



LAND SOUTH OF HORAM (COXLOW FARM)

Landscape and Visual Issues Site Study

on behalf of

Horam Parish Council

August 2025

Date of Issue: 02/09/2025
Status/Revision: FINAL
Checked: Approved: BH/NB
File ref: 971/reports/HBA/Current

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APPENDIX A:

HBA LANDSCAPE OPPORTUNITIES AND CONSTRAINTS PLAN

HBA LANDSCAPE STRATEGY PLAN

1 INTRODUCTION AND BACKGROUND

- 1.1 Huskisson Brown Associates (HBA) is a firm of Chartered Landscape Architects, established in 1987 and registered since then with the Landscape Institute. HBA has been a member of the Institute of Environmental Management and Assessment since 1992.
- 1.2 The practice has undertaken a range of landscape and visual assessment work for many clients including public bodies, private companies and individuals. This includes projects in the commercial, industrial, retail, recreational, healthcare, agricultural, infrastructure and residential development sectors including the presentation of evidence at Public Inquiries. The Practice has also given extensive development management and strategic planning advice to Local Planning Authorities on a wide range of projects.
- 1.3 HBA is now appointed by Horam Parish Council to provide Landscape Architectural Consultancy in connection with the draft proposed site allocation at Land South of Horam (Coxlow Farm) in the Wealden (Regulation 18) Draft Local Plan (hereafter referred to as the 'Site'). The Site is located to the south of the village of Horam between the Cuckoo Trail in the east and the A267 in the west. The land parcels within the Site are identified by the following site references in the Strategic Housing and Economic Land Availability Assessment (SHELAA): 875/3030, 123/3030, 1055/3030, 1054/ 3030, 1059/ 3030, 1171/3030, 1172/3030, 1173/3030, and 1174/3030.
- 1.4 HBA has carried out a desk-based review of the relevant published landscape evidence base documents to the Wealden (Regulation 18) Draft Local Plan; notably the Landscape and Visual Appraisal - New Settlements and Large Urban Extensions (LVA-NSLUE) and Landscape Sensitivity Assessment - Residential and Employment Development (LSA-RED) both prepared by LUC in November 2023 on behalf of Wealden District Council (WDC), and other published landscape character assessments and local studies. This has been supported by visits to gain an appreciation of the local landscape and visual context of the Site.
- 1.5 Our analysis is consolidated and presented on a Landscape Opportunities and Constraints Plan which builds upon the landscape evidence base work and identifies the range of landscape and visual issues that should inform any scheme layout/design, particularly with regard to pertinent issues e.g. that may impact upon local character, the delivery of relevant strategies within the Neighbourhood Plan, the amenity of the Cuckoo Trail, or the delivery of Biodiversity Net Gain (BNG).
- 1.6 A Landscape Strategy Plan is also provided based upon the landscape analysis and Landscape Opportunities and Constraints Plan, to provide an overall landscape-led approach to development on the site and illustrate a concept for how development could be laid out on the site within an appropriate landscape structure.
- 1.7 This Landscape and Visual Issues Site Study outlines the findings of our analysis and explains the overall strategy approach.
- 1.8 The preparation of this document has involved both desk-based and site work. A site visit was carried out in April 2025 in clear weather conditions, when vegetation was predominantly defoliated. This involved walking the Public Rights of Way (PRoW) and roads in the local area.
- 1.9 The following documents and sources have been reviewed and are considered to be the

primary ones of relevance to the landscape and visual context of the site and its immediately surrounding area:

- National Planning Policy Framework (Revised December 2024) and Planning Practice Guidance Notes
- National Design Guide (30 January 2021)
- Landscape and Visual Appraisal - New Settlements and Large Urban Extensions. LUC for Wealden District Council (November 2023)
- Landscape Sensitivity Assessment - Residential and Employment Development. LUC for Wealden District Council (November 2023)
- Strategic Housing and Economic Land Availability Assessment (SHELAA) Appendix 4 – Parish Summaries. Wealden District Council (February 2024)
- Wealden District Council – Landscape Character Assessment for Wealden District. LUC (May 2022)
- The East Sussex County Landscape Assessment – 5 South Slopes of the High Weald. East Sussex County Council, (2016)
- Horam Neighbourhood Plan (2023 – 2040) Final Version. Horam Parish Council, (Adopted by Wealden District Council on 16th October 2024)
- National Character Area (NCA) profile NCA 122: High Weald. Natural England (online resource 2025)
- Online review of current and historic Ordnance Survey mapping, Historic England website, MAGIC website, Google Earth and Google Maps.
- An Approach to Landscape Character Assessment, by Christine Tudor, Natural England (October 2014)
- Guidelines for Landscape and Visual Impact Assessment, (GLVIA3) (April 2013). The Landscape Institute and the Institute of Environmental Management and Assessment.
- TGN 02-21 Assessing landscape value outside national designations. The Landscape Institute (May 2021).
- LITGN-2024-01 Notes and Clarifications on aspects of the 3rd Edition Guidelines on Landscape and Visual Impact Assessment (GLVIA3). The Landscape Institute (August 2024).

1.10 This Site Study is not a Landscape and Visual Impact Assessment (LVIA) and accordingly it does not assess the predicted impacts of any proposal upon landscape and visual receptors. It does however offer comment on the existing documentation published by WDC. It should be noted that this document does not consider any other potential sites in the vicinity and only references any perceived anomalies in approach.

