

1. List of Parties involved:

- Crawley Borough Council (CBC)
- Reigate and Banstead Borough Council (RBBC)

2. Signatories:



29.01.21

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



05.02.21

Reigate and Banstead Borough Council
Councillor Richard Biggs, Portfolio Holder for Planning Policy

3. Strategic Geography

The Statement of Common Ground (SOCG) covers the local authority areas of Crawley Borough Council (CBC) and Reigate and Banstead Borough Council (RBBC) and is a sound basis for co-operation on strategic cross boundary matters identified in this SOCG.

CBC and RBBC share a common boundary across the Surrey/West Sussex county border. Gatwick Airport, and associated safeguarded land, along with areas of Rural Surrounds of Horley and Metropolitan Green Belt, separates the main settlements in each of the authority areas.

Both authorities are located within the Gatwick Diamond sub-region and within the Coast to Capital Local Enterprise Partnership (LEP) Area. The two authorities have a long history of positive and active engagement on cross-boundary matters, including through Statements of Common Ground reached through the Reigate and Banstead Core Strategy (adopted 2014 and reviewed 2019) and the Crawley Borough Local Plan 2015-2030¹.

¹ Statement of Common Ground on meeting strategic housing needs (2013) RBBC/CBC

<https://crawley.gov.uk/sites/default/files/documents/PUB231177.pdf>

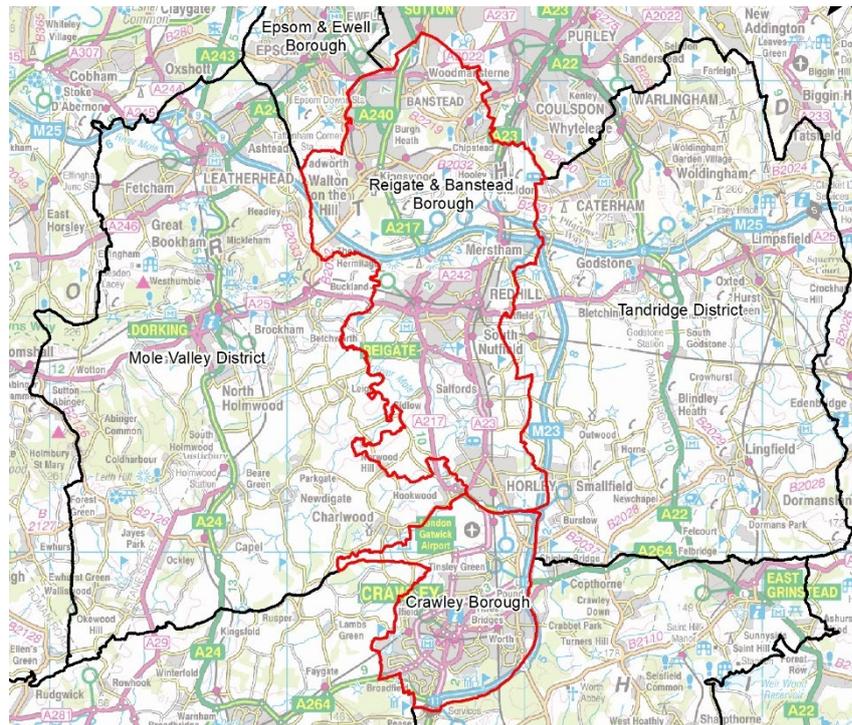
Statement of Common Ground on meeting the Duty to Cooperate and Retail Issues relating to Reigate and Banstead Borough Council draft Core Strategy (2013) RBBC/CBC

<https://crawley.gov.uk/sites/default/files/documents/PUB231179.pdf>

Statement of Common Ground between Crawley Borough Council and Reigate and Banstead Borough Council on the submission Crawley Local Plan (December 2014) CBC/RBBC

<https://crawley.gov.uk/sites/default/files/documents/PUB241111.pdf>

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 and Gypsy, Traveller and Travelling Showpeople needs, across the respective Housing Market Areas (East Surrey Housing Market Area and North West Sussex Housing Market Area);
- to establish a mutual understanding of the Employment Land requirement and the economic development impact of COVID-19 on the area;
- 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 develop an agreed position on the transport impacts of strategic allocation sites;
- to establish a common and agreed position on secondary education;
- to identify and develop opportunities for health provision if required through evidence;
- to develop an agreed position on cross boundary flooding impacts;
- to develop an agreed position in relation to water supply and waste water treatment impacts of strategic allocation sites.

