

**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 - 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 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.**

Given the potential future provision of a medical practice within this proposed development, there appears to be nothing here that guarantees its construction. Exception circumstances requiring the construction of a new medical practice would imply a critical need and an urgency to the delivery of this part of the proposal, prior to any other development of the site. Constructing a new medical practice at some point in the future, even in 3 to 5+ years time (given there are no apparant plans or planning application as yet), seems to be beyond the realm of urgent or exceptional, and I fail to see how it can be used to justify this major development. In addition, no justification has been set out here as to why this is the only viable site for a new medical practice - the Infrastructure Delivery Plan only states that a site is being sought. Existing NHS facilities in Hawkhurst - the Cottage Hospital - would be a logical site for a new multi-displine medical practice, that isn't subject to the whims and detail of private arrangements at Birchfield Grove. **This is all counter to the exceptional circumstances claim of the "provision of a Doctors surgery, which cannot be delivered without the housing /or on another site".**

In addition, from comments during the planning process for this site, it is apparant that the actual ecological and biodiversity value of this site has not been accurately assessed, and any development here will result in an unacceptable loss of biodiversity. Is Tunbridge Wells Borough Council complying with its own biodiversity net gain policy, and its obligations under the Environment Act 2021, by considering/permitting the development of this site? **This is counter to the exceptional circumstances claim that the site will deliver biodiversity net gain.**

**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.**

Deletion of AL/HA 5 Birchfield Grove from the proposed local plan. Retention of this site as woodland pasture and parkland habitat.

**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