

# Mid Sussex District Plan Review Examination

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**Our ref** 65901/01/MS/HBe  
**Date** 27 September 2024  
**From** Lichfields obo Berkeley Latimer

## Subject Matter 6: Housing

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This hearing statement has been submitted by Berkeley Latimer (BL). BL is promoting the 'Land South of Reeds Lane' (DPSC3) 'Significant Site' for 2,000 homes in Sayers Common.

### **1.0 Issue 1: Whether the Council's approach to calculating its full, objectively assessed needs and housing requirement is justified, based on up-to-date and reliable evidence, effective, positively prepared, and consistent with national policy?**

#### **Objectively assessed need – housing**

**Q57. Does the Plan period cover an appropriate time frame for the provision of housing (2021-2039) consistent with national policy? If not, what would be the implications for housing need?**

- 1.1 No. Linked to our response to Q32 (Matter 3) **BL objects** to the plan on this basis as it would not be consistent with national policy (Paragraph 35d, NPPF Sep 2023). This is owing to the plan period as submitted (2021 to 2039) being likely to look ahead less than 15-years at the point of potential adoption (i.e. not in accordance with Paragraph 22, NPPF Sep 2023). Notwithstanding, the Council has suggested a modification (M1, DP1<sup>1</sup>) to extend the plan-period to 2040. BL supports this modification, and it would resolve our soundness concern.
- 1.2 In respect of housing need, an additional years' worth of housing need would need to be provided for (considered further in our response to Q58). This is a matter than can be dealt with via modifications.

**Q58. To determine the minimum number of homes required, housing policies should be informed by the Government's local housing need methodology. As such, are the inputs used to determine the level of housing needed within the Plan appropriate?**

- 1.3 The plan as submitted (DP1) (based on the Reg.19, published in January 2024) identified a minimum local housing need of 1,090 dpa<sup>2</sup>; calculated using the then latest inputs to the Government's standard method. By the time of the plan's submission (July 2024), the inputs to the standard method – in accordance with the methodology detailed in the PPG

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<sup>1</sup> M1 (Page 3, DP2).

<sup>2</sup> See policy DPH1 supporting text (Chapter 14, page 136, DP1) & paragraphs 11 to 13 of document H5 (page 3).

(ID: 2a-004) – had changed as detailed in the supporting ‘Housing Need and Requirement’ topic paper (H5)<sup>3</sup>. The changing inputs (specially the baseline household projections and local affordability ratio) results in the output of the standard method decreasing slightly to 1,039 dpa<sup>4</sup>.

- 1.4 As detailed in the Council’s schedule of proposed modifications (DP2), the Council has suggested that the annual housing requirement in the plan (Policy DPH1) should be amended to reflect this new – albeit slightly lower – figure (modification M67)<sup>5</sup>. This modification is necessary in the context that the plan-period needs extending to 2040 to ensure the plan is consistent with national policy (M1) (to accord with Paragraph 22, NPPF Sep 2023: as per our response to Q32 and Q57). The effect of these two changes would result in the district needing to deliver a minimum of 19,741 homes to 2040<sup>6</sup> compared to 19,620 to 2039 as submitted<sup>7</sup>.
- 1.5 In these circumstances, BL supports the proposed modification (M67<sup>8</sup>) to amend the minimum number of homes needed – to reflect the latest inputs which are the appropriate inputs to use – in combination with a revised plan-period (modification M1<sup>9</sup>). Both modifications would ensure the plan is sound and that it is positively prepared: seeking to meet the area’s objectively assessed needs (Paragraph 35a, NPPF Sep 2023).

**Q59. Are there exceptional circumstances to suggest that an alternative approach be taken? If so, what are they, and how would they impact on housing need?**

- 1.6 BL agrees with the Council’s conclusions<sup>10</sup> that there are not exceptional circumstances that would suggest an alternative approach to calculating the minimum number of homes needed.

**Is the Strategic Housing Market Assessment 2021 (H1) up to date and justified?**

- 1.7 While BL has no specific concerns with either the scope or methodology of the submitted SHMA (H1), it was however prepared in October 2021 and risks not appropriately identifying the housing needs of the district in terms of the needs of specific groups. In this context, the plan as submitted is not justified (Paragraph 35b, NPPF Sep 2023) and **BL objects** to it.
- 1.8 An update or addendum to the SHMA is therefore necessary to ensure the plan is justified. This can be prepared by the Council in good time as part of this examination. This is to bring the underlying data supporting the SHMA up-to-date – primarily to account for the 2021 census that would not have been available when it was prepared<sup>11</sup> but was when the

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<sup>3</sup> Paragraph 15 (page 3-4, H5).

<sup>4</sup> Paragraph 16, (page 4, H5)

<sup>5</sup> M67 (page 20, DP2)

<sup>6</sup> M67 (page 20, DP2)

<sup>7</sup> Policy DPH1 (page 138, DP1)

<sup>8</sup> M67 (page 20, DP2)

<sup>9</sup> M1 (Page 3, DP2).

<sup>10</sup> Paragraphs 17-21 (page 4, H5)

<sup>11</sup> For example, the current SHMA (H1) uses data from the 2011 Census (see paragraph 3.4).

plan was submitted – and for any updated conclusions to be reported and reflected in policies via any corresponding modifications. Updating the SHMA would overcome any soundness concerns BL has in this respect.

**Q60. What are the implications, if any, of the Gatwick Airport’s proposed extension and DCO on the demand for housing? Does the OAN set out within the submission Plan of 19,620 remain appropriate?**

- 1.9 In accordance with (1) evidence submitted to the DCO examination (prepared by Lichfields on behalf Gatwick Airport); and (2) SoCGs to said DCO; the potential granting of the airport expansion would **not** impact the submitted OAN for housing (i.e. a minimum of 19,620 homes). By extension, it would also not affect the Council’s proposed revised OAN for housing as per the Council’s schedule of modifications (M67<sup>12</sup>).
- 1.10 Specifically, Document 5.3 submitted to the DCO examination<sup>13</sup> concludes: *“it is not considered that there is likely to be any significant housing effects, in terms of the overall demand for housing in the study area or any particular HMA, as a result of operational employment demand associated with the Project”*<sup>14</sup>. In addition, in the SoCG between Mid Sussex District Council and Gatwick Airport<sup>15</sup>, the Council implicitly agrees to this conclusion as it only disagrees with the airport expansion’s effects on housing with regard to additional pressure on temporary accommodation arising from construction<sup>16</sup> (section 2.19.3.5). Extracts of both these documents have been appended to this hearing statement for ease: Appendix 1 and Appendix 2 respectively.
- 1.11 Finally, in the recently-published Crawley Local Plan Inspector’s Report (dated 6 Sep 2024) the Inspector concludes that the granting of the DCO *“would not affect the overall spatial strategy in this Plan”*<sup>17</sup>. The implication is clearly that it would not impact Crawley’s need for housing. Given this conclusion applies to Crawley, the same should be said for Mid Sussex in light of the evidence submitted to the DCO.

