

## **Meopham Parish Council**

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### **LDF Core Strategy Consultation Response from Meopham Parish Council**

The public meetings that have been conducted to present and discuss the Local Development Framework (LDF) and the subsequent feedback that the public have given to Meopham Parish Council (MPC) have delivered an overwhelming rejection of the plans that Gravesham Borough Council (GBC) has presented.

Specifically, it is felt in the strongest possible terms that all brown field sites have to be fully re-developed before a case is made for the erosion of our Green Belt. Failure to do so not only deprives the area of large sections of its Green Belt, but also appears to represent a missed opportunity to regenerate brown field sites, which would have a positive impact on the areas immediately around those sites. Green Belt land should not be sacrificed in perpetuity for short-term expediency.

As has been stated in the Public Meetings, the land will be declassified, and therefore cease to be Green Belt before the development commences. This seems to be an entirely unreasonable way of circumventing Green Belt legislation. While national planning policies do allow for Green Belt boundaries to be altered, this is only to occur in "exceptional circumstances" and MPC do not believe that any such "exceptional circumstances" exist. It would not seem sufficiently "exceptional" that

planners/developers are claiming that redevelopment of existing brown field sites would not be "economically viable." Current concerns about the economic climate and simple willingness of landowners to sell, should not dictate policy over the next 20 years.

The onus of proof that "exceptional circumstances" exist would be on GBC to clearly demonstrate to the independent planning inspector's satisfaction that it has considered all the opportunities for development within the urban areas contained by the Green Belt. It is for the inspector to decide whether or not the plan is in accordance with Government policy. In light of the recent support and reassurance the Government has given that the Green Belts will continue to be protected under its proposed planning changes, it would seem logical that this will be an area the inspector looks at very closely. Given the amount of brown field land available in Gravesham it would appear that GBC is running the risk of the plan being rejected at this stage, and presumably that could lead to the loss of control over the plan at local level. While much has been made of this concern with reference to the target number of dwellings in the LDF, very little seems to have been made of the plan being insufficiently robust in this area.

If the current GBC proposals were to be approved, including the declassification of the Green Belt sites, then this decision could be open to a legal challenge on the basis that such declassification was not done as a result of "exceptional circumstances." It would therefore seem advantageous for all, if we were able to pursue a robust plan that does not in fact require the declassification of the Green Belt.

There are a number of specific issues, not solely their current Green Belt status, that make the proposed developments in the parish of Meopham unsustainable. It should also be noted that developing individual sites on such a large scale is unprecedented in the parish of Meopham. While these are well-worn areas of discussion, the facts remain that the current level of infrastructure in Meopham is struggling to cope with our current population. Despite the fact that these are areas we have discussed previously, it would seem logical to re-iterate the issues here.

**Roads.** The A227 is currently almost gridlocked at peak times of the day, whilst joining from the side roads is a very slow process. The structure of the road itself has come into question over the last 12 months with a severe collapse of the road in January, and a further closure due to a burst water pipe, which was neither old nor badly maintained. All signs point towards the A227 being incapable of coping with the current traffic levels both from a structural, and a “traffic flow” perspective. Additional developments would only make this bad situation worse. There is no option of widening the A227, and the A227 is therefore a limiting factor which cannot be ignored.

**Schools.** At present there are just 90 places available in the reception classes at Meopham Community Academy (60) and Culverstone Green Primary School (30), and that is currently insufficient to accommodate all Meopham parish residents who apply for their children to attend the local village primary schools, which is a less than satisfactory situation. More dwellings, brings more families, and more children. Without the spaces at the local school, then that is yet more traffic on the roads to take children to schools outside of the area.

The feedback we have received from the residents has highlighted the considerable strain on the Doctors surgery, as well as concerns for the adverse effect additional population would have on the situation. The utilities are also under considerable strain currently, with the area already experiencing an unacceptably high number of disruptions to our service, with electricity failures being a particular issue, as well as a problem with low water pressure. Once again, further dwellings only make this situation worse, and would appear to make the additional dwellings unsustainable.

All the proposed sites within the Meopham Parish form part of the Green Belt and play a key role in protecting the villages from urban sprawl. Building on these sites would be ribbon development and conflict with one of the fundamental aims of Green Belt policy: to prevent the linking of separate rural communities and the unrestricted sprawl of built-up areas in this way. The amount of building development quoted by GBC would damage the landscape on these highly visible and open sites resulting in the loss of open countryside and be detrimental to the rural character of the areas. All sites are good agricultural land; some high grade farming land and the others

grassland for grazing animals. Good agricultural land is a diminishing resource in Meopham, in Kent and across the UK. Development of these sites will result in the consequent loss of further capability for national home grown produce, and an ever-increasing reliance upon imported foodstuffs. In isolation this may seem irrelevant and yet the precedent it sets will certainly create more cases such as this, the combination of which will materially impact the whole country.