2 PUBLISHED LANDSCAPE STUDIES

2.1 The following section sets out an overview of the relevant sections of published landscape studies in relation to the Site.

[WDC – Landscape Character Assessment \(LUC May 2022\)](#)

2.2 The Landscape Character Assessment completed by LUC in May 2022 classifies the land south of Horam as **Landscape Character Type (LCT) 6: Wooded Slopes (High Weald)** described as *“a rolling landscape of ridges and valleys that form the slopes to the most elevated ridgelines of the High Weald, typically between 40m and 100m Above Ordnance Datum (AOD). Much of the landscape type lies within the High Weald AONB, and is one of the best surviving medieval landscapes in North West Europe, as a result of the historic field patterns, extensive woods and network of historic routeways. The landscape type contains the catchments of the rivers Medway, Teise, Rother, Ouse and Cuckmere that drain the High Weald and flow through the district. The landscape is a mix of arable and pasture fields, interspersed by extensive areas of woodland, much of ancient origin. Scattered villages are linked by generally narrow roads, and there is very good recreational access on public rights of way.”*

2.3 LCT 6 contains five Landscape Character Areas (LCA), the Site lying broadly central within **LCA 6E: High Weald - Cuckmere / Pevensey Catchments**. The relevant Key Characteristics of LCA 6E which apply to the Site are:

- *Narrow gill stream corridors and ponds support wetland habitats...*
- *A well wooded landscape of small-scale woodlands, which is a defining component of character of the High Weald AONB. Most woodlands are recorded as priority habitat and many are of ancient origin while some have been partially replanted with mixed or coniferous species.*
- *A distinctive field pattern, of small to medium irregular fields, predominantly medieval in origin, which is a defining component of character of the High Weald AONB. These are often derived from assarting (formed from cleared areas of woodland) interspersed with medium-large fields derived from piecemeal enclosure or planned private enclosure at Hooe and Waldron. Modern amalgamations do not detract from this.*
- *Fields are bound by unmanaged hedgerows, sometimes reinforced by post and wire fencing.*
- *The area is rich in relics of the Wealden iron industry including hammer ponds (constructed to power hammer forges), charcoal hearths and remnants of coppiced woodland, managed to produce charcoal...*
- *An historic settlement pattern of small, ridge-top villages...*
- *Villages are connected by a historic network of ridgetop roads and winding, sometimes sunken, lanes lined with mature trees and hedgerows.*
- *An accessible landscape with numerous promoted routes including the Wealdway, Vanguard Way, Cuckoo Trail and 1066 Country Walk, which provide access to, and enjoyment of, the landscape.*
- *Woodland, hedgerows, and sunken lanes result in an enclosed character, and many views are terminated by woodland blocks either within the LCA or further afield in the High Weald.*
- *There are open views across the Pevensey Levels, including across Waller’s Haven, and to the distinctive ridge landforms of the South Downs to the south. Church towers in ridgetop villages form landmark features which rise above the tree line.*

- *The contrasting landscape pattern of pastoral fields combined with dense areas of mixed woodland and scattered historic villages, results in a varied landscape colour palette. v A rural and tranquil landscape with areas of relative remoteness, tranquillity and experience of dark skies away from the towns of Horam and Hailsham.”*

2.4 In terms of ‘Perceptual Character’, LCA 6E is described as a *“largely rural landscape, with areas of enclosure formed by the woodland, hedgerows and mature trees. There are areas of tranquillity and dark skies in the valleys and larger woods, away from Hailsham and Horam and the busy trunk roads.”* It is also noted that *“the distinctive ridge landforms of the South Downs are also visible in views to the south”* and that *“Electricity pylons and solar farms are modern elements in the landscape which reduce a sense of rurality in the immediate vicinity...”*

2.5 ‘Landscape Qualities’ are indicated for LCA 6E, including the following of relevance to the Site and its context:

- *Hammer ponds and gill streams, support wetland habitats, increasing biodiversity.*
- *The numerous woodlands (with a high proportion of ancient woodlands), trees and mature hedgerows, provide a sense of place as well as habitat connectivity to support biodiversity, carbon sequestration and the regulation of temperatures.*
- *The small-scale medieval field patterns, with sinuous hedgerow boundaries provide a sense of place and history.*
- *Hammer ponds, coppiced woodlands and historic forges provide a link to the Wealden iron industry and a sense of time depth.*
- *The pattern of historic ridgetop villages (whose value is recognised through designation as Conservation Areas), linked by winding rural lanes, provide a connection to history, cultural identity and aesthetic value.*
- *The extensive network of public rights of way contributes to people’s physical health and mental well-being.*
- *Contrasts between the enclosed character around woodlands and sunken lanes, and open views to the Pevensey Levels and the South Downs provides visual interest and a sense of place.*
- *The harmonious small-scale landscape pattern of mixed farms, dense woodland and open views across the Pevensey Levels contribute to the strong scenic quality of the area, reflected in its partial designation as an AONB.*
- *The low density of settlement provides a sense of rural tranquillity and experience of dark skies.*

2.6 A number of ‘Forces for Change’ are identified for LCA 6E including the various impacts of climate change as well as the following of relevance to the Site and its context:

- *“Expansion of urban areas, particularly Horam and Hailsham, and pressure for housing in rural villages, could alter the historic dispersed settlement pattern and has the potential to impact the area’s dark skies and sense of tranquillity.*
- *Recreational pressure on the landscape, leading to an increase in recreational infrastructure, including visitor centres and toilets, reducing the rural character of the landscape. Visitors’ dogs can also disturb wildlife and damage habitats from dog faeces.*
- *Pylons are a modern influence of the landscape, and often highly visible in this undulating landscape.”*







