Duty to Co-operate
Scoping Statement

FUTURE
MoleValley

May 2017
Section 1: Introduction

1. When preparing a Local Plan there is a legal requirement that local planning authorities cooperate with their neighbours and other relevant bodies to maximise effective working on strategic matters.

2. The Localism Act 2011 and the Planning and Compulsory Purchase Act 2004 set out a legislative context for the 'duty to cooperate'. Section 33A of the Planning and Compulsory Purchase Act 2004 states that local authorities are required to engage with other relevant bodies "constructively, actively and on an ongoing basis".

3. This cooperation can include, but is not limited to, the preparation of joint evidence and regular consultation on a particular issue. It is important that cross-boundary matters are identified early in the plan making process to ensure that any outcomes arising from the duty to cooperate can be addressed during the preparation of the Local Plan.

4. Paragraph 156 of the National Planning Policy Framework (NPPF) sets out the strategic priorities for local plans. These include:
   - The homes and jobs needed in the area;
   - The provision of retail, leisure and other commercial development;
   - The provision of infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk and coastal change management and the provision of minerals and energy (including heat);
   - The provision of health, security, community and cultural infrastructure and other facilities; and Climate change mitigation and adaption, conservation and enhancement of the natural and historic environment, including landscape.

5. The duty to cooperate is not a duty to agree, but as part of the examination process for the Local Plan, local planning authorities are expected to submit evidence showing that they have cooperated with their neighbours regarding cross-boundary strategic matters.

6. This document will look at the strategic context of Mole Valley and identify the strategic matters relevant to the District. It will also describe the key relationships Mole Valley has with neighbouring local authorities and other strategic bodies. This will enable MVDC to work constructively and to actively engage with the right partners as the Local Plan progresses.

Section 2: Strategic Context

7. The District of Mole Valley lies mid-way between London and the Sussex coast. Dorking and Leatherhead are the two principal economic centres of the District, although they are market towns and offer less in comparison goods than the higher order centres in adjacent authorities like Guildford, Kingston-upon-Thames, Reigate/Redhill, Horsham and Crawley.

8. The District does not fall within a single travel to work area (TTWA). The Dorking and rural areas of the District being within the Crawley / Gatwick TTWA and the
Leatherhead area being within the London TTWA. Part of the District falls within the scope of the Gatwick Diamond Initiative and consequently the whole District has been incorporated in the new Coast to Capital LEP which covers a broad area from Brighton to Croydon. The 2011 census indicates that net in-commuting figure for the District is 4,055 (approximately 31% of the workforce, with a similar percentage of the District’s economically active residents out-commuting.) Good road and rail communications, and the proximity to two international airports attracts major companies especially the Leatherhead area where there are UK and international headquarters.

9. An important feature of Mole Valley is its close proximity to the economic generators of London to the North, Gatwick Airport on the southern border and the Leatherhead interchange of the M25 motorway. Mole Valley traditionally has been an area of high market demand and subject to intense pressure for development. As planning constraints, including the AONB and Green Belt, have prevented the outward spread of the built-up areas, development requirements upon Mole Valley have resulted in more intensive development, particularly in the North of the District.

10. Much of Mole Valley’s landscape is of nationally recognised importance with a third of the District falling within the Surrey Hills AONB. Additional areas lie within the contiguous Area of Great Landscape Value (AGLV). MVDC benefits from a highly attractive landscape, including well know beauty spots such as Box Hill and Leith Hill. Mole Valley’s visitor economy is centred on day trips and short breaks taken by local residents and those travelling from outside the District (predominantly London).

11. The pressures of development, traffic and other activity are increasingly felt, not just in terms of major development schemes but also the collective effects of a range of small-scale developments. Mole Valley’s Corporate Priorities seek to protect the environmental characteristics of the District as a valuable and irreplaceable resource, whilst meeting development requirements and reflecting the needs of the community.

12. The new Local Plan will support MVDC’s key priorities for the District’s towns and villages, including those to facilitate the Transform Leatherhead Project, promote the culture and economy of Dorking and support rural communities.