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. CBC is located in the Northern West Sussex (NWS) Housing Market Area and RBBC is located in the East Surrey Housing Market Area.

2. There is some relationship between the North West Sussex Housing Market Area and the Horley area. However, RBBC as a whole falls within the East Surrey Housing Market Area.
3. A robust and appropriate Strategic Housing Market Assessment has been completed for each local authority.
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. CBC and RBBC will engage through the Gatwick Diamond Authorities, as a wider Duty to Cooperate forum, with other neighbouring authorities in relation to housing related matters, including affordability, large scale developments and opportunities for meeting unmet need.
6. As each authorities' respective housing supply or updated housing market evidence is completed, the findings will be shared with the councils.
7. The draft Crawley Local Plan identifies that Crawley's land supply allows for almost half of its overall housing needs to be met on sites within the borough's administrative boundaries: a minimum totalling 5,320 dwellings over the Plan period (2021 – 2037). 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 adopted RBBC Local Plan includes a constraints-based housing requirement to deliver at least 460dpa. Whilst it is recognised in Paragraph 7.4.3 of the Core Strategy and Paragraph 67 of the Core Strategy Inspector's Report that this allows for some continuing in-migration from other local authorities including those within the East Surrey and North West Sussex Housing Market Area (at a total of around 90-130 dwellings per annum). RBBC's adopted Local Plan does not seek to meet a specified quantum of CBC's unmet need.
8. The RBBC adopted Development Management Plan (DMP) includes three Sustainable Urban Extensions within/ajoining Horley (NWH1, NWH2 and SEH4), these are allocated to meet housing needs in RBBC.
9. CBC is not in a position to meet any unmet housing need that may arise from further work for RBBC.
10. RBBC is not in a position to meet any of CBC's unmet housing need.
11. Both authorities will each seek to meet their own need for additional Traveller provision.

Employment, economic development and retail:

The parties agree:

12. CBC is located within the Northern West Sussex Functional Economic Market Area. Work undertaken to inform the RBBC Core Strategy determined that RBBC's Functional Economic Marke Area was primarily the Gatwick Diamond area, reflecting the influence of Gatwick Airport. However, this work also recognised the strong influence of London on the borough's economy generally (particularly in terms of commuting), but also more localised relationships with Sutton and Croydon.
13. The adopted RBBC Development Management Plan allocates Horley Strategic Business Park to meet strategic office needs, including 45,513sqm of the unmet strategic office need identified in the Crawley Borough Local Plan 2015. Horley Strategic Business Park is not able to accommodate Crawley's current industrial or storage & distribution needs.

14. A robust Economic Growth Assessment (2020) has been undertaken which identifies the employment land requirement for Crawley is 24.1ha of unmet B8 storage and distribution accommodation.
15. A proposed new industrial-led (B8 storage and distribution) Strategic Employment Location at Gatwick Green, is planned to ensure this need is met within Crawley's boundary. Any supporting limited complementary ancillary uses such as office floorspace, small-scale convenience retail and small-scale leisure facilities that would support the principal industrial (storage and distribution) function would need to demonstrate that the proposal would be complementary to the Horley Strategic Business Park; and not have a significant adverse impact on the vitality and viability of, or consumer choice and trade within, existing town centres and existing, committed and planned public and private investment in those centres.
16. As any updated economic evidence for Crawley BC is completed, the findings will be shared between the councils.
17. The "Town Centre First" approach for each authority is appropriate and neither are proposing strategic scale retail development. As any updated retail evidence is completed for Crawley BC, the findings will be shared.

