

Horsham District Strategic Gap Background Document

Horsham District Strategic Gaps

Background Document in support of the General Development Control Policies Submission Document

1.0 INTRODUCTION

- 1.1 Strategic gaps have been designated within the District by successive West Sussex Structure Plans since 1980. Horsham District Council has defined the boundaries of two of these strategic gaps for the period to 2018 covered by the Core Strategy. The boundaries of the gaps and the policies detailing their impact on the development of the District are set out in the Development Control Policies Submission Document.
- 1.2 The purpose of this background paper is twofold. Firstly, to set out in detail the justification for the continued use of strategic gaps as a policy tool. Secondly, to outline the work that has been done to review the boundaries of the gaps and to justify changes that the Council has made. This review and justification is required by national and Structure Plan policies.
- 1.3 Planning Policy Statement (PPS) 7: Sustainable Development in Rural Areas requires that local planning authorities, when reviewing their area-wide development plans, should 'rigorously consider the justification for retaining local landscape designations'. The Adopted West Sussex Structure Plan 2001-2016 requires local planning authorities to 'review the boundaries of the strategic gaps identified in Policy CH3 taking into account the development requirements of this [Structure] Plan and local plans and the need to secure the objectives of the strategic gaps on a long-term basis.' In the past, Examination in Public panels have interpreted 'long-term basis' in this respect to mean 'for the life of the plan'.
- 1.4 This document is a technical background paper that sets out the justification for, and review of, strategic gap definitions that are found in the Development Control Policies Submission Document.

2.0 THE PURPOSE OF STRATEGIC GAPS

- 2.1 The concept of strategic gaps has a long history in West Sussex and arose, in part at least, from the characteristic close settlement pattern within the County. Strategic gaps are local designations, distinct from and subordinate to national designations like 'Green Belt'. They are used specifically to maintain the strategic settlement pattern of the County by seeking to resist the loss of character of individual settlements and by preventing settlement coalescence.
- 2.2 In the absence of appropriate planning controls actual settlement coalescence may occur through development at the edges of settlements physically reducing the gap between them. However, strategic gaps also seek to prevent 'perceived' settlement coalescence. This occurs where small-scale development and general increases in the levels of activity between the settlements cumulatively and over time reduce the perception of leaving and entering a settlement from the countryside. Therefore, within an area designated as a strategic gap, development and change, which would conflict with the objectives of the policy, i.e. which would actually or in people's perception reduce the separate identity and character of settlements, alter the settlement pattern or lead to coalescence of settlements, will not be permitted.

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- 2.3 Although strategic gaps effectively constrain most forms of development, they are not a policy tool for additional countryside protection. Strategic gaps and their policies are concerned only with the strategic pattern of settlements and settlement identity. Their justification lies in the stated objectives and not in any wish to maintain the visual, natural or recreational qualities of the areas of countryside they cover, which are aspects dealt with in other policies. Indeed, the key requirement of the areas designated as strategic gaps within the County is that they should have an absence of development. The West Sussex Structure Plan 2001 – 2016 stresses that the areas designated are not protected because of their landscape quality. They are allocated so that there is a clear perception of leaving one settlement and arriving at another, therefore providing a visual break and preserving the openness between settlements.
- 2.4 Notwithstanding their very specific role, distinctive to that of the general countryside protection policies, strategic gaps have the effect of protecting countryside that, due to its location between closely spaced settlements, is especially sensitive towards development. They provide the strongest possible locally designated protection over and above that given under general countryside policies. In essence, strategic gaps help preserve the rural character of key pressure points within West Sussex and help protect distinct urban edges in particularly sensitive places between substantial settlements. Section 8.0 of this paper explores the link between strategic gaps and landscape quality further.

3.0 JUSTIFICATION IN POLICY FOR STRATEGIC GAPS

3.1 National policy context

- 3.1.1 National planning policy does not give specific guidance of the use of strategic gaps. Some Government pronouncements on the issue have been supportive of the tool. For example, in the conclusion to their inquiry into Housing in 1998, a House of Commons Committee suggested that the Government should support local authorities who wish to maintain their own designations which play a similar role to Green Belts. This did not translate into specific policy however.
- 3.1.2 *PPS 7: Sustainable Development in Rural Areas*, places a general requirement on local planning authorities to ‘continue to ensure that the quality and character of the wider countryside is protected and where possible enhanced’. Nevertheless, there is some guidance on local landscape designations to the effect that they should only be used where other planning policies are not able sufficiently to protect the areas in question. In addition, local designations should be based on a formal and robust assessment of the qualities of the landscape concerned. The policy argues that the use of “carefully crafted, criteria-based policies...utilising tools such as landscape character assessments should provide sufficient protection for these areas.”
- 3.1.3 There are several problems with the approach suggested in PPS7. The first is that strategic gaps are not landscape designations in the same way as, for example AONB designations. They are designations designed to achieve the objectives of maintaining the separate identity and character of settlements and avoiding coalescence. Areas identified for the purposes of these objectives are included due to their relative location to the settlements and due to an absence of development. There is no reference to landscape quality.
- 3.1.4 Another problem with the ‘national approach’ is that it does not recognise the particular settlement characteristics of West Sussex, where historical settlement patterns have led

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to a large number of small and medium sized towns that are closely spaced and well connected. These conditions have led to particular problems with urban sprawl in the late Twentieth Century which have raised the prospect of settlement coalescence. West Sussex is not the only area where strategic gaps have been used to resist this trend. Hampshire and parts of Kent also use strategic gaps in a similar way. Elsewhere, in Wiltshire, Lincolnshire and Norfolk, other related tools such as 'rural buffers' and 'green wedges' have been employed to deal with similar problems in a way that recognises the specific geographical pattern of settlements in each location.

- 3.1.5 The suggestion by PPS7 that local designations could be dropped in favour of criteria-based policies, utilising tools such as landscape character assessments is based on the approach developed by The Countryside Agency. Such a strategy would seem to offer a solution to the management of all land around all settlements and could, it is argued, prove more flexible than strategic gap designations. There are problems with this criteria-based approach however. It is very difficult to define through criteria the areas where policies to prevent settlement coalescence should operate. Precision is difficult without arbitrary numerical limits (e.g. within 5km of a settlement) and may lead to unnecessary constraint of development in some places or provide a reason to object to a beneficial and sustainably planned urban extension.

3.2 County and regional policy context

- 3.2.1 The long-term use of strategic gaps in West Sussex and the absence of clear Government guidance has resulted in an evolving policy approach in the County's Structure Plans and, more recently, in the emerging South East Plan.
- 3.2.2 The adopted Structure Plan is due to end formally once the Regional Spatial Strategy for the South East (The South East Plan) is adopted. However, it currently represents an important expression of policy at the sub-regional level. The plan seeks to maintain a strong strategic gap policy (CH3) consistent with previous Structure Plans for the County. The policy maintains that authorities must ensure that the separate identity of all settlements is maintained and protected from perceived and actual coalescence. Authorities must also maintain and enhance the predominately open and undeveloped character of the countryside between the settlements. In listing the County's 22 strategic gaps the policy makes it clear that greater restraint of development is sought in these locations than elsewhere in the countryside. In this respect gaps should be protected not only from development that would lead to a physical joining of settlements, but also from an increase in levels of activity which would reduce the sense of travelling between settlements. This policy is based very clearly on the principle that the essential feature of the gaps is the absence of development and activity rather than its landscape quality.
- 3.2.3 Policy CH3 seeks to ensure that any development within strategic gaps would not compromise, either individually or cumulatively with other development, the objectives and fundamental integrity of the gaps and would maintain and enhance the predominantly open and undeveloped character of the gaps. This envisages a degree of restraint higher than that in other countryside areas. The justification for this degree of restraint is that strategic gaps are generally so narrow and limited in extent that any development could affect their openness and could be seen as contributing to visual or physical coalescence. This justification relies for its credibility on the strict definition by local authorities of only those areas that are necessary to achieve the objectives of the Policy. This requirement underlines the importance of the review that local authorities must undertake when re-defining strategic gaps during the creation of a new local development plan (now LDF).
- 3.2.4 A further requirement of Policy CH3 is the need to have regard to the strategic gap

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designations in neighbouring local authorities. Where these gaps cross the boundary into another District, that local authority is obliged to define boundaries for the Strategic Gap, as long as doing so would meet the objectives of the policy. In this way the Structure Plan aims to secure a consistent and co-ordinated approach across the County.