13. In June 2016 Mole Valley jointly commissioned a SHMA with the Borough Councils of Kingston upon Thames, Elmbridge, and Epsom and Ewell. The joint SHMA concluded that the Objectively Assessed Housing Need for Mole Valley is 391 dwellings per year and that Mole Valley fell within the larger HMA of London. However there was a pull, particularly from the southern and eastern portion of the District to the HMA’s associated with economic development in the Gatwick Diamond area and the Reigate and Banstead HMA. There is no strong evidence to suggest the need for any increase in OAN for housing as a result of projected employment change although there are challenges posed by the need for housing to support economic growth whilst at the same time addressing the impact of high housing costs through an adequate supply of affordable housing. The OAN figure includes an assessment of needs for affordable housing and for accommodation for the elderly.

14. The provision for pitches for Gypsy and Travellers is also a component of housing need. MVDC’s 2013 Travellers Accommodation Assessment identifies a need for
44 additional pitches for gypsies and travelers and 7 additional plots for travelling showpeople, in the period 2012-2027. MVDC’s intention is to update this Assessment during 2017 to take into account planning permissions granted since it was produced, national policy changes and the longer Local plan period (to 2033).

15. The Gatwick Diamond Initiative is a business-led partnership with Gatwick Airport at its centre. The airport offers opportunities for business and residents of Mole Valley in terms of access and employment. However, noise from the airport and associated flight paths impacts on villages in the south east of the District, particularly Charlwood, Hookwood, Leigh, Beare Green, Newdigate and Capel.

16. The River Mole runs through the District from north to south. This contributes to the scenic landscape of the District, but areas of Mole Valley are prone to flooding, with a severe incident occurring in the winter of 2013/2014. Development in Mole Valley and adjoining authorities up river has the opportunity to influence the future potential for flood risk in the area.
Section 3: Strategic Planning Priorities

17. Paragraph 156 of the NPPF sets out a list of strategic priorities that a local plan should aim to deliver. These five headings are set out below and expanded to identify specific issues that are significant for Mole Valley. Following on from this, partners that may be contacted regarding strategic working on cross-boundary issues are also identified in line with the Duty to Cooperate.

**The homes and jobs needed in the area**

18. MVDC Issues:

- Identify strategies for delivering homes to meet the needs of residents across the Housing Market Area, specifically including affordable housing and accommodation suitable for an ageing population;
- Identify the level of need and mechanisms for delivery of caravan pitches suitable for Gypsy and Traveller households and plots for Travelling Showpeople;
- Identify strategies for meeting development needs of a successful, sustainable and diverse local economy.

**The provision of retail, leisure and other commercial development**

19. MVDC Issues:

- Ensure the District's town, district and local centres are successful and viable places for people to live, shop and spend their leisure time.
- Recognise the relationship between the District and retail, leisure and commercial centres outside Mole Valley and ensure an appropriate response to cross-boundary issues where they arise.

**The provision of infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk and coastal change management and the provision of minerals and energy (including heat)**

20. MVDC Aims:

- Manage traffic growth and identify strategies to promote sustainable transport networks, including strategic routes (M25, A24 and A25), rail, bus and local transport networks, that can provide for strategic development, the cumulative development of smaller sites and changing commuter patterns within the district and neighbouring authorities.
- Seek opportunities to manage and mitigate future flood risk and surface water flooding within the district and the River Mole and River Rye catchment areas.
- To ensure the efficient use of existing infrastructure (telecommunications, waste management, water supply etc.), and ensure the delivery of additional capacity by extending or providing new infrastructure.
- Manage mineral resources in the area, recognising that the minerals industry in
the area makes a significant contribution to the wealth and quality of life in Surrey and the UK. The planning for minerals is a Surrey County Council function however the impact on the district and adjoining areas needs to be considered alongside planned development in Local Plans.

The provision of health, security, community and cultural infrastructure and other facilities

21. MVDC Aims:

- Ensure growth in homes and employment is met by adequate infrastructure provision.

Climate change mitigation and adaption, conservation and enhancement of the natural and historic environment, including landscape.

24. MVDC Aims:

- To safeguard and enhance a strategic network of open space, local green space and green infrastructure, including protected landscapes which contribute to the District being an attractive place to live and work, such as Box Hill, Leith Hill and the wider Surrey Hills AONB. To safeguard and enhance the built historic environment and heritage assets.

- To ensure that planned development does not have a significant adverse effect on sites protected under the Birds and Habitats Directives, notably the Mole Gap to Reigate Escarpment Special Area of Conservation and the Thames Basin Heaths Special Protection Area.

