



North Cray Residents Association

www.northcrayresidents.org.uk

Dear Mrs Acton

DATE: 6 November 2018

Ref 18/02656/OUTM 139 North Cray Road – Outline application for up to 67 residential units

Please would you register our very strong Objection to the above application. Our reasons are set out below.

1. First, I would like to refer you to Mr Lancaster's letter of 23 November 2017 in which he set out the Council's informal pre-application response to the proposed residential development on land at 139 North Cray Road (ref 10668/JA). In this he set out the policies that would govern Bexley's decision and identified the key planning policy issues. As you will see, Mr Lancaster's conclusion was that a residential development of this site, which is designated as Metropolitan Green Belt, would be an inappropriate form of development which would be considered unacceptable; and that in the absence of very special circumstances which could warrant an exception being made to established green belt policy, any planning application for a residential development of the site is likely to be refused.
2. Nothing has changed since then. The NPPF was updated in July 2018; but the need for very special circumstance was repeated (see its paras. 142-143). The government continues to maintain its support of the Green Belt, eg in the several statements made over the year by the Prime Minister and the Secretary of State for Housing Communities and Local Government – the latter re-affirming that brown field land, not green field or that in the Green Belt, is the priority for housing development. The new London Plan maintains, and indeed strengthens, the Mayor's support of the Green Belt (see its para 5.59, Policy 7.16). And we know of no change in Bexley's *Growth Strategy* document as approved in December 2017 that changes what we told by the Planning Strategy team in November 2017, ie “... we will be focusing on 'true' brownfield land, ie land that is suitable for developers to use for housing, eg large-scale developers/development”. So, what are Fairfax's arguments – and how valid are they?
3. The July 2018 version of the NPPF puts a very strong emphasis on “delivering a sufficient supply of homes” in line with the local strategic plans informed by the local housing needs assessment. Fairfax contend that Bexley's housing need assessment is based upon out-of date data and is inaccurate (6.6). They consider therefore that the Council's Development Plan policies are not up to date, and should therefore be awarded reduced weight in the determination of applications for new housing. In effect

Fairfax are stating that the Council's strategic plans (which includes Green Belt designations) are invalid.

This is clearly a serious challenge to the Council's policies and competency which must be refuted.

To add to this outrageous conclusion, Fairfax are also stating that the Green Belt status of the proposed development land is also invalid on the grounds that it is doesn't meet the requirements of the Green Belt definition and makes very little contribution to its purpose. This land has been designated Green Belt for many years during which the designation criteria has not changed. The land provides a natural western boundary for the Green Belt through its mature tree border with the North Cray Road. It is ridiculous for Fairfax to suggest moving the Green Belt border to the east side of the proposed site would not conflict with the purpose of the Green Belt and in any case the council could continue to protect the Green Belt elsewhere. This is just arrogant contempt for the Council's strategic policies and must be dismissed. Green Belt boundaries can only be changed in line with strategic policies. Bexley has no plans to change such policies.

Fairfax claim that “very special circumstances” exist for the release of this site from the Green Belt in that the development will provide much needed housing. Bexley's Strategic Growth Strategy already states that housing need will be met in the north of the borough where the supporting infrastructure will be in place to provide for transport, schools, health services, jobs etc. There is absolutely no case for development in Bexley's designated Green Belt land.

4. We now turn to what is the key document amongst all those that have been submitted to you in support of this planning application: Fairfax's Planning Statement.

This 41 page document is repetitive and:-

- repeatedly alleges that Bexley has under-estimated its 5-year housing land supply position and repeatedly argues that building houses on this site would meet identified local needs. *See its paras 6.8-6.10*

- exaggerates the significance of the planning permission already granted by Bexley for six dwellings *See its para 6.13*

Here, we remain of the view that this decision was made on an unsound planning basis, please see our letter of 25th January 2018 .

- argues that “no evidence of perceived landscape 'openness' would be lost” despite the fact that openness is the key factor in the value of Green Belt land, whether perceived or not. *See its para 6.14, “Purpose 3”*

- greatly exaggerates the size of the allegedly previously developed land on the site. *See its para 6.14, “Purpose 5”*

The piece of land in question is that area where the erection of six houses was approved earlier this year. The greater part of the site is open grassland.