- 3.2.5 West Sussex County Council has justified its strategic gaps as a crucial policy tool to ensure the continued protection of the settlement structure within the County. In a 1996 publication, *Environmental Capacity in West Sussex*, a further argument was put that Strategic Gaps are themselves a valuable environmental resource.
- 3.2.6 The Submission Draft of the South East Plan (March 2006) maintains the strong support for strategic gaps. For the Gatwick sub-region the emphasis is on maintaining existing settlement patterns and identities and preventing coalescence through an ongoing protection of strategic gaps.
- 3.2.7 The Submission Draft policy (CC10b) now establishes criteria for the designation of strategic gaps in recognition of the lack of consistency across the region in the nature of the designations and the way they are used. In order to comply with the new policy, the settlements that the gap seeks to separate must now each have a population of 10,000 and the gap must be no more than 5 miles at the widest point.
- 3.2.8 In similar wording to the Structure Plan, Policy CC10b asserts that development should only be permitted in a strategic gap where it would not compromise, individually or cumulatively with other existing or proposed development, the fundamental integrity and purpose of the gap.
- 3.2.9 This study of relevant policy shows that strategic gaps are seen by some (for example The Countryside Agency) as a 'blunt tool' for attempts to protect large areas of diverse landscape with a range of development pressures and landscape qualities. Such a line of argument stresses the need for landscape character to form the basis of a criteria-based protection policy which would obviate the need for local designations. Against this, the particular pattern of closely spaced settlements in West Sussex which are often set within a landscape of a generally high quality has justifiably encouraged a use of tools which specifically address the problem of settlement coalescence. This approach has been supported by the West Sussex Structure Plans and continues to be well supported in the emerging the South East Plan.

4.0 REVIEWING THE USE OF STRATEGIC GAPS IN HORSHAM DISTRICT

4.1 Reviewing the policy text

- 4.1.1 Policy CS5 of the adopted 1997 Horsham District Local Plan was prepared in accordance with a previous Structure Plan. CS5 therefore allows for development in the strategic gaps only in 'compelling circumstances' which could, 'exceptionally', include 'essential development related to agriculture, forestry, the extraction of minerals or the disposal of waste' as well as 'opportunities to meet the demand for quiet informal recreation'. Such planning applications are subject to 'rigorous examination' of their possible impact on the objectives of the strategic gaps. Under the 1997 Local Plan, areas outside the defined strategic gaps are subject to the control of the general countryside protection policy CS1 if outside a built up area and also to Policy CS6 if within one of the defined Local Gaps.
- 4.1.2 A problem with this policy was that the terms used, such as 'exceptionally' were open to interpretation. The wording neither offered secure protection to the strategic gaps nor

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provided developers with clarity about the acceptability of their proposals. In addition, there was no policy mechanism anywhere in the Plan to prevent settlement coalescence in countryside areas outside the designated strategic or local gaps.

- 4.1.3 The review of the policy text sought to address the issues highlighted above. A different approach has therefore been taken in the General Development Control Policies Submission Document. Although Policy DC3 (Townscape Character and Settlement Coalescence) is still set within the framework of the underlying Countryside Protection and Enhancement Policy (DC1), it proposes (in part b.) general protection from settlement coalescence for all relevant countryside areas rather than just for the designated gaps, as was the case before. In addition the second part of DC3 seeks to protect further the two designated strategic gaps, whilst acknowledging the importance of opportunities to conserve and enhance landscape and amenity and opportunities for quiet informal recreation.
- 4.1.4 This can be seen as an incremental approach or a sliding scale of protection with those areas designated as strategic gaps at the top of this scale (in terms of locally protected areas). This approach effectively establishes a rigorous series of 'tests' that an application must meet in order to comply with the proposed policies. This approach offers more effective protection to areas within the strategic gaps than that afforded by the wording of CS5 with terms such as 'compelling' and 'exceptionally' which are open to interpretation. The new approach offers better protection from settlement coalescence to those relevant countryside areas outside of the strategic gaps and gives much greater clarity to the circumstances under which development will be permitted within the strategic gaps.

4.2 Reviewing the strategic gap boundary definitions

- 4.2.1 It is now well established that local authorities must only include areas within strategic gaps that are necessary to meet the objectives of the gap. This requirement has been included in several Structure Plans, including the currently adopted 2001-2016 Plan which states that 'only land which is necessary to secure the objectives of strategic gaps on a long-term basis should be included within them.'
- 4.2.2 In the past local authorities, including Horsham, have taken a broader view of what 'necessary' means in the context of the definition of strategic gaps and in previous local plans the definition of a patchwork of strategic and local gaps has resulted in a mistaken impression by some residents of the District that Horsham had a 'Green Belt' (Figure 1). There is a danger in this approach however, as the courts have in the past been prepared to back objectors to strategic gap definitions where in the Court's view the local authority had included land that was not necessary to achieve the objectives of the gap. This was the case in 1998 when the High Court decided that Horsham District Council's inclusion of Ifield Court Farm (now a hotel, see Figure 1) was not 'necessary'. This case established in law the principle of 'necessity' and the need for review and justification of areas included.
- 4.2.3 In addition to the threat of judicial intervention, broad definitions of strategic and local gaps made it difficult to find suitable sites for desirable or necessary developments. This has in the past led to exceptions being made to the policy in order to allow required developments to proceed. These exceptions, even if very infrequent, may have the effect of undermining the objectives of the policy. This underlines the importance of reviewing the definitions alongside development land allocations that are proposed in the production of a new development plan (now LDF). The Secretary of State confirmed some years ago that the boundaries of strategic gaps and built-up areas should not necessarily be coincidental which raises the possibility that strategic gaps may not

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always be defined up to the edge of a settlement where it was anticipated that a development allocation would be made during the life of the new plan. This approach has informed the decisions on the definition of the Horsham – Crawley Gap in the area covered by the west of Crawley strategic development Area of Study.

- 4.2.4 The Submission Draft of the South East Plan is very clear that designations must not be larger than necessary and states that designations must only be made to a maximum width of 5 miles. It gives no guidance however, on the breadth of the gap, i.e. the dimension not defined by the two settlements themselves.
- 4.2.5 The Horsham – Crawley Strategic Gap is now between 3.1 and 4 miles wide depending on how the 'widest point' is defined. The width of the previously defined gap was approximately 5.6 miles wide (Figure 1). The breadth of the gap is 3.4 miles at the widest extent (Figure 2). The previous gap has a breadth of over 6 miles. This highlights the need to reduce the extent of the gap in order to comply with the South East Plan.
- 4.2.6 Land previously designated as strategic gap can be removed during a review in order to meet the requirements of the Structure Plan and the South East Plan. Removing land from a strategic gap does not mean that the District Council considers that it should be developed. Often such land is removed because it is far from built-up areas and is experiencing little if any pressure for development. Such land is protected by other policies including DC1, the Countryside Protection and Enhancement Policy and part b. of DC3, the Townscape Character and Settlement Coalescence Policy.

