
Elmbridge Local Plan Examination

Stage 1 Matters Statement

Legal Compliance & the Duty to Cooperate

Date : Tuesday 6th February 2024

From: Levanter Developments Limited

Local Authority : Elmbridge Borough Council

Subject: Wood Lark Farm, Pleasant Place, Hersham

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5B Highway Farm, Horsley Road, Cobham, Surrey KT11 3 JZ

1. Introduction

- 1.1 This Matters Statement has been prepared by Levanter Developments with respect to the land known as Wood Lark Farm, Hersham for Stage 1 of the Local Plan Examination which will deal with Legal Compliance and the Duty to Cooperate.
- 1.2 Levanter Developments are the Promoters of Wood Lark Farm.
- 1.3 Levanter have been in discussions with the Council for 7 years and in December 2019, a pre-application was submitted to the Council for the redevelopment of the site for up to 80 dwellings with associated landscaping and infrastructure.
- 1.4 The purpose of the pre-application was to demonstrate the site's deliverability should the Green Belt designation be removed in the new Local Plan. The pre-application therefore sought Development Management comments on all material considerations except for the Green Belt designation.
- 1.5 The Council concluded that **“with the exception of the Green Belt designation, there are no other designations that would restrict development on the site, subject to compliance with the material planning considerations above and relevant planning policies at the time of submission”**.
- 1.6 Each of the Matters raised by the Inspector in document ID-003 (Schedule of Matters, Issues and Questions for Stage 1 of the Examination) are set out within this statement.
- 1.7 Regard has been had to document ID-002 (Guidance Note for People Participating in the Stage 1 Examination). Any reference to the National Planning Policy Framework is in accordance with the previous version. Annex 1 of latest version released in December 2023 sets out the implementation of the new framework for the purposes of plan making and states that previous version of the framework will apply to plans already at examination.

2. Issue 1: Have the relevant legal requirement been met in the preparation of the Plan and is the Plan legally compliant?

Has the Plan been prepared in accordance with the Duty to Cooperate (DtC) imposed by S33A of the Planning and Compulsory Purchase Act 2004 (as amended)? This applies to the preparation of Local Plans so far as relating to a strategic matter. It is necessary for Local Planning Authorities to demonstrate how they have complied with the DtC at the Examination stage of their Local Plan.

2.1 No representations were made on the Duty to Cooperate (DtC) at regulation 18 or regulation 19 stage and no further submissions are made in this regard.

Has the Council maximised the effectiveness of the Plan by engaging constructively, actively and through an on going basis with the prescribed bodies on the relevant strategic matters identified and how has this been undertaken?

2.2 No representations were made on the Duty to Cooperate (DtC) at regulation 18 or regulation 19 stage and no further submissions are made in this regard.

Has the DtC under sections 22(5)(c) and 33A of the Planning and Compulsory Purchase Act 2004 (2004 Act) and Regulation 4 of the Town and Country Planning (Local Planning) (England) Regulations (2012) (2012 Regulations) been complied with, having regard to advice contained in the National Planning Policy Framework (NPPF) and the PPG?

2.3 No representations were made on the Duty to Cooperate (DtC) at regulation 18 or regulation 19 stage and no further submissions are made in this regard.

Elmbridge Borough Council has set out within its Statement of Compliance and associated update (CD014 and CD015) and associated appendices (CD016) how it considers it has complied with the DtC. The Council have also submitted a number of Statements of Common Ground (SoCG) in support of this position. What has been the nature of the cooperation undertaken and on what issues has it focused?

2.4 No representations were made on the Duty to Cooperate (DtC) at regulation 18 or regulation 19 stage and no further submissions are made in this regard.

In relation to the Strategic Flood Risk Assessment (SFRA):

Does the work provided to date accord with the advice contained within paragraphs 159-160 of the Framework?

According to the letter of 10 November 2023 from the Council (COUDO002) the Council have been asked to update the SFRA Level 1 Assessment. What is the reason for this?

Does the modelling work undertaken appropriately address all of the possible sites within the relevant flood zones? If not why not?

Is there a SoCG with the Environment Agency? If not, this should be submitted with the hearing statement.

2.5 No representations were made on community involvement matters at regulation 18 or regulation 19 stage and no further submissions are made in this regard.