- Identify if Green Belt land is performing in line with the five functions of the Green Belt, and assess whether it may be appropriate/there are exceptional circumstances to release this land in accordance with para. 85 of the NPPF.
Section 4: Duty to Cooperate bodies

25. The duty to cooperate is a legal test identified in the NPPF. While the duty to cooperate is not prescriptive, planning guidance states that cooperation between local planning authorities should produce effective and deliverable polices on strategic cross boundary matters.

26. It is noted that some issues, like impacts on main road networks like the M25 and fluvial flood risk from the River Mole extend beyond neighbouring authorities. Equally not all direct neighbours will be affected by the same cross-boundary issues and therefore there will be no benefit in entering into discussions on certain topics. It may also be that the progression of the Local Plan identifies additional bodies that may need to be engaged with on certain strategic matters, and the lists in this section of the document will be updated accordingly.

27. The Districts and Boroughs that either border Mole Valley or are considered potentially to share strategic cross-boundary issues are listed below,

- Crawley Borough Council
- Elmbridge Borough Council
- Epsom and Ewell Borough Council
- Guildford Borough Council
- Horsham District Council
- Kingston Upon Thames Borough Council
- Reigate & Banstead Borough Council
- Tandridge District Council
- Waverley Borough Council

28. In terms of higher tier local authorities, Surrey County Council is a key partner in terms of strategic issues and County Matters within Surrey. West Sussex County Council may also have an interest in strategic cross-boundary issues to the south of Mole Valley, notably in its role as Highways Authority. The Greater London Authority is also identified as a potential duty to cooperate body, bearing in mind that the London Plan will have an impact on strategic issues throughout Surrey. The current plan plans for the city's substantial economic and residential growth, and there are further changes proposed for 2017-2019.

29. National Planning Policy Guidance also requires Local Authorities to cooperate with a number of prescribed national bodies/organisations. They include the following bodies who are, themselves, subject to the Duty to Cooperate:

- The Environment Agency
- Historic England
• Natural England
• The Mayor of London
• The Civil Aviation Authority
• The Homes and Communities Agency
• Surrey Downs Clinical Commissioning Group (CCGs covering neighbouring areas may also need to be contacted)
• The National Health Service Commissioning Board (NHS)
• The Office of Road and Rail
• Highways Authority (Surrey County Council Highways)

30. Other key bodies with cross-boundary remits that MVDC will need to proactively engage with as the Local Plan progresses include, but are not limited to,

• Local Enterprise Partnership - Coast to Capital
• Highways England
• Gatwick Airport
• Surrey Police
• Thames Water
• Southern Water
• Sutton and East Surrey Water
• Telecommunications Providers: Vodafone and O2, EE, Three
• Network Rail
• EDF Energy Networks Ltd
• Surrey Local Nature Partnership
• Surrey Wildlife Trust
• Surrey Hills AONB Board

31. The level of engagement will be proportionate to the strategic matter under consideration. In additional, additional parties may be consulted as part of the Local Plan preparation, and therefore all the lists in this section of the document will be subject to regular review.

Existing mechanisms/organisations
32. MVDC already proactively works to engage with other local authorities, stakeholders and public bodies through working groups and partnerships. Some of the groups given below exist primarily for sharing information rather than the discussion of strategic cross-boundary issues. Therefore while the entire list can not be relied upon to meet the Duty to Cooperate, they are included as they may raise awareness of cross-boundary issues to the participants.

- East Surrey Local Plan Working Group (Elmbridge, Epsom and Ewell, Mole Valley, Reigate and Banstead, Tanridge)
- Surrey Planning Working Group (PWG)
- The Surrey Planning Officers Society
- Gatwick Diamond Initiative
- Surrey Connects
- Surrey Flood Risk Management Working Group
- Surrey Leaders Group
- South East and East of England Leader’s Group for the London Plan, including relevant summit meetings.
- Strategic Spatial Planning Officer Liaison Group for the London Plan
- Gatwick Diamond Strategic Project Group
- Gatwick Officers Group
- Surrey Economic Development Officers Group
- East Surrey Economic Development Officer’s Group

33. In addition to the above, some issues may warrant the creation of new mechanisms specifically focused on facilitating the Duty to Cooperate. This will be determined as Local Plan preparation progresses, in terms of the functional geography of the District and the strategic matter to be discussed.

