

**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?**

7.0 Other matters

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

Policy

**What is the reference number?**

AL/SO2

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

**Yes No**

**Legally Compliant** 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.**

I am commenting under Section 7 (Other Matters) as it is the most appropriate place to respond even though my comments are in relation to a policy for Southborough not Hawkhurst.

Policy AL/SO2 allocates land at Mabledon House Southborough for a luxury 200 bed hotel. The Planning Inspector states in his initial findings that “The construction of new buildings is inappropriate development in the Green Belt” (Para 66) and “Allocating the site for development, but then requiring it to demonstrate very special circumstances [for Green Belt development] does not represent an effective or justified policy” (Para 67).

The clear implication from the Inspector is that the policy is unsound. However, the Inspector does suggest it might be possible for the council to make the policy sound. For example, one option might be to prohibit the construction of new buildings in favour of a smaller hotel.

The council’s response and amendments to the plan are totally silent on this policy and the Inspector’s comments. The council need to respond to the Inspector’s comments and amend/clarify the policy accordingly.

**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.**

It is up to the council to respond directly to the issues raised by the Inspector. To date they have not done so.

However, I would suggest that the most obvious way to make the policy sound is to prohibit the construction of new buildings at Mabledon in favour of a smaller hotel centred around the existing buildings only, as implied by Paragraph 68 of the Inspector's response (“a different type of development to the one proposed by the site promoters”)

**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