4.3 Factors considered in reviewing boundaries

- 4.3.1 There is no standard formula for delineating the boundaries of strategic gaps. A helpful contribution was made by a Planning Inspector in 1998 and later quoted in the 2000 DETR research into strategic gaps. This offered the following factors which have informed that work by Horsham District Council in reviewing the current strategic gap boundaries:
- distance;
 - topography;
 - landscape character/type;
 - vegetation;
 - existing uses and density of buildings;
 - nature of urban edges;
 - inter-visibility (the ability to see one edge from another);
 - intra-visibility (the ability to see both edges from a single point);
 - the sense of leaving a place.
- 4.3.2 The review work done has included full assessments of all the land within the previous strategic gaps, based on the 1997 Local Plan (Figure 1). This has involved the identification of certain features including; the presence of development; recent planning applications (which can give an indication of pressure for development); and landscape features such as woodlands, field patterns and rights of way. Particular attention has been paid to the assessment of the strategic gap boundaries, including the nature, permanence and visibility of the boundary. This included an assessment of the nature of settlement edges where they form a part of the boundary and the degree to which there is a clear definition between the built-up areas and the countryside.
- 4.3.3 The final deliniation results in detailed boundaries on the ground that are logical, reasonable and defensible and readily identifiable through existing durable features of

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the landscape (see Figure 2). The boundaries identified have included roads, substantial footpaths, mature hedgerows and woodland boundaries. Occasionally settlement edges have had to be used in the absence of alternatives. However, it is not always the case that such boundaries conveniently bound the areas considered necessary to include in the gap.

- 4.3.4 Using roads as a boundary, for example Forest Road which delimits the southern boundary of the Horsham - Crawley Strategic Gap, necessarily means that one side of the road is within the gap and the other is outside it. Therefore, the side not included would not receive the protection of the policy and could be subject to development which, due the proximity to the strategic gap, could undermine the gap's objectives and lead to settlement coalescence. However, it is not easy to simply include both sides of the road within the gap as this would cause a problem in the identification of a firm, logical and visible boundary. The issue has been resolved by using a form of words in the Policy which applies protection to the strategic gap and to areas 'immediately abutting' the strategic gap. This solution mirrors a similar wording in DC14, the Conservation Areas Policy which seeks to resist development near to conservation areas where it would have an effect on the character of the area.

5.0 THE HORSHAM – CRAWLEY STRATEGIC GAP

5.1 The nature of the 1997 Local Plan Horsham – Crawley Strategic Gap

- 5.1.1 At slightly over 5000 hectares, the Horsham – Crawley Strategic Gap defined in the 1997 Horsham District Local Plan (referred to from here as the 1997 Gap) is by far the largest strategic gap in West Sussex (see Figure 1). It stretches from the northern boundary of Horsham District, including Rusper and Ifieldwood, down through part of the High Weald AONB to St. Leonard's Forest, reaching almost as far south as Mannings Heath. From west to east the Gap stretches from Langhurst Wood Road adjacent to Warnham Brickworks to the Crawley Borough boundary and the boundary with Mid Sussex at Pease Pottage. The Gap is, dissected by both the A264 and the railway line.
- 5.1.2 Although the area covered by the 1997 Gap is very largely rural, several areas of concentrated development are present within the Gap. These include the villages of Rusper, Faygate, and Colgate as well as several smaller hamlets including Ifieldwood, Lamb's Green, Wimlands and other areas of sporadic development particularly along Forest Road and Old Holbrook. Although most of this development is either residential or related to countryside activities, there are a few other major land uses within the Gap. These include the Forest Grange School in St Leonard's Forest, Cottesmore School, Golf Club and leisure complex west of Pease Pottage and the Roffey Park Institute on Forest Road. There are in addition a number of businesses located at Faygate and at Holmbush and others within the northern part of the Gap that are related to servicing Gatwick Airport, including the Ifield Court Hotel complex that was removed from the Gap following the High Court case in 1998, but restored to the Gap on successful appeal by Horsham District Council.
- 5.1.3 The landscape of the 1997 Gap varies considerably. In the north the largely wooded slopes of the Warnham & Rusper Wooded Ridge landscape character area are crossed by a large number of narrow country lanes. Fields are smaller here with approximately equal amounts of pasture and arable agriculture. Further south towards the A264 the Warnham to Faygate Vale character area possess much larger field patterns used for arable agriculture. The openness of the Vale, especially when viewed from the A264 and from the railway line makes any development in this area particularly visible. South of the A264 the slope of the Vale is largely forested (The St. Leonard's Forest landscape

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character area) although south of Forest Road the woodland is more intermittent and broken by small pasture and arable fields.

- 5.1.4 From Horsham there are several entry points to the 1997 Gap. By far the most important of these is the A264 at Moorhead Roundabout and by train just to the north west of this roundabout. Both of these points provide a very clear and distinct sense of leaving Horsham and entering the countryside. The same is true for the Rusper Road and Forest Road entry points which are also clear and distinct. The entry point from Hammerpond Road is slightly less distinct due to the presence of a number of agricultural and residential buildings in the Doomsday Green area.
- 5.1.5 From Crawley, the A2220 emerges into the Gap at Buchan Country Park. In spite of hedging and some trees, Bewbush to the north of the A2220/A264 prevents a genuinely clear and distinct entry into the countryside until Beaubush Cottage. At that point the openness of the landscape provides fine views of the Warnham to Faygate Vale. The entry point by train from Crawley is very distinct and clear and also offers views over the Vale. Other entry points from Crawley include Forest Road from Pease Pottage and Rusper Road from Ifield. Both of these lose some clarity of entry into the Gap due to some sporadic development, although this is much less visible in the case of Forest Road due to screening by trees in the summer months at least.
- 5.1.6 The distance between Horsham and Crawley makes intravisibility (seeing both settlements from any one point in the Gap) impossible and therefore, no intervisibility (seeing one settlement from the edge of the other) is possible either. Nevertheless, there are several view points within the Gap where one of the settlements may be viewed. For Horsham this is possible from the open farmland adjacent to the Rusper Road and for Crawley it is possible from farmland south of Kilnwood Lane. The views from the southern slopes of the Vale, south of the A264 are impeded by the woodland. However, there are fine views across the Gap from Roffey Park House and on the north side from Kilnwood Lane and Wimland Hill.

5.2 Changes to the Strategic Gap north of the A264

- 5.2.1 The land between Langhurst Wood Road and Rusper Road (Area A on Figure 3) has been removed from the Gap. This area, directly north of Horsham, contains a mixture of land uses including a large clay pit adjacent to Warnham Brickworks and established linear residential development along Old Holbrook. Away from these land uses, woodland and generally small fields can be found. The area is in part more than 5 miles from the eastern edge of the Gap and it does not readily fit with the conception of a strategic gap as a 'narrow gap' between two settlements. Indeed, although the Council is in no way endorsing further development here, if it were to occur, it would be hard to argue that it would contribute seriously to settlement coalescence with Crawley. It is considered therefore, that due to the distance from Crawley and the existing development, this area does not fulfil the objectives of the Strategic Gap.
- 5.2.2 The large area surrounding Rusper and Lamb's Green which constitutes the north western part of the Gap has been removed from the designation (Area B on figure 3). Although much of this area is very attractive and quiet countryside on the wooded ridge, it is relatively distant from both Crawley and Horsham and pressure for development here is generally low, perhaps in part due to the distance from the two towns. The development found in this area is mainly residential and is largely concentrated within Rusper and Lamb's Green. Although it is desirable to resist the further spread of Rusper beyond its built-up area boundary (Lamb's Green has no such designation), it is not the place of the Horsham – Crawley Gap to achieve this objective. Rusper does not lie directly between the two towns in the same way that Faygate does. In conclusion, due to

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the distance from Horsham and Crawley and due to the presence of existing development within the two villages, this area is not appropriate to be included within the Horsham – Crawley Strategic Gap.

