?
We feel very strongly that this should be a policy.

Policy WNP7Page9
a) Again, if the Free School go into Edwardian Buildings the mention of ‘adoption of a travel plan’ is weak. Who will enforce this? Who can make the travel plan binding?
It is totally impossible as has already been proved at Occupation Road.

There is no mention of alternative use for the Edwardian Buildings and laboratories should the Free School NOT go in them. At this stage with the current state of affairs, it would appear an assumption of the Neighbourhood Plan to state positively that these building will be for use by the School.

c) Disagree strongly that the proposed use for the Grade I building be a policy. The Parish Council had no mandate from the village to proceed with this. The proposal came from the PC Chairman.
To date a business plan although stated by the Chairman has been done in a recent statement, has not been presented to the village. Quoting the description of the NP on page 2 whereby it states

The NP is not a wish list of projects but a planning policy document, raises even more questions as to why the Grade I features as a policy. Without a mandate from the village and presentation of a businesses plan it should remain a project.

f) The current tenant at Withersdane has a clause in his lease 'with an option to purchase'. This obviously means that if the Promis Clinic should fail, he could sell.

Could the terminology 'institutional, residential (C2) use have restrictions on it?

Ie: add to this clause 'except a prison or immigration detention centre.'

Policy WNP 76.3 Page 13

There is no mention of Bexley House in this section.

Policy WNP 12 Page 13

Could it be added that 'designed for mobility access suitable for elderly or disabled' not to be used by builders to simply get planning permission through. It should mean what it says. For example the - flats at Headley Court Bridge Street were passed purely on these grounds. Attention to the facilities when built were very poor indeed. Example: Sash cord windows. Bath across a sash cord window. Doorways not wide enough for wheelchairs. No wheelchair access or storage for persons with shared entrance. Mobility scooters are a way of life for the elderly and disabled. New builds for such need to include parking facilities for these.

Policy WNP 15 Page 14

Analysis of impacts should include mention that this applies also to the very people who use the premises with the access.

Policy WNP 14 Improvements to village Hall

Would like to see some provision mentioned for a stage. (We used to have one) Also hanging facilities for art exhibitions. We seem to be focused mainly on sports at the moment.

Encouragement of the arts would be appreciated. This could then become a need to support the demand on developer contributions.

Policy Traffic calming and parking. Page 15

It was suggested and supported at one of the workshops that the obvious traffic calming solution would be to reduce the speed restriction, both approaching the village and whilst driving through the village. This is not mentioned here.

Policy Grade I building for community use Page 15

This is classed as a project in this section which is confusing. It's either a project or a policy. Otherwise why aren't the other suggestions listed classed as policies?

8. Concluding remarks Page 17

Agree on all this BUT there is a gaping great hole here. Should the Neighbourhood Plan not be saying we do not want any extra infrastructure. If it does not contain this then how are we going to protect our village from the points itemised in the NP general summing up? We feel
very strongly that this should be a **policy**.

*We have concerns that any comments deemed negative, may be edited out before submission to Independent Auditor, where are the guarantees on this?*

*The Free School survey was suspect as there was not a box where one could answer 'NO' We would like to have had the opportunity to answer a clear NO But this was denied us.*

*The Free School brought about extra traffic and will continue to do so which has always been our concern. Our other concern is that the Free School will bring about a reason to build houses. Kennington is an example.*

*We also have reservations as to the real strength of the NP. Will it really offer protection to our village of over development. What if it is challenged in court or superseded by other plans and changes inlegislation?*

**Anon 2**

**ADAS Site, Olantigh Road, Wye**

Currently designated to be returned to a green field site or to be used, in part, as a solar energy farm.

**Site for renewable energy suggested including the possibility of a solar farm.**

The site was originally the College arboretum and a number of the specimen trees still stand. The rest of the site consists of poor quality brick buildings, road ways and some open ground. In total, my guess is that the site occupies about 4 acres.

All services required for building are on this site including electricity, water and drainage. The site is also well screened from the road and on both sides by trees although is open on the south (back) side. The land is not particularly good agricultural land being a clay and chalk mix. The site is just outside the village envelop but ADAS employees often walked to the village in lunch hours etc so it can be considered to have very ready access.

On the Olantigh Road boundary there is a substantial brick wall running the length of the frontage of the site and access to the site is through a double gateway.

I think this site would cost a great deal of money to return to a green field site. The removal of all of the roadways and buildings including glasshouses, together with the underground facilities would be extremely expensive. The statement makes no mention of the costs of this or who would pay for it.

Because it is north facing and well screened by trees it would be totally unsuited for a solar panel farm.

Conversely the site would make an ideal residential development.

Such a development would take advantage of the existing services (water electricity and drainage) roadways and topography. It would be well screened from the Village and would not interfere in anyway with the views.
The residents would be well positioned to access the village on foot and by car, could choose to go via Godmersham for journeys elsewhere thereby reducing the possible impact of more houses on the Village.

I urge the Parish Council to think again and bargain with Imperial College in order to use this site to the advantage of the Village.

**Future Energy Requirements**

The statement is disappointingly short of suggestions and ideas in this very important area. Wye is in the position of having possible energy sources on or near to the Village which, if developed could make the Village self sufficient.

The two renewable sources that are suggested are the anaerobic digester situated near to Olantigh Road and the possible use of the ADAS site for a solarfarm.

**Anaerobic digester**

To be effective such a digester will require large amounts or organic material and the digestion will need to be very well controlled in order that there are no smells in the area.

The plan gives no information on the sources of the organic material to be digested. Is it thought that the community farm could do this? Has thought been given to the area of land and crops to provide enough material to make the digester economic? If the farm is not the source of the organic material or is only partially so, will there be truck loads of materials coming through the village or along Olantigh Road. The road from Godmersham to Wye is not one for trucks. Without further details this option seems to be unrealistic.

**Solar farm**

This is a possibility but not on the ADAS site that slopes to the north and is well shaded by trees. There must be far better sites in the village than this one.

**Wind power**

There is no mention of possible wind generated power and yet Wye is very well positioned for wind generators.

**Water power**

Has the use of the river been considered? It was, in the past, powerful enough to run a flour mill so why not a water driven turbine.

We would like to see positive statements in the plan which, at least, gives a commitment to the investigation of energy sources for the Village. Wye has the chance to plan ahead for its energy supplies and is better placed than most to develop environmentally clean power.

*Biomass burner suggested rather than digester.*