Gatwick Airport

The parties agree:

18. Land continues to be required to be safeguarded for a potential future southern runway at Gatwick Airport.
19. As part of the submission Local Plan, CBC propose to allocate 47ha of land east of Balcombe Road, and south of the M23 Spur, referred to as Gatwick Green, for a strategic employment site. This site is identified by the Gatwick Airport Masterplan (2019) for safeguarding as to be utilised for a large area of surface car parking. CBC does not consider parking to represent an efficient use of the site, particularly given the significant employment needs of their borough, and is of the view that the airport could accommodate parking more efficiently through decked parking and other efficiency measures, should it be demonstrated that additional on-airport parking is required having regard to the airport's surface access obligations stated in the S106 legal agreement. Therefore, the CBC submission Local Plan retains safeguarding but amends its boundary to exclude land to the east of Balcombe Road and south of the M23 spur.
20. 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.
21. The appropriate noise contours for decision-making are the Gatwick Master Plan 2019 Additional Runway Summer Day 2040 contours (Plan 31) until such time as these are superseded by subsequent noise contours that are published by Gatwick Airport and approved by the CAA.
22. 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.
23. 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:

24. Planning for education in Crawley borough will require discussions between the authority areas (CBC and RBBC), involving the Surrey and West Sussex County Councils and the Department for Education.

Health

The parties agree:

25. Planning for health provision will require discussions across the two authority areas (RBBC, CBC), involving the NHS England South (South East), Surrey Heartlands CCG, and NHS West Sussex CCG, along with the Primary Care Networks relevant to each borough.

Flooding

The parties agree:

26. Cross boundary flooding matters will be worked on at a strategic mitigation level, alongside the two County Lead Local Flood Authority (Surrey and West Sussex), in particular within the Burstow Stream catchment.

Strategic Sites – Transport and Infrastructure

The parties agree:

27. Where development with strategic transport implications is proposed close to the authorities' common administrative boundary, the authorities will work together, along with the two county councils (Surrey and West Sussex) and Highways England, to establish a joint planning policy position to support positive and sustainable development management and maximise infrastructure and sustainability benefits.
28. They will continue to discuss any impacts on the strategic road network particularly the M23, the A23 and the local road network, including Balcombe Road.
29. They will jointly explore opportunities for transport improvements through discussions with Surrey and West Sussex County Councils.
30. Robust transport modelling will be used to ensure that growth will not result in severe transport impacts upon the road networks in CBC and RBBC.
31. They will continue to work together to consider any impacts on other infrastructure, such as water supply and waste water.

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.

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.