- 5.2.3 The most northerly area of the present Gap including Ifieldwood and stretching north to the border of the District (Area C on Figure 3) has been removed from the Gap. This area is characterised by open farmland near the Ruser to Ifield Road with more woodland to the north which is also traversed by several lanes. Ifieldwood is a very spread out linear settlement with no discernable central focal point. The north of this area, including Ifieldwood is characterised by a noticeable number of businesses serving nearby Gatwick Airport. The effect of this is a more developed and less rural feel than other areas on the wooded ridge. A large proportion of this area is now within the west of Crawley strategic development Area of Study (see Figure 4 and paragraph 5.2.5).
- 5.2.4 This part of the District is very close to Gatwick Airport. Although it is not currently required, BAA may at some point insist on some level of 'safeguarding' within this area. This proximity to Gatwick as well as the presence of the west of Crawley Area of Study make this area a complex one in planning terms. Although the strategic gap designation here has served in the past to resist small scale urban and commercial development spreading from Crawley and Gatwick, it is hard to justify the retention of this area in the Gap in relation to the prevention of settlement coalescence between Horsham and Crawley. The land west of Ifieldwood does not lie directly between the two towns and, mindful of the approach to the strategic gap that will be taken within the west of Crawley Area of Study (east of Ifieldwood), it is not appropriate to continue to define the area to the west as part of the Strategic Gap.
- 5.2.5 The west of Crawley strategic development location was identified in the West Sussex Structure Plan 2001-2016. Nevertheless, it has not yet been possible to identify the precise location(s) where the development will take place. Therefore at present Horsham District Council and Crawley Borough Council have defined a cross-boundary Area of Study (Figure 4). Both councils are working together to bring forward the strategic development through a Joint Area Action Plan (JAAP). This work makes it impossible for Horsham to define any area within the Area of Study as strategic gap, as to do so would pre-empt the work of the JAAP. In addition, the Submission Draft South East Plan policy CC10b requires local authorities to work jointly on a local development document where strategic gap designations cross boundaries. These considerations have led the Council to the conclusion that, at the present time, no land within the west of Crawley Area of Study can be defined as part of the Strategic Gap. It will be a role of the JAAP to consider the need and appropriateness of defining strategic gap within its Area of Study once the development locations have been formalised.
- 5.2.6 The village of Faygate was included within the 1997 Gap. However, the village has grown in recent years and has been considered a sustainable enough location to warrant a built-up area boundary. Since the primary requirement for land defined as strategic gap is to be largely free of development, it has been considered appropriate to remove Faygate from the Strategic Gap. This allows development to occur within the BUAB as appropriate for a Category 2 settlement (see the Settlement Sustainability Hierarchy Document).

5.3 Changes to the Strategic Gap south of the A264

- 5.3.1 The 1997 Horsham – Crawley Strategic Gap included a large triangular shaped area of St. Leonard's Forest between Forest Road and Grouse Road stretching south to Hammerpond Road (area D on Figure 3). The definition of this area within the Gap was intended to prevent the eastwards expansion of Horsham towards Pease Pottage and

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Crawley beyond. However, as a result of the review undertaken this area has been removed from the Gap. Although the area is largely wooded, development does occur especially along Forest Road and south of Colgate. There are also small clusters of development at Barnsnap and at Forest Grange. In spite of this, the area is predominantly rural and lacking in development. The area has a sparser network of lanes compared to the areas north of the A264 and this contributes to the perception of the area south of Forest Road as being relatively distant from both Crawley and Horsham. This also has the effect of reducing the availability of clear, defensible boundaries within the area that could be used for the delineation of strategic gap. Further, it is considered that this relative inaccessibility has given rise to only a very low pressure for further development away from Forest Road.

- 5.3.2 It is questionable whether further development south of Forest Road would contribute significantly enough to the coalescence of Crawley and Horsham to warrant its inclusion within the present Gap as the bulk of the area clearly relates far more to Horsham than it does to Crawley. It is more than five miles from the south of this area to the urban edge of Crawley. In this sense the area mirrors that described in paragraph 5.2.2 north of the A264. However, an important difference in this location is that this area is entirely within the High Weald AONB. National and regional guidance is not clear as to whether AONB can also be designated as strategic gap, although the suggestion is that as national designations are a 'higher order' of protection these areas would be unnecessary additions to 'lower order' local designations such as strategic gap. Across West Sussex most strategic gaps are not within AONB, although some do include AONB designation within at least a part of their definitions. It is considered that there may be very practical reasons for this overlapping in terms of the settlement pattern. Therefore, although it is not considered that AONB designation is incompatible with the definition of a strategic gap, the presence of AONB designation is an aspect that must be weighed against the desirability of maintaining the area within the Gap.
- 5.3.3 The difficulty in the decision as to the necessity of this area for inclusion within the Strategic Gap rests in the protection from urban sprawl it affords to the countryside to the immediate east of Horsham. However, an analysis of the constraints in effect east of Horsham between Forest Road and Hammerpond Road indicates that, in addition to being within the AONB, the northern area constitutes Leechpool Woods an Ancient Woodland and Site of Nature Conservation Importance, with St. Leonard's Park to the east of that. Further south the Horn Brook provides some constraint to the eastwards expansion of Horsham.
- 5.3.4 In conclusion it is not considered that there is a strong enough argument to retain the land south of Forest Road within the present Gap. The absence of defensible and visible barriers within this area in addition to the poor locational relationship to Crawley, the existence of multiple landscape constraints and the low pressure for development away from Forest Road all point to the area not being appropriate for inclusion.

5.4 Delineation of boundaries for the Horsham – Crawley Gap

- 5.4.1 The changes made have resulted in a strategic gap much reduced in size from that defined by the 1997 Local Plan. However, it is strongly believed that the Gap as currently defined is better suited to achieving its purpose as it is based on a sound process of review and on a careful analysis of the available guidance on the matter which has been taken into account when defining the Gap. As a part of this process, very careful consideration has been made of the actual boundaries used for the Gap. This is intended to eliminate uncertainty about the extent of the Gap and contribute to the soundness of the policy tool as a whole.

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- 5.4.2 Starting with the long southern boundary of the Gap, the need for clear and defensible boundaries in a largely forested area with a paucity of lanes made Forest Road itself the only realistic choice. However, as has been noted in Paragraph 4.3.4 above, using roads as boundaries in this way causes a problem in that one side of the road is, by definition outside of the gap. It is hoped that the policy wording devised in DC3 will resolve this conflict between the need to use clear boundaries and the need to define all areas considered necessary within the gap.
- 5.4.3 The boundary between Forest Road and the A264 lacks a convenient road. However, survey work here has found that the urban edge of Horsham is clear and distinct, being bounded by a brick wall for most of its length. The land adjacent to the built-up area is mostly used as a public park and as Beech Road Allotment Gardens.
- 5.4.4 The boundary between the A264 and Rusper Road now follows the north edge of the A264 itself. The 1997 Strategic Gap extended a little way into north Horsham beyond the road. Although this wooded buffer could be seen as a legitimate part of the Gap, the lack of a clear boundary beyond the A264 has suggested that these small areas should be removed from the Gap. However, as with Forest Road, Policy DC3 will still offer considerable protection against the development of these areas.
- 5.4.5 The western edge of the Gap follows the Rusper Road. Opposite Hilltop Farm, the boundary turns eastward to follow the northern edge of Hawkasbourne Woods then Blakehouse Copse and finally Northland Copse, before meeting Wimland Hill immediately south of its junction with Wimland Lane. This section of the boundary has been surveyed in the field and using aerial photographs. It is considered that it does form a permanent feature in the landscape and is a suitable boundary for the Gap.
- 5.4.6 The northern boundary continues to follow Wimland Lane and then Kilnwood Lane until the eastern edge of Kilnwood Copse. At that point the Gap reaches the boundary of the west of Crawley Area of Study. The boundary between the two designations follows a track leading south from Kilnwood Lane. The track has been surveyed and is considered to be a permanent and well established feature. The track crosses the railway and emerges at the A264 opposite Holmbush Farm. The boundary then follows the southern edge of the Area of Study eastwards along the A264 until it meets the boundary of Horsham District and Crawley Borough which continues eastwards a little way along the A2220 until just west of St. Sampson Close in Broadfield.
- 5.4.7 Between the A2220 and Forest Road, the Strategic Gap boundary first follows the distinct urban edge of Broadfield until it crosses over the A264. From that point, the Strategic Gap becomes a cross-boundary designation and is defined by Crawley Borough Council on their Submission Stage LDF Proposals Map. The last section of the boundary separates Horsham District from Mid Sussex District. Mid Sussex District Council continue to define the Strategic Gap following Forest Road until the edge of Pease Pottage village.

