1. List of Parties involved:

- Crawley Borough Council (CBC)
- Mole Valley District Council (MVDC)

2. Signatories:



25.01.21

Crawley Borough Council Councillor Peter Smith, Cabinet Member for Planning and Economic Development

Man

22.01.21

Mole Valley District Council Councillor Margaret Cooksey, Cabinet Member for Planning

3. Strategic Geography

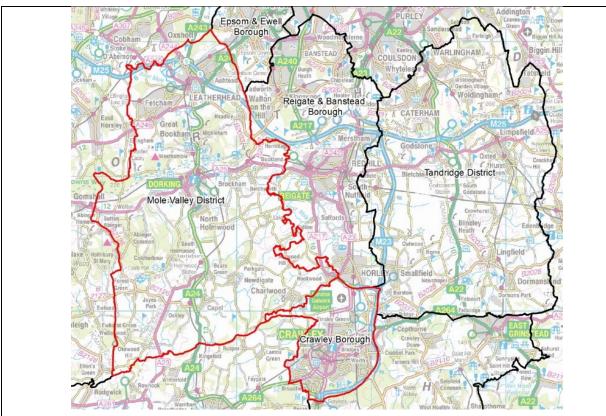
The Statement of Common Ground (SOCG) covers the local authority areas of Crawley Borough Council (CBC) and Mole Valley District Council (MVDC) and is a sound basis for cooperation on strategic cross boundary matters identified in this SOCG.

Crawley and Mole Valley share a common boundary across the Surrey/West Sussex county border. Areas of Metropolitan Green Belt and Gatwick Airport, and associated safeguarded land, separate the main settlements in each of the authority areas.

Although the two local authorities lie within separate Housing Market Areas (HMAs), it is beneficial to prepare a SOCG to deal with the strategic and locally specific cross boundary issues identified in this SOCG.

Both authorities also lie in separate Functional Economic Market Areas (FEMAs). However, both authorities are located within the Gatwick Diamond sub-region and within the Coast to Capital Local Enterprise Partnership (LEP) Area.

The map below shows the authorities in relation to each other (i.e. indicated with the red administrative boundaries).



A scale map of the Gatwick Diamond Authorities is provided in Appendix A.

4. Strategic Matters

Both parties have a collective and shared view of the long term priorities and have identified specific strategic objectives:

- → to work collaboratively on Housing Need including affordable housing across two Housing Market Areas;
- → to establish a common understanding of the employment land requirement and the economic development impact of COVID-19 on the area, notwithstanding that the local authorities lie within two distinct and separate FEMAs;
- → to continue and develop the existing shared approach to Gatwick Airport, having regard to its economic and social benefits, and also its environmental impacts including those relating to air quality, noise pollution, and surface access;
- → to work jointly to mitigate traffic impacts arising from developments, in conjunction with Surrey County Council Highways, where necessary;
- ightarrow to establish a common and agreed position on secondary education;
- $\rightarrow\,$ to identify and develop opportunities for health provision if required through evidence; and
- ightarrow to develop an agreed position on cross boundary flooding impacts.

Background information and context to support the above strategic objectives is set out in Appendix B. **Agreements** reached for each of the matters are set out below:

Housing Need

The parties agree:

1. A robust and appropriate Strategic Housing Market Assessment has been completed for each local authority.

- 2. Crawley Borough is located in the Northern West Sussex (NWS) Housing Market Area.
- 3. Mole Valley District is located in the Kingston and North East Surrey Housing Market Area.
- 4. Each authority has assessed the ability of its area to accommodate housing development. They each consider that they are doing the maximum reasonable to meet the housing needs.
- 5. Where each party cannot meet its housing need within its own boundary, it should first prioritise working collaboratively with authorities within its HMA to address the identified housing need.
- 6. As each authorities' respective housing supply or updated housing market evidence is completed, the findings will be shared between the councils.
- 7. Due to the need to undertake site-specific exceptional circumstances testing to determine whether it is appropriate for individual sites to be released from the Green Belt, it is not currently considered possible to meet any of Crawley's housing needs within Mole Valley.
- 8. CBC is not in a position to meet any unmet housing need that may arise from further work for the Mole Valley district.
- 9. They will seek to meet their own need for additional Traveller provision.

Employment and economic development

The parties agree:

- 10. Crawley Borough Council is located within the Northern West Sussex Functional Economic Market Area.
- 11. Mole Valley is located within its own Functional Economic Market Area and the district is not identified as having influential economic connections with NWS authorities.
- 12. A robust Economic Growth Assessment has been undertaken to identify the employment land requirement for Crawley, and an appropriate economic strategy, including a proposed new strategic employment location, is planned to meet this need within Crawley's boundary.
- 13. As any updated economic evidence is completed, the findings will be shared between the councils.