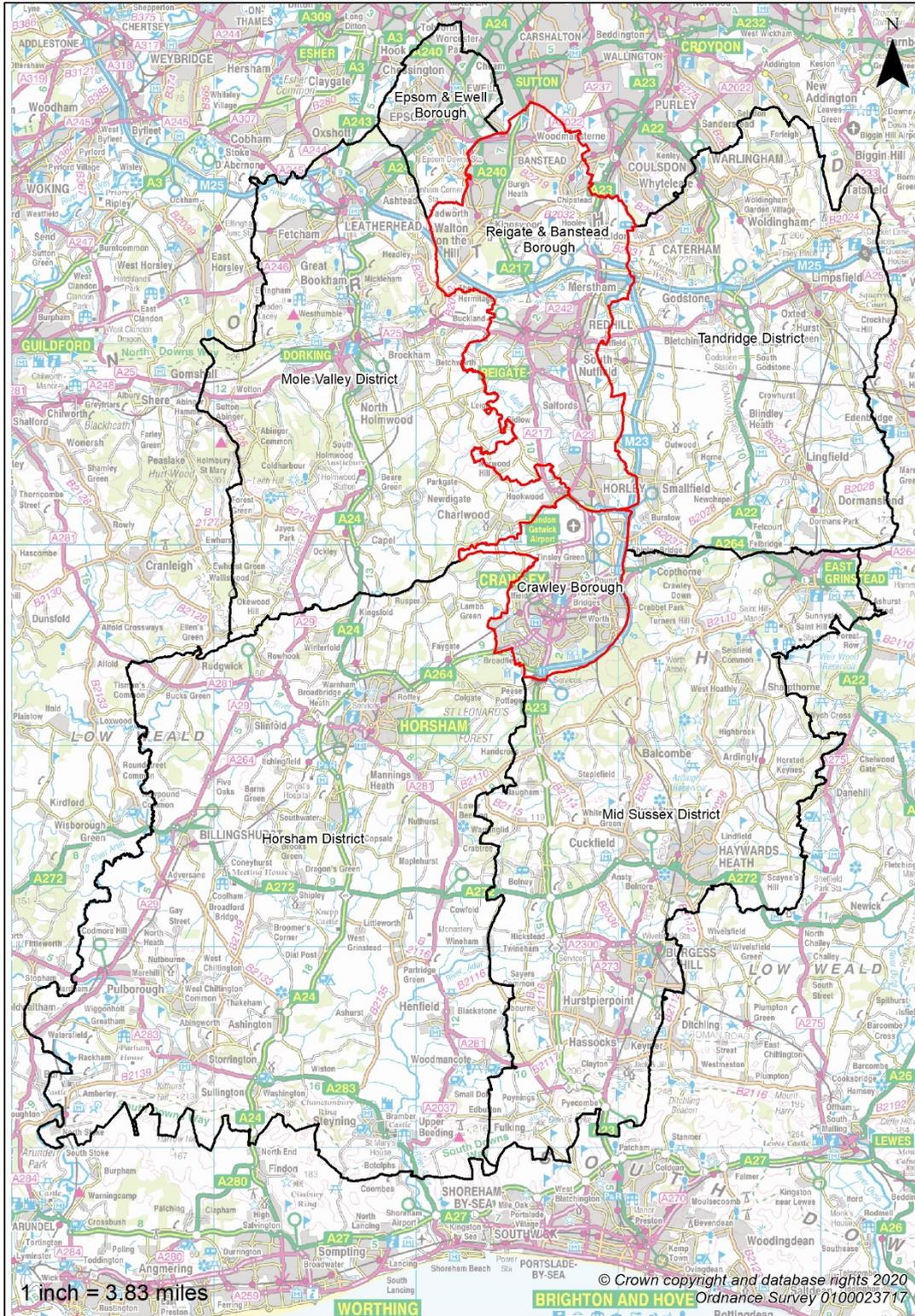
In terms of governance, the authorities agree to:

32. continue to work with the other Gatwick Diamond authorities on housing, employment, Gatwick Airport and other strategic issues affecting the Gatwick Diamond as a whole;
33. work collaboratively on plan preparation and evidence, whilst acknowledging others' timetables and timescales.
34. respect each other's right to develop their own plans that fit the specific circumstances of the local authority's communities;
35. meet at member and officer level to review the situation and respond to new issues and changing circumstances; and
36. 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 Local Plan	Dec 2015	2019 - 2021	July 2019	Jan 2020/Jan 2021	Mar 2021
Reigate and Banstead Core Strategy (CS)	July 2014	Five Year Review Undertaken July 2019			
Reigate and Banstead Development Management Plan (DMP)	September 2019	-	-	-	-

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.

RBBC is a Surrey authority that extends from the London boroughs of Sutton and Croydon in the north to Crawley in the south with Epsom and Ewell and Mole Valley to the west and Tandridge to the east. Much of the northern half of the borough is a combination of Green Belt Land and the Surrey Hills Area of Outstanding Natural Beauty (AONB), Areas of Great Landscape Value (AGVL) and Mole Gap to Reigate Escarpment Special Area of Conservation (SAC). Defra and Natural England are planning to start work in 2021 to review the AONB boundary including consideration of land within RBBC currently designated as AGLV. DMP Policy NHE1 'Landscape Protection' states that any AGLV remaining after the AONB Boundary Review will thereafter be treated as a local landscape designation.