34. Appendices 1 and 2 identify the issues in which MVDC believes each is likely to have an interest.
Section 5: Strategic Planning Priorities and the Duty to Cooperate

34. The following section builds on the strategic matters identified in Chapter 3. It aims to identify specific strategic and cross boundary issues. The tables in appendices 1 and 2 identify the duty to cooperate bodies who MVDC believes have an interest in each issue.

The homes and jobs needed in the area

Housing

35. Aim: Identify strategies for delivering homes to meet the needs of residents across the Housing Market Area, specifically including affordable housing, accommodation suitable for an ageing population and sites suitable for self and custom housebuilders

Strategic and cross-boundary issues:

36. A joint Strategic Housing Market Assessment (SHMA) was commissioned with Kingston BC, Elmbridge BC and Epsom and Ewell BC and was published in 2016. This found that there is a high demand for houses within MVDC and across the Housing Market Area. Surrey is an affluent county and a desirable place to live, however house prices can be beyond the means of some residents. There is a deficit in the supply of affordable two and three bedroom houses and accommodation that provides opportunities for an increasingly ageing population to downsize.

37. The SHMA identifies that Mole Valley is a highly constrained District, and that this is one of the reasons that makes it a desirable place to live. One of the challenges for MVDC is to identify potential options for a proportion of Mole Valley's objectively assessed housing needs to be met through cross-boundary co-operation, particularly where the land within adjacent districts/boroughs lies outside the Green Belt and/or is less constrained than land within Mole Valley.

Gypsies and Travellers

38. Aim: Identify the level of need and mechanisms for delivery of caravan pitches suitable for Gypsy and Traveller households and plots for Travelling Showpeople

Strategic and cross-boundary issues:

39. MVDC carried out a Travellers Accommodation Assessment in 2013. Taking into account household growth it was considered there will be a further need within the District for 44 pitches for Gypsies and Travellers and 7 plots for Travelling Showpeople between 2012 and 2027. However, this document does not take into account the recent changes in Gypsy and Traveller legislation. Consequently an updated TAA will be carried out during 2017 as part of the evidence base for MVDC’s Local Plan.

40. MVDC will use this document to understand how family relationships across administrative boundaries may have a bearing on the assessment of needs for pitches within Mole Valley (e.g. within the travelling showpeople’s community, where there are known links between Mole Valley and Tandridge).
Employment Land Provision

41. **Aim:** Identify strategies for meeting development needs of a successful, sustainable and diverse local economy.

Strategic and cross-boundary issues:

42. The main towns of Leatherhead and Dorking are easily accessible from junction 9 of the M25 and have transport links to Gatwick Airport and London. Leatherhead is the main commercial centre of the District, and Transform Leatherhead proposes a regeneration of the town centre that will include working with businesses to make the town an attractive place to be based.

43. Dorking's economy and role as an employment location in the centre of the District will also be promoted.

44. Discussions with adjoining authorities and relevant business-focused organisations (such as the LEP and Gatwick Diamond Initiative) will help Mole Valley understand the extent to which the economic growth objectives of the District and/or adjoining authorities may be met through the Local Plan, and support the continuing success of the District as a business location.

Retail, Leisure and other Commercial Developments

45. **Aim:** Ensure the District's town, district and local centres are successful and viable places for people to live, shop and spend their leisure time.

Strategic and cross-boundary issues:

46. Leatherhead and Dorking are the main shopping areas within the District and face strong competition from larger centres including Guildford, Kingston, Horsham and Crawley. However, the town centres support other social, community and cultural facilities including Dorking Halls, Leatherhead Theatre and leisure centres in both locations.

47. The January 2010 update to Mole Valley's Town, District and Local Centres Study demonstrates Dorking has a leakage of convenience and comparison goods to retailers outside the town's catchment area. The Council will continue to seek ways to promote the culture and economy of Dorking Town Centre.

48. In line with the Council's Corporate Strategy the Transformation Leatherhead project will also support the improvement of the retail offer of the town centre, and the accessibility of the leisure centre by working with stakeholders including local business, Surrey County Council and the Environment Agency.

49. MVDC will understand how changes within Mole Valley, or in neighbouring authorities, will influence existing retail, leisure and commercial patterns, giving particular regard to the Transform Leatherhead project and promoting Dorking as a market town.