6.0 THE HORSHAM – SOUTHWATER STRATEGIC GAP

6.1 Compliance with the Submission Draft South East Plan

- 6.1.1 One of the criteria set in the Submission Draft of the South East Plan is that all settlements for which a strategic gap is designated should have a population of at least 10,000. The official census figure for the settlement of Southwater itself (2001 Census) was 8,298. However, the 2006 estimate for the parish of Southwater is 9,780. This latter figure, it could be argued, would deliver the required 10,000 population by at least the

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end of the LDF plan period if not before. It is considered that this gives Horsham District Council a strong case for the continued designation of the Horsham – Southwater Strategic Gap.

6.2 The nature of the 1997 Local Plan Horsham – Southwater Strategic Gap

- 6.2.1 The 1997 Horsham – Southwater Strategic Gap is much smaller than the Horsham – Crawley Gap, only 1.24 miles at its widest point between Horsham and Southwater. Nevertheless, it consists of a wide variety of landscapes and other features. It stretches from the urban edge of Horsham south to Southwater with Coltstaple Lane forming the southeastern boundary. In the west however, the Gap follows the railway line and then the South Downs Link path, through Christ's Hospital and Two Mile Ash Road and meets the Worthing Road at the western edge of Southwater, just north of Church Lane. In the east the Gap is bounded by Kerves Lane.
- 6.2.2 There are several main transport corridors running through or at the edge of the 1997 Gap. The Arun Valley Railway Line provides views of the Gap on leaving Horsham. The B2237 (Worthing Road) is an essential feature of the Gap and gives a sense of leaving both settlements. Finally the A24 traverses the Gap, effectively splitting it in two. East of the Worthing Road there are no roads at all traversing the Gap until one reaches the lanes bounding the Gap to the east and the south. This half of the Gap is criss-crossed by a large number of footpaths and bridleways however, including the 'Peddler's Way' off road cycle route from Horsham to Southwater.
- 6.2.3 Overall the 1997 Horsham – Southwater Gap is more developed than the larger Horsham – Crawley Gap. However, development is not evenly spread and is concentrated to the west of the Worthing Road. Here the residential area of Tower Hill can be found and to the south, the Hop Oast Park & Ride, amenity site and depot. Christ's Hospital School and its associated buildings dominate the far west of the Gap. In the East of the Gap, there is development including Denne Park House and the Golf Club. The remainder of the development in this part of the Gap is of an agricultural or equestrian nature.
- 6.2.4 The landscape in the 1997 Gap is remarkably varied. The north of the Gap is heavily influenced by the Arun Valley (Upper Arun Valley landscape character area). The River traverses the northeast of the Gap with its valley side sloping steeply away from the River towards Tower Hill. The east of the Gap is within the Crabtree and Nuthurst Ridges and Ghylls landscape character area. It is gently undulating and consists largely of open pasture, paddocks and rough grass, except for the belt of woodland surrounding Denne Park. The western area, located within the Southwater and Christ's Hospital Farmlands landscape character area, is flatter south of Tower Hill and more open than the rest of the Gap. Nevertheless, tall hedgerows along Two Mile Ash Road reduce the views within that part of the Gap. The area between Two Mile Ash Road and the Worthing Road is the only part of the Gap where arable land can be found, with much of the land here being pasture or paddocks. West of Two Mile Ash Road almost all the land is in use by Christ's Hospital School, mainly as playing fields.
- 6.2.5 The topography of the north of the Gap with its steep slopes up from the River Arun affords some excellent views over Horsham from within the Gap. This is especially the case at Parthings Lane near Tower Hill and on the bridleway near Chesworth Farm in the north east of the Gap. This second location also offers views over the eastern half of the Gap itself. However at no point in the Gap can intra- or intervisibility be achieved. There are however, some points in Horsham that offer good views of parts of the Strategic Gap. These include the Forum, south of Black Horse Way and Horsham Cricket Club.

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6.2.6 The main point of entry to the Gap from Horsham is the Worthing Road. There is a clear sense of leaving Horsham by this route with no discernable urban-rural fringe. Tower Hill cannot easily be seen from the Worthing Road and there is a real sense of entering a countryside area before arriving at Hop Oast. On leaving Southwater however, there is a much less clear-cut transition into countryside. The residential properties on and adjacent to New Road and the Oakhurst Business Park have effectively extended Southwater to the north and one only gets a clear sense of leaving Southwater after crossing the Hop Oast Roundabout and passing the Park and Ride site and the entrance to the Golf Club, some 500 metres into the Strategic Gap. Travelling into the Gap along the A24 gives one a greater sense of leaving Southwater due to the screening vegetation. The impression north from the Hop Oast Roundabout is one of little development apart from a view of Piffolds where the A24 bridges Two Mile Ash Road.

6.3 Changes to the Horsham – Southwater Strategic Gap

6.3.1 Horsham Cricket Club (area E on Figure 3) is included in the 1997 Gap. This area is separated from the rest of the Gap by the railway line. The area plays an important role in contributing to the urban fringe, but it does relate better to the urban area than it does to the countryside. Although it is largely open, several features, such as the large club building and the parking area and tennis courts are urban in nature. These factors have led to the area being included within Horsham's built-up area boundary. Nevertheless, the land is protected by leisure polices in the General Development Control Policies Submission Document. This land has now been removed from the Strategic Gap.

6.3.2 The most important change to the 1997 Horsham – Southwater Gap is the removal of the large area south of the A24, including Christ's Hospital and the land south of New Road between Two Mile Ash Road and Worthing Road. In connection with this, the residential area of New Road and the adjacent Worthing Road properties have also been removed. These areas will be considered in turn.

6.3.3 The Christ's Hospital area west of Two Mile Ash Road (area F on Figure 3) differs in character from the rest of the Gap. Its character is clearly defined by the School, which includes several listed buildings. The presence of school playing fields is quite dominant and provides an open aspect towards the east. The level topography here and the scale of the school buildings as well as the expanded settlement north of the Christ's Hospital Road give the area a relatively well-developed feel which is not consistent with the 'absence of development' required for strategic gap.

6.3.4 The land between Two Mile Ash Road and Worthing Road, south of New Road (area G on Figure 3) is flat in common with the Christ's Hospital area to the west. It consists of a combination of woodland and mixed agricultural land. It is clear that the inclusion of this area in the Gap has served to restrict the westwards expansion of Southwater in the past. Nevertheless, it is hard to argue that this protection is for the prevention of coalescence between Horsham and Southwater. The area is relatively distant from Horsham and does not relate to Horsham in any meaningful way. Therefore the only argument for continued inclusion would be the prevention of coalescence between Southwater and Christ's Hospital. Although this is an acknowledged planning aim, it is not consistent with the strategic gap designation criteria of the emerging South East Plan and would be hard to defend. Indeed, it is felt that the removal of this area strengthens the case for the retention within the Gap of the land north of New Road (see Paragraph 6.3.6 below).

6.3.5 As part of the Local Plan review, an assessment has been made of the built-up area boundaries of Horsham District's settlements. In this review it was decided to include within Southwater's BUAB the residential properties on New Road and on the section of

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the Worthing Road north of New Road (area H on Figure 3). This decision was perhaps an inevitable consequence of the development of Oakhurst Business Park, which has effectively connected the once isolated residential area with the continuously developed part of Southwater. As a result of this BUAB change, the residential areas on and adjacent to New Road have been removed from the Gap, as they are no longer within the countryside.