Gatwick Airport

The parties agree:

- 14. Land continues to be required to be safeguarded for a potential future southern runway at Gatwick Airport.
- 15. Airport related parking should be located on-airport as the most sustainable location, and should be justified by a demonstrable need in the context of proposals for achieving a sustainable approach to surface transport access to the airport.
- 16. Each authority will work collaboratively with Gatwick Airport, the other Gatwick local authorities and the LEP to:
 - understand and respond to the impacts of the current economic crisis; and
 - understand the implications of the proposed Northern Runway Nationally Significant Infrastructure Project (NSIP) on the environment, community and economy, and to respond to the Development Consent Order (DCO) application.
- 17. They will work with the Gatwick Officers Group and the Gatwick Joint Local Authorities, as agreed in the Memorandum of Understanding (MOU) supporting the Gatwick S106 Legal Agreement, to share expertise on airport related matters including noise, air quality and parking.

Education

The parties agree:

18. Planning for education will require discussions across the three authority areas (MVDC, CBC, RBBC), involving the County Councils and the Department for Education.

Health

The parties agree:

19. Planning for health provision will require discussions across the two authority areas (MVDC, CBC), involving the Clinical Commissioning Groups (CCGs).

Flooding

The parties agree:

20. Given flooding in Hookwood and the River Mole running beneath Gatwick Airport, cross boundary flooding matters will be worked on at a strategic mitigation level.

Strategic Sites – Transport

The parties agree:

- 21. Where development with strategic transport implications is proposed close to the authorities' common administrative boundary, the authorities will work together to establish a joint planning policy position to support positive and sustainable development management and maximise infrastructure and sustainability benefits.
- 22. They will jointly explore opportunities for transport improvements through discussions with Surrey and West Sussex County Councils and Reigate and Banstead Borough Council.

5. Governance Arrangements

The authorities are committed to working positively together, sharing information and best practice and continuing to procure evidence jointly, where appropriate, throughout the plan preparation phase and beyond. This co-operation and collaboration takes place at senior member, chief executive and senior officer as well as at technical officer level.

Joint working will include the following existing governance arrangements:

- Gatwick Diamond Authorities Partnership;
- Gatwick Greenspace Partnership; and
- Gatwick Joint Local Authorities Group and Gatwick Officers Group.

In addition, a potential new cross boundary arrangement with education and health involvement will be explored.

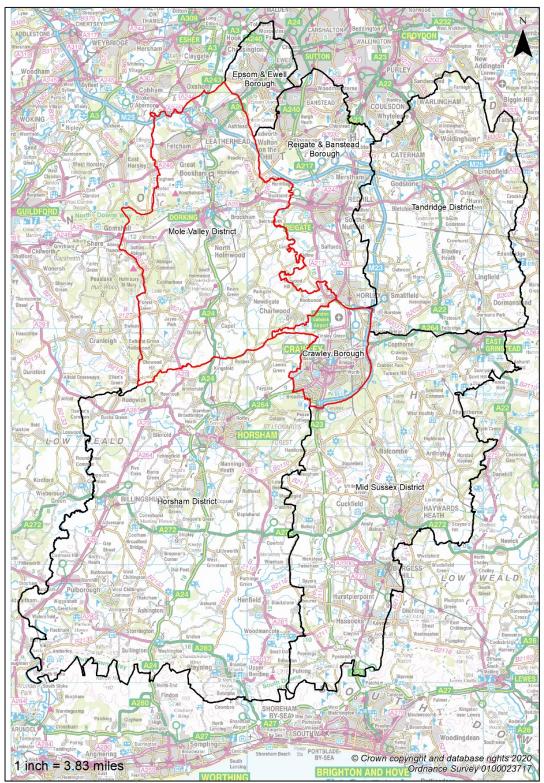
This Statement of Common Ground is signed at planning portfolio holder member level and will be reviewed at each key stage of plan-making. It will be updated to reflect progress made through effective cooperation.

In terms of governance, the authorities agree:

- 23. to continue to work with the other Gatwick Diamond authorities on housing, employment and other strategic issues affecting the Gatwick Diamond as a whole;
- 24. to work collaboratively on plan preparation and evidence, whilst acknowledging others' timetables and timescales.
- 25. to respect each other's right to develop their own plans that fit the specific circumstances of the local authority's communities;

- 26. to meet at member and officer level to review the situation and respond to new issues and changing circumstances; and
- 27. to update this SoCG as progress continues through the preparation of the local plans and development plan documents for each of the authorities.