**Affordable Housing**

**Q61. Is the figure of 470 affordable homes per annum set out in the SHMA (H1), split between rented and owned homes, subject to S106 control, based on appropriate evidence?**

- 1.12 As per our response to Q59, BL has no specific concerns as to the methodology for which the affordable housing need – 470 per annum – has been calculated in the submitted SHMA (H1). However, in light of the passage of time since the SHMA (H1) was prepared

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<sup>12</sup> M67 (page 20, DP2)

<sup>13</sup> Document 5.3. Available here: <https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/projects/TR020005/TR020005-000884-5.3%20ES%20Appendix%2017.9.3%20Assessment%20of%20Population%20and%20Housing%20Effects.pdf>

<sup>14</sup> Page V, conclusions section (Document 5.3)

<sup>15</sup> Document 10.1.5. Available here: <https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/projects/TR020005/TR020005-003632-10.1.5%20Statement%20of%20Common%20Ground%20between%20Gatwick%20Airport%20Limited%20and%20Mid%20Sussex%20District%20Council%20-%20Version%203%20-%20Clean.pdf>

<sup>16</sup> See section 2.19.3.5 (page 124, Document 10.1.5)

<sup>17</sup> See IR61. Inspector’s report available here: [https://crawley.gov.uk/sites/default/files/2024-09/Crawley%20Borough%20Local%20Plan%202023%20to%202040%20inspectors%20report%20-%20final\\_o.pdf](https://crawley.gov.uk/sites/default/files/2024-09/Crawley%20Borough%20Local%20Plan%202023%20to%202040%20inspectors%20report%20-%20final_o.pdf)

incomes, house prices/rents, and availability of accommodation will have changed. In this context, the plan as submitted is not justified (Paragraph 35b, NPPF Sep 2023) and **BL objects** to it.

- 1.13 An update or addendum to the SHMA is therefore necessary to ensure the plan is justified. This can be prepared by the Council in good time as part of this examination. This is to bring the underlying data supporting the SHMA up-to-date and for any updated conclusions to be reported and reflected in policies via any corresponding modifications. Updating the SHMA would overcome any soundness concerns BL have in this respect.

### **Gypsies and travellers and travelling showpeople**

#### **Q62-64 inclusive:**

- 1.14 No comment.

### **Other specialist needs**

#### **Q65. How have the needs of other caravan dwellers and houseboat dwellers been considered within the Council's evidence base?**

- 1.15 No comment.

#### **Q66. What assessment has taken place of the needs of particular groups by household size, type, and tenure, including self-build and custom housebuilding? What assumptions have been made to calculate the need for specialist housing: for example, housing for older people, and for households with specific needs, to offer a better choice of housing? Are these assumptions justified and consistent with national policy?**

- 1.16 This is considered to be a question for the Council. However, the question refers to assessments that would be assessed in the SHMA (H1). As per our responses to Q59 and Q61, it is our view the Council should update its SHMA (H1) originally prepared in October 2021 to ensure it is up to date and address the needs of particular groups as required by the NPPF.
- 1.17 **BL therefore objects** to the plan on the basis that it is not justified (Paragraph 35b, NPPF Sep 2023). However, preparing an update to the SHMA – as set out above – would overcome our soundness concerns in this regard.

### **Housing requirement**

#### **Q67. Is a minimum housing requirement of 19,620 justified and consistent with national policy?**

- 1.18 No. Considering the required amends needed to the plan period to ensure the plan is consistent with national policy, the submitted requirement of 19,620 is not justified or consistent with national policy (Paragraph 35b and 35d, NPPF Sep 2023). **BL therefore objects** to the plan on the basis.

- 1.19 However, the Council has already proposed modifications to update the requirement – reflecting the extended plan-period proposed and the updated local housing need figure – to a total of 19,741 homes (modifications M1 and M67<sup>18</sup>) to make the plan sound.
- 1.20 It is of note that the Government has published a new draft NPPF (2024) alongside a revised standard methodology for assessing local housing need<sup>19</sup>. The draft NPPF (2024) – for which a national consultation recently concluded – includes a provision (Paragraphs 226c and 227) whereby any plan already submitted for examination at the point of the new NPPF’s formal publication is then adopted with a housing requirement more than 200 dwellings lower than the proposed new standard method figure it would be “*expected to commence plan-making in the new plan-making system at the earliest opportunity to address the shortfall in housing need*”. Were the Inspector to consider that modifications to the housing requirement as per M1 and M67<sup>20</sup> were needed to make the plan sound, then using the latest inputs to the standard method outputs a figure – 1,039 dpa – that would trigger Paragraph 227 of the draft NPPF (2024) were that element of the draft NPPF to be adopted as currently set out.
- 1.21 This would at one level be a benefit to this plan as were there any apparent delay on sites coming forward in reality, then the Inspector would know that the Council would at the earliest opportunity be required to make a new plan under the new framework within which housing needs (including unmet needs) and approach to housing supply will be reconsidered.

**What is the status of the 996 dwellings referenced within the table in Policy DPH1 as total under/over supply for resilience and unmet need? Should this figure be included within the annual housing requirement for the district?**

- 1.22 Policy DPH1 states that an additional 966 homes have been planned for both ‘resilience’ (i.e. to ensure the district meets its own needs) and to meet wider ‘unmet needs’. We note that this figure would extend to 1,042 homes based on proposed modification M67 owing to proposed changes to the plan-period and requirement (M1)<sup>21</sup>; needed to make the plan sound.
- 1.23 Notwithstanding, the dual status of the oversupply is not consistent with national policy (Paragraph 35d, NPPF Sep 2023). **BL therefore objects** to the plan on this basis regardless of the specific number of homes being ‘oversupplied’.
- 1.24 The soundness concern we have with Policy DPH1 relates to the oversupply potentially providing flexibility and specifically unmet needs. In respect of unmet needs, Paragraph 11(b) of the NPPF (Sep 2023) requires strategic policies to provide for, as a minimum, objectively assessed needs as well as unmet needs. Next, the tests of soundness includes the plan being ‘positively prepared’ (Paragraph 35a). This means plans must, *inter alia*, be informed by agreements with neighbouring areas so that unmet needs are ‘accommodated’ (where practical and consistent with achieving sustainable development).