The current Reigate & Banstead Core Strategy (2014 and reviewed in 2019) identifies a number of Sustainable Urban Extensions to the south west from Reigate, north west of Horley and to the east of Redhill and Merstham. These are allocated to meet needs arising within RBBC and in accordance with the forward-looking mechanism in DMP Policy MLS1, will be 'released' for development when the Council's Housing Monitor (published annually in June) predicts that a five year housing supply will not be maintained over the next year and subsequent year.

As recognised by RBBC's Core Strategy Inspector, the southern part of Reigate and Banstead borough is constrained by areas at high risk of flooding and the capacity of Horley to absorb any more housing at the present time (Core Strategy Inspector Report Paragraphs 15 and 44). Significant areas in the south of the borough, around Horley are designated as Rural Surrounds of Horley in the DMP. This is protected countryside in accordance with national policy, which recognises the intrinsic character and beauty of the countryside.

The authorities work with partners in the wider 'Gatwick Diamond'² 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 Statement³, which was reviewed and updated in 2016.

CBC submitted representations to the RBBC DMP and participated in the Examination for that Plan. Representations were received from RBBC to the Regulation 18, Early Engagement CBC Local Plan Review (July – September 2019) as well as the Initial Regulation

² 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

³ 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-local-strategic-statement>

Reigate and Banstead -

19, Publication Consultation (January – March 2020). Technical evidence has been shared from both authorities for input as part of its preparation.

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;
- 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 and sharing of expertise in relation to the monitoring of air quality and noise impacts associated with the airport.

The authorities participate as members of the Gatwick Greenspace Partnership⁴. 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 employment land and floorspace needs, retail 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.

⁴ alongside Horsham District Council, Mid Sussex District Council, Mole Valley District Council, Horley Town Council, Surrey County Council, West Sussex County Council, Sussex Wildlife Trust and Gatwick Airport Limited.

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 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 long-established, 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.

RBBC's adopted Local Plan includes a constraints-based housing requirement to deliver at least 460dpa over the plan period against an identified objectively assessed housing need of 600-640dpa. This will be delivered through town centre and urban area site allocations, sustainable urban extensions and windfall development.

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

The constrained land supply and high housing need, which strongly characterise and influence planning within Crawley borough, demonstrate that CBC is unable to help RBBC meet their unmet need. Similarly, due to the constraints within the borough RBBC is unable to assist in meeting Crawley's unmet needs. However, both councils will continue to work together to consider where unmet need could be met in the future.

LPA	MHCLG LHN	Local Plan target	Plan status	Year	Plan period
Crawley	750	332.5	Reg.19 Consultation	2021/22	2021-2037
Reigate and Banstead	644/1,148	460 ⁵	Adopted Reviewed	2014 2019	2012-2027
Totals	1,394/1,898	792.5			

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 higher rise development), leading to a reduction in the levels of affordable housing which can be required through such private market led schemes.
- RBBC's adopted Local Plan seeks to provide between 2012 and 2027 a minimum of 1,500 gross new affordable homes within the borough (100dpa) (DMP Policy DES6 'Affordable Housing) against an identified affordable housing need of 366dpa.

Self- and Custom-Build 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.
- Reigate and Banstead has two allocated sites east of Merstham where the provision of self build housing is encouraged (DMP (2019) Policies ERM4a and ERM5) . Furthermore by identifying approved housing developments which have the CIL self and custom build housing exemption, RBBC considers such approved housing developments are meeting the self build needs identified on the Council's Self Build Register.

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.
- As with bricks and mortar housing, Crawley's constrained land supply and unacceptable noise levels associated with Gatwick Airport for residential, and particularly caravan, accommodation, means there is significantly limited opportunities for provision of sites to meet accommodation needs of Gypsies, Travellers and Travelling Showpeople within Crawley borough's administrative boundaries. A site is currently being safeguarded

⁵ Reigate and Banstead Core Strategy and Review

through the Crawley Local Plan to meet the potential future needs arising from the existing population within Crawley, and this is proposed to continue through into the Reviewed LP.