6. Timetable for review and ongoing cooperation						
LPA	Present Plan Adoption	Proposed Plan Review Date	Reg.18 Date	Target Reg.19 Date	Target Submission Date	
Crawley	Dec 2015	2019 - 2021	July 2019	Jan 2020/Jan 2021	Mar 2021	
Mole Valley	2009	2020 - 2022	Feb 2020	June 2021	Sept 2021	1



APPENDIX A - GATWICK DIAMOND AUTHORITIES

APPENDIX B: BACKGROUND SUPPORTING CONTEXT

Crawley is a land-constrained borough, due to its tight administrative boundaries, the requirement to 'safeguard' land south of Gatwick Airport for a potential southern runway, and physical constraints such as aircraft noise, flooding, nature conservation and there being few infill opportunities due to planned nature of the New Town. Therefore, there is very limited land within the borough that is suitable, available and achievable for accommodating further development.

Mole Valley is also heavily constrained due to 75% of the district falling within the Metropolitan Green Belt. Development in the district is also constrained by landscape and environmental designations, including the Surrey Hills Area of Outstanding Natural Beauty (AONB), which, together with Area of Great Landscape Value, covers about 45% of the district, and the Mole Gap to Reigate Escarpment Special Area of Conservation (SAC). As with Crawley, Mole Valley is also constrained by areas prone to flooding and aircraft noise contours associated with Gatwick Airport.

Despite being adjacent authorities, links between the two areas are limited. This is due to weak transport links as well as the large area of Green Belt and Gatwick Airport, and associated safeguarded land, separating the main settlements. These physical barriers contribute to Crawley and Mole Valley each operating in a separate Housing Market Area (HMA) and Functional Economic Market Area (FEMA).

The authorities work with partners in the wider 'Gatwick Diamond'¹ area to address strategic planning issues. The aim of this work is to promote the continued prosperity of the Gatwick Diamond and plan for its future growth. As part of this wider area, the authorities have worked on and signed up to the Gatwick Diamond Memorandum of Understanding and Local Strategic Statement², which was reviewed and updated in 2016.

Officers and Members from the authorities meet regularly to discuss issues related to the operation, growth and development of the airport including its master plan, air quality and noise issues, on and off airport parking and surface access. This discussion is secured by way of a S106 legal agreement between CBC, WSCC and Gatwick Airport Limited, with a commitment to joint working between the Gatwick Local Authorities set out within an accompanying Memorandum of Understanding. The authorities are also working collaboratively with regard to the Airport's ongoing Development Consent Order (DCO) application relating to the operational use of the northern 'standby' runway, and to consider the economic impacts of the Covid-19 pandemic, given its significance for the aviation and related sectors.

Effective outcomes of this joint working includes:

• success at planning appeals across boundaries;

² Which can be accessed from each of the Gatwick Diamond Authorities' websites:

Crawley - https://crawley.gov.uk/planning/planning-policy/planning-policy-evidence/gatwick-diamond-localstrategic-statement

¹ Crawley Borough Council, Epsom and Ewell Borough Council, Horsham District Council, Mid Sussex District Council, Mole Valley District Council, Reigate and Banstead Borough Council, West Sussex County Council, Surrey County Council and Tandridge District Council

- securing financial contributions and commitments from the airport to increase the modal share of passengers and staff accessing the airport by sustainable transport, supporting major schemes like Gatwick station improvements and smaller improvements to public transport services; and
- financial support for the monitoring of air quality and noise impacts associated with the airport.

The authorities participate as members of the Gatwick Greenspace Partnership³. Gatwick Greenspace is a community project managed by Sussex Wildlife Trust as one of its "Living Landscape Projects" to benefit people, wildlife and the countryside between Horsham, Crawley, Horley, Reigate and Dorking.

Strategic Matters

The specific strategic matters which the authorities have determined are relevant across the administrative boundaries are:

- → housing need, including overall housing need, affordable housing need and the needs for specialised housing;
- → employment and economic development, including economic development needs and Gatwick Airport;
- → strategic sites and/or sites on the boundaries between authorities and specific aspects of infrastructure development, including transport, flooding, water supply and waste water treatment, education and health; and
- → environmental impacts, including flooding, and airport-related air quality and noise pollution.

These have been refined into the detailed strategic objectives.

Housing Need:

Crawley's submission Local Plan confirms that the government's Standard Methodology for calculating housing need results in a total housing need for the plan period (2021-2037) of 12,000 dwellings (based on 750 dwellings per annum).

The draft Crawley Local Plan identifies that the borough's land supply allows for almost half of this to be met on sites within the borough's administrative boundaries: a minimum totalling 5,320 dwellings. This equates to an annualised average of 332.5dpa.

This leaves a total unmet need figure of 6,680 dwellings (417.5dpa) to be accommodated within the wider housing market area, insofar as is consistent with the National Planning Policy Framework and delivery of sustainable development.

The land currently subject to safeguarding for future potential runway expansion to the south at Gatwick Airport has only limited opportunities for future housing development, even in a scenario where some or all of safeguarding were removed and a southern runway were not to be progressed. This is due to the noise contours associated with the existing

³ alongside Horsham District Council, Mid Sussex District Council, Reigate and Banstead Borough Council, Horley Town Council, Surrey County Council, West Sussex County Council, Sussex Wildlife Trust and Gatwick Airport Limited.

runway, which the Regulation 19 Local Plan finds to be unacceptable where noise exposure is greater than 60dB. This limits the extent of development to the north of the existing Built-Up Area Boundary for Crawley to small pockets under the existing 60dB noise levels.