<sup>18</sup> M1 (Page 3, DP2), M67 (page 20, DP2)

<sup>19</sup> <https://www.gov.uk/government/consultations/proposed-reforms-to-the-national-planning-policy-framework-and-other-changes-to-the-planning-system>

<sup>20</sup> M1 (Page 3) & M67 (page, 20) (DP2).

<sup>21</sup> M1 (Page 3) & M67 (page, 20) (DP2).

1.25 In the context of both these policies, it would not be consistent with national policy to have a buffer of supply that can both provide flexibility and meet unmet needs. Any provision to unmet needs must be informed by agreements and accommodated in the plan itself through strategic policies. In our view the only sound route to do this is through the housing requirement policy to ensure a specific level of unmet need will be met over a plan period.

1.26 Therefore, the status of so-called ‘oversupply’ identified in Policy DPH1 (regardless of what the figure is) needs to be amended to one of the following approaches:

**1 Flexibility only:**

Solely for the supply-side resilience of Mid Sussex District in terms of meeting its own housing needs. This would be to cover for the situation where an existing or new allocation failed to deliver in the timeframes or at the rates envisaged.

Noting this, BL is committed to delivering the proposed allocation at ‘Land South of Reeds Lane’ (DPSC3) and intends to deliver all 2,000 homes allocated within the revised plan-period to 2040 (as per modifications proposed to the plan by the Council, DP2 – M66).

If the Council amended the status of the oversupply identified (whatever that figure might be) to account just for resilience in the supply, the logic is that the district would make **no** provision for addressing wider unmet needs (unless further sites were found to be needed and integrated through modifications to meet wider unmet needs, noting also that an immediate review may be necessary as set out above in our response to Q67);

Alternatively, it would be:

**2 Unmet needs only:**

Solely for addressing some of the unmet needs arising from neighbouring areas (i.e. elsewhere in the Northern West Sussex HMA and/or the Coastal West Sussex and Greater Brighton HMAs<sup>22</sup>). In doing so, this would need to be reflected as a specific contribution in the housing requirement element of the policy.

If the Council amended the status of the ‘oversupply’ identified (whatever that figure be) to be for a specific level of unmet needs in the housing requirement, the district would have **no** resilience (or ‘buffer’) to give assurance that Mid Sussex District could meet its own needs if specific sites failed to deliver for whatever reason (unless further sites were found to be needed and integrated through modifications to provide additional flexibility, noting also that an immediate review may be necessary as set out above in our response to Q67);

A final alternative would be:

**3 Split:**

Split the ‘oversupply’ to both (a) make a specific contribution to unmet needs in the housing requirement element of the policy and (b) any residual to provide a level of ‘buffer’ for the district’s own flexibility. However, both elements would need to be

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<sup>22</sup> As identified in document H5 – paragraphs 31 to 46 (pages 7-9)

justified in terms of being sufficient to address the basis on which both were advanced. It would be a matter for the Council to determine the numerical basis of that split and then for this examination to test this figure (noting that further sites could be added and integrated through modifications to meet wider unmet needs and provide additional flexibility if necessary, noting also that an immediate review may be necessary as set out above in our response to Q67).

1.27 Ultimately, it is for the Council to consider what is the most appropriate remedy and for the Inspector to come to a view on the issue (noting wider questions related to the spatial strategy and unmet needs).

1.28 Other than noting a modification is required, BL has no specific view as to which approach should be taken. However, the following should be noted:

- 1 As per Appendix 4 to the 'Housing Supply and Trajectory' topic paper (H4)<sup>23</sup>, it is only in the last four years of the revised plan-period to 2040 (i.e. years 12 to 15, assuming the plan is adopted in 2025) that the expected supply of homes falls consistently below the annual housing requirement. In all bar one other year (2024/25), the Council expects to deliver above the annual requirement.

In this context, the NPPF (Sep 2023) only requires plans to identified sites "*where possible, for years 11-15 of the plan*" (Paragraph 68).

- 2 If (a) the Inspector endorsed proposed modifications suggested by the Council to the housing requirement (M67<sup>24</sup>), (b) the transition arrangements in the draft NPPF (2024) were adopted as currently written – the adoption of which is likely to occur during this examination – and (c) the new standard methodology remained unchanged; the Council would need to immediately recommence plan-making under the new planning system. This would be to address its increased local housing need (as set out in our response to this question: Q67).

Therefore, there would be an early opportunity for the Council to not only boost supply further within a new policy environment to meet its increased local housing need figure but also to (a) address any sites that have failed to deliver within its own district; and (b) an additional opportunity to address unmet needs as appropriate.

**Q68. Are there other considerations that are likely to drive an increase in the homes needed locally, such as any needs that cannot be met within neighbouring areas namely the 30,000 dwellings of unmet need identified up to 2050 in the Coastal West Sussex and Greater Brighton authorities, Housing Need and Requirement Topic Paper (HNRTTP) (H5), and the more immediate housing needs of Crawley, Brighton and Horsham?**

1.29 As per BLs response to Q27 (Matter 2), there are 9,882 homes worth of unmet need arising in the Northern West Sussex HMA – within which Mid Sussex District largely sits – alongside c.30,000+ homes arising from the Coastal West Sussex and Greater Brighton

<sup>23</sup> Page 35 (H4)

<sup>24</sup> M67 (page 20, DP2).

HMA's. BL is of the view that the plan – with the proposed modifications suggested both by the Council and by BL itself – can be found sound.

- 1.30 In this context, if the Inspector concluded that more homes were needed within Mid Sussex to make a specific contribution to meet unmet needs, then BL considers that this is a matter that can be dealt with via modifications to the plan; i.e. to make additional allocations (if justified in accordance with a potentially updated wider evidence base). Moreover, as per our response to Q27 (Matter 2) the best place to meet wider unmet needs is where HMA's with unmet needs overlap within Mid Sussex District. This overlap area would be the most appropriate place to find new sites – if required – but also sites already allocated within this area should inherently be supported. This would include BL's allocation of 2,000 homes at 'Land South of Reeds Lane' (DPSC3).

**Q69-Q70:**

- 1.31 No comment.

**Q71. What is the housing requirement for each designated neighbourhood area?**

- 1.32 The plan includes a distribution of commitments, existing allocations, and proposed allocations by settlement and parish at Tables 2a and 2b of the submitted plan (Chapter 6, page 41).