- Reigate and Banstead has allocated sufficient sites to meet its requirements for gypsies and travellers meeting the PPTS definition, as well as those identified future needs who do not, but who would require provision under wider Equality Act requirements.

<ul style="list-style-type: none"> • Key objective 	<p>Working collaboratively on Housing Need including affordable housing across two Housing Market Areas as far as is relevant.</p>
<ul style="list-style-type: none"> • Relevant studies, intelligence or evidence base completed or to do 	<ul style="list-style-type: none"> • Northern West Sussex Strategic Housing Market Assessment (2019) • East Surrey Strategic Housing market Assessment (2008) • Reigate & Banstead Strategic Housing Market Assessment Update (2012) – in relation to Affordable Housing • Crawley Borough Council Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment (2020 Review) • Reigate & Banstead Borough Council Gypsy and Traveller Accommodation Assessment (2017)
<ul style="list-style-type: none"> • Key conclusions from the evidence 	<ul style="list-style-type: none"> • Crawley lies within the Northern West Sussex (NWS) Housing Market Area (HMA), which also includes Horsham and Mid Sussex Districts. • RBBC forms part of the East Surrey HMA, which also includes Elmbridge, Epsom and Ewell, Mole Valley and Tandridge. • There are localised links between Crawley and Horley. • There is no immediate need arising from Crawley’s Gypsy, Traveller and Travelling Showpeople population for new pitch or plot sites. However, there may be a need arising later within the Plan period.
<ul style="list-style-type: none"> • Agreement that has been reached or progress made 	<ul style="list-style-type: none"> • 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.
<ul style="list-style-type: none"> Any further actions / governance requirements etc. 	<ul style="list-style-type: none"> 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)⁶ concluded that NWS authorities (Crawley, Horsham and Mid Sussex) continue to operate as a broad functional economic market area (FEMA). The assessment identifies that influential economic linkages also exist with Coastal West Sussex, Reigate and Banstead (Horley) and East Sussex.

As identified through the Crawley Focused 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, 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.

Strategic employment development at Gatwick Green will be required to come forward in a manner that is complementary to the mixed-use business function of Manor Royal, the vitality and viability of Crawley Town Centre, delivery of the allocated office-led Horley Strategic Business Park in Reigate & Banstead Borough, and other planned strategic employment development in the functional economic market area. The developer will be required to undertake an Impact Assessment to demonstrate how the Strategic Employment Location will address Crawley’s identified need for industrial focused business floorspace, and how its offer will be complementary to existing and planned employment growth in the Gatwick Diamond. Any supporting limited complementary ancillary uses such as office floorspace, small-scale convenience retail and small-scale leisure facilities that would support the principal industrial (storage and distribution) function would need to demonstrate that the proposal would be complementary to the Horley Strategic Business Park; and not have a significant adverse impact on the vitality and viability of, or consumer choice and trade within, existing town centres and existing, committed and planned public and private investment in those centres.

⁶ Northern West Sussex Economic Growth Assessment (January 2020) Lichfields
<https://crawley.gov.uk/sites/default/files/documents/PUB354687.pdf>

The adopted RBBC Local Plan seeks to meet the identified unmet strategic office needs arising from the existing CBC Local Plan (45,513sqm). CBC proposes to meet its quantitative office needs for the forthcoming planning period in full.

The Horley Strategic Business Park is allocated in the Reigate & Banstead Development Management Plan (DMP) to provide a strategic business park of predominantly offices, a complementary range of commercial, retail and leisure facilities to serve and facilitate the main business use of the site and at least 5ha of new high quality public open space, including parkland and outdoor sports facilities.

The site allocation policy (HOR9) states that the predominant use of the site should be for B1a purposes with limited B1b, B1c, B8 and non-B Class uses including appropriate airport-related Sui Generis uses.

Indicative quanta of development provided within DMP Explanatory Paragraph 3.3.167 includes up to 200,000sqm of B1 floorspace and up to 10,500sqm of community facilities. Paragraph 3.3.171 states that further work on scheme design will need to identify detailed floorspace mix, taking into account economic impact and economic circumstances.