Crawley lies within the Northern West Sussex (NWS) Housing Market Area (HMA), which also includes Horsham and Mid Sussex Districts, and across which there is already longestablished, effective joint working. Crawley's unmet housing need established from the adopted Local Plan is being addressed by the combined adopted Local Plans within the NWS HMA. Currently, the adopted Local Plans for Horsham and Mid Sussex are anticipated to provide an additional 3,150 dwellings, predominantly to meet Crawley's unmet needs, above their objectively assessed housing needs, over the period from 2021. However, it is acknowledged that through Local Plan Reviews this is likely to change, particularly as the Standard Method increases the housing needs within these districts above those established in the adopted Plans.

Mole Valley does not form part of the NWS HMA. This has been confirmed through the most recent Northern West Sussex Strategic Housing Market Assessment (SHMA⁴), which reiterates that the Crawley, Horsham and Mid Sussex continue to represent the geographic extent of the NWS HMA. The 2016 Strategic Housing Market Assessment for Kingston upon Thames and North East Surrey Authorities⁵ confirmed that Mole Valley forms a coherent and self-contained HMA with the adjacent boroughs of Elmbridge, Epsom and Ewell and Kingston upon Thames. The SHMA further recognises that there are "strong linkages" between the Kingston and NE Surrey HMA and surrounding authorities, particularly to the south, and that these linkages should be taken into account in developing policy. However, in view of significant subsequent national methodological and policy changes, together with the publication of Mole Valley District Council Housing Strategy 2020 to 2025, consultants completed a SHMA in 2020 to update Mole Valley's housing market evidence.

The draft Future Mole Valley Local Plan confirms MVDC cannot meet its own housing need on brownfield land and/or within the district's existing built-up areas. At this stage, Mole Valley has not identified any opportunities for part of its housing need to be met by neighbouring local authorities. Therefore, having fully explored all other reasonable options for meeting the district's housing need, it has been identified at a strategic level that exceptional circumstances may exist for MVDC to consider some degree of change to Green Belt boundaries. The extent of any such changes remains under consideration. Further work will include the application of exceptional circumstances tests on a site-by-site basis, alongside other relevant matters raised through Mole Valley's Regulation 18 consultation process. It remains possible that MVDC will conclude that local housing need cannot be met need in full and therefore there is an ongoing need to continue exploring cross-boundary options.

In accordance with paragraph 137c of the NPPF 2019, all other reasonable options for meeting housing need must be examined before concluding exceptional circumstances exist to justify changes to Green Belt boundaries. Therefore, where neighbouring authorities, particularly within the NWS HMA are not constrained by Green Belt, and are capable of

⁴ Northern West Sussex Strategic Housing Market Assessment (November 2019) Iceni <u>https://crawley.gov.uk/sites/default/files/documents/PUB354604.pdf</u>

⁵ <u>https://molevalley.gov.uk/sites/default/files/2020-05/SHMA%202016.pdf</u>

meeting their own housing needs, then this should be the first instance for exploring and accommodating unmet needs.

LPA	MHCLG LHN	Local Plan target	Plan status	Year	Plan period
Crawley	750	332.5	Reg.19 Consultation	2020	2021-2037
Mole Valley	453	449 ⁶	Reg.18 Consultation	2020	2020-2037
Totals	1,203	781.5			

- Affordable housing: The recent Strategic Housing Market Assessment for Crawley
 highlighted an affordable housing need emerging from the borough of a total of 739
 dwellings per year. Even with the council meeting the affordable housing plan target of
 40% for the housing delivery anticipated within the borough, this leaves a substantial
 amount of unmet affordable housing need arising and unmet. Viability evidence being
 prepared to support the Local Plan is highlighting the challenges in securing 40% for
 town centre and high density schemes (due to high existing land values and high costs
 for high rise development), leading to a reduction in the levels of affordable housing
 which can be required through such private market led schemes.
- The Mole Valley Strategic Housing Market Assessment 2020 update identifies an affordable housing need of 746 new homes per year and, in terms of housing mix, the greatest need is for 1- and 2-bedrooom market housing and 2- and 3-bredroom affordable housing. There is also a considerable need for older people's leasehold sheltered housing.
- Specialist housing: Due to Crawley's predominantly urban nature, with a high proportion of higher density residential schemes proposed, and the limited area of land around the existing Built-Up Area Boundary, with the exception of the land affected by aircraft noise constraints, there are limited opportunities for self-build to take place within the borough's administrative boundaries. The current number of individuals and groups on the council's Self- and Custom-Build Register is 90; of which 73 are Part 1 entries (i.e. those which satisfy local eligibility criteria) and a further 17 are Part 2 entries. Based on evidence of demand through the Self Build Register, it is expected that the necessary number of serviced plots to satisfy the demand in Mole Valley highlighted by the Register will come forward on small sites, single plots on infill sites and other windfall sites. It is anticipated that small windfall sites will play a key role in meeting this demand for self-builders.
- Gypsy, Traveller & Travelling Showpeople: In 2011, the Gatwick Diamond authorities (which include Crawley, Mid Sussex, Horsham, Tandridge, Reigate & Banstead and Mole Valley) agreed to seek to meet their own need for additional Traveller provision. As part of the Gatwick Diamond Authorities, the authorities meet to discuss matters including Traveller issues and share information. During preparation of MVDC's 2018 Gypsy and Traveller Accommodation Assessment, stakeholder engagement included consideration of any cross-boundary needs and no specific issues were identified which would change this approach. Similarly, this has continued also to be considered the case through the review of the Crawley Gypsy, Traveller and Travelling Showpeople Accommodation