**Q72. Are any main modifications necessary for soundness, if so, why?**

- 1.33 Yes. The following modifications should be made:
- 1 Amending the plan requirement to 19,741 homes and the plan-period to 2040 (as per the Council's suggested modifications in DP2);
  - 2 Amending the status of the current 'oversupply' and resultant changes to Policy DPH1 (as per our response Q67);
  - 3 Amendments to relevant policies to account for an update or addendum to the current SHMA (prepared in October 2021) (as per our response to Q59, Q61 and Q66); and
  - 4 Set specific requirements for neighbourhood plan areas as necessary (including if a specific housing requirements is not required) (as per our response to Q71).
- 1.34 In addition, further modifications may be required to Policy DPH1 in terms of the requirement and the number of homes allocated should the Inspector consider the Council needs to – and any updated evidence concludes the Council can – increase the number of homes planned for to address a specific and increased level wider unmet needs.

[Total Word Count: 2,908]



**Appendix 1 Extract from Gatwick DCO  
Document 5.3**



# Gatwick Airport Northern Runway Project

Environmental Statement

Appendix 17.9.3: Assessment of Population and Housing Effects

**Book 5**

VERSION: 1.0

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## Table of Contents

1	Introduction	1
2	Demographic-led scenarios	4
3	Employment-led scenarios	8
4	Housing-led scenarios	18
5	Labour supply analysis	25
6	Housing need during construction	39
7	Employment and housing types	43
8	Summary and conclusions	48
9	References	50
10	Glossary	50
	Annex 1	51
	Annex 2	52
	Annex 3	56
	Annex 4	58
	Annex 5	74
	Annex 6	75
	Annex 7	76
	Annex 8	86

## Summary Report

This report has been prepared by Lichfields on behalf of Gatwick Airport Limited (GAL) to assess the population and housing effects of the employment generated by the proposal to make best use of London Gatwick Airport's existing runways and infrastructure (referred to within this report as 'the Project'). In particular, this report looks at whether the future supply of labour generated by current and potential future plans for housing supply would be sufficient to accommodate the additional operational employment generated by the Project in its operational phase. It also assesses any potential implications for the type and tenure of housing during operation and the potential impacts on demand for housing during the construction phase.

This report is structured in three main parts:

- **Summary Report** (this report) – this is a summary of the key conclusions of the analysis. It summarises the position regarding the population and housing effects of the Project;
- **Technical Report** – the technical report presents the data and analysis which underpins the Summary Report as well as a range of background and contextual information and a number of additional scenarios for future population, housing and job growth which were assessed by Lichfields as part of the process of preparing this report (and earlier versions). This includes presenting additional information and analysis to reflect comments received during the consultation process; and
- **Annexes** – the Annexes contain additional data for information purposes, including a local authority breakdown of the outputs of all scenarios assessed as part of the Technical Report. This is in response to comments received from local authorities during consultation.

### Overall Housing Need

#### Context

The study area covered by this report comprises 17 local authority areas around Gatwick; this is considered to be an appropriate area of study because these are the authority areas which might reasonably be expected to experience any potential material impact on housing as a result of labour demand associated with the Project. The study area covers the Labour Market Area (14 authorities) plus a further three authorities.

This analysis uses a base date of 2021 and the base population for each local authority in the study area as per the 2021 Census. Key reporting years are 2024, 2029, 2032, 2038 and 2047.

This analysis is based on a range of official datasets published by the Office for National Statistics (ONS) (including Sub-National Population Projections and Census data, including economic activity), the Department for Levelling Up, Housing and Communities (DLUHC) (Sub-National Household Projections) and the Office for Budget Responsibility (OBR) (economic activity rate projections). This report also draws upon economic forecasts published by third parties<sup>1</sup> and employment estimates produced specifically for the purposes of the Project (by Oxera – see Environmental Statement [ES] Appendix 17.9.2 'Local Economic Impact Assessment'). This report also draws on housing monitoring information published by local authorities, such as annual monitoring reports, five-year land supply statements, housing trajectories and local plans.

#### Methodology

The assessment of future population, housing and job growth in this report uses industry-standard toolkit PopGroup which is widely adopted by local authorities within the evidence base for local plans to help establish estimates of housing need and is considered appropriate for the purposes of this report. Scenarios are modelled within PopGroup at the local authority level; however, within the Summary Report and Technical Report, results are aggregated to Housing Market Area (HMA) or study area level. Local authority outputs are available within the Annexes.

A total of 16 scenarios have been assessed (and are detailed further within the Technical Report) as part of this report, however, the conclusions of this report are based on a comparison between the outputs of the following principal two scenarios.

#### Current housing trajectories (Scenario 8a in the Technical Report)

This is a 'housing-led' scenario where the number of homes planned for the study area in existing local plans determines the number of people living in the study area (based on demographic projections<sup>2</sup>). In turn, this population determines the size of the labour force (based on its size and age structure, taking into account assumptions around economic activity rates<sup>3</sup> and unemployment). This estimate of labour force determines the number of jobs supported (based on commuting patterns). It should be noted that the PopGroup model translates homes into jobs in this scenario based on a fixed

set of inputs (economic activity, unemployment and commuting); in reality these inputs could change in response to labour demand and supply.

Where the plan period or housing trajectory expires before 2047 (most areas now have plans covering the period only to 2031) average completion rates from that trajectory are extrapolated for the remainder of the period to 2047. Whilst this is an assumption, it is a prudent one because, generally, the rates of housing growth are lower than those produced by the Government's standard methodology for calculating housing need (c.18,000 dwellings per year compared with c.10,500 per year in plans) which would apply to new local plans that are produced over coming years. This scenario should therefore be viewed as a 'worst-case' scenario from a housing supply perspective.

This scenario is considered to be the likely 'future baseline' scenario for the population – albeit a 'worst-case' scenario from a housing supply perspective, for the reasons set out above - because it uses planned levels of housing growth (based on trajectories published by local authorities) to estimate the future population in the study area. From this population, the size of the labour force and number of jobs is estimated (i.e. labour force and jobs are an output based on the amount of housing and population).

#### Cambridge Econometrics employment, with the Project (Scenario 5a in the Technical Report)

This is a 'jobs-led' scenario where the number of jobs is an input to the PopGroup model, and this determines the size of the labour force required (based on commuting patterns), which in turn determines the population required which then determines the amount of housing needed. In this scenario, the amount of housing is an output. As noted previously the PopGroup model translates jobs into homes based on fixed inputs (economic activity, unemployment and commuting); in reality, these inputs could change in response to labour demand and supply.