2.7 'Landscape Guidelines' for LCA 6E recommend how the landscape can be managed to ensure that future change respects local character and it is noted that these should be read in conjunction with the objectives and proposed actions of the High Weald AONB Management Plan. The following guidelines have particular relevance to the Site and its context:

- *Encourage active and appropriate management of woodland to ensure a diverse species and age structure by thinning, coppicing and replanting as necessary, while avoiding damage from large machinery. No management is recommended for gill woodland as these habitats are too sensitive and insufficiently understood.*
- *Safeguard ancient woodland and protect and enhance vulnerable woodland habitats including gill woodlands and wet woodlands for the benefit of biodiversity and the landscape structure.*
- *Protect and manage the existing hedgerow network, and plan for the restoration of, and linkages between, hedgerows, including establishing hedgerow oaks, to maintain habitat corridors and to retain the medieval field pattern typical of the High Weald. Remove post and wire fencing where appropriate.*
- *Maintain and restore links between the numerous woodlands in the area, other woodland habitats (such as hedgerows and parkland) and species-rich habitats such as wet meadows and unimproved grasslands, to create a robust network of woodland and open semi-natural habitats for the benefit of biodiversity and to contribute to an integrated green infrastructure network.*
- *Restore species-rich grassland through appropriate management and, where necessary, reseeded with Weald Native Origin Seed.*
- *Maintain the mixed farmed character of the area...*
- *Limit the amount and scale development in rural areas, protecting the existing settlement pattern of dispersed rural villages, hamlets and scattered farmsteads, and the separation of these different settlement types*
- *Ensure new building reinforces and responds to local character in its scale, layout and design, reflecting the local vernacular in use of materials. Developments should draw on the principles contained within the High Weald AONB design guidance, High Weald AONB 'Guidance on the selection and use of colour in development' and objectives of the High Weald AONB Management Plan*
- *Extend woodland around existing settlement edges and infrastructure development to filter light pollution and reduce the visual impact of further urbanisation.*
- *Maintain the historic network of routeways, ensuring new roads or 'upgrades' take account of their rural context and avoid over-engineered features and/or the introduction of lighting into dark areas. Maintain the trees and species-rich grasslands on road verges.*
- *Restore and establish new hedgerows and shaws to create habitat connectivity [sic] and restore historic landscape character. Reduce the visual impact of transmission lines in line with the Beautiful Boundaries project with the National Grid's Landscape Enhancement Initiative.*
- *Retain the characteristic contrast between areas of enclosed character and long open views to the Pevensey Levels, South Downs and landmark church towers.*
- *Maintain the strong scenic qualities of the landscape and its sense of remoteness, tranquillity and experience of dark skies.*

[WDC - Landscape Sensitivity Assessment - Residential and Employment Development \(LSA-RED\) \(LUC November 2023\)](#)

- 2.8 The LSA-RED considers the relative landscape sensitivity of the landscape within the district (outside the National Park) to residential and employment development. It was prepared to help inform decisions on the potential location of housing and employment growth, and the subsequent allocation of sites in the new Local Plan and to also guide consideration of individual planning applications.
- 2.9 The LSA-RED provides a strategic Landscape Sensitivity Assessment at its Appendix A which assesses the sensitivity of the landscape across the district using the Wealden Landscape Character Assessment as a spatial framework. Appendix B of the LSA-RED sets out a site-specific Landscape Sensitivity Assessment of the sites submitted for consideration in the WDC Strategic Housing Land Availability Assessment (SHELAA).
- 2.10 The LSA-RED considers sensitivity to three different development typologies which are set out in its Table 2.1, reproduced in **HBA Figure 1** below:

Table 2.1: Development typologies

Development typology	Sub-types and description	Example images (sourced from outside Wealden)
 Small-scale residential development	'Low density' two/two and a half-storey houses at approximately 30-40 dph, terraced, semi-detached or detached – with associated access roads, private gardens and garaging.	
 Medium-scale residential development	'Medium' density mixed residential (i.e. houses and flats) at approximately 40-50 dph with associated access roads, private gardens and garaging. Maximum 3 storeys.	
 Commercial/ industrial / employment development	Commercial/ industrial / employment development, 2 to 3 storeys with associated access roads, parking and open space. e.g. local business parks, light industrial units, office blocks, hotel complexes.	

HBA Figure 1 - Table 1 from the LSA-RED setting out the development typologies assessed.

- 2.11 Section 2 of the LSA-RED sets out the methodology including the criteria used for making judgements on landscape sensitivity. It describes the process applied to then informing and overall judgement on landscape sensitivity for the assessment units and provides a five point scale defining the levels of overall sensitivity (Table 2.3 of LSA-RED and reproduced below at **HBA Figure 2** for ease of reference)

Table 2.3: Overall landscape sensitivity

Sensitivity judgement	Definition
High	Landscape and visual characteristics/ values of the assessment unit are very susceptible to change, and the unit is unlikely to be able to accommodate the relevant type of development without adverse change and significant effects.
Moderate-high	Landscape and visual characteristics/ values of the assessment unit are susceptible to change. The assessment unit may be able to accommodate the relevant type of development but only in limited areas or limited amounts without adverse change or significant effects.
Moderate	Some landscape and visual characteristics/ values of the assessment unit are susceptible to change. The assessment unit may have some potential to accommodate the relevant type of development if sited and designed sensitively.
Low-moderate	Landscape and visual characteristics/ values of the assessment unit are more resilient and of lower susceptibility to change. The assessment unit is likely to be able to accommodate some development, although care is still required in siting and design to minimise landscape and visual effects.
Low	Landscape and visual characteristics/ values of the assessment unit are relatively robust and are less susceptible to change, and the unit is likely to be able to accommodate the relevant type of development without significant change.