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In what way has the Council complied with the requirements of section 19(3) of the 2004 Act and Regulations 18 and 19 of the Town and Country Planning (Local Planning (England) Regulations 2012 with regard to conducting consultation in accordance with their statement of community involvement (SCI)?

- 2.6 No representations were made on community involvement matters at regulation 18 or regulation 19 stage and no further submissions are made in this regard.

3. Issue 2: Are the likely environmental, social and economic effects of the Plan adequately and appropriately assessed by the Habitats Regulations Assessment (HRA) and the Sustainability Appraisal (SA)?

Is the Sustainability Appraisal (SA) adequate in terms of:

- *its assessment of the likely effects of the Plan's policies and allocations,*
- *the consideration of reasonable alternatives, and*
- *Giving clear reasons for the preferred approach, explaining why the preferred strategy and policies were selected? (This issue relates to the legal compliance of the SA and HRA only and questions concerning the detail of the SA, outcomes and how it has informed the selection of the spatial strategy will be considered under matter 2).*

- 3.1 Paragraph 35 of the National Planning Policy Framework outlines the tests of soundness which the plan will be assessed against. In order to be considered 'Justified' plans must represent *an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.*
- 3.2 The Regulation 18 (Options Consultation 2019) document took place in light of the increase in the housing requirement to 623dpa under the Government's standard methodology. A total of five options were presented as part of this document.
- 3.3 **Option 1 – intensify urban area.** This would deliver the number of homes required but would involve significantly increase densities in urban areas and would involve developing on open spaces such as allotments and playing fields.
- 3.4 **Option 2 – optimise urban area and three areas of Green Belt release.** This option would not meet the housing need but would optimise densities and remove some areas of land from the Green Belt.
- 3.5 **Option 3 – optimise urban area and large Green Belt release.** This would deliver the number of homes required and would be able to help other LPAs within the HMA meet their housing targets.
- 3.6 **Option 4 – optimise urban area.** This would not meet the housing need, unlike Option 1.
- 3.7 **Option 5 – optimise urban area and small areas of Green Belt release.** This option would deliver the number of homes required whilst only resulting in a 6% loss of land from the Green Belt. The areas of land identified for release from the Green Belt included areas which either performed weakly against the purposes or were not essential for the Green Belt to work properly or were not (or only partially) affected by absolute constraints which would prevent development from coming forward.
- 3.8 Wood Lark Farm was previously identified within the Regulation 18 Consultation Draft Local Plan within Options 3 & 5 as site reference GB31. Wood Lark Farm was also further assessed as being one of only 12 of the 33 Green Belt sites identified in Option 5 to be carried forward to Option 5A as detailed in the Sustainability Assessment below.
- 3.9 Table 8 of the Sustainability Appraisal (SA) (June 2022) for regulation 19 sets out the decision-making criteria for assessing the 2019 options (as set out above):

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Criterion (most significant criteria in bold)	Option 1	Option 2	Option 3	Option 4	Option 5
Meets housing need (623 per year, total 9345)	Yes	No	Yes	No	Yes
Meets housing need (641 per year, total 9615)	No	No	Yes	No	No
Number of new homes	9,345	6,800	16,300	5,300	9,400
Can help neighbouring authorities to meet their housing needs	No	No	Yes	No	No
Does not need neighbouring authorities to help meet Elmbridge's housing need	Yes	No	Yes	No	Yes
Does not require Green Belt release	Yes	No	No	Yes	No
Amount of Green Belt release – ha (%)	0 (0%)	188 (3%)	2,920 (53%)	0 (0%)	366 (7%)

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Green Belt boundaries remain fit for purpose	Yes	Yes	No	Yes	Yes
Overall sustainable (from Table 7)	No	Yes	No	Yes	Yes
Suitable accessible natural greenspace (SANG) requirement – ha from 2019 Habitats Regulation Assessment	14.7ha	30.7ha	118.3ha	14.9ha	37.1ha
Provides a site large enough for suitable accessible natural greenspace (SANG)	No	No	Yes	No	Yes
Does not require high densities, i.e. doubling current density rates	No	Yes	Yes	Yes	Yes
Optimises development sites	No	Yes	Yes	Yes	Yes
Does not require relocating open space into Green Belt	No	Yes	Yes	Yes	Yes
Includes larger sites	No	Yes	Yes	No	Yes
Community support from 2019 options consultation	No- 2%	No- 2%	No- 1%	Yes- 85%	No- 5%

- 3.10 It is evident from this extract that while reasonable alternatives were indeed evaluated within the SA, the manner in which they were assessed raises significant concerns. The assessment of community support for these alternatives is deemed inappropriate and unjustified as a criterion for evaluating the suitability of spatial options for the Local Plan and any alternatives. Despite this, it is apparent from Table 8 that community support played a crucial role in the Council's decision-making process regarding which options should be further explored in detail.