⁶ Based on MVDC's Regulation 18 consultation draft Local Plan, which consults on potential site allocations that would meet MVDC's LHN in full. However, MVDC has not yet confirmed a Local Plan target and, as set out above, further evidence-gathering, including the application of a site-specific exceptional circumstances test, may lead to MVDC revising the Local Plan housing target at Reg. 19 stage.

Needs Assessment. The MVDC Assessment is currently being updated by the consultants to ensure the most up-to-date assessment of Gypsy and Traveller need is completed for the revised 2020-2037 plan period, as the Local Plan progresses to the submission stage.

Key objective	Working collaboratively on Housing Need including affordable housing across two Housing Market Areas.
 Relevant studies, intelligence or evidence base completed or to do 	 Northern West Sussex Strategic Housing Market Assessment (2019) Strategic Housing Market Assessment for Kingston upon Thames and North East Surrey Authorities (2016) Mole Valley District Council Gypsy and Traveller Accommodation Assessment (2018) Crawley Borough Council Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment (2020 Review) Mole Valley Strategic Housing Market Assessment – 2020 update completed Mole Valley Gypsy and Traveller Accommodation Assessment – Update – under preparation
Key conclusions from the evidence	 Crawley lies within the Northern West Sussex (NWS) Housing Market Area (HMA), which also includes Horsham and Mid Sussex Districts. Mole Valley forms a coherent and self-contained HMA with the adjacent boroughs of Elmbridge, Epsom and Ewell and Kingston upon Thames.
 Agreement that has been reached or progress made 	 The parties agree that each authority has assessed the ability of its area to accommodate housing development. They each consider that they are doing the maximum reasonable to meet the housing needs. Where each party cannot meet its housing need within its own boundary, it should work collaboratively with its neighbouring authorities within its HMA to address the identified housing need within the HMA as a first priority. The Gatwick Diamond authorities (which include Crawley, Mid Sussex, Horsham, Tandridge, Reigate & Banstead and Mole Valley) agreed to seek to meet their own need for additional Traveller provision.
• Any further actions / governance requirements etc.	 As each of the housing supply or updated housing market evidence is completed, the findings will be shared with between the councils.

Employment and Economic Development:

The Northern West Sussex Authorities are located within the wider economic areas of the Coast to Capital Local Enterprise Partnership and the Gatwick Diamond.

The NWS Economic Growth Assessment (EGA)⁷ concluded that NWS authorities (Crawley, Horsham and Mid Sussex) continue to operate as a broad functional economic market area (FEMA). The assessment also identifies that influential economic linkages also exist with Coastal West Sussex, Reigate and Banstead (e.g. Horley) and East Sussex.

As identified through the Crawley Focussed EGA Update (September 2020), there is need for a minimum of 38.7ha new business land in the borough for the period to 2036. This need is significantly within the industrial sectors (32.8ha), with office needs accounting for 5.9ha of the total. Crawley's Employment Land Trajectory (September 2020) identifies an available employment land supply pipeline of 17.6ha, which comprises 8.8ha office land and 8.7ha industrial land. This supply is sufficient to meet Crawley's quantitative office needs in full, though there is only sufficient land to meet industrial needs in the early part of the Plan period, resulting in a shortfall of 24.1ha industrial land, principally within the B8 storage & distribution sectors. Therefore, to meet Crawley's outstanding employment needs in full, an industrial-led Strategic Employment Location is allocated at Land East of Balcombe Road and South of the M23 Spur, referred to as Gatwick Green.

Mole Valley is not included within the NWS FEMA nor is the district identified as having influential economic connections with NWS authorities. Its Economic Development Needs Assessment (2017) establishes that the FEMA is Mole Valley Local Authority. In May 2016, the authority consulted neighbouring authorities who confirmed that Mole Valley was not included within their sphere of economic influence. Mole Valley is not included within the NWS FEMA nor is the district identified as having influential economic connections with NWS authorities.