HBA Figure 2 - Table 2.3 from LSA-RED methodology definitions for levels of overall landscape sensitivity

2.12 The methodology reiterates that the study is strategic and is based upon given settlement edge units and SHELAA sites that in some cases are grouped for assessment (including those considered around the Site). Importantly, the methodology emphasises that:

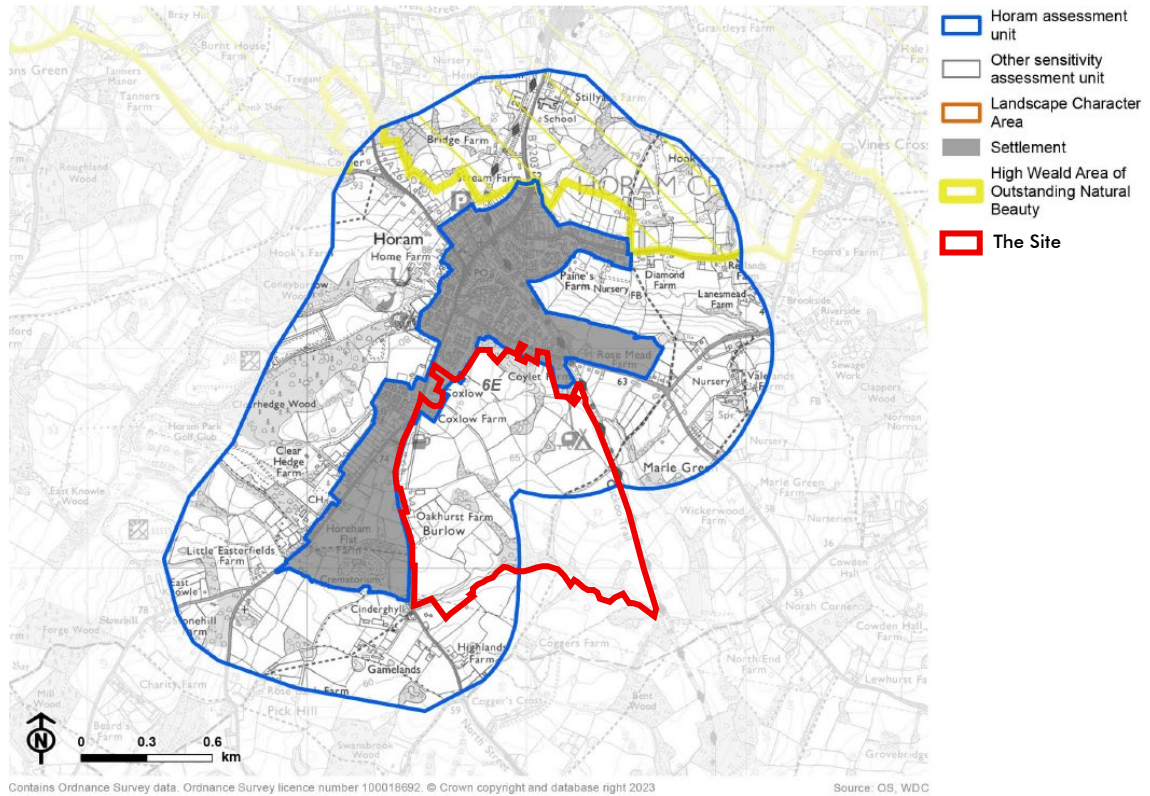
- *“There are likely to be spatial variations in character within any one assessment unit and these are generally described in the text. Individual site level investigations will likely indicate further differences and variations at the site scale.”* (LSA-RED paragraph 2.44)

2.13 The methodology states that the LSA-RED *“should not be interpreted as a definitive statement on the suitability of certain locations for development or a particular type of development”* and that it *“is not a replacement for detailed studies for specific siting and design and all developments will need to be assessed as to their suitability among other considerations on their individual merits.”* (LSA-RED paragraph 2.40). Paragraph 2.41 and 2.42 of the LSA-RED note some of the issues that it does not take into consideration but that *“will need to be taken into account in site selection”*, including that the LSA-RED assessment considers:

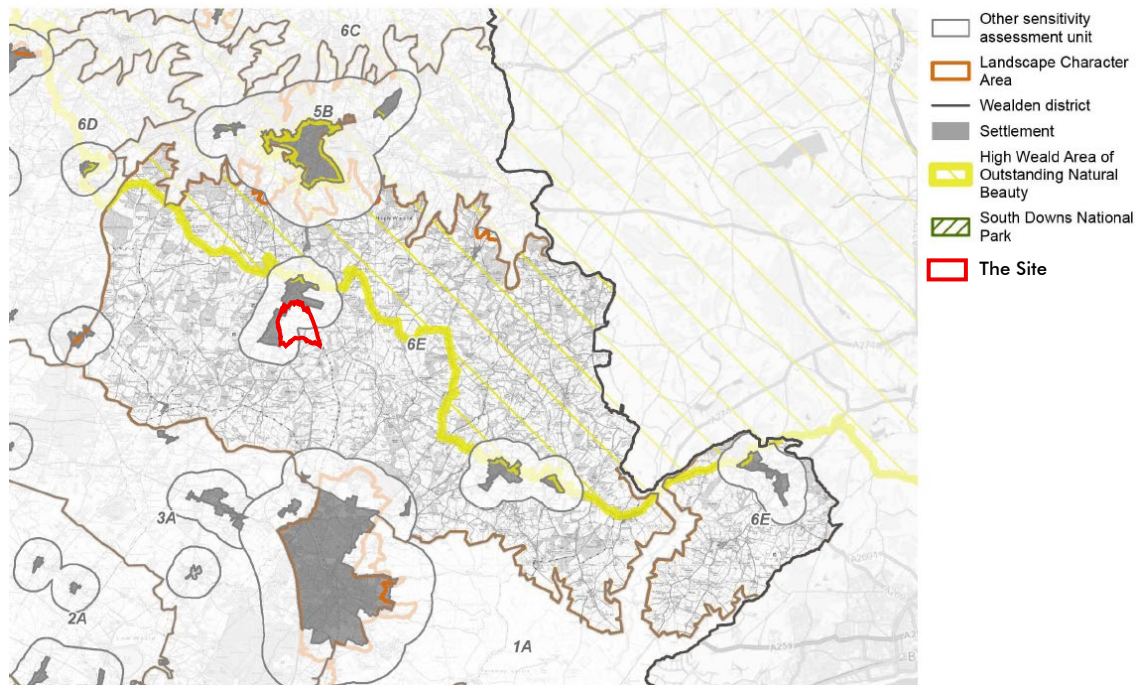
- *“natural character of the landscape but not specific ecological issues in relation to species or habitats;*
- *The historic and cultural character of the landscape but not specific cultural heritage/archaeological issues associated with individual designated heritage assets and their settings; and*

- *The visual character of the landscape but not visual amenity issues associated with specific receptors - such as public views from specific locations (e.g. promoted viewpoints), or private views and outlooks available to occupants of residential properties.”*
- 2.14 The LSA-RED includes areas within or adjoining the High Weald Area of Outstanding Natural Beauty – AONB, now the High Weald National Landscape) but excludes areas within the South Downs National Park, noting with regard to the National Park that:
- *“Land within the South Downs National Park is outside the scope of this assessment. However, a significant proportion of the Low Weald and Pevensy Levels landscape can be viewed from the top of the Downs, and conversely, parts of the Low Weald benefit from views of the iconic South Downs. As a result, the setting of the National Park is considered as part of this study.”* (LSA-RED, Paragraph 1.15)
 - *“The South Downs Landscape Character Assessment 2020 provides information on the landscape character of the National Park and provides a guide to ensure that its natural beauty is protected and enhanced.”* (LSA-RED, Paragraph 1.16)
- 2.15 In considering the landscape, the LSA-RED makes a distinction between land that lies on the fringes of settlements and the wider landscape of the LCA, on the basis that landscape character *“will often reflect greater urban influence in the vicinity of settlements and are areas where development is most likely to occur”* (LSA-RED Paragraph 2.8).
- 2.16 The settlement edge assessment units used in the LSA-RED were established by applying an arbitrary ‘buffer’ around the key towns and villages, the size of the buffer being proportionate to the size of the settlement and generally extending to 1km from the settlement edge of larger towns or groups of larger villages and 500m from smaller settlements (such as Horam).
- 2.17 The landscape within the 500m settlement buffer to Horam is considered as the ‘Horam assessment unit’ in the LSA-RED Landscape Sensitivity Assessment, whilst the landscape beyond the buffer is considered as ‘LCA 6E wider area’.
- 2.18 The extent of the Site in relation to the LSA-RED assessment units is indicated below on annotated versions of Figure A.242: Location of Horam assessment unit, (our **HBA Figure 3** below) and Figure A.226 (our **HBA Figure 4** below). It can be noted that approximately 2/3 of the Site lies within the Horam assessment unit, whilst the remaining area and southeast portion of the Site lies in LCA 6E wider area.

Land South of Horam (Coxlow Farm)
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HBA Figure 3 - Location of the Site (red outline by HBA) in relation to the LSA-RED Landscape Sensitivity Assessment unit (Figure A.242 from LSA-RED)



HBA Figure 4 - Location of the Site (red outline by HBA) in relation to the LSA-RED Landscape Sensitivity Assessment unit for LCA 6E Wider Assessment Unit (Figure A.226 from LSA-RED)

2.19 Chapter 3 of the LSA-RED summarises the assessment findings and presents generic landscape mitigation guidance for accommodating built development within the landscape. Generic landscape guidance includes:

- *Locate development in more enclosed areas and avoid the most visually prominent slopes;*

- *Development should be in scale with the existing settlement pattern i.e. discrete larger settlements surrounded by rural landscapes containing small-scale villages and hamlets;*
- *Conserve, and where possible enhance, areas of historic field patterns (particularly areas of ancient medieval field patterns) and parkland as well as historic features (and their settings);*
- *Take opportunities to mitigate the impact of existing detracting features such as industrial style fencing/ buildings, open storage and poorly managed land in rural areas.*

2.20 The Strategic Landscape Sensitivity Assessment at Appendix A of LSA-RED considers each assessment unit and provides a commentary against landscape sensitivity indicators, notes the 'key landscape sensitivities' and provides an assessment and summary of overall landscape sensitivity, noting variations in landscape sensitivity. It provides strategic landscape guidance for any development that may come forward within the assessment unit.