- 6.3.6 The proposed changes described above leave only a small area of land within the Gap west of the A24. This area is more akin in landscape and character terms to the land south of Tower Hill, traversed as it is by a small stream creating a gently undulating landscape. As a result of this, and due to its proximity to the A24 this land is much more clearly related to Horsham than any other area west of the A24. As a result of this review, there is clear evidence of some genuine pressure for development here and further, that the presence of strategic gap here has made and will continue to make a valuable contribution to the prevention of coalescence between Horsham and Southwater. In part this conclusion derives from the very narrow gaps of truly undeveloped countryside between Southwater and Two Mile Ash Road and between this Road and Tower Hill. The prospect of further development between the A24 and Two Mile Ash Road could easily lead to a low density but continuous development between Southwater and Tower Hill, very seriously undermining the overall objectives of the Gap.
- 6.3.7 It is considered that the Gap, as modified by the changes described above, is of the correct size and covers the necessary land to achieve the objectives of the Gap for the long-term. It will be noted that no changes have been made east of the Worthing Road, other than the removal of Horsham Cricket Club. Survey work in the east of the Gap has led the Council to believe that the definition is correct and justified. To remove any land from the Gap here would involve withdrawing the designation from some or all of the southern urban edge of Horsham between the railway line and Kerves Lane. It is considered that this could add to pressure for development at this edge, which would encourage settlement coalescence. However, adding further to the Gap east of Kerves Lane would not relate at all well to Southwater and would be hard to defend.

6.4 Delineation of boundaries for the Horsham – Southwater Gap

- 6.4.1 The relatively narrow distance between Horsham and Southwater (1.24 miles) and the clear pressure for development within the Gap make this designation crucial to maintain. This is even more the case when the proposed strategic development west of Horsham is considered, which will have considerable effects on the countryside to the northwest of the Gap. Although not a direct justification, the accessibility of the countryside in the Gap from both settlements, which is arguably greater than that within the Horsham – Crawley Gap, is a tremendous resource for Southwater and Horsham and it is clear that the area is extremely well used for leisure and recreational purposes.
- 6.4.2 It is felt that the review has resulted in logical, visible and defensible boundaries for the Gap. The northern boundary of the Gap from the A24 to Denne Road follows the line of the railway. East of Denne Road the absence of a convenient transport route forces the urban edge to be used as the boundary until Kerves Lane. Survey work done at this edge has indicated that it is clear and distinct, delineated for much of its length by brick walls and substantial fences forming the rear curtilage of residential properties. The allotments at Athelstan Way are included within the Gap as a gradual break between the urban and rural domains.
- 6.4.3 South of the continuous built-up area of Kerves Lane, the eastern boundary of the Gap follows the Lane before turning westwards along Coltstaple Lane which forms the substantial part of the southern boundary of the Gap. At the point where Coltstaple Lane

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crosses the A24, the boundary turns north along the A24 for a short way following the built-up area boundary of Southwater. The boundary of the Gap then follows the line of the BUAB along the edge of Newlane Wood, before crossing the Worthing Road just south of the roundabout. The boundary continues to follow the BUAB of Southwater briefly turning north on Worthing Road then west between 'The Copse' and 'Pine Lodge'. At the rear of the curtilage of 'Pine Lodge' the boundary turns south. The length of the gardens at the rear of this part of Worthing Road, between 'Pine Lodge' and 'Beech House' has resulted in the BUAB excluding approximately two thirds of the gardens (see the current Horsham District Proposals Map). Therefore, the Strategic Gap includes those portions of the gardens excluded from the BUAB. From 'Beech House' the boundary of the Gap follows the BUAB along the rear of the curtilages of the New Road properties. At end of New Road where the BUAB meets the bridleway the boundary of the Gap follows this well established path to the west until the Two Mile Ash Road.

- 6.4.4 This section of the southern boundary between the end of Coltstaple Lane and the end of New Road is perhaps more complex than would be desirable. Nevertheless, survey work undertaken has shown that alternatives are not available without sanctioning unwarranted substantive changes to the form of the Gap. Essentially this boundary follows the newly extended BUAB of Southwater.
- 6.4.5 The final southern section of the boundary follows the bridleway until it emerges onto Two Mile Ash Road. At that point the boundary turns northwards along the road to the point where the A24 bridges the road. The final section of the western boundary of the Gap follows the A24 north to the railway line.

7.0 OTHER GAP DESIGNATIONS

7.1 The Crawley – Gatwick Strategic Gap

- 7.1.1 The 1997 Horsham District Local Plan defined the most north-easterly tip of the District within the Crawley – Gatwick/Horley Strategic Gap. This stretches from Charlwood Road east to the boundary with Crawley (see Figure 1). The bulk of this gap lies within Crawley Borough and the definition was done to achieve a consistent approach with our neighbouring authority. Survey work done in this area has indicated that it relates very clearly to Gatwick Airport, with a strong presence of small businesses serving the Airport on Bonnets Lane in particular. At several points within this area there are views of the runway and buildings associated with the Airport.
- 7.1.2 Although it is considered that this area makes a valid contribution to the prevention of coalescence between Crawley and Gatwick, it is proposed that the definition be removed at this stage as the entire area falls within the west of Crawley strategic development Area of Study. This approach is consistent with that taken with the Horsham - Crawley Gap south of Kilnwood Lane. The Joint Area Action Plan for West of Crawley will eventually define a strategic gap in this area if it is considered to be appropriate and necessary following the allocation of land for development that may be proposed in the area.

7.2 Horsham's 'Local Gaps'

- 7.2.1 A number of local gaps were designated in the 1997 Local Plan. These included the Warnham / Broadbridge Heath Gap to the west of Horsham and the Mannings Heath Gap is to the south east of the town (see areas I and J on Figure 3). The West Sussex Structure Plan 2001-2016 provided for the designation of local gaps by local authorities as part of their requirement to maintain the character, separate identity and separation of

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all settlements. The 1997 Local Plan used policy CS6 (Local Gaps) to resist development within the local gaps where it would contribute to coalescence or severe visual intrusion.

- 7.2.2 The review of the Strategic Gaps Policy in the old Local Plan has now resulted in the new policy DC3 (Townscape Character and Settlement Coalescence Policy). This makes provision for the prevention of actual or perceived coalescence between all settlements within the District. This straightforward approach meets the requirement of the Structure Plan without having to designate local gaps. The Submission Draft South East Plan makes no provision for local gaps and it is considered that the designation of these gaps would conflict with the criteria-based approach taken in policy CC10b of the South East Plan. Therefore, no local gaps have been designated.

8.0 THE LINK BETWEEN STRATEGIC GAPS AND LANDSCAPE QUALITY

- 8.1 Although all of the relevant guidance stresses that an absence of development and not landscape quality is the essential feature of strategic gaps, it is clear that there is a strong *de facto* link with environmental character and quality. Research for West Sussex County Council suggests that this link is stronger in the strategic gaps in the north east of the county where the landscape quality is in general higher than it is in the strategic gaps on the coastal plain.
- 8.2 This link or perceived link can lead to concerns when areas of high landscape quality are removed from the strategic gaps. Nevertheless, it is felt that the review of the strategic gaps as outlined in this paper has shown not only that it is inappropriate to keep land in a strategic gap simply because of its landscape value, but more importantly that Countryside policies are fully capable of protecting valuable landscapes from the pressures of development which would undermine their value. The commitment of the Council to protect valuable landscapes is undiminished and is reflected a strong set of policies in the Core Strategy and General Development Control Policies Document.
- 8.3 Research for the Government in 2000 considered landscapes within strategic gaps and concluded that there is a general acceptance that environmental improvement measures are a necessary complement to restraints imposed by strategic gap designations. This is reflected in policy DC3 through its encouragement of opportunities to conserve and enhance landscape and amenity within the strategic gaps. The Submission Draft of the South East Plan seeks further commitments from authorities in policy BE4 in relation to rural-urban fringe areas in particular. Opportunities are envisaged in the fringe areas for enhancement of landscape quality and its use. Authorities are encouraged to be proactive in identifying the boundaries of such areas as well as the issues and opportunities they present in terms of ten key functions highlighted by the Countryside Agency in their report 'Unlocking the Potential'. This kind of work at the rural – urban fringe has the potential to reinforce the integrity and purpose of the strategic gap policy and to solve some of the conflicts in cases where development within a strategic gap is considered unavoidable. A very recent example of this sort of work undertaken jointly for Horsham District and Crawley Borough Councils is the Urban – Rural Fringe Study for Crawley completed by LDA Consultants as part of the JAAP.

