

MM68: Strategic Policy 13 - The Natural Environment and Landscape Character

Soundness: Effectiveness

CPRE Sussex agrees with the Inspector that former Strategic Policy 15 (Settlement Coalescence) required clarification. The Inspector identified uncertainty in terms such as “between” and “settlement”, and considered the requirement in Strategic Policy 13 to “maintain settlement separation” too general. We do not seek reinstatement of Strategic Policy 15.

Our concern is that MM68 does not yet provide a sufficiently clear and effective replacement.

MM68 would require development to respond to individual settlement characteristics and:

“avoid coalescence where it would erode that character and sense of place, and maintain settlement separation.”

We support that objective, but the policy does not explain how coalescence or loss of settlement separation is to be assessed. This is particularly significant because it retains the requirement to “maintain settlement separation” which the Inspector has already found too general.

Coalescence is not confined to the literal joining of two built-up areas. Settlements can remain physically separate while development substantially narrows or urbanises the countryside between them, reducing visual or perceptual separation and eroding their individual identity and sense of place. A residual physical gap does not necessarily maintain meaningful settlement separation.

HDC has previously recognised this distinction. Earlier iterations of the Plan referred to retaining “the sense of leaving one place and arriving at another” and recognised that buildings, signs, roads, lighting and other urbanising effects can create a sense of continuous development even where countryside remains between settlements.

The Sustainability Appraisal Addendum (HDCJB13, paras 3.1.29–3.1.32) provides current examples. It identifies measures at Storrington to reduce “perceived settlement coalescence” between Storrington and West Chiltington, and structural landscaping at Kilnwood Vale to maintain separation between Crawley, Horsham and Faygate. The SA therefore itself recognises that visual and perceptual separation, and the character of the intervening landscape, matter.

The issue is significant given the scale and distribution of development proposed in the Plan. The SA identifies, for example, the need to consider carefully the effects of the proposed new settlement at Adversane in combination with urban extensions to Billingshurst. This illustrates why a district-wide policy needs criteria capable of assessing the extent, character and openness of remaining gaps and the cumulative urbanising effects of development, rather than simply whether built-up areas physically join.

The need for clarity is reinforced by the National Planning Policy Framework published on 17 August 2026, which applies to decision-making on planning applications and appeals and now provides a definition of “settlement”. The policies now being examined will operate alongside that new national decision-making framework.

MODIFICATION SOUGHT

The appropriate response to the Inspector's concern is not to reinstate Strategic Policy 15, but to make its replacement sufficiently clear for consistent decision-making.

Criterion 1 should identify the principal considerations by which settlement coalescence and separation are to be assessed, including, as appropriate:

- the extent, character and openness of the remaining gap between settlements;
- physical, visual and perceptual separation, including the experience of leaving one settlement before entering another;
- landscape structure and features which contribute to settlement separation and individual identity; and
- the cumulative urbanising effects of development.

These considerations should be included in the policy itself, rather than solely in supporting text, because they provide the tests against which development proposals will be assessed.

For example, the relevant part of criterion 1 could be amended to read:

“...avoids coalescence where it would erode that character and sense of place, having regard to the extent, character and openness of the remaining gap, physical, visual and perceptual separation between settlements, landscape structure and features which contribute to their separation and individual identity, and the cumulative urbanising effects of development; and maintains settlement separation.”

This would address the Inspector's concern without recreating Strategic Policy 15 or imposing a general restriction on development between settlements. It would provide the clarity needed for the replacement provision to operate effectively and consistently in development management and at appeal.

SUSTAINABILITY APPRAISAL

The Sustainability Appraisal Addendum (HDCJB13, paras 3.1.29–3.1.32) predicts a “moderate or uncertain” negative effect against the landscape objective, which includes maintaining local distinctiveness and sense of place. It records the deletion of Strategic Policy 15 and its replacement through Strategic Policy 13, but does not assess whether the replacement provides an equally effective means of protecting settlement character, identity and separation.

This is significant because, as noted above, the SA itself identifies the need to address “perceived settlement coalescence” at Storrington, to maintain separation between Crawley, Horsham and Faygate, and to consider the effects of Adversane in combination with urban extensions to Billingshurst.

CPRE Sussex considers that the SA therefore reinforces the case for the principal criteria for assessing settlement coalescence and separation to be included within Strategic Policy 13 itself, providing a consistent district-wide framework for addressing effects which the SA recognises require specific mitigation at individual allocations.