50. **Aim:** Recognise the relationship between the District and retail, leisure and commercial centres outside Mole Valley and ensure an appropriate response to cross-boundary issues where they arise.
Strategic and cross-boundary issues:

51. A specific cross-boundary issue arises in the north east of the District, where Epsom Downs Racecourse lies just outside the District boundary, within the Borough of Epsom and Ewell. The Racecourse is of international importance as a historic and current centre for horse racing.

52. Historically, racing stables have been located within Mole Valley in order to make use of the training gallops at Epsom Downs. The extent to which this use should be safeguarded, in order to support long term retention and management of the training gallops, is an issue which would beneficially be considered jointly with Epsom and Ewell Borough Council, with a view to achieving a consistent approach across the administrative boundary.

Infrastructure

Transport

53. Aim: Manage traffic growth and identify strategies to promote sustainable transport networks, including strategic routes (M25, A24 and A25), rail, bus and local transport networks that can provide for strategic development, the cumulative development of smaller sites and changing commuter patterns within the district and neighbouring authorities.

Strategic and cross-boundary issues:

54. The M25 runs through the north of the District. The A25 runs east to west, and the A24 runs north to south, both passing through Dorking. There are also a number of rural lanes in the southern half of the District which connect the smaller settlements to each other and the larger commercial centres.

55. Over time there has been a consistent pattern of people travelling further to get to work. MVDC is partially in the Crawley/Gatwick and London Travel to Work Areas, although the connections to Guildford may also mean that some residents are travelling to the west.

56. A number of MVDC's neighbours, including Guildford and Horsham have allocated housing sites along some of the main routes into the District. MVDC will ensure that the growth plans of other local authorities are taken into account when modelling traffic impact of strategic options for development, focusing on areas where the strategic and local road network crosses administrative boundaries. This will include engaging with public transport providers as required to ensure that public transport networks are able to accommodate growth plans across administrative boundaries.

Flood Risk

57. Aim: Seek opportunities to manage and mitigate future flood risk and surface water flooding within the district and the River Mole and River Rye catchment area

Strategic and cross-boundary issues:

58. Approximately 1,520 addressable properties in Mole Valley are in Flood Zone 2 and
within the Middle Mole Catchment approximately 115 addressable properties in Flood Zone 3b and 200 in Flood Zone 3a. The River Mole rises in the Surrey/Sussex Weald and flows northwards past Crawley and Gatwick Airport and on to Dorking through the Mole Gap.

59. In the South West of the District, tributaries around Ockley drain in to the River Arun Catchment which crosses boundaries with both Horsham and Waverley Councils.

60. The Gatwick and Burstow Streams lie outside the District, but it may also be necessary to take part in cross-boundary discussions regarding these watercourses as flooding is not contained by administrative boundaries.

61. Where watercourses cross administrative boundaries, strategic working is necessary to mitigate flood risk as development built may impact on a settlement further down river and across administrative boundaries. The Environment Agency is a key strategic partner able to provide an overview of cross-boundary issues.

62. In addition to fluvial flooding, there are parts of the District where surface water flooding caused by heavy rain and pressure on local sewer networks is also becoming an issue. Insufficient sewerage infrastructure can be a contributing factor to flooding. Therefore engagement with drainage providers is essential for assessing capacity.

63. Groundwater is not always easy to identify as a source of flooding; however there are areas at risk to the north of the North Downs where the chalk meets sand, silt and clay. Once groundwater is contaminated it can take a long time to recover, if at all, and Mole Valley will seek to ensure ground water is protected through local policy and cross boundary discussions with neighbouring authorities and the Environment Agency.

64. MVDC will undertake joint or co-ordinated working, as and when required, with other local authorities in the Middle Mole catchment area (Elmbridge BC, RBBC, Crawley BC) and with the Environment Agency to manage and mitigate fluvial flood risk across administrative boundaries.

Utilities, etc

65. Aim: To ensure the efficient use of existing infrastructure (telecommunications, waste management, water supply, sewerage infrastructure etc.), and ensure the delivery of additional capacity by extending or providing new infrastructure.

Strategic and cross-boundary issues:

66. Among residents of Mole Valley, one of the most widely-expressed concerns regarding the building of new development, particularly homes, is that the provision of infrastructure should be related to the scale and pace of growth.