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- 3.11 The SA indicates that additional efforts were made through the land availability assessment (LAA). However, the SA lacks clarity regarding the specific tasks carried out during this process, and there is a lack of detail provided regarding the methodology or findings, aside from the identification of shortlisted sites highlighted in Option 5a, of which Wood Lark Farm was one. Table 9 of the SA subsequently presents the performance of all the sites included in option 5 against the SA objectives.

Table 9: SA of Green Belt sites in Option 5 (sites considered to be most sustainable, and so included in Option 5A, are shown in blue)

Sites	1. Homes	3. Heritage	4. Accessibility	5. Previously Developed Land	6. Economic Growth	7. Employment	11. Flooding	12. Water	13. Land	14. Pollution	15. Landscape	16. Biodiversity
GB1- Land NE of Waterside Drive, Walton	++	0	0	-	0	0	0	+	0	+	0	-
GB2- Land S of Ruxley Crescent, Claygate	+	0	-	-	+	0	0	+	-	0	-	-
GB3- Pains Hill Farm, Cobham	+	0	-	0	+	+	0	+	++	0	-	-
GB4- Land S of Randolph Close, Stoke D'Abernon	+	0	-	-	+	0	-	+	-	+	-	-
GB5- Esher Rugby Club, Walton	++	0	+	0	+	0	-	+	++	+	-	-
GB7- Land S of Arbrook House, Esher	++	-	0	0	+	0	0	-	++	+	-	-
GB17- Land NE of Horrington Farm, Claygate	+	0	0	0	+	0	0	+	-	-	-	-
GB18- Land N of Island Barn Reservoir	++	0	0	-	0	0	-	0	++	0	0	-
GB19- Land E of Danes Way, Oxshott	++	0	-	-	+	0	0	+	++	+	-	-
GB20- Hillview Nursery, Seven Hills Road, Walton	0	0	-	++	+	+	0	+	++	+	-	+
GB21- Land at Imber Court	++	0	0	0	+	0	0	+	++	+	0	-
GB23 – Land S of Waterside Drive, Walton	++	0	+	0	+	0	0	+	0	+	0	-
GB24- Land S of Esher Sewage Works, Esher	++	0	0	0	0	0	-	0	++	+	0	-
GB25- Land N of A309, Woodstock Lane N, Long Ditton	++	0	-	0	-	?	0	0	+	-	-	-
GB26- Land south of Holroyd Road, Claygate	+	0	-	-	+	0	0	+	-	0	-	-
GB27- Land E of Telegraph Ln, Claygate	+	0	0	-	+	0	-	+	+	+	-	-
GB29- Land W of Slough Farm	++	0	0	-	+	0	-	0	++	+	-	-
GB31- Land N of Woodlark Farm, Hersham	+	0	+	-	++	0	0	+	++	+	0	-
GB33- Land S of Hillcrest Gardens, Esher	+	0	0	-	+	0	0	+	++	+	-	-
GB35- Land E of Claygate House	+	0	+	0	+	0	-	+	++	+	0	-
GB41- Land NW of	++	0	0	-	0	0	0	+	++	0	-	-

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Sites	1.Homes	3.Heritage	4. Accessibility	5.Previously Developed Land	6. Economic Growth	7. Employment	11. Flooding	12.Water	13. Land	14.Pollution	15.Landscape	16.Biodiversity
Queen Eliz. II reservoir, Walton												
GB42- Land NW of Anvil Lane, Cobham	+	-	0	-	+	0	-	+	++	+	-	-
GB46- Land E of Blundel Lane & S of Waverley Rd	++	0	-	-	0	0	0	+	-	+	-	-
GB48- Land W of Stoke D'Abernon train station	0	-	-	0	0	0	-	+	-	+	-	-
GB49- Land S of Lammas Lane	++	0	0	0	++	0	0	0	++	+	0	-
GB50- Land at Arran Way, Esher	++	?	+	-	+	-	-	0	++	+	0	-
GB51- Land at Hersham Golf Course	++	0	+	0	+	?	-	+	-	+	-	-
GB58- Horrington Farm, Claygate	++	-	-	0	+	0	0	+	++	+	-	-
GB62- Land at and S of Burhill School, Hersham	+	0	++	0	++	0	0	+	++	+	0	-
GB63- Loseberry Farm, Claygate	++	0	+	0	+	0	0	+	+	+	-	-
GB64- Land at Moore Place Golf Course, Esher	++	-	0	0	+	0	0	+	++	+	0	-
GB65- Land at Chippings Farm & Fairmile, Cobham	++	-	0	-	0	?	0	+	-	0	-	-
GB67- Land W of Blundel Lane, Cobham	++	0	-	-	0	0	0	+	-	+	-	-