In this case, the number of jobs is based on economic forecasts published by Cambridge Econometrics (CE), with the jobs associated with the Project taken into account. CE forecasts obtained for this analysis (published March 2022) suggest that across this study area there will be a total of 1.32m jobs by 2047; an increase of 119,400 from 2021, or c.4,600 per year. This is a level of job growth which broadly corresponds with the number of jobs underpinning evidence in currently adopted local plans in the study area over the next c.10 years. For this reason, CE is considered a reasonable assessment of likely baseline or ambient future job growth in the study area.

<sup>1</sup> Cambridge Econometrics has been used for the purposes of the Summary Report, however Experian forecasts have also been considered within the Technical Report in response to comments received from local authorities during the consultation process.

<sup>2</sup> Based on official projections published by the Office for National Statistics (ONS)

<sup>3</sup> Based on labour market participation rates published by the Office for Budget Responsibility (OBR).

Employment estimates produced by Oxera/ICF suggest the operational phase of the Project would result in c.9,500 jobs (direct, indirect, induced and catalytic, compared with how many jobs Gatwick would support without the Project) across the study area at its peak (2032), falling to c.8,700 jobs in the longer term (2047), as shown in Table SR1. The North West Sussex HMA (which also corresponds to the North West Sussex Functional Economic Market Area – FEMA – comprising Crawley [where Gatwick is located], Horsham and Mid Sussex) is anticipated to accommodate the greatest share of Project jobs – 35-36%.

**Table SR1: Project jobs by Housing Market Area**

	2029	2032	2038	2047
North West Sussex	1,049	3,308	3,300	3,131
Croydon and East Surrey	661	2,065	2,021	1,889
Coastal West Sussex	851	2,642	2,553	2,363
North East Surrey	255	794	773	718
Wealden and Eastbourne	213	662	640	593
<b>Study Area Total</b>	<b>3,030</b>	<b>9,471</b>	<b>9,286</b>	<b>8,694</b>

Source: Oxera

If all jobs associated with the Project were net additional (to job growth forecast by CE) this would suggest total job growth of 128,000 by 2047, or c.4,900 per year) in the study area. This could be a 'worst-case' scenario in terms of labour (and therefore housing) demand because it is possible that some jobs associated with the Project will substitute or displace other jobs which are included in the CE forecast. In these circumstances, overall employment growth will be lower than the 128,000 assessed within this report, and the result will be a lower labour force requirement and lower housing demand than this scenario (5a) suggests.

From these two scenarios (Scenario 8a and Scenario 5a) a comparison is made between labour supply (generated by a given level of housing growth – i.e. based on current housing trajectories) and labour demand (needed to support a given level of job growth – i.e. CE forecasts, with the Project). This enables the identification of any shortfalls, either in specific geographic areas or in key reporting years. If significant shortfalls are identified, these might need to be 'made good' by changes in commuting patterns, increases in economic activity and/or additional housing provision.

### Outputs

This analysis primarily reports outputs at the Housing Market Area (HMA) level because HMAs represent the geographic areas across which people move in search of housing, taking into account commuting patterns, house prices and other factors (such as school catchment areas). The HMAs used within this report are based on the HMAs which have been identified by the authorities themselves within their evidence base, such as in a Strategic

Housing Market Assessment, where this evidence is available. However local authority outputs are provided within the Annexes for information purposes, as requested by some local authorities during consultation.

In headline terms – i.e. across the study area as a whole - current housing trajectories provide for sufficient labour supply across the study area to meet CE forecasts of future job growth and with sufficient 'surplus' to match the additional labour demand generated by the Project (direct, indirect, induced and catalytic). Modelled labour demand over the assessment period associated with the CE forecasts (with all operational Project jobs) is c.143,000 whereas the labour supply likely to be generated by housing growth in existing local plans is c.238,000 by 2047 – a 'surplus' of c.95,000 in the labour force across the study area, as shown in Table SR2. From a housing perspective, modelled housing demand associated with CE forecasts (with all operational Project jobs) is 201,000 whereas housing growth on the basis of current trajectories is estimated to be 272,000 – a 'surplus' of c.71,000 homes by 2047 across the study area, as also shown in Table SR2.

The labour demand associated with Scenario 5a is likely to be a 'worst-case' scenario for the reasons set out above, and in addition, the current housing trajectory scenario (Scenario 8a) is likely to be the 'worst-case' scenario from a housing supply perspective because future housing supply will likely be higher than estimated by current trajectories (as plans are updated in response to current Government policy requirements). Therefore any labour supply shortfalls (at either the local authority or HMA level) identified between Scenarios 5a and 8a within this report should be seen as maximums.

To assess whether there are likely to be any localised 'pinch points', Table SR2 below summarises the position for each Housing Market Area (HMA) in the study area for the key assessment years of 2024, 2029, 2032, 2038 and 2047, comparing the labour supply generated by Scenario 8a with the labour demand associated with Scenario 5a.

It should be noted that because the Project's first year of opening is 2029, no operational employment impacts are anticipated in 2024 and hence the outputs are the same with or without the Project. In other words, the shortfalls in labour in the North East Surrey HMA and Wealden and Eastbourne HMA shown in Table SR2 are modelled to occur regardless of whether the Project's operational jobs are included within the modelling.

In 2029, 2032 and 2038 shortfalls are expected within the Croydon and East Surrey HMA and the North East Surrey HMA. Surpluses are anticipated in the North West Sussex HMA, Coastal West Sussex HMA and Wealden and Eastbourne HMAs. By 2047 all HMAs within the study area would be expected to have a labour surplus.

**Table SR2: Summary of surplus/shortfall in labour supply and housing by HMA - Cambridge Econometrics forecast (with Project jobs) compared with current housing trajectory (Scenario 8a vs Scenario 5a)**

	2024	2029	2032	2038	2047
<b>Labour Supply</b>					
North West Sussex	1,798	9,767	9,670	15,192	29,815
Croydon and East Surrey	1,864	-1,597	-4,089	-1,670	10,152
Coastal West Sussex	1,157	15,348	14,911	18,187	39,699
North East Surrey	-1,482	-412	-1,192	-936	3,454
Wealden and Eastbourne	-1,851	611	1,142	3,445	11,673
<b>Study Area Total</b>	<b>1,486</b>	<b>23,717</b>	<b>20,442</b>	<b>34,217</b>	<b>94,793</b>
<b>Dwellings</b>					
North West Sussex	974	5,887	6,376	10,310	20,923
Croydon and East Surrey	1,061	-855	-2,379	-1,432	6,348
Coastal West Sussex	429	10,775	11,428	15,989	33,189
North East Surrey	-809	-222	-658	-597	2,267
Wealden and Eastbourne	-1,380	22	350	1,892	8,120
<b>Study Area Total</b>	<b>276</b>	<b>15,606</b>	<b>15,118</b>	<b>26,163</b>	<b>70,847</b>

