

Submission 32-1

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

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 Not Selected 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.

The amendment to the Local Plan is a simple piece of reverse-engineering dressed up as an act of community altruism, albeit one imposed upon Hawkhurst against the clear wishes of local residents and Hawkhurst Parish Council.

The revision to the Local Plan simply mirrors what the TWBC Planning Committee agreed at its meeting in November 2023 when it agreed planning application 22/02664 (the ‘planning application’) for 70 houses, a medical centre, a 50-bay car park, expansion land for the Primary School and a ‘Country Park’.

The arguments against the planning application and therefore the revision to the Local Plan remain strong and valid. In summary, it is in direct contradiction of:

1. The Appeal Decision of the Inspector in 2014 who rejected a similar application and made clear that protection of the AONB outweighed other considerations. Importantly, this was also at a time when TWBC was unable to meet its housing targets (see 2 below).
2. TWBC’s own SHELAA process where the site was considered unsuitable for housing "due to the impact of the development on the character of the High Weald AONB landscape...in conjunction with highways capacity." It now appears that TWBC believe the need for a new Medical Centre on this site (and only this site) is so important that its own conclusions and analysis can be ignored. Of course, the real reason for this volte -face is the massive housing shortfall brought about by the failure of the proposed Tudeley and Paddock Wood developments. This is why previous AONB arguments now no longer matter – black is now white, and white, black.

3. The Hawkhurst Neighbourhood Development Plan with its clear preference for small scale development.
4. The conclusions of the High Weald AONB Unit which states unequivocally with respect to this site that the exceptional circumstances test in Paragraph 177 of the NPPF has not been met. The Unit also makes clear that the application is contrary to several objectives of the High Weald AONB Management Plan as "it would constitute a significant, suburbanising and uncharacteristic incursion into the rural setting of the settlement.....and harming the landscape character and natural beauty of the AONB." Finally, they point out that the application is also contrary to NPPF Para 176 because it fails to "conserve and enhance the natural beauty of the High Weald AONB". It is extremely disappointing and concerning that these views were ignored both by the Planning Committee when agreeing the Planning Application and by TWBC when putting forward this amendment to the Local Plan.
5. The views of Hawkhurst Parish Council who have objected in the strongest terms to the application.
6. The views of the overwhelming majority of Hawkhurst residents, as evidenced by the number of objections to the Planning Application on the TWBC Planning portal (97% against).

Medical Centre

A major argument advanced for the proposed amendment to the Local Plan (and to justify the approval of the planning application) is that this site is the "only" site in Hawkhurst for a medical centre. This requires challenge.

It is stated at paragraph 7.5 of the Local Plan Development Strategy Topic Paper – Addendum that “subsequent work carried out by Council officers has confirmed that there is no other suitable site at Hawkhurst to deliver the new medical centre”. But no evidence (let alone an independent assessment) is presented to support this sweeping conclusion. This mirrors what happened at the Planning Committee hearing where nothing was made available to the public to support this argument.

This lack of transparency is very troubling and significantly undermines public faith in the Local Plan process and planning policy in general across the Borough. Bear in mind that even the doctors' own assessment of sites (which is available publicly) concluded that this was the "preferred" site, not the "only" site. There are alternative sites - most notably the Community Hospital.

Highways/congestion/sewage

This proposal will generate increased congestion in Hawkhurst. This is inevitable and the arguments well-rehearsed. That said, some of the statistics in support of the planning application (and therefore, presumably, part of the justification for the amendment to the Local Plan) are not realistic. Given that the vast majority of the new homeowners will be commuting and/or on the school run, it is, for example, quite unrealistic to suggest, that the proposed 70 houses (which, realistically, means close to 140 extra cars), will only generate an extra 7 morning peak time journeys at the Flimwell Crossroads (all of which will need to pass through the already heavily congested Hawkhurst Crossroads).

Access to and from Birchfield Grove is very poor and no amount of cutting back of vegetation on the slither of highways land that abuts the Rye Road will materially improve matters.

The sewage problems in Hawkhurst are well documented. This proposal will only make a bad situation worse.

Summary

The amendment to the Local Plan should be rejected. The AONB should be protected and better and alternative sites for a Medical Centre exist within Hawkhurst. Failures in policy elsewhere in the Borough should not result in Hawkhurst having to accommodate additional housing, particularly as it has met its targets as per the Submitted Local Plan.

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.

This allocation should be removed from the Plan.

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

Yes, I wish to participate at the examination

If you wish to participate at the examination hearings stage once it resumes, please outline why you consider this to be necessary:

To assist the Inspector understand the local sensitivities relating to this allocation and to explain the very significant problems it will generate for residents and the very material negative impact on their residential amenities.

Submission 32-2

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?

14.0 Commitment to early review

Which part of the plan does your comment relate?

Policy

What is the reference number?

STR 1

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 Not Selected Selected

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I have no comment on the legal aspects of this approach.

The decision to move to a 10-year housing land supply position while understandable given the complete reversal of approach in Tudeley and, to a very significant extent, in Paddock Wood as well, is most regrettable. It means that the new Plan once made will, as acknowledged, need to be immediately reviewed. Presumably, a Call for Sites will be initiated and the whole Borough will therefore be subject to years of ongoing uncertainty. There will be no settled Local Plan and no reasonable certainty for the Borough's residents as regards the site and scale of future development. This uncertainty will considerably strengthen the hand of developers in pressing their case for more and more Borough wide development.

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A more imaginative approach which gives residents at least some degree of certainty as to future development rather than a never ending Plan review process.