3.12 Two additional sites were introduced after further information became available about their availability during the 2019 consultation.

Sites	1.Homes	3.Heritage	4. Accessibility	5.PDL	6.Economic Growth	7.Employment	11. Flooding	12.Water	13. Land	14. Pollution	15. Landscape	16.Biodiversity
Café Rouge and land to north, Esher	+	-	+	-	+	0	0	+	++	+	-	-
Weylands Old Treatment Works ¹²	0	0	0	0	++	+	0	0	++	+	0	-

3.13 The sites highlighted in blue (to include Wood Lark Farm as reference GB31) were incorporated into an option 5a which removed the 33 least sustainable sites.

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- 3.14 We would agree with the assessment that Wood Lark Farm is one of the most suitable sites identified in this process to be selected for allocation as demonstrated by the positive response to the pre-application in December 2019.
- 3.15 The SA then goes on to set out the alternative options of; 4a (Urban Area Only), option 5a (Urban area and 12 small parcels of green belt) or option 6 (Urban area and intensify development around town and village centres and train stations). As above, Option 5a contained Wood Lark Far as site reference GB31. These options are summarised in table 11 of the SA:

SA Objective	Option 4a: Urban area only	Option 5a: Urban area and 12 small parcels of G/B	Option 6: Urban area and intensify development around town and village centres and train stations.
	Using sites from LAA 2021 with non-implementation discount applied	Using sites from LAA 2021 with non-implementation discount applied and 12 sites from the Green Belt.	
	6988 homes	9328 homes	9689 homes
1. Homes	--	+	-
2. Health	+	+	+
3. Heritage	?	?	?
4. Accessibility	+	+	++
5. Previously developed land	+	+	++
6. Economic growth	?	?	?
7. Employment	-	-	-
8. Energy Use	-	-	-
9. Natural Resources	-	-	-
10. Climate Change	-	+	-
11. Flooding	-	-	-
12. Water	-	-	-
13. Land	+	-	+
14. Pollution	-	-	-
15. Landscape	++	-	++
16. Biodiversity	+	-	+

- 3.16 The Council selected option 4a as the preferred spatial strategy at a Council meeting on 13 June and the plan proceeded to examination on this basis.
- 3.17 It is noted that no conclusion was reached in respect of Economic Growth with the reason set out in paragraph 3.71 of the SA as follows:
- Unknown scores are also given to SA objective 6: Economic growth as all three-options support economic growth but do not allocate land due to the uncertainty in the market for premises.*
- 3.18 That may be the case for employment land allocations but it is clear that the impact on economic growth of not meeting housing need in full has not been properly assessed nor did it have any influence on why

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option 4a was selected. It is clear that members of the Council did not have this information provided at the time they made their decision to proceed with option 4a in June 2022.

- 3.19 The SA also lacks conclusions in respect of heritage. The Heritage Impact Assessment Selection Methodology (ENV006) was released in August 2023 after the submission of the local plan and shows significant heritage constraints around the remaining allocated sites. This shows that a significant impact of the spatial options has not been assessed at the correct time and information in this regard not properly assessed through the SA process. Furthermore, information in respect of heritage impact was not available to members at the point that the preferred spatial strategy was selected.
- 3.20 It is therefore clear that the Council made a decision on which spatial approach to adopt within the final local plan without a full and considered assessment of the impacts of that approach upon the key criteria of the sustainability appraisal.
- 3.21 The planning practice guidance sets out detailed consideration as to how any sustainability appraisal should assess alternatives and identify likely significant effects:

The sustainability appraisal needs to consider and compare all reasonable alternatives as the plan evolves, including the preferred approach, and assess these against the baseline environmental, economic and social characteristics of the area and the likely situation if the plan were not to be adopted. In doing so it is important to:

