

**To which part of the Proposed Changes to the Borough Local Plan Submission Version (2020 – 2038) as set out in the Development Strategy Topic Paper Addendum does this representation relate?**

7.1 Land north of Birchfield Grove Hawkhurst

**Which part of the plan does your comment relate?**

Policy

**What is the reference number?**

7.2 to 7.11

**Do you consider the Proposed Changes to the Borough Local Plan Submission Version (2020 – 2038) would make it:**

Yes No

**Legally Compliant** Not Selected Not Selected

**Sound** Selected Not Selected

**Please give details of why you consider the Proposed Changes to the Borough Local Plan Submission Version (2020 - 2038)(as set out in the Development Strategy Topic Paper Addendum) are not legally compliant or are unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Proposed Changes to the Borough Local Plan Submission Version (2020 – 2038) (as set out in the Development Strategy Topic Paper Addendum) please also use this box to set out your comments.**

I object in the strongest terms about the decision to modify allocation AL/HA5 - Land to the North of Birchfield Grove in the Local Plan. As a resident in Birchfield Grove, I recognise that the Planning Committee has granted outline planning permission for this site. However, this goes against the wishes of the residents in Birchfield Grove and a majority of residents in Hawkhurst. Only a handful of people supported this proposal, most of those don't even live in Hawkhurst!

Birchfield residents especially, feel the Planning Committee took Rydon's proposals at face value with little challenge and with the appearance of a sham consideration of information. It was noted by Birchfield residents attending the planning committee meeting that the recording of the meeting had been edited to exclude awkward moments. Furthermore, our Local Councillor was prevented from voting because she had previously objected to the proposal. Any conflict of interest is usually a financial one. Surely an elected Councillor has the right to represent their residents' views and vote in any decision. Birchfield residents feel they were democratically disenfranchised by this process. This site is simply not suitable for a medical centre or housing.

The reason for this change in the Summary of Proposed Modifications is to "ensure delivery of the medical centre". However, the decision to grant planning permission for application 22/02664/HYBRID means that this has not been achieved. It was expressly stated at the Committee Meeting in November 2023 that once the outline permission was granted, there was no provision to make the housing conditional on the delivery of the medical centre. The only requirement was that the land was made available with appropriate services. This is also the only requirement of the modified AL/HA5.

The Local Plan Development Strategy Topic Paper - Addendum dated January 2024 asserts that “there is no other suitable site at Hawkhurst to deliver the new medical centre.” There seems to be no detailed argument about why the land north of Birchfield Grove is the only site for the medical centre, simply an assertion that it is. Even the Doctors' own business case states that the Birchfield Grove site is the preferred site rather than the only site that will meet the required needs. The medical centre with the community hospital, land is available, and the synergies of co-location in this case are obvious. If the existing Wish Valley and Northridge surgeries are closed, most patients will drive to any new medical centre no matter where it is located so it may as well be in a place where health services can support each other.

Rydon claim that there would be minimal disturbance to the AONB if the medical centre were built on land north of Birchfield Grove, but the medical centre would sit on the highest point of the ridge and be a very ugly and noticeable addition to the landscape.

The junction between Rye Road and Birchfield Grove is dangerous. Traffic trying to turn right out of Birchfield Grove into Rye Road cannot see oncoming traffic leaving the village which is often breaking the speed limit as it accelerates out of the village. Equally, traffic leaving the village cannot see traffic trying to pull out of Birchfield Grove until it's almost on top of any car trying to pull out of Birchfield Grove. It is unlikely that site lines can be improved sufficiently to mitigate the risk.

Any car turning left into Birchfield Grove from the Rye Road as it leaves the village is turning into a blind spot, if there was a queue or a parked car just near the junction in Birchfield Grove, the first a car turning left might know of this is when it crashes into the queue or parked vehicle. This is the reason current residents often turn wide into Birchfield Grove, something that would not be possible if there was a queue waiting to turn right out of Birchfield Grove, a very likely scenario with the proposed development. Current residents of Birchfield Grove frequently experience having to pull back into Birchfield Grove. The only way you can see when turning right out of Birchfield Grove is to edge out gradually until you can actually see any vehicle and then sometimes it's been a close call regarding a road traffic accident.

The more frequent queues on the Rye Road will make it very difficult to turn right and this will cause queuing cars in Birchfield Road resulting in air pollution and further congestion. Birchfield Grove was never designed to deal with higher volumes of traffic which the proposed development would create. Birchfield Grove is a cul-de-sac and totally unsuited as an access road and to cope with volumes of traffic created by a new medical centre and 70 houses. The result of all this will be queues of traffic in Birchfield Grove increasing air pollution and contributing to the already congested traffic on Rye Road.

Given that the access to this site is through the landscape buffer created as part of the development of Birchfield Grove, how can residents have confidence that the open space, protected landscapes etc. that contribute to the requisite Biodiversity Net Gain (BNG) will not simply be eroded as the developer decides that further housing would provide a more suitable edge to the settlement?

This concern regarding the future governance of the land used to meet BNG targets, of course, applies to more than just this particular allocation. There appears to be no recognition that the Birchfield Grove site comprises wood pasture and parkland habitat. As a consequence, our understanding is that the baseline BNG evaluation is undervalued, raising questions over the extent of any gain that is achievable.

**Please set out what modification(s) you consider necessary to the Proposed Changes to the Borough Local Plan Submission Version (2020 – 2038) Incorporating the Proposed Changes set out in the Development Strategy Topic Paper Addendum, legally compliant or sound, having regard to the Matter you have identified at Section 5 (above) where this relates to legal compliance or soundness. You will need to say why this modification will make the Proposed Changes to the Borough Local Plan Submission Version (2020 – 2038) legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

To remove site AL/HA5 - Land to the North of Birchfield Grove from the Local Plan for the purposes of development of any medical centre, housing or any other building and infrastructure.

**If your representation is seeking a modification, do you consider it necessary to participate at the examination hearings stage when it resumes?**

No, I do not wish to participate at the examination hearings