Source: Lichfields analysis

For HMAs where shortfalls have been identified, it is important to consider whether the Project is a determinative factor in this shortfall (i.e. whether the shortfall would occur in any event, even without the Project) and what the scale of this shortfall is (relative to, for example, the overall size of the labour force or available housing supply). In this context, Table SR3 below shows the labour supply position of Scenario 8a (labour and housing supply generated by current housing trajectories) compared with Scenario 4a (labour and housing demand associated with the CE forecast, without the Project). This shows that for Croydon and East Surrey a labour shortfall would be expected in 2029 and 2032 even if the Project did not take place. Similarly, in the North East Surrey HMA, a shortfall would be anticipated without the Project in 2029, 2032, and 2038 even without the Project. The inclusion of the Project therefore makes an already-anticipated shortfall ever so slightly greater.

The only HMA and assessment year in which the Project is the determinative factor is therefore in the Croydon and East Surrey HMA in 2038; without the Project there is expected to be a surplus of 904 (Table SR3 below) whereas with the Project there is anticipated to be a shortfall of 1,670 (Table SR2 above). In housing terms, there is expected to be a surplus of 382 without the Project but a shortfall of 1,432 with the Project. This is likely to represent a worst-case scenario because some Project jobs may not be net additional (over and above those jobs already in the CE forecast) and it does not take into account likely future increases in housing supply (as plans are

reviewed). By 2047 (the long-term forecast year) this HMA would be expected to have a substantial surplus (in labour and housing) with or without the Project.

**Table SR3: Summary of surplus/shortfall in labour supply and dwellings by HMA - Cambridge Econometrics forecast (without additional Project jobs) compared with current housing trajectory (Scenario 8a vs Scenario 4a)**

	2024	2029	2032	2038	2047
<b>Labour Supply</b>					
Northern West Sussex	1,798	10,718	12,667	18,173	32,638
Croydon and East Surrey	1,864	-754	-1,456	904	12,557
Coastal West Sussex	1,157	16,247	17,703	20,885	42,197
North East Surrey	-1,482	-148	-371	-139	4,195
Wealden and Eastbourne	-1,851	874	1,957	4,233	12,403
<b>Study Area Total</b>	<b>1,486</b>	<b>26,938</b>	<b>30,500</b>	<b>44,057</b>	<b>103,990</b>
<b>Dwellings</b>					
North West Sussex	974	6,405	8,087	12,345	23,063
Croydon and East Surrey	1,061	-389	-860	328	8,178
Coastal West Sussex	429	10,897	13,206	17,385	35,327
North East Surrey	-809	-84	-197	-47	2,842
Wealden and Eastbourne	-1,380	191	909	2,534	8,777
<b>Total</b>	<b>276</b>	<b>17,021</b>	<b>21,145</b>	<b>32,545</b>	<b>78,187</b>

Source: Lichfields analysis

In 2038, Scenario 8a (current housing trajectories, which comprises the future baseline for population, labour and housing for the purposes of the Socio-Economic Chapter) indicates there will be a total labour supply of 370,770 in the Croydon and East Surrey HMA. The inclusion of the Project represents a change of 2,574 in the labour supply (+904 without the Project to -1,670 with the Project) which represents a magnitude of change of 0.7%. Based on the significance criteria used in Chapter 17 of the ES (Socio-Economics) for the labour market during the operational phase, impacts of up to 5% in the Labour Market Area are described as 'Very Low'. However it is important to recognise that the 'Croydon and East Surrey HMA' does not in and of itself form a study area for the purposes of the Socio-Economic assessment in the ES; any housing impacts in this HMA are relevant only insofar as it is a constituent part of the Labour Market Area, which is referred to as a whole within the main Socio-Economic Chapter (para 17.9.137).

It should also be reiterated that additional housing provision is not the only way this shortfall (or indeed any shortfall elsewhere, with or without the Project) can be 'made good'; labour shortfalls could be rectified by one (or more) of any of the following occurring; increases in economic activity within

the HMA, reductions in unemployment rates within the HMA and/or changes in commuting patterns (e.g. an increase in in-commuting into or a reduction in out-commuting from the HMA). In light of the fact that the labour shortfall equates to just 0.24% in the only HMA where the Project is a determining factor, and the much greater surpluses that exist within other HMAs in the study area at that time (for example, in 2038 the surplus that exists within the North West Sussex HMA – i.e. the FEMA – equates to a 6.9% surplus on an overall labour supply of 262,000, and in the Coastal West Sussex HMA the surplus equates to 4.1% on an overall labour supply of 507,000), only a relatively small change in any of these factors would need to occur to 'make good' the identified shortfalls.

In light of this, and given substantial surpluses in labour supply that are anticipated to exist across the study area as a whole (over 34,000 in 2038, of which a surplus of over 15,000 is found within the North West Sussex HMA), and the fact that housing trajectories are extrapolated in the later assessment years, it is not considered that there is likely to be any significant housing effects as a result of operational employment demand associated with the Project in any housing market area within the study area.

Furthermore, the standard method results in substantially higher future housing supply when compared with current trajectories across the study area, and would be expected to generate substantially greater labour supply than current trajectories; enough to result in labour surpluses in every housing market area in every assessment year. This is explored in further detail within the Technical Report.

### Tenure of housing needed

This report also gives consideration to whether operational employment associated with the Project might have implications for the demand for different tenures of housing (particularly affordable housing), particularly in those areas immediately adjacent to Gatwick where the majority of employment associated with the Project will be based.

Based on current occupancy patterns by socio-economic group, an estimated 17% of workers associated with the Project's operational jobs in the authorities immediately adjacent to Gatwick are expected to require affordable rented housing (equating to 791 out of the 4,793 total operational Project jobs in these authorities at the peak in 2032). Across the study area as a whole, an estimated 14% of workers associated with the Project are expected to require affordable housing (1,344 out of 9,471 in 2032). This is slightly higher than the proportion of affordable housing within the existing stock across both geographies.