67. There is also concern about the ability of existing infrastructure to cope with these gradual but collectively significant increases in demand on the supply of water, sewerage infrastructure etc. These are not issues that are confined by district/borough boundaries.
68. MVDC will engage with utility providers as required to ensure that infrastructure is able to accommodate growth plans across administrative boundaries.

**Health, Security, Community and Cultural Infrastructure**

69. **Aim:** Ensure growth in homes and employment is met by adequate infrastructure provision.

**Strategic and cross-boundary issues:**

70. The need for residential development within Surrey can put pressure on existing infrastructure if development is not designed to incorporate expansion of essential services, such as schools and health care.

71. There is a statutory duty on local authorities to ensure that there are sufficient school places available, and a future pressure on secondary school places has been predicted in MVDC.

72. With an identified ageing population the adequate provision of accessible health care is also a strategic matter that must be taken into account as part of the duty to corporate.

73. MVDC will understand how growth plans in adjoining authorities may have a bearing on infrastructure capacity, focusing on areas where specific items of infrastructure serve more than one authority. Specifically:

- Secondary school catchment areas in the north of the District, some of which overlap boundaries and serve pupils from more than one local authority;

- Dedicated post-16 education provision which lies outside the District but is accessed by students from Mole Valley;

- Primary care provision in parts of the District, where GP surgeries serve a cross-boundary population, and acute health care which lies outside the District but is accessed by Mole Valley's population.

**Climate Change, Historic Environment and Landscape**

**Open Green Space**

74. **Aim:** To safeguard and enhance a strategic network of open space, local green space and green infrastructure, including protected landscapes which contribute to the District being an attractive place to live and work, such as Box Hill, Leith Hill and the wider Surrey Hills AONB and the AGLV.

**Strategic and cross-boundary issues:**

75. Open spaces are key components of the District's Green Infrastructure network. This network already links to other authorities through east to west footpaths along the North Downs, and from north to south through the Mole Gap and as part of the Thames2Downs Project which includes links to Elmbridge and Epsom and Ewell.

76. Effingham Neighbourhood Area is in Guildford District, but abuts the boundary with Mole Valley. The draft Effingham Neighbourhood Plan identifies cross-boundary
Green Infrastructure links with Bookham.

77. The River Mole also plays an important role in the biodiversity of the District, and also for the recreation/ enjoyment of people. The Mole is not confined by administrative boundaries and can provide opportunities for developing and improving wildlife corridors.

78. MVDC will identify the extent to which green spaces within the Mole Gap Special Area of Conservation provide for the informal recreation needs of residents of other local authority areas and what influence this might have on the policy framework for protection of this European site and securing mitigation measures where required.

**Historic Environment**

79. **Aim:** To safeguard and enhance the built historic environment and heritage assets.

**Strategic and cross-boundary issues:**

80. The historic environment is of national importance as set out in section 12 of the NPPF. Nationally significant sites within the district, such as Polesden Lacey, encourage tourism and contribute to the character of the District as an attractive place to live, work and visit. There are also a number of conservation areas which directly abut or cross administrative boundaries between Mole Valley and neighbouring authorities (specifically Elmbridge and Guildford Boroughs).

81. Growth and development is an essential part of planning, but the character and setting of heritage assets also needs to be respected and MVDC will ensure that strategic development issues take into account any cross-boundary impacts where heritage assets which straddle administrative boundaries or lie very close to the administrative boundaries of Mole Valley.

**Protected Sites**

82. **Aim:** To ensure that planned development does not have a significant adverse effect on sites protected under the Birds and Habitats Directives, notably the Mole Gap to Reigate Escarpment Special Area of Conservation and the Thames Basin Heaths Special Protection Area. Other local and national designated sites including, but not limited to, Sites of Special Scientific Interests and local and nationally protected nature reserves will also be protected.

**Strategic and cross-boundary issues:**

83. Parts of north Leatherhead, Fetcham and Bookham are within the Thames Basin Heaths SPA 5km buffer zone and 5-7km buffer zone. The Mole Gap to Reigate Escapement SAC covers land to the north of east of Dorking, including Box Hill, Norbury Park and Headley Heath. Both these designations cross administrative boundaries.