- outline the reasons the alternatives were selected, and identify, describe and evaluate their likely significant effects on environmental, economic and social factors using the evidence base (employing the same level of detail for each alternative option). Criteria for determining the likely significance of effects on the environment are set out in schedule 1 to the Environmental Assessment of Plans and Programmes Regulations 2004;*
- as part of this, identify any likely significant adverse effects and measures envisaged to prevent, reduce and, as fully as possible, offset them;*
- provide conclusions on the reasons the rejected options are not being taken forward and the reasons for selecting the preferred approach in light of the alternatives. Any assumptions used in assessing the significance of the effects of the plan will need to be documented. Reasonable alternatives are the different realistic options considered by the plan- maker in developing the policies in the plan. They need to be sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made. The development and appraisal of proposals in plans needs to be an iterative process, with the proposals being revised to take account of the appraisal findings.*

Paragraph: 018 Reference ID: 11-018-20140306

Revision date: 06 03 2014

- 3.22 For the reasons set out, it is clear that reasonable alternatives were identified as part of the local plan process, however, it is equally clear that the decisions on pursuing spatial strategy options were not fully considered as part of the SA process and this led to an erroneous and misguided site selection process as a result.

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Has the SA been undertaken as an iterative process to inform the Local Plan preparation, with reference to the flowchart contained within the Planning Practice Guidance?

- 3.23 The SA flowchart within the Planning Practice Guidance shows the stages of the SA process and includes developing and evaluating reasonable alternatives. It is recognised that reasonable alternatives were identified but for the reasons set out they were not properly assessed.
- 3.24 It was clear as part of the process in the selection of a preferred spatial strategy option that this would not meet the identified housing requirement.
- 3.25 The PPG sets out the process that the Council should have gone through in this scenario.

What happens if the assessment indicates that there are insufficient sites / broad locations to meet needs?

When preparing strategic policies, it may be concluded that insufficient sites / broad locations have been identified to meet objectively assessed needs, including the identified local housing need.

In the first instance, strategic policy-making authorities will need to revisit their assessment, for example to carry out a further call for sites, or changing assumptions about the development potential of particular sites to ensure these [make the most efficient use of land](#). This may include applying a range of densities that reflect the accessibility and potential of different areas, especially for sites in town and city centres, and other locations that are well served by public transport.

If insufficient land remains, then it will be necessary to investigate how this shortfall can best be planned for. If there is clear evidence that strategic policies cannot meet the needs of the area, factoring in the constraints, it will be important to establish how needs might be met in adjoining areas through the process of preparing [statements of common ground](#), and in accordance with the [duty to cooperate](#). If following this, needs cannot be met then the plan-making authority will have to demonstrate the reasons why as part of the plan examination.

Paragraph: 025 Reference ID: 3-025-20190722

Revision date: 22 07 2019

- 3.26 There is no evidence that the Council went back through the assessment process to revisit assumptions made as part of the LAA process to explore whether sites could deliver housing. In fact, the Council has produced further work which further confuses its position on not taking sites forward but this was provided after the Local Plan was submitted for examination and on the request of the Inspector. GB Site Assessment Proformas – Sites considered for release under spatial strategy option 5a– 2021) is dated 2021 but was uploaded onto the Examination Portal on 10 November 2023 but is dated 2021.
- 3.27 Wood Lark Farm is referenced within this document as SA-45. The conclusion sets out that the land parcel could be considered for a release from the Green Belt designation together with the land parcel at SA-47 and further that “the exceptional circumstances exist to enable the release of the land parcel from the Green Belt”.
- 3.28 This summary is bolstered by the conclusions of our December 2019 pre-application which confirmed that subject to the Green Belt designation being removed, the proposal for 80 units on the site is considered acceptable.

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- 3.29 However despite the above, Wood Lark Farm has not been selected in the Local Plan for a housing allocation.
- 3.30 Overall, it is not considered that the Council has undertaken an iterative process in relation to the SA and specifically the site selection process. Further representations will be made to the inspector in later hearing sessions but it is clear that the plan is not justified or effective in this regard and is unsound on this basis alone.