A review of recent affordable housing delivery, current evidence of affordable need published by the Councils, policies in local plans and pipeline delivery of affordable housing on large-scale sites has been conducted. This shows that the operational demands associated with Project (which are likely to be

slightly skewed more towards affordable housing than the existing employment base) are unlikely to have any impact on affordable housing demands beyond what is already emerging or being planned for in the authorities in Gatwick's surrounding area, because:

- **Recent completions** – in the local authority areas adjacent to Gatwick, affordable housing delivery has been 21% of all housing completions collectively since 2018; this is above the level of affordable housing in the existing stock and the likely affordable housing need associated with the Project;
- **Local evidence of need** – local authority evidence bases in the adjacent authorities already acknowledge the scale of affordable housing need, and in all cases this need (as a proportion of overall need) is significantly higher than the current stock of affordable rented housing and the affordable housing need associated with the Project. In Crawley the affordable need has been identified by the Council as being 75% of overall need, in Horsham this is 36%, in Mid Sussex 43%, in Mole Valley 19%, in Reigate and Banstead 68-76% and in Tandridge 48-98%. The Project therefore is not expected to place any additional pressure on affordable housing need beyond that which the Councils themselves already acknowledge to exist;
- **Local plan policies** – local plan policies in the adjacent authorities require a level of affordable housing which is well above the level of affordable housing within the existing stock and the need associated with the Project. In Crawley, the adopted (and emerging) plan requires 40% of housing to be affordable, in Horsham this is 35% (adopted), in Mid Sussex 30% (adopted and emerging), in Mole Valley 30-40% (emerging), in Reigate and Banstead 20-30% (adopted), in Tandridge 34% (adopted, 20-40% in the emerging plan). The Project therefore is not expected to place any additional pressure on affordable housing policies beyond policies which are already adopted or emerging; and
- **Pipeline supply** – pipeline supply across the adjacent authorities typically is making provision for affordable housing at or close to levels of affordable housing in plans. For example, the majority of the eight strategic sites in the North West Sussex HMA analysed were delivering 30% affordable housing. In Reigate and Banstead the key strategic site in the Core Strategy (Horley North West) is making provision for 25% affordable housing. In Tandridge and Mole Valley, the nature of these areas (being heavily Green Belt constrained) means there are limited amounts of large-scale strategic housing sites, and the largest development sites in these areas are typically brownfield sites which have relatively low affordable housing delivery (our analysis showed sites delivering 111-214 units, with affordable delivery ranging from 0% to 17% on these sites). However, in both areas, the adoption of new local plans would be expected to create a step-change in overall housing delivery as well as affordable housing delivery, as indicated by the affordable housing requirements in those emerging plans (as cited above).

Authorities therefore already recognise that future affordable housing needs are well above the level of affordable housing in the existing stock, and policies (adopted and emerging) along with emerging large-scale schemes are therefore seeking to maximise affordable housing delivery (subject to viability and other factors). The proportion of affordable housing need associated with the Project – whilst slightly higher than the affordable housing stock associated with the current employment base - is unlikely to place any further upward pressure on affordable housing delivery in the future beyond pressures that already exist, acknowledged by the Councils, and which feed into current/emerging policies and underpin decision-making. The Project is therefore unlikely to result in any significant effects insofar as the specific tenure requirements of housing within the study area.

### Housing during construction

Analysis prepared by Quod on behalf of GAL for the purposes of the Project (see Appendix 17.9.1 of the Environmental Statement) suggests the construction workforce will peak at c.1,400 workers in February 2027, of which it is estimated that up to 20% may be non-home based (NHB) and therefore require temporary accommodation, with the vast majority being located in Crawley and Reigate & Banstead. For the reasons set out by Quod in (Section 4 of Appendix 17.9.1 of the ES), the assumption that 20% of construction workers will be NHB should be seen as a ‘worst-case’ scenario from the perspective of demand for accommodation.

NHB workers will be accommodated in a number of ways, depending on their role (and therefore income available to spend on housing) and duration working on the Project. This report has assessed the housing market’s potential to absorb housing demand from temporary workers for the seven authorities where >1 NHB worker is expected to be accommodated; Crawley, Mid Sussex, Horsham (which make up the North West Sussex HMA), Reigate & Banstead, Mole Valley, Tandridge and Croydon. Collectively these account for 250 of the 270 NHB workers at the construction peak.

This analysis primarily focuses on the private rented sector and its capacity to absorb this potential demand, but also other sources of housing supply for construction workers. It shows that the demand for temporary accommodation during the construction phase from NHB workers is unlikely to give rise to significant housing effects as the number of NHB workers (even at its peak) represents a very small proportion of the potential sources of housing/accommodation supply which might meet this demand.

### Conclusions

This report has been prepared in order to assess the population and housing effects of the employment generated by the Project. The conclusions are as follows:

- **Overall need for housing** - it is not considered that there is likely to be any significant housing effects, in terms of the overall demand for housing in the study area or any particular HMA, as a result of operational employment demand associated with the Project;
- **Tenure requirements** - the Project is unlikely to result in any significant effects insofar as the specific tenure requirements of housing within the study area, based on a review of recent completions, current evidence of affordable housing need, local plan policies and pipeline housing supply; and
- **Housing during construction** - demand for temporary accommodation during the construction phase from non-home-based workers is unlikely to give rise to significant housing effects.

**Appendix 2 Extract from Gatwick DCO  
Document 10.1.5**





# Gatwick Airport Northern Runway Project

Statement of Common Ground Between Gatwick Airport Limited and Mid Sussex District Council – Clean Version