- argues that, even if this site were to be withdrawn from the Green Belt, Bexley would be readily able to continue upholding the protection of the Green Belt elsewhere (but please see Appendix A where we identify the very real threat to North Cray's Green Belt were this application to be allowed. *See its para 6.15*

The arguments they use for this could then be used by whoever owns the adjoining sites, or by the several other landowners in North Cray. This is ridiculous! Please also note the very real threats to North Cray's Green Belt listed in our Appendix A.

- presents an unconvincing argument that the site does not serve the purposes of the Green Belt and so should be released from its Green Belt designation *See its para 6.18*

-exaggerates the contribution of the scheme to the local building industry (which would only be of short duration) and the economic benefits of the new residents' expenditure at local services and facilities. *See its para 6.27*

Nearby, but on the other side of the dual carriage way, is just one small corner shop-cum-post office, a newsagent, two take-aways and a tanning parlour.

- claims that the scheme would accord with the character of the surrounding area *See its paras 6.29 and 6.38*

It would not – the site lies within open countryside. And the most distinctive feature of North Cray's special character – as yet mostly unspoilt – is the long run of Green Belt land along the eastern side of the North Cray Road.

- greatly exaggerates the site's position in relation to an alleged “excellent infrastructure” and its closeness to a bus service *See its paras 6.42 -6.44*

What infrastructure? There are no schools in North Cray, no doctor's surgery and no chemist; and the nearest railway stations are car-rides away . The site does have a bus stop close by, but the service runs only half-hourly. For this reason, the new residents will almost certainly use their car for visiting such services – and for their weekly shop at say the Sidcup Tesco or in Sidcup. Some will order on-line for a home delivery, but this will create even more motor movements to and from the site. No-one is likely to cross the dual carriageway on foot to do their major shop at the small corner shop in the High Beeches Parade.

Fairfax also say here that there are no flood risk issues. However, North Cray was flooded in 1977, when the house adjoining the site (Cray Hall) and its land became under water. Please see attached photos taken at the time.

- argues that the proposal for a housing estate of 67 dwellings would both conserve and enhance the Green Belt designation *See its para 6.45*

It would not, Openness – whether perceived or not – is one of the key factors in a Green Belt site. This para is also at odds with the case made elsewhere by Fairfax for the site to be removed from its Green Belt designation! Furthermore, the alleged value of the proposed creation of a public open space is vastly over-rated. On the eastern side of the North Cray Road there are several existing public open spaces where people can walk or ride - Footpath 137 from upper Parsonage Lane leading to Chalk and Joydens Woods and Footpath 134 running up up from the North Cray Road and linking with 137. On the western side of the North Cray Road is Footscray Meadows, a Public Open Space with a link to the Cray Riverway.

The remaining 12 pages of this 41-page documents re-iterate, again and again, the points it made in pages 1- 30.

5. Our comments on the arguments made in Fairfax's in some of its other Statements and Papers are given below.

5.1 Utilities Statement Here we direct you, in particular, to the expert comments made by our member Rhodri Roberts (a professional in the construction industry), from whom you have a separate submission letter.

5.2 Accoustic Planning Report In its Executive Summary, this reports that noise monitoring results confirmed that the western aspect of the site is exposed to moderately high levels of noise during the day time and night time, and that calculations indicate that an accoustic glazing system providing a sound insulating performance would be required. It further reports that the western peripheral garden areas are however exposed to noise levels in excess of WHO guidance; and that it would be advisable to provide boundary treatment in the form of accoustic grade garden fencing to ensure that an acceptable outdoor living environment can be provided across the whole of the site.

Its para 2.4 states “the redevelopment of the Site...will provide 67 new houses, with open green space for the community”.

Such a green space is not required for the community of North Cray. Moreover, would anyone wish to sit in a place dominated by traffic noise? And suffer the air pollution such traffic creates? We think not, and that this is just window dressing to get the scheme passed. See also our para 4, where we challenge Fairfax's allegation that an estate of 67 houses would “conserve and enhance the Green Belt designation” (their para 6.45).