The MVDC Economic Development Needs Assessment confirms that the identified economic development needs of the FEMA to 2033 can largely be met through the currently available and planned floorspace and better utilisation of existing sites in the District. However, as a period of economic uncertainty is entered, adaptability and flexibility in land allocation policy will be key to fulfilling the economic potential of the District. The Economic Development Needs Assessment has recently been updated to take account of additional monitoring data and the impact of the changes to the Use Class Order and Permitted Development Rights on future economic projections and patterns.

There are significant physical and policy constraints on development in the south eastern part of Mole Valley, adjacent to Crawley, which limit the potential for growth in this area. Transport links between Mole Valley and Crawley are weak, mainly comprising rural lanes with limited capacity. The only A-road connections are the A217 and A264/A24. The A217 reduces to a single carriageway north of the CBC boundary and serves only one small settlement (Hookwood) in Mole Valley before continuing north to Reigate. The A264/24 is far from a direct route; the A264 lying to the south of Crawley and connecting to the A24 some 5km south of Mole Valley's boundary. Public transport connections are also weak, with only limited bus services in the rural parts of southern Mole Valley. Gatwick Airport is a major constraint, both in physical terms and in terms of the consequences of air traffic on

⁷ Northern West Sussex Economic Growth Assessment (January 2020) Lichfields <u>https://crawley.gov.uk/sites/default/files/documents/PUB354687.pdf</u>

the southern part of Mole Valley. The south eastern part of Mole Valley is also significantly impacted by flooding (Flood Zones 2 and 3).

Key objective	To establish a common understanding of the employment Land requirement and the economic development impact of Covid 19 on the area notwithstanding the local authorities lie within two distinct and separate FEMAs.
 Relevant studies, intelligence or evidence base completed or to o 	
Key conclusions from the evidence	 The NWS authorities (Crawley, Horsham and Mid Sussex) continue to operate as a broad functional economic market area (FEMA). Influential economic linkages also exist with Coastal West Sussex, Reigate and Banstead (e.g. Horley) and East Sussex. Mole Valley is located within its own Economic Market Area. The district is not identified as having influential economic connections with NWS authorities.
 Agreement that has been reached or progress made 	 Crawley is planning positively to meet its business land needs within its borough boundary. There are no influential economic connections between Crawley and Mole Valley. Mole Valley is, therefore, not able to physically or effectively accommodate any unmet business land needs from Crawley, should these arise.
Any further actions / governance requirements etc.	• The authorities will continue to work together with the other Gatwick Diamond authorities on housing, employment and other strategic issues affecting the Gatwick Diamond as a whole.

Gatwick Airport:

<u>Safequardinq</u>

Land is required to continue to be safeguarded at Gatwick Airport for a potential future southern runway given the statement in the 2013 Aviation Policy Framework, para. 5.9, that *"land outside existing airports that may be required for airport development in the future needs to be protected against incompatible development until the Government has established any relevant policies and proposals in response to the findings of the Airport* *Commission*" and the statement in the draft Aviation Strategy para 3.66 (published in December 2018 after the Airports National Policy Statement) that "*It is prudent to continue with a safeguarding policy to maintain a supply of land for future national requirements and to ensure that inappropriate developments do not hinder sustainable aviation growth."* These statements provide no certainty in national policy that safeguarding at Gatwick could be removed.

Safeguarding has a significant impact on Crawley Borough's ability to meet its economic needs. The published Gatwick Airport Masterplan identifies an extensive area east of the airport solely for surface parking, which CBC considers to be an inefficient use of land in such a land constrained borough, particularly given Crawley's business land needs. The draft submission Local Plan therefore removes this area from safeguarding and allocates it as a strategic employment location to meet Crawley's industrial and warehouse employment needs.

Airport related parking

The airport operator is achieving the target of 48% non-transfer passengers arriving at the airport by public transport, but this still requires a significant amount of on-airport parking facilities for those passengers that choose to access the airport by private car. There are some authorised sites off-airport, but also many unauthorised sites, or requests for planning permission. Sites within the airport boundary provide the most sustainable location for any additional long stay parking as they are close to the terminals. The Airport operator is responsible for meeting the modal split target and it is important that the level of provision of car parking spaces can be appropriately managed. The Gatwick Local Authorities work together with GAL to undertake an Annual Parking Survey of on and off airport parking provision (authorised and unauthorised) and participate in the Surface Access Forum.