**Book 10**

VERSION: 3.0

DATE: AUGUST 2024

Application Document Ref: 10.1.5

PINS Reference Number: TR020005

<p>2.19.3.4</p>	<p>New construction labour</p>	<p>New construction labour - Assumption that there will be new entrants to construction, is the applicant going to be identifying where these entrants will be coming from. Not specific about where these are coming from. No analysis of existing skills in local areas has been undertaken to inform this analysis.</p> <p><b>Updated position (Deadline 1):</b> Noted. Further discussion through ESBS.</p> <p><b>Updated Position (Deadline 5):</b> The Local Authorities have set out their concerns with regards to the ESBS in their <b>Deadline 4</b> response. [REP4-042] paragraphs 7.13.1 to 7.13.27.</p> <p>It is also noted that a further workshop and further iteration of the ESBS will be published by the Applicant at Deadline 6. The Council will make further comment once the updated ESBS has been published and reviewed.</p> <p><b>Updated position (12.08.24):</b> The council welcomes the updated Draft ESBS Implementation Plan being provided by the Applicant. Example Thematic/delivery Plans have also been shared by the Applicant which provide further detail. The review of these is ongoing by MSDC and the Authorities. It is understood that an updated ESBS and ESBS Implementation Plan will be submitted at Deadline 8a which will necessitate further response.</p>	<p>There will be new entrants in all labour market sectors over the next seven years. These (broadly) will come from the same places as where existing workers live (ie existing towns and cities). The spatial distribution of those workers is set out in ES Appendix 17.9.1. This is specific to the existing construction skills in the local area.</p> <p><b>Updated position (April 2024):</b> Please refer to the response at Row 2.19.3.2 of this Table. Additionally, as noted, a draft ESBS Implementation Plan has been provided and will be updated iteratively. Ultimately, it will feature measures to boost local employment in the construction sector and support upskilling and training. The proposed governance of the ESBS includes a proposed multi-agency Steering Group that will approve the Implementation Plan and oversee its delivery.</p> <p><b>Updated position (July 2024):</b> The Applicant has provided an updated ESBS Implementation Plan and discussions will continue at future workshops with JLAs.</p> <p><b>Updated position (Deadline 9):</b> The topic of ESBS is Agreed, subject to the s106 Agreement and therefore it is considered that the absence of a local level assessment is agreed.</p>	<p><b>ES Appendix 17.9.1: Gatwick Construction Workforce Distribution Technical Note</b> [APP-199]</p> <p><b>Updated position (April 2024): Draft Section 106 Agreement Annex: ESBS Implementation Plan</b> [REP3-069]</p> <p><b>Updated position (July 2024):</b> Appendix 6 of <b>Draft Section 106 Agreement Version 2</b> [REP6-063]</p>	<p>Agreed subject to s106</p>
<p>2.19.3.5</p>	<p>Population and Housing Report</p>	<p>Population and Housing Report - Impact on housing does not take full account of increased pressure on temporary accommodation created by migration. This is too large to capture impacts at a local authority level. How will local authorities understand the extent of impacts on their areas?</p> <p><b>Updated position (Deadline 1):</b> Lack of consideration of locally specific pressures on temporary accommodation.</p> <p><b>Updated position (Deadline 5):</b> In relation to housing, please refer to Deadline 3 West Sussex Joint Local Authorities response [REP3-117] Sections 2.2 and 2.3.</p> <p><b>Updated position (12.08.24):</b> Stock of PRS using Census 2021 data is broadly correct albeit stock has not improved since Census 2021 data was captured.</p> <p>There are pressures in the private rented sector which have increased since the Census 2021 data suggesting that vacancy is more limited than what the data suggests. Pressure is felt through shorter void periods and high demand per unit on the market but data is limited. Demand from Government seeking to place asylum seekers in either the PRS or hotels</p>	<p>To determine the potential housing effects, the number of NHB workers (ie those who will temporarily migrate to the area) allocated to each local authority area has been compared with the total number of bed spaces available in the private rented sector. Table 6.1.1 of ES Appendix 17.9.3 sets out the distribution of NHB construction works (at peak) within the key authorities. In MSDC, it is expected that there would be six NHB workers requiring temporary accommodation within the district. Represented as a proportion of total bed spaces in MSDC, this accounts to 1.41%.</p> <p><b>Updated Position (April 2024):</b> A further response on the construction workforce and accommodation issues is provided in the Construction Labour Market and Accommodation Impacts note in response to Local Impact Reports.</p> <p><b>Updated position (July 2024):</b> This matter will be discussed further at a TWG.</p>	<p><b>ES Chapter 17 Socio-Economic</b> [APP-042]. <b>ES Appendix 17.9.3 Assessment of Population and Housing Effects</b> [APP-201].</p> <p><b>Updated position (April 2024): The Applicant's Response to Local Impact Reports Appendix D – Construction Labour Market and Accommodation Impacts</b> [REP3-082]</p>	<p>Not Agreed</p>

		adds to the pressures, albeit there is limited data available. NHB workers using hotels also makes it harder for the JLAs to source emergency hotel accommodation for homeless people. Local authorities have observed an increase in the per night rate of hotel accommodation locally which, it is believed, is adding to these pressures.			
2.19.3.6	Population and Housing Report	<p>Population and Housing Report - What data sources are being used to assess hotel, B+B and temporary accommodation capacity.</p> <p><b>Updated position (Deadline 1):</b> Lack of consideration of locally specific pressures on temporary accommodation.</p> <p><b>Updated position (Deadline 5):</b> In relation to housing, please refer to Deadline 3 West Sussex Joint Local Authorities response [REP3-117] Sections 2.2 and 2.3.</p> <p>The JLA's have responded to [REP3-082] at deadline 4 in [REP4 – 042] paragraphs 2.118 – 2.124.</p> <p><b>Updated position (12.08.24):</b> Position is as per response at Row 2.19.3.5.</p>	<p>Lichfields undertook primary research, splitting them into three broad categories – on-airport, off airport in close proximity (i.e. within 15 minutes), and off-airport (up to 30 minutes away).</p> <p><b>Updated position (April 2024):</b> A further response on the construction workforce and accommodation issues is provided in the Construction Labour Market and Accommodation Impacts note in response to Local Impact Reports.</p> <p><b>Updated position (July 2024):</b> This matter will be discussed further at a TWG.</p>	n/a	Not Agreed
2.19.3.7	Gravity Model testing / calibrating	<p>Gravity Model testing/calibrating and Results - 100% home based theoretical example assuming all construction workers are home based (90 mins). Theoretical breakdown of where these would be based. Gravity model captures distribution of construction work force. It is not clear how numbers have been split by locality, types of workers based in different localities and whether there would be sufficient supply of labour to fill these positions.</p> <p><b>Updated position (Deadline 1):</b> The Applicant has not taken account of current labour supply constraints within the local area.</p> <p><b>Updated position (Deadline 5): The Applicant has not given a clear response to the question above ‘ how have numbers been split by locality, types of workers based in difference localities and whether would be sufficient supply of labour to fill these positions.</b></p> <p>The Local Authorities have set out their concerns with regards to labour supply constraints in their <b>Deadline 4</b> response [REP4- 042].</p> <p><b>Updated position (12.08.24):</b> The Gravity model was not specifically mentioned at the further TWG. The specific analysis requested has not</p>	<p>The approach to developing the Gravity Model is set out in Section 4 of ES Appendix 17.9.1 Gatwick Construction Workforce Distribution Technical Note. Table 5-2 sets out the distribution of home based workers across the local authority areas. This is based on both the number of construction workers who live there and the distance from the site.</p> <p><b>Updated position (April 2024):</b> Please refer to the response at Row 2.19.3.2 of this Table.</p> <p><b>Updated position (July 2024):</b> This matter will be discussed further at a TWG.</p>	ES Appendix 17.9.1 Gatwick Construction Workforce Distribution Technical Note [APP-199]	No longer pursued.