An updated Market demand Study has been commissioned in the light of the Covid-19 pandemic RBBC is currently in the process of producing a site development brief supplementary planning document for the site. This is due for public consultation in summer 2021.

<ul style="list-style-type: none"> • Key objective 	<p>To establish a common understanding of the employment Land requirement and the economic development impact of Covid 19 on the area.</p>
<ul style="list-style-type: none"> • Relevant studies, intelligence or evidence base completed or to do 	<ul style="list-style-type: none"> • Northern West Sussex Economic Growth Assessment (January 2020) • Crawley Focused EGA Update (September 2020)
<ul style="list-style-type: none"> • Key conclusions from the evidence 	<ul style="list-style-type: none"> • 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 (Horley) and East Sussex. •
<ul style="list-style-type: none"> • Agreement that has been reached or progress made 	<ul style="list-style-type: none"> • The allocated Horley Strategic Business Park is planned to accommodate the strategic unmet office need (45,513sqm) from the existing CBC Local Plan (2015-2030). • The CBC submission Local Plan seeks to meet the most recently identified office and industrial (storage and distribution) needs in their borough.

<ul style="list-style-type: none"> • Any further actions / governance requirements etc. 	<ul style="list-style-type: none"> • 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.
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Gatwick Airport:

Safeguarding

As there is no new Aviation Strategy and because, in February 2020, the Court of Appeal determined that the Airports National Policy Statement regarding Heathrow is unlawful and has no legal effect, the national policy with regard to safeguarding remains as set out in the 2013 Aviation Policy Framework. This states “*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 Airports Commission*”. Local Plans must be in conformity with the relevant national policy. 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 (storage and distribution) 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 and can help reduce the number and length of trips. 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.

<ul style="list-style-type: none">• Key objective	To develop a shared approach to Gatwick Airport including the impact of air quality and noise pollution.
<ul style="list-style-type: none">• Relevant studies, intelligence or evidence base completed or to do	<ul style="list-style-type: none">• Annual Airport Parking Surveys• Gatwick Airport Masterplan 2019• Gatwick Airport, WSCC, CBC Section 106 Legal Agreement 2018
<ul style="list-style-type: none">• Key conclusions from the evidence	<ul style="list-style-type: none">• Gatwick Airport influences the environment, economy and community in the area
<ul style="list-style-type: none">• Agreement that has been reached or progress made	<ul style="list-style-type: none">• 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.
<ul style="list-style-type: none">• Any further actions / governance requirements etc.	<ul style="list-style-type: none">• 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). 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.

Reigate and Banstead has sufficient secondary school places and primary school places (with the site allocation) as summarised in its Infrastructure Delivery Plan (Nov 2017), and summarised in the DMP Inspector's Report (9 July 2019) (paragraph 77).

<ul style="list-style-type: none"> • Key objective 	To establish a common and agreed position of Secondary Education.
<ul style="list-style-type: none"> • Relevant studies, intelligence or evidence base completed or to do 	<ul style="list-style-type: none"> • Crawley draft Infrastructure Plan (2020) • RBBC DMP Infrastructure Delivery Plan (Nov 2017)
<ul style="list-style-type: none"> • Key conclusions from the evidence 	<ul style="list-style-type: none"> • CBC has needs for secondary education provision within the vicinity over their Local Plan period. • Crawley has substantial needs, which are concentrated towards the early part of their plan period.
<ul style="list-style-type: none"> • Agreement that has been reached or progress made 	<ul style="list-style-type: none"> • Assessments of the need for secondary school forms of entry within the vicinity have been undertaken for CBC and RBBC. • CBC and RBBC agree 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. • As summarised in as summarised in RBBC's DMP Infrastructure Delivery Plan (Nov 2017), and the DMP Inspector's Report (9 July 2019) (paragraph 77), R&B borough has sufficient existing and planned provision to meet its needs.
<ul style="list-style-type: none"> • Any further actions / governance requirements etc. 	<ul style="list-style-type: none"> • 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 Crawley borough , 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.