Gatwick Airport Economic Recovery and Growth

The local authorities neighbouring the airport work together at officer (the Gatwick Officers Group) and member (the Gatwick Joint Local Authorities) level, as well as the Chief Executives and leaders meeting regularly and the authorities taking part in the Gatwick Airport Consultative Committee (GATCOM). The authorities, GAL, and the LEP are currently working together to understand the impacts of the current economic crisis caused by the Covid-19 pandemic which has been particularly significant in the Crawley area due to its reliance on aviation and related employment sectors. The authorities are also collaborating to understand the implications of the proposed Northern Runway NSIP project on the environment, community and economy, and to respond to the DCO application to ensure that Gatwick Airport and the Planning Inspectorate are aware of the councils' positions in relation to the opportunities and implications associated with airport growth.

Environmental protection

GAL, West Sussex County Council and Crawley Borough Council have signed a joint S106 Legal Agreement to ensure that, as the airport grows as a single runway, two-terminal airport, its short and longer-term environmental impacts are minimised, and to maintain and enhance the ways the parties share information and work together and with other stakeholders to bring benefits to the airport and the communities it serves and affects. The S106 includes matters such as Climate Change, Air Quality, Noise, and Surface Access. The other neighbouring authorities are party to the Memorandum of Understanding supporting the S106.

Key objective		To develop a shared approach to Gatwick Airport including the impact of air quality and noise pollution.
•	Relevant studies, intelligence or evidence base completed or to do	 Annual Airport Parking Surveys Gatwick Airport Masterplan 2019 Gatwick Airport, WSCC, CBC Section 106 Legal Agreement 2018
•	Key conclusions from the evidence	• Gatwick Airport has a significant influence on the environment, economy and community in the area
•	Agreement that has been reached or progress made	 Land continues to be required to be safeguarded for a potential future southern runway at Gatwick Airport. Airport related parking should be located on-airport as the most sustainable location, and should be justified by a demonstrable need in the context of proposals for achieving a sustainable approach to surface transport access to the airport.
•	Any further actions / governance requirements etc.	• The authorities will continue to work with the Gatwick Officers Group and the Gatwick Joint Local Authorities, as agreed in the Memorandum of Understanding (MOU) supporting the Gatwick S106 Legal Agreement, to share expertise on airport related matters including noise, air quality and parking.

Education:

Crawley has a recognised unmet need for secondary education. This is identified as amounting to 6-8 forms of entry (180-240 places per year group) as the relatively recently opened Gatwick Free School provides 4 forms of entry (120 places per year group). A proportion of its pupils are from Horley in Surrey. However, the Gatwick Free School does not have permanent planning permission on its current site in Manor Royal Industrial Estate and WSCC are concerned about relying on these places. The further 6-8 forms of entry of demand for secondary school places is in the short and medium term and there will be capacity issues from Sept 2021. In the longer term, numbers are expected to reduce as entry to primary schools is now falling after a rapid rise from 2012. When the Crawley Borough Local Plan 2030 was adopted (December 2015), it was anticipated by WSCC that they would explore options for the extension of existing secondary schools within the Borough, although the Infrastructure Delivery Plan recognised the need for places might be supplied by a new school. In 2017, the Department for Education (DfE) announced funding for a new six form entry plus a sixth form Secondary Free School, 'Forge Wood High', within Crawley to be sponsored by a high performing multi-academy trust. However, given Crawley's constrained land supply, no suitable site has been found to build the school. Therefore, the potential to provide additional secondary school places, to serve Crawley's needs, will be considered on sites close to Crawley. If new strategic development on Crawley's boundaries could provide this opportunity, the DfE will seek to bring forward a school as early as possible. Also, notwithstanding the lack of a suitable site for a secondary school within

Crawley, the submission draft 2021 Local Plan makes allowance for consideration of education provision on sites allocated for uses including housing, where justified by local need, in case suitable opportunities should arise.

The draft Future Mole Valley Plan identifies three site allocations in Hookwood totalling nearly 500 dwellings. In itself, it is not considered necessary to provide a secondary school. However, SCC have identified that secondary provision is already at capacity and a further 1FE will be required. SCC advises that this does not prevent potential growth in Hookwood, provided this is phased towards the end of the plan period, to allow time for cross boundary education planning. Discussions between the relevant local authorities will be necessary to consider if mutual benefits can be achieved to address the identified gap in education capacity. This would include the relevant district/borough councils, along with both Surrey and West Sussex County Council representatives and potentially the Department for Education.

Key objective	To establish a common and agreed position of Secondary Education.
 Relevant studies, intelligence or evidence base completed or to do 	 Crawley draft Infrastructure Plan (2020) Mole Valle Infrastructure Delivery Plan (2020) SCC provided a consultation response on the MVDC Reg.18 Draft Local Plan, which will need to be refined for revised local plan period.
• Key conclusions from the evidence	• CBC and MVDC have needs for secondary education provision within the vicinity over their local plan periods. Crawley has more substantial needs, which are concentrated towards the early part of their plan period. Mole Valley has much more modest requirements in the cross-boundary area and as the strategic site in question is phased towards the end of the plan period more time is afforded for cross boundary education planning.
 Agreement that has been reached or progress made 	 Assessments of the need for secondary school forms of entry within the vicinity have been undertaken for CBC and MVDC. CBC and MVDC have agreed that planning for secondary education will require discussions across the three authority areas (MVDC, CBC, RBBC), involving the County Councils and the Department for Education.
 Any further actions / governance requirements etc. 	• Discussions to be arranged across the three authority areas (MVDC, CBC, RBBC), involving the County Councils and the Department for Education.