84. Increase in air pollution can also impact on both human health and the biodiversity of protected sites. This is a strategic issue that needs addressing across the South East and MVDC will continue to work with neighbouring authorities to address this issue.
85. MVDC will identify the extent to which growth within the District and across administrative boundaries may have a significant effect on both local, national and European sites and what mitigation measures may be required. MVDC will work with Natural England to identify appropriate mitigation measures at a strategic level through Habitats Regulations Assessment process and in respect of site-specific proposals on a case by case basis. Where appropriate this may include contributions to Suitable Alternative Natural Greenspace (SANG) and Strategic Access Management and Monitoring (SAMM) in line with the principles included in the Thames Basin Heath SPA Avoidance and Mitigation Strategy.

**Green Belt**

86. **Aim:** Identify if Green Belt land is performing in line with the five functions of the Green Belt, and assess whether it may be appropriate/there are exceptional circumstances to release this land in accordance with para. 85 of the NPPF.

**Strategic and cross-boundary issues:**

87. The Green Belt is a national designation that seeks to prevent urban sprawl and preserve the openness of the countryside.

88. MVDC will ensure that Green Belt Review work takes into account areas where Green Belt land within Mole Valley contributes to the purposes of the Green Belt across administrative boundaries —e.g. by preventing urban sprawl or the merging of settlements across boundaries or by preserving the setting of historic towns which lie outside Mole Valley.
## Appendix 1 – Duty to Cooperate Bodies

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<th>Homes and Jobs need in the area</th>
<th>Retail, Leisure and Commercial Developments</th>
<th>Infrastructure for Transport, telecommunications, waste management, water supply, flood risk and costal change management and the provision of minerals and energy.</th>
<th>The provision of health, security, community and cultural infrastructure and other facilities</th>
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Epsom and Ewell BC | ✔ | ✔ | ✔ | ✔ | ✔ | ✔ | ✔ | ✔ | ✔ | ✔ |

Guildford BC | ✔ | ✔ | ✔ | ✔ | ✔ | ✔ | ✔ | ✔ | ✔ | ✔ |

Horsham DC | ✔ | ✔ | ✔ | ✔ | ✔ | ✔ | ✔ | ✔ | ✔ | ✔ |

Kingston BC | ✔ | ✔ | ✔ | ✔ | ✔ | ✔ | ✔ | ✔ | ✔ | ✔ |

Reigate & Banstead BC | ✔ | ✔ | ✔ | ✔ | ✔ | ✔ | ✔ | ✔ | ✔ | ✔ |

Tandridge DC | ✔ | ✔ | ✔ | ✔ | ✔ | ✔ | ✔ | ✔ | ✔ | ✔ |

Waverley BC | ✔ | ✔ | ✔ | ✔ | ✔ | ✔ | ✔ | ✔ | ✔ | ✔ |

Surrey CC | ✔ | ✔ | ✔ | ✔ | ✔ | ✔ | ✔ | ✔ | ✔ | ✔ |
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<tr>
<td>Housing</td>
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<td>Employment Land Provision</td>
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<td>Transport</td>
<td>Flood Risk</td>
<td>Utilities, etc</td>
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</table>
### Appendix 2 – Other organisations subject to the Duty to Cooperate in their own right, or with a relevant strategic/cross-boundary remit

<table>
<thead>
<tr>
<th>Homes and Jobs need in the area</th>
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<tbody>
<tr>
<td>Environment Agency</td>
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<td>Employment Land Provision</td>
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<td>Historic Environment</td>
</tr>
<tr>
<td>Natural England</td>
<td></td>
<td>District Centres</td>
<td></td>
<td>Protected Sites</td>
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<tr>
<td>Civil Aviation Authority</td>
<td></td>
<td>Relationship to centres outside Mole Valley</td>
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<tr>
<td>Homes and Communities Agency</td>
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<td>Surrey Downs CCG</td>
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<tr>
<td>NHS</td>
<td></td>
<td>Utilities, etc.</td>
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</tbody>
</table>

- ✓ indicates that the organisation has a relevant remit for the aspect specified.

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**Note:** The table above lists various organisations and their remits in relation to certain needs and aspects. For a comprehensive understanding, consult the full document for detailed information and context.
<table>
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Retail, Leisure and Commercial Developments
Infrastructure for Transport, telecommunications, waste management, water supply, flood risk and coastal change management and the provision of minerals and energy.

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