Reigate and Banstead considered its primary health care needs for its DMP, and these are summarised in its Infrastructure Delivery Plan (Nov 2017).

<ul style="list-style-type: none"> • Key objective 	<p>To identify and develop opportunities for Health provision if required through evidence.</p>
<ul style="list-style-type: none"> • Relevant studies, intelligence or evidence base completed or to do 	<ul style="list-style-type: none"> • Crawley draft Infrastructure Plan (2020) • RBBC DMP Infrastructure Delivery Plan (Nov 2017)
<ul style="list-style-type: none"> • Key conclusions from the evidence 	<ul style="list-style-type: none"> • • Planning permission was granted in late 2020 for a new medical centre in the new Local Centre within NW Horley / Westvale development. • If this does not get taken up, there may be potential to expand an existing medical centre in Horley as an alternative to serve that development. • Potential options include expansion of Birchwood Medical Centre or Wayside surgery (whose practice boundary already includes the Westvale site) both of which are located on Kings Road in Horley, the Beechcroft site at Victoria Road, or potentially Clerklands surgery in Vicarage Lane.
<ul style="list-style-type: none"> • Agreement that has been reached or progress made 	<ul style="list-style-type: none"> • CBC and RBBC agree that planning for health provision will require discussions across the two authority areas (RBBC, CBC), involving Crawley Clinical Commissioning Group (CCG), NHS England (SE) and relevant Primary Care Networks as they are established.
<ul style="list-style-type: none"> • Any further actions / governance requirements etc. 	<ul style="list-style-type: none"> • Discussions to be arranged across the two authority areas (RBBC, CBC), involving Crawley Clinical Commissioning Group (CCG), NHS England (SE) and relevant Primary Care Networks as they are established..

Transport Infrastructure:

There are three key areas including transport interconnectivity between and across the boroughs, capacity of the transport networks and support for more sustainable modes of surface level transport where the two boroughs continue to work together.

<ul style="list-style-type: none"> • Key objective 	To develop an agreed position on the transport impacts of strategic allocated sites.
<ul style="list-style-type: none"> • Relevant studies, intelligence or evidence base completed or to do 	<ul style="list-style-type: none"> • Crawley Local Plan Transport Modelling (under preparation) • Crawley Infrastructure Plan (2020) • Crawley New Directions Transport Strategy 2020
<ul style="list-style-type: none"> • Key conclusions from the evidence 	<ul style="list-style-type: none"> • 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.
<ul style="list-style-type: none"> • Agreement that has been reached or progress made 	<ul style="list-style-type: none"> • CBC and RBBC agree 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.
<ul style="list-style-type: none"> • Any further actions / governance requirements etc. 	<ul style="list-style-type: none"> • 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.

Water Supply and Waste Water Infrastructure:

<ul style="list-style-type: none"> • Key objective 	To develop an agreed position on the water supply and waste water impacts of strategic allocated sites.
<ul style="list-style-type: none"> • Relevant studies, intelligence or evidence base completed or to do 	<ul style="list-style-type: none"> • Gatwick Water Cycle Study (2020) • Crawley draft Infrastructure Plan (2020)

<ul style="list-style-type: none"> • Key conclusions from the evidence 	<ul style="list-style-type: none"> • The conclusions of the Gatwick Water Cycle Study confirm that the South East remains an area of serious water stress. The water supply companies serving Crawley and Reigate and Banstead Borough have confirmed there is sufficient water resources to serve the proposed level of growth, though it is recognised that further work will be required in relation to the Sussex North Water Resource Zone (this does not affect RBBC). Both Crawley and Horley WwTWs are scored as “red” by Thames water indicating that future upgrades will be required.
<ul style="list-style-type: none"> • Agreement that has been reached or progress made 	<ul style="list-style-type: none"> • CBC and RBBC agree that where development with strategic 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.
<ul style="list-style-type: none"> • Any further actions / governance requirements etc. 	<ul style="list-style-type: none"> • 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 the relevant Water Companies.