We believe that the LDF, when presented to the Secretary of State's Planning Inspectorate, should show that GBC has put economic growth and social well-being at the forefront of their planning by concentrating on regeneration and employment. The following focuses on the housing numbers that have been produced to date.

As per the draft SLAA October 2011, the dwellings identified on brown field sites are 2,871, plus 1,517 dwellings with planning permission, giving a total of 4,388. While this represents a shortfall of 812 dwellings for the 5,200 figure, it is the view of MPC that the LDF should work on the basis of the Long Term Migration figures, which would give us a requirement of 4,600 dwellings. This would seem to be a robust basis for arriving at a requirement figure, and is stated in the range of figures being discussed at consultation, which would indicate that GBC is relatively confident that this is a figure for which a robust case could be made. A figure of 4,600 leaves a shortfall of just 212 dwellings.

As recently as January 2010, the SLAA identified brown field sites that would produce 5,678 dwellings, but by October 2011, this figure has fallen by 2,807, so that the SLAA now has only 2,871 dwellings on brown field sites. While it is inevitable that these figures will change from one study to another, it seems rather an extreme revision of the numbers in this case. It seems difficult to justify this revision as being due to the economic recession, when the economy has not been in recession in the period January 2010 to October 2011, with the UK Office for National Statistics only showing one quarter of negative growth in GDP in that 22 month period, whereas there must be two consecutive quarters of GDP contraction for a recession. Therefore, it is perhaps sensible to review some of the sites that have been withdrawn or reduced, to see if they could be revised back up slightly.

On the basis that we work towards the Long Term Migration figure of 4,600, with a shortfall of 212 dwellings to identify, these could come from the brown field sites that had been identified in January 2010, but have been subsequently removed. The current housing market is depressed, and while there are varying reports of how long it will take for the recovery, it would seem an extreme stance to exclude areas from a 20 year plan, on the basis of there being "low residential property values" at the current time. Therefore, it would be sensible to reconsider;

- **Northfleet Embankment East**, which could very easily accommodate a further 250.
- **Grove Road** development can increase by another 200.
- **Lord and Parrock St car parks**. By GBC's own admission, the development of Lord Street and Parrock Street car parks will be redeveloped in the next 20 years, so there seems no reason not to include these 120 dwellings as well.

It would seem to be a very conservative estimate that the above examples could generate an additional 570 dwellings,

In addition to the above, the current brown field site from Northfleet to Canal Basin represents a blot on the landscape of Gravesham, and the development of this area for both housing and employment represents a perfect example of the regeneration we should be looking to promote to the full in development plans.

On the basis that the housing requirement is derived from historical data over the past 10 years, then it would seem logical that the windfall numbers should also be incorporated, which is predicted to be in the region of 400 new dwellings (including small developments and buildings upon brown field sites in Meopham and other rural areas) over the next 20 years. With other previously identified sites such as Island Block, Heritage Quarter, Bath St and Stuart Road, also being available, then it would seem that there are ample brown field sites that are both available and in need of redevelopment. Combine this with the option of a greater density of dwellings on the brown field sites identified, and it would seem that GBC have numerous alternatives to the option (which is clearly unpopular with residents) of redrawing the Green Belt boundary, without any demonstration of exceptional circumstances.

Finally, we also consider that the documents "Have your say on the future" are too complicated for the average resident to understand and it is unfair to expect them to answer the questionnaire. So we, like them, have decided to respond by letter.

To summarise, we do not believe that GBC has sufficiently demonstrated the "exceptional circumstances" under which it is permissible to de-classify Green Belt land. The consultation process with residents of Meopham parish has resulted in an overwhelming consensus, that the current plans to build on Green Belt land are completely opposed. On behalf of the residents of Meopham parish, we request GBC should submit the figure of 4,600 dwellings, with a credible supporting plan, which grasps the opportunity to redevelop brown field sites (including brown field sites in Meopham), while completely retaining the "green lung" for the benefit of all Gravesham residents.

The text of this letter was agreed by resolution of Meopham Parish Council on Tuesday 13 December 2011, when it was also resolved to authorise the Chairman to sign the letter on behalf of the Council.

With best wishes

Yours sincerely

Cllr Douglas Powell  
Chairman  
Meopham Parish Council