Health:

There are recognised capacity constraints on GP provision across the area, particularly with the decision by the NHS not to bring forward new provision as originally planned within the Forge Wood and Kilnwood Vale new neighbourhoods. However, the introduction of Primary Care Networks (PCNs) is anticipated by the NHS West Sussex CCG to enhance capacity.

Mole Valley is within Surrey Heartlands CCG. MVDC is awaiting further advice on GP provision to support its Local Plan development but the Surrey Heartland CCG's ability to respond to the Reg. 18 consultation has been affected by their Covid-19 workload.

Discussions to date have not highlighted any need for new provision in SE Mole Valley and Surrey Heartlands are taking a similar view on the introduction of PCNs to increase capacity. However, officers have highlighted that Hookwood residents use GPs in other authorities and cross-boundary issues in this part of Mole Valley will need to be addressed.

Key objective	To identify and develop opportunities for Health provision if required through evidence.
 Relevant studies, intelligence or evidence base completed or to do 	 Crawley draft Infrastructure Plan (2020) Mole Valle Infrastructure Delivery Plan (2020) Surrey Heartlands CCG have yet to provide a response to the MVDC Reg. 18 Draft Local Plan consultation. Their views are needed to obtain an understanding of Mole Valley's need for GP provision within the area.
• Key conclusions from the evidence	MVDC evidence to be confirmed.
 Agreement that has been reached or progress made 	 CBC an MVDC have agreed that Planning for health provision will require discussions across the two authority areas (MVDC, CBC), involving the Clinical Commissioning Groups (CCGs).
 Any further actions / governance requirements etc. 	 Discussions to be arranged across the two authority areas (MVDC, CBC), involving the CCGs.

Transport Infrastructure:

Transport links and public transport connections between Mole Valley and Crawley are weak. This limits effective cross-boundary benefits of strategic developments. However, working jointly across the county boundary could allow opportunities for addressing some of the identified unmet infrastructure needs. This could include working jointly with Reigate and Banstead Borough Council as well as both West Sussex and Surrey County Councils, and the National Health Service. Public transport links to Gatwick Airport and East Surrey Hospital are particularly important, and the authorities are also engaging with Metrobus.

•	Key objective	To develop an agreed position on the transport impacts of
		strategic allocated sites.

•	Relevant studies, intelligence or evidence base completed or to do	 Crawley Local Plan Transport Modelling (under preparation) Crawley draft Infrastructure Plan (2020) Crawley New Directions Transport Strategy 2020 Mole Valley Infrastructure Delivery Plan (2020) Mole Valley District Council Local Plan Strategic Highways Assessment (2019) Mole Valley Local Plan Site Specific Transport Assessment Modelling – to be undertaken on finalisation of site allocations to be taken forward.
•	Key conclusions from the evidence	 Mole Valley District Council Local Plan Strategic Highways Assessment (2019) identified three hotspots (areas of stress where drivers are subject to considerable delay and are likely to require mitigation to facilitate any development in the local area) in Hookwood. These include two junctions and A23 Brighton Road. The Infrastructure Delivery Plan Schedule of Schemes contains a number of cycling schemes involving links between Charlwood and Hookwood in MVDC, Horley (R&B DC) and Gatwick (CBC). Surrey County Council has submitted a bid for Tranche 2 (the creation of longer-term projects) of the funding allocations for the emergency active travel fund. Scheme 4 – A217 Gatwick to Westvale Park Shared Cycle/footway is located on the A217 Reigate Road between the A217 / Westvale Road roundabout to the A23 roundabout at the approach to Gatwick Airport. The conclusions of the Crawley Transport Modelling are yet to be finalised. Once known these will be shared and this section will be updated with key issues.
•	Agreement that has been reached or progress made	• CBC and MVDC have agreed that where development with strategic transport implications is proposed close to the authorities' common administrative boundary, the authorities will work together to establish a joint planning policy position to support positive development management and maximise infrastructure benefits.
•	Any further actions / governance requirements etc.	 Where strategic development is proposed close to the authorities' common administrative boundary, the authorities will work together to establish a joint Planning Policy position to support positive Development Management and maximise infrastructure benefits.

 The authorities agree to jointly explore opportunities through discussions with Surrey and West Sussex County Councils and Reigate and Banstead Borough Council
Council.