List of Figures

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- 3 – Area by area analysis of the 1997 Strategic Gaps
- 4 – The Horsham – Crawley Strategic Gap with the west of Crawley Area of Study

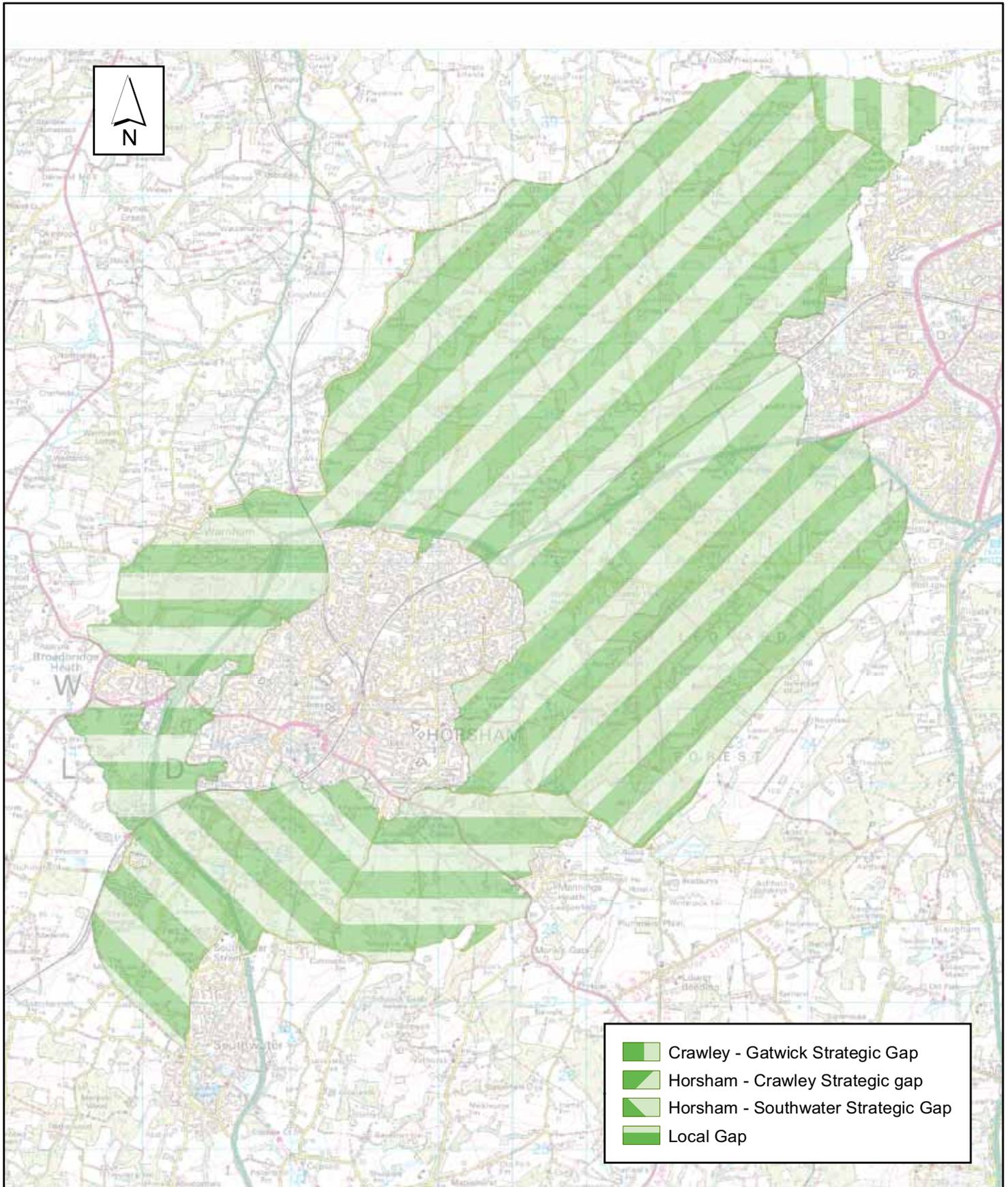


Figure 1 - Strategic and Local Gaps defined by the 1997 Local Plan

Horsham District Council

Park North, North Street, Horsham
 West Sussex, RH12 1RL.
 Head of Development, Ray Wright, Directorate of Planning

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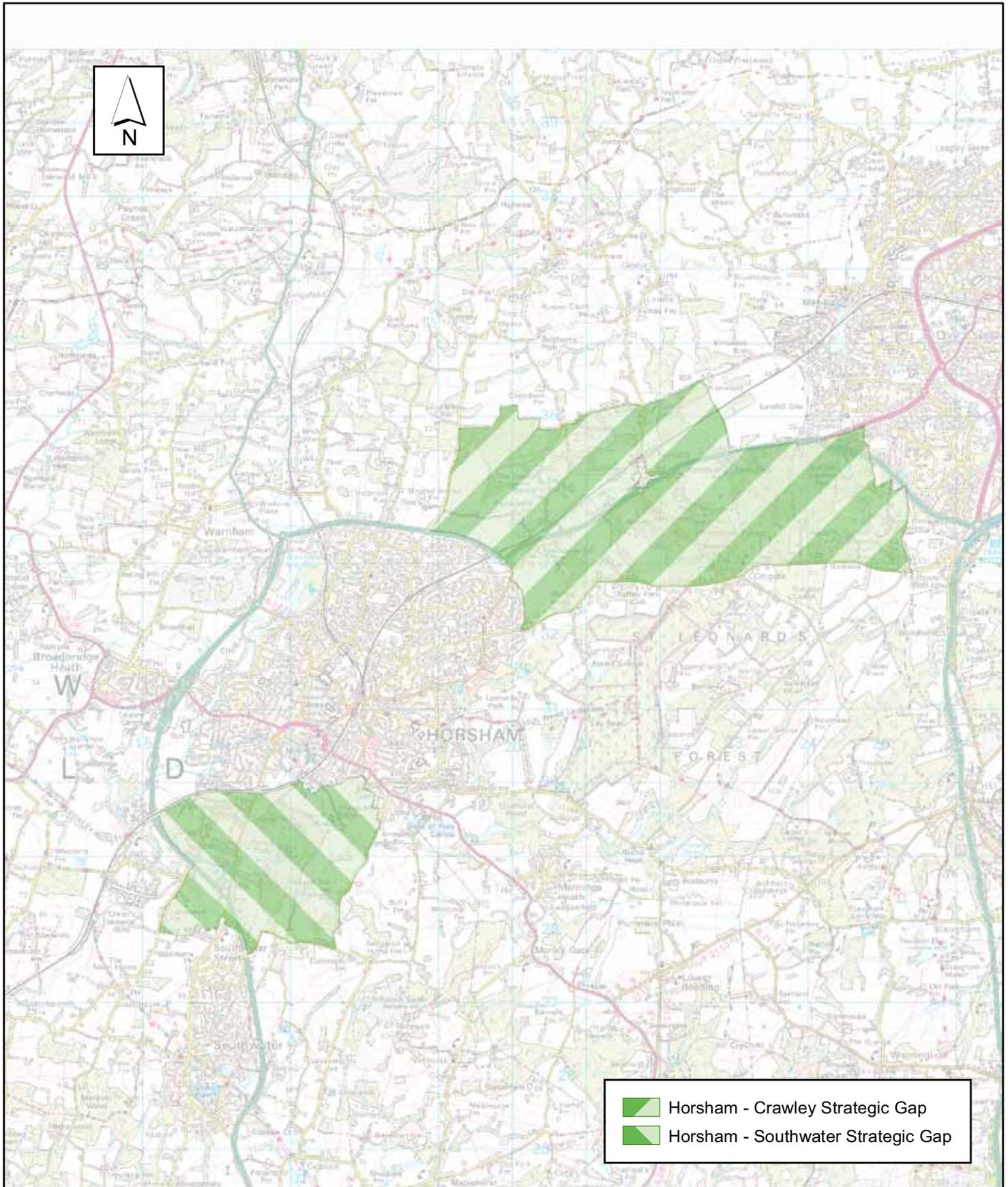