The HRA and Suitable Alternative Natural Greenspace (SANG) Options Assessment (ENV010) advises that there is enough SANG capacity for the first 10 years of the Plan however an additional 7.5ha of land provision will be required for years 11-15. Reference is made to the possibility of two feasibility options – the extension of Esher Common SANG and the Effingham Common SANG (within Guildford Borough Council).

- *What is the status of both of these options? Are these conclusions now superseded by the SANG Options Assessment, September 2023 (ENV011) which refers to the identification of Land at Field Common, Hersham?*
- *How does the Council intend to address this shortfall ?*
- *Overall, does the Plan provide for an acceptable approach to the provision of SANG for the Plan Period?*

- 3.31 No comments.

The HRA concludes that the Plan will not result in adverse effects on the Thames Basin Heaths SPA regarding atmospheric pollutants. With regards to the air quality modelling work which has been undertaken, ENV003 Air Quality Assessment refers to the assessment of 3 different growth scenarios – 2037 Baseline, 2037 Urban Growth Strategy (Elmbridge Local Plan) and 2037 Urban Growth Strategy with mitigation (Elmbridge Local Plan with a range of transport measures incorporated). Where in the evidence does it set out what is included for the urban growth scenarios and what are the transport measures referred to in the last scenario?

- 3.32 No comments.

4. Issue 3: Whether the Council has complied with the other relevant procedural and legal requirements.

Chapter 4 of the Plan sets out a number of policies which have been identified to address climate change (CC1, CC2, CC3, CC4 and CC5). In what way will these policies ensure that the development and use of land in the Borough contributes to the mitigation of, and adaptation to, climate change?

- 4.1 No representations were made in response to this matter as part of the regulation 18 or regulation 19 consultation and no further submissions are made in this regard.

In what ways does the Plan seek to ensure that due regard is had to the aims expressed in s149 of the Equality Act 2010 in relation to those who share a 'protected characteristic'?

- 4.2 No representations were made in response to this matter as part of the regulation 18 or regulation 19 consultation and no further submissions are made in this regard.

Is the Plan clear in identify strategic and non-strategic policies? Does the Plan need to be more explicit in this regard? (Noting COUD002 sets out the Council's initial views in relation to this matter).

- 4.3 No representations were made in response to this matter as part of the regulation 18 or regulation 19 consultation and no further submissions are made in this regard.

The key diagram at page 26 of the Plan identifies 3 broad locations for development – Whiteley Village, Brooklands College and Lower Green as set out at policy SS3.

- *Are these the broad locations for development as envisaged by paragraph 23 of the Framework?*
- *Does the key diagram sufficiently illustrate the broad distribution of development across the Plan area?*
- *There does not appear to be any corresponding allocations in relation to these 3 broad locations for development. Is this correct? Does this present a justified and effective approach?*

- 4.4 No representations were made in response to this matter as part of the regulation 18 or regulation 19 consultation and no further submissions are made in this regard.

Do the proposed changes to the policies map correctly illustrate geographically the application of the policies within the Plan?

- 4.5 No representations are made on this matter.

Paragraph 1.2 of the Plan advises that once adopted, the Local Plan will replace the 2011 Core Strategy and 2015 Development Management Plan and a cross reference is made to appendix A1. However, appendix A1 of the submitted Plan only refers to the Core Strategy policies and makes no reference to the Development Management Plan. The Council have provided an update to this in the form of appendix 4 attached to COUD002 and are requested to confirm this will be addressed as a modification to the Plan.

- 4.6 No representations are made on this matter.

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Is the Plan compliant with the Council's Local Development Scheme in relation to its form, scope and timing? What is the role of purpose of the SPD on the TBHSPA referred to within the LDS?

4.7 No representations are made on this matter.

5. Conclusion

- 5.1 These representations set out the failings in the Sustainability Appraisal process for the Local Plan. It is submitted that, whilst reasonable alternatives were identified, the Council failed to properly assess these through the SA process and as a result the selection of the most appropriate spatial strategy, and individual sites, is fundamentally flawed.
- 5.2 This leads to issues of soundness through the lack of an effective or justified spatial strategy.
- 5.3 Levanter Developments, as Promoters of Wood Lark Farm, have consistently made their intentions for redevelopment of the site clear and have entered into pre-application discussions with the Council in this regard. The Council themselves have identified that “the exceptional circumstances exist to enable the release of the land parcel from the Green Belt”.
- 5.4 Levanter Developments will continue to make representations throughout the local plan process for the redevelopment of Wood Lark Farm to take place.