2.21 For **LCA 6E Wider Area**, the following sensitivity indicators and commentary are of particular relevance:

- ***Landform*** is assessed to be of 'Higher sensitivity' where there is "A complex undulating ridged landform in the north which falls to incised stream valleys, part of a wider ridge and valley landscape which is a defining component of character of the High Weald AONB.."
- ***'Natural' character*** is of 'Higher sensitivity' on account of "A mosaic of woodland and pastoral/arable fields bound by shaws, mature hedgerows and hedgerow trees. Interconnecting priority habitat deciduous woodland including riparian woodland, many ancient in origin, which are a defining component of character of the High Weald AONB. Occasional priority habitat semi-improved grassland and lowland meadows, including rich pastures and grassland at Sapperton Meadows and St Dunstan's Farm Meadows SSSIs. Numerous BOAs cross the assessment unit – Pevensey, Rother, Cuckmere Watershed, Heathfield Habitat Link, River Uck and its Headwaters, Pevensey & Cuckmere Valley Link, Pevensey Levels, and the Cuckoo Trail Habitat Link.."
- ***Landscape pattern and time depth*** is of 'Higher sensitivity' where "A historic field pattern of small to medium scale irregular fields (a defining component of character of the High Weald AONB) derived from assarts, piecemeal enclosure and planned private enclosure. Frequent small ancient woodlands contribute to time-depth.." Whilst there are some 'Areas of lower sensitivity' these relate to "The occasional influence of modern field amalgamation, horse paddocks and modern development including golf courses erodes the historic field pattern in these localised areas, including around Wellshurst Golf and Country Club." Which are not of relevance to the Site.
- ***Settlement form*** is recorded as including areas of 'moderate sensitivity' where there is "Some influence of ribbon development and urban expansion near Horam and Hailsham" and 'Higher sensitivity' where there is "An historic settlement pattern of small and dispersed ridge-top villages...."
- ***Recreational value*** is of 'Higher sensitivity' due to "A strong interconnected network of public rights of way, including the promoted Wealdway, Vanguard Way, Cuckoo Trail and 1066 Country Walk."
- ***Perceptual aspects*** are 'Higher sensitivity' and described as "A landscape with a strong sense of rural character and scenic quality, typical of the High Weald AONB designation in the north. Dark night skies and tranquillity can be experienced from much of the assessment

unit away from the influence of Horam and Hailsham.”

- **Visual prominence** is of ‘Moderate sensitivity’ where there is a “Semi-enclosed character due to dense woodland and wooded field boundaries” and with ‘Areas of higher sensitivity’ where there is “Some intervisibility in the north with the wider AONB, with views to ridgetop settlements including Heathfield and Punnett’s Town and to the distinctive ridge landform of the South Downs National Park to the south” and “Glimpsed longer views across the gently undulating pastoral landscape...”

2.22 Key landscape sensitivities of the LCA 6E Wider Area (LSA-RED, pA396) include:

- *“The complex ridge and valley landform in the north.*
- *Mature deciduous woodlands (many of which are ancient in origin) interconnecting with shaws and hedgerows.*
- *The strong network of public rights of way.*
- *...intervisibility with some areas of the High Weald AONB and South Downs National Park...”*

2.23 The summary of overall landscape sensitivity in the LSA-RED assesses LCA 6E Wider Area to have **high** sensitivity to all development types as the landscape and visual characteristics/ values are very susceptible to change as development would erode key landscape features, with a noted variation in landscape sensitivity as follows;

- *“Limited areas in the south of the assessment unit, where topography is gently undulating, where well-enclosed by woodland and mature hedgerows, and near existing development between Horam and Hailsham along the A267 are considered to be of **moderate-high** sensitivity to small scale residential housing.”*

2.24 ‘High’ overall landscape sensitivity is defined in the LSA-RED methodology as “Landscape and visual characteristics/values of the assessment unit are very susceptible to change, and the unit is unlikely to be able to be able to accommodate the relevant type of development without adverse change and significant effects”

2.25 It is noted under strategic landscape guidance for LCA 6E Wider Area, that any development that comes forward in this assessment unit should amongst other guidance:

- *Retain areas of habitat interest, notably ancient woodland and priority habitat lowland meadows and semi-improved grassland.*
- *Retain, and where possible restore, broadleaved woodland including linear riparian woodland along watercourses, in line with the aims of the Biodiversity Opportunity Areas (BOAs).*
- *Preserve historic field patterns, locating development away from intricate small-scale historic field patterns.*
- *Consider key views, as noted in the Conservation Area appraisals, to the surrounding countryside and key views towards the skyline features within historic settlements*
- *Consider views of development from popular public rights of way.*
- *Ensure opportunities to access and enjoy the landscape are preserved and enhanced.*
- *Consider any expansion of Heathfield, Horam and Hailsham and urban fringe uses carefully, ensuring new development is in keeping with the local vernacular, and minimises influence on the dispersed settlement pattern.*
- *Carefully integrate any development into the landscape, utilising existing woodland, or using*

native species that are in character with the wider landscape.

- Retain the characteristic contrast between areas of enclosed character and long open views to the Pevensey Levels, South Downs and landmark church towers.
- Ensure development does not affect the scenic rural character of the landscape, and areas of relative tranquillity, particularly the defining components of character relating to the High Weald AONB.