Figure 2 - Strategic Gaps defined by General Development Control Policies Submission Document

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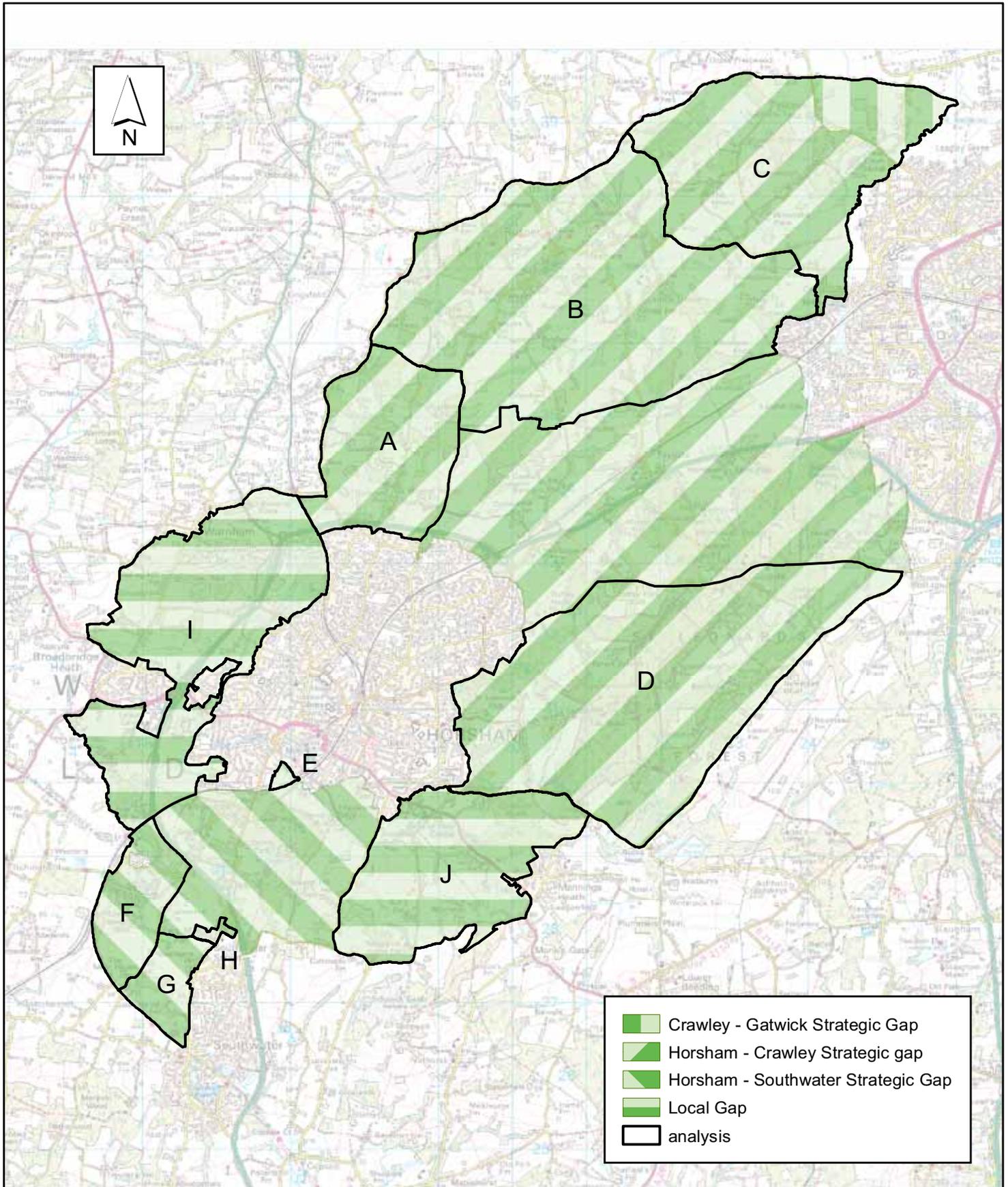


Figure 3 - Area by area analysis of the 1997 Strategic Gaps

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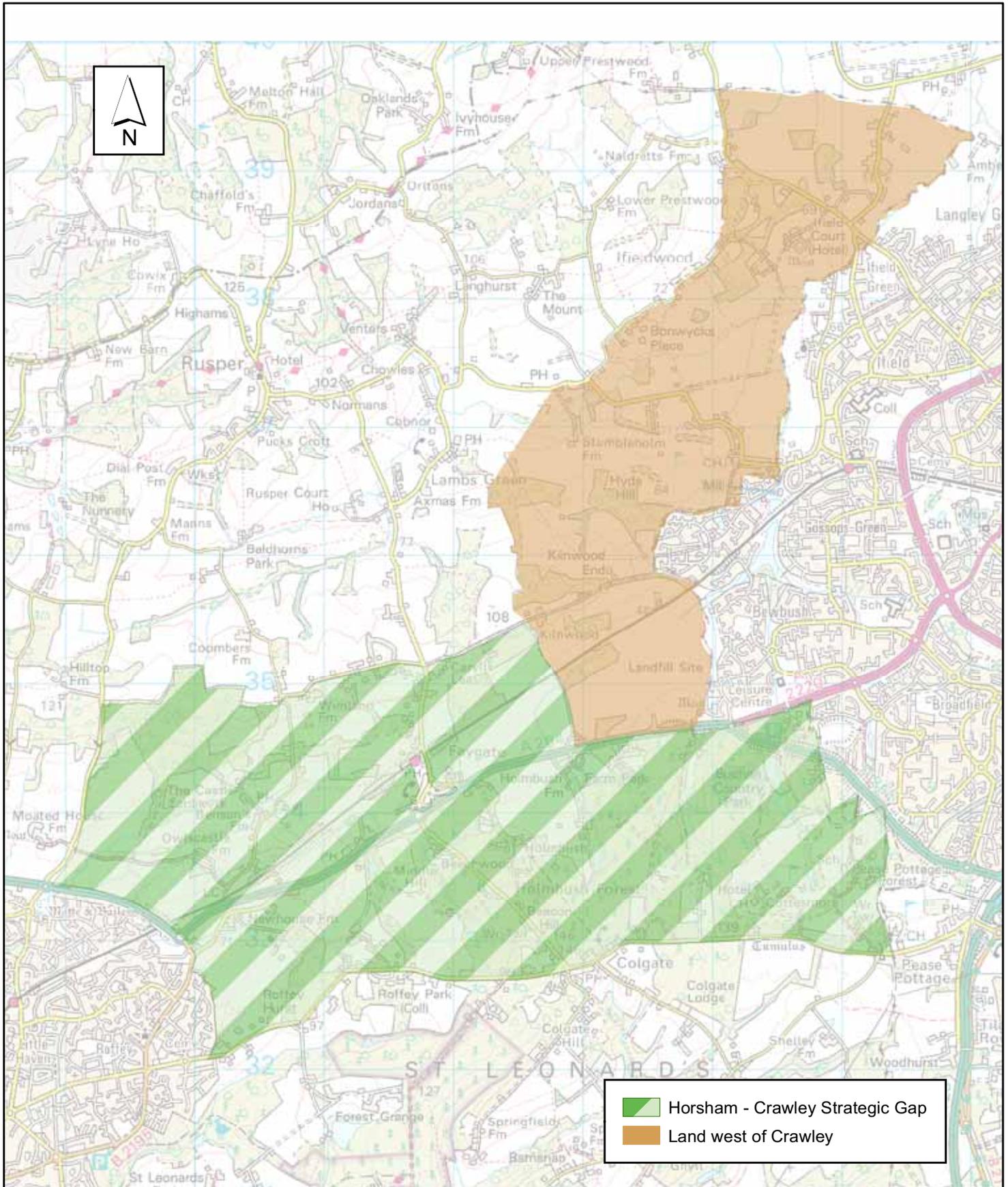


Figure 4 - The Horsham - Crawley Strategic Gap with West of Crawley Area of Study

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