5.3 Transport Statement

In this, it is argued that Fairfax's development proposal will not have a material impact, in traffic and transport terms, on the surrounding highway network. We do not agree. The single bus service running past the site is a half-hourly one and only links people with Sidcup or (in the other direction) with Bexley Village, Bexleyheath and beyond. It is therefore extremely likely that residents of the proposed housing estate of 67 dwellings will use their car for transport. This would mean that 67 extra cars would be using the North Cray Road, twice that if, as is common these days, each family had two cars. And such traffic to and from the site will include service vehicles.

We ask you to please refer to the many individual submissions made to you by local people who know the area well. Several cite existing congestion on the North Cray Road. For example, see the comments made by Richard Moon, Caroline Slevin and Rhys Trigg (who also points to serious safety hazards) and Geoff Wilkins.

In the view of all of us the additional traffic generated by this housing estate would have a material impact.

We also take issue with the assertion in its para 2.10 that, through the granting of planning permission for six houses on this site (15/00358/FUL) the Council has acknowledged that the site is an appropriate location for residential development. This is at odds with what Mr Lancaster stated in his letter of 23.11.17 and contrary to the point we made in our letter of 25.1.2018 that this decision was made on unsound planning grounds.

5.4 Statement of Community Involvement

In this, Fairfax allege that in August they arranged for 500 leaflets to be delivered to the houses surrounding the site, and go on to say “The views of local residents had played a significant part in helping to inform the design process.”. Poppycock!

Fairfax say they received only two responses. This is unsurprising since, we having checked with our Volunteers in all of our roads, none knew of any of these flyers being delivered to our residents. We did receive news of one flyer though – a resident of The Grove says that his friend who lives in Sidcup Hill got one, but he did not respond to it as North Cray is outside his locality.

Fairfax's inference here, which they hope Planning will believe, is that local people are unconcerned about the proposal to build 67 houses on this site.

Not true, our Association represents just under 400 households in North Cray – almost 100% membership - and many residents have joined the NCRA because of its commitment to protecting and preserving the Green Belt from inappropriate development. The application before you would, if granted, would be inappropriate as there are no Very Special Circumstances to justify it.

Moreover, since publication of this planning application, we have also received offers of help from people outside North Cray who are unhappy about what is being applied for at 139 North Cray Road and - seeing this as a major threat to London's Green Belt – want to support us in our fight to defend it.

5.5 Landscape and Visual Impact Assessment

This also refers to the “area of public open space” included in Fairfax's housing scheme. This is clearly meant to persuade you that the inclusion of this feature will meet the obligation required of a local planning authority as set out in para 81 of the NPPF. But please see our comments in para 5.2 above.

6. In 2014, the applicant applied for planning permission for two houses. Immediately this was granted, further applications were submitted – first, for four houses, then for six. We note that in 2017 the applicant wanted to build 83 houses, but in the current submission for outline planning permission Fairfax have reduced the number to 67. We strongly anticipate that, if Bexley were to grant outline permission for 67, Fairfax would quickly revert to their 2017 figure – 83 houses.

SUMMARY

- Bexley's views in November 2017 remain valid
- No very special circumstances to justify a breach of the Green Belt
- No evidence that Bexley's strategic plans are invalid
- Significance of planning permission already granted for six houses is exaggerated.
- The proposed Public Open Space for the Community is not needed; and setting one within this intensive development is laughable in the light of traffic noise and air pollution
- The development would have a material adverse impact on the local highway
- Strong opposition by local residents and others to the proposed development.

We all hope very much that Bexley will firmly reject this application and continue to protect our Green Belt as it has done for many years.

Yours sincerely

Jean Gammons
Secretary

/APPENDIX A

APPENDIX A

The following is a list of the other sites in North Cray's Green Belt whose owners are (as we know from past or current planning applications, or know from what the landowner has said about his aspirations) clearly await a major breach of Green Belt policy by Bexley, such as the current application would be were it to be approved:-

Manor Freehold Farm
Manor Farm
North Cray Riding School
Honeydale Farm
Stuarts 57 North Cray Road

There is also the likelihood of the car dealer who recently bought Kelseys Farm taking an opportunity to further capitalise on his large land holding of Green Belt land on the western side of the North Cray Road.

Please see the attached annotated Google Earth view of these vulnerable Green Belt sites.