2.26 For the assessment unit of **Horam** (sites south-east of town) the following sensitivity indicators and commentary are of particular relevance:

- **Landform** is assessed to be of 'Moderate sensitivity' on account of "The centre of Horam sits on a spur, which extends south from more prominent ridgelines in the High Weald AONB. Gently undulating landform falls to either side of the spur in the south." With 'Areas of higher sensitivity' where there is "A complex landform of ridges and valleys in the north, associated with the winding course of Waldron Gill, and other tributaries of the River Cuckmere"
- '**Natural' character** is considered to be of 'Moderate sensitivity' on account of "Predominantly pastoral land use with some arable. Fields are bound by mature hedgerows (with some deterioration in the south-east), hedgerow trees and shaws. Existing development, including two solar farms, a golf course and a caravan park are located to the west of the settlement and influence the rural character locally..." with 'Areas of higher sensitivity' where there are "Numerous small broadleaved woodlands, (mostly priority habitat and many of which are ancient in origin), with larger mixed blocks on the valley sides, predominantly in the west and north-west. An interconnecting network of ancient woodland is a defining component of character of the High Weald AONB. The wooded Cuckoo Trail Habitat Link BOA is located in the north and east of the assessment unit" and "Pockets of priority habitat semi-improved grassland in the south-east of the area"
- **Landscape pattern and time depth** is of 'Higher sensitivity' where there is "An intact historic field pattern with a mix of small to medium scale assarts, particularly extensive in the south east (a defining component of character of the High Weald AONB) and some smaller areas of regular piecemeal enclosure. Scattered areas of ancient semi-natural woodland within the west and north-west of the area (including within the High Weald AONB) contribute to time depth."
- **Settlement setting and coalescence** is of 'Moderate sensitivity' on account of "Woodland across the assessment unit and the scenic qualities of the pastoral landscape to the east provides some positive contribution to the character of the settlement." and "The north of the assessment unit plays some role in providing separation between Horam and Maynard's Green."
- **Recreational value** is of 'Moderate sensitivity' due to "Some public rights of way, including the Cuckoo Trail."
- **Perceptual aspects** are 'Moderate sensitivity' where there is "A strong sense of rural character particularly in the wooded north, typical of the High Weald AONB, and pastoral landscape to the east." With 'Areas of lower sensitivity' according to "Modern development including solar arrays to west, pylons to the south and busy trunk roads including the A267. Proximity to the settlement has some influence on the experience of dark night skies and the sense of rurality/tranquillity."
- **Visual prominence** is of 'Moderate sensitivity' where "Views are generally screened by

mature hedgerows and woodland. There are glimpsed outward views from the A267, and in the south.” with ‘Areas of higher sensitivity’ described as relating to “The north is generally enclosed by woodland but there are significant views of the wooded ridges of the wider AONB, particularly from the pastoral landscape north of Horebeech Lane.”

2.27 Key Landscape Sensitivities for Horam are noted as:

- *The complex ridge and valley landform, particularly in the north*
- *Interconnecting mature deciduous woodlands (many of which are ancient in origin).*
- *The strong network of thick hedgerows with hedgerow trees.*
- *Intact historic field patterns, particularly assarts most strongly expressed in the south-east of the area, which provide a strong rural setting to the settlement.*
- *The rural character of the landscape with areas of remoteness, tranquillity and dark skies, particularly in the north and east, away from busy roads, the settlement edge and electricity infrastructure.*
- *Occasional intervisibility with the High Weald AONB.*

2.28 The Horam assessment unit is assessed as having overall **moderate** landscape sensitivity to small-scale residential, this increasing to **moderate-high** overall landscape sensitivity to medium-scale residential and **high** overall landscape sensitivity for commercial / industrial development. For reference, the LSA-RED methodology defines ‘moderate’ overall landscape sensitivity as *“Some landscape and visual characteristics/values of the assessment unit are susceptible to change. The assessment unit may have potential to accommodate the relevant type of development if sited and designed sensitively”*.

2.29 Overall landscape sensitivity of the Horam assessment unit is summarised as *“The undulating landform in the north, with areas of dense woodland and mature hedgerows and areas of intact historic field pattern of this assessment unit, increase sensitivity. However, the presence of urban edge development; including electricity infrastructure; areas of simpler landform to the south; limited historic features and the contained nature of views decrease sensitivity.”*

2.30 Strategic landscape guidance for Horam includes that any development that comes forward in this assessment unit should, amongst other guidance:

Locate development on low lying flat fields, or lower slopes in close proximity to the western settlement edge, well enclosed by landform and vegetation where development would be less visible and have less influence on landscape character

- *Avoid development in the incised stream valleys and heavily wooded valley slopes to the north of the assessment unit.*
- *Retain broadleaved woodland, including linear riparian woodland along watercourses. Avoid loss of, harm, or deterioration to the interconnecting ancient semi-natural woodlands and allow a buffer zone around them (to avoid root damage). Replace any unavoidable losses, with native species where possible, ensuring an appropriate maintenance schedule is prepared and implemented for remedial planting.*
- *Avoid, where possible, development on sites in areas of habitat interest, notably deciduous woodlands, grassland habitats and riparian habitats along the Waldron Gill and other tributaries of the of the River Cuckmere.*
- *Preserve historic field patterns, locating development away from intricate small-scale historic field patterns, particularly medieval assarts which are concentrated in the south-east of this*

assessment unit.

- Any development should be carefully integrated into the landscape, utilising existing woodland, or using species that are in character with the wider landscape
- Consider views from public rights of way, such as the Cuckoo Trail, when siting and designing development in the landscape.
- Ensure opportunities to access and enjoy the landscape are preserved and enhanced.

2.31 Appendix B of the LSA-RED provides Landscape Sensitivity Assessments for the SHELAA sites, considered together and summarising from the Appendix A Strategic Landscape Assessment. The SHELAA Sites Landscape Sensitivity Assessment considers that the sites are located in a landscape that is “typical of the wider Horam assessment unit” (LSA-RED, Appendix B, pB-368) and notes that development of the sites could affect:

- the complex ridge and valley landform, particularly the incised stream corridor near Site 875/3030, 1120/3030 and 1173/3030
- interconnecting areas of deciduous woodlands, some of which is ancient.
- the strong network of thick hedgerows with hedgerow trees
- the historic field pattern of small to medium scale assarts.
- rural tranquillity and dark night skies experienced throughout the sites, away from the busy A267.
- occasional intervisibility with the High Weald AONB

2.32 Note that site ref 1120/3030 is outside of the Site being considered in this report. The other sites are described in terms of Landscape Sensitivity at pages B-369 – B-370 of the LSA-RED with a **moderate sensitivity** to small-scale residential concluded (the same ‘level’ of sensitivity as assessed for the Horam assessment unit in the Appendix A Strategic Landscape Sensitivity Assessment but a two ‘levels’ lower sensitivity than the ‘High sensitivity’ assessed for ‘LCA 6E Wider Area’ which covers the southern portions of SHELAA site refs 1172/3030 and 875/3030). The reasoning for ‘moderate sensitivity’ is set out below (narrative relating to an “increased sensitivity” of the southern parts of the aforementioned sites underlined by HBA):

- The field pattern of these sites consists predominantly of medium scale assarts, with small, but interconnecting areas of woodland, some of which are ancient (including Cogger’s Shaw, Coxlow Shaw, Ten Acre Wood, Coylet Farm Shaw, Marle Green Shaw and Toll Wood), which form field boundaries in addition to mature hedgerows. Topography falls away to a wooded stream corridor in the south, which increases sensitivity in the southern part of Site 875/3030 and Site 1173/3030. The sites form part of the pastoral context in outward views from the southern edge of Horam. A public right of way passes through Site 875/3030 and Site 1172/3030 and there are some occasional open views looking across the wider pastoral landscape. All of these characteristics increase the sites sensitivity to development.
- However, Site 123/3030 is well contained within the landscape comprising a small piece of agricultural land largely covered by semi-mature trees to the south of Horam and to the east of the A267.
- Site 875/3030 and Site 1173/3030 are relatively extensive sites made up of woodland, grazing fields and a farmhouse. A significant area of ancient woodland is located on the western, southern and eastern boundaries of the sites with some ancient woodland located within Site 1173/3030 and a public right of way crosses through the southern portion of

Site 875/3030 from north to south. The southern edge of Site 875/3030 and Site 1173/3030 is of slightly higher sensitivity given the incised topography of the stream corridor to the south and presence of ancient woodland at Cogger's Shaw.

- Ancient woodland is also present in the south-east corner of Site 1055/3030 and the site is well enclosed by existing hedgerows, with a mature tree belt separating the two fields that comprise the site. Site 1054/3030 is also well enclosed by existing vegetation and has a strong tree line along the western boundary with the A267. There are also small pockets of ancient woodland within and along the boundaries of Site 1174/3030 and Site 1172/3030, which encloses views of the site.
- The western sites (Site 1054/3030 and 1059/3030) are located adjacent to or near the relatively busy trunk road (A267), which reduces tranquillity and decreases sensitivity. Existing development along the A267 influences the pastoral character and historic field pattern locally, reducing sensitivity along this edge of the sites. There is some deterioration of field boundaries in the northern sites (Site 1172/3030, 1174/3030 and 875/3030). Sites 123/3030 and 875/3030 are located adjacent to the built settlement edge of Horam, however containment by woodland limits the visual relationship of these sites to the settlement. Mature hedgerows and linear woodland limit distant views, which also reduces sensitivity.
- The characteristics described above result in a higher landscape sensitivity to medium-scale residential or commercial/industrial development types.

2.33 Outline landscape mitigation / guidance is described for the combined SHELAA sites as

"Any development on the site(s) should:

- *Retain, protect and enhance all vegetation within and surrounding the sites, especially mature woodlands, trees, and hedgerows as these provide screening to the site as well as contributing to the green infrastructure network of the site and provide links for wildlife through the site and beyond.*
- *Be set back from ancient woodland at Coxlow Farm Shaw, Cogger's Shaw, Ten Acre Wood, Coylet Farm Shaw, Marle Green Shaw and Toll Wood. An appropriate buffer should be provided to protect the ancient woodland.*
- *Retain, protect and enhance woodland along the A267 to minimise visibility of development.*
- *Locate development within Sites 123/3030 and 1054/3030, and the west and north-west of Sites 875/3030, 1055/3030, 1171/3030 and 1174/3030, where development would relate to the existing settlement pattern.*
- *Avoid development near the incised topography of the stream corridor near Cogger's Shaw.*
- *Retain public access and consider views from the public rights of way which cross Site 875/3030 and Site 1172/3030 and pass through the wider countryside.*
- *Retain, protect and enhance woodland and hedgerows along the A267 to minimise intervisibility between the sites and the road and to minimise the influence of road traffic within the westernmost sites.*
- *Please also refer to the strategic landscape guidance for the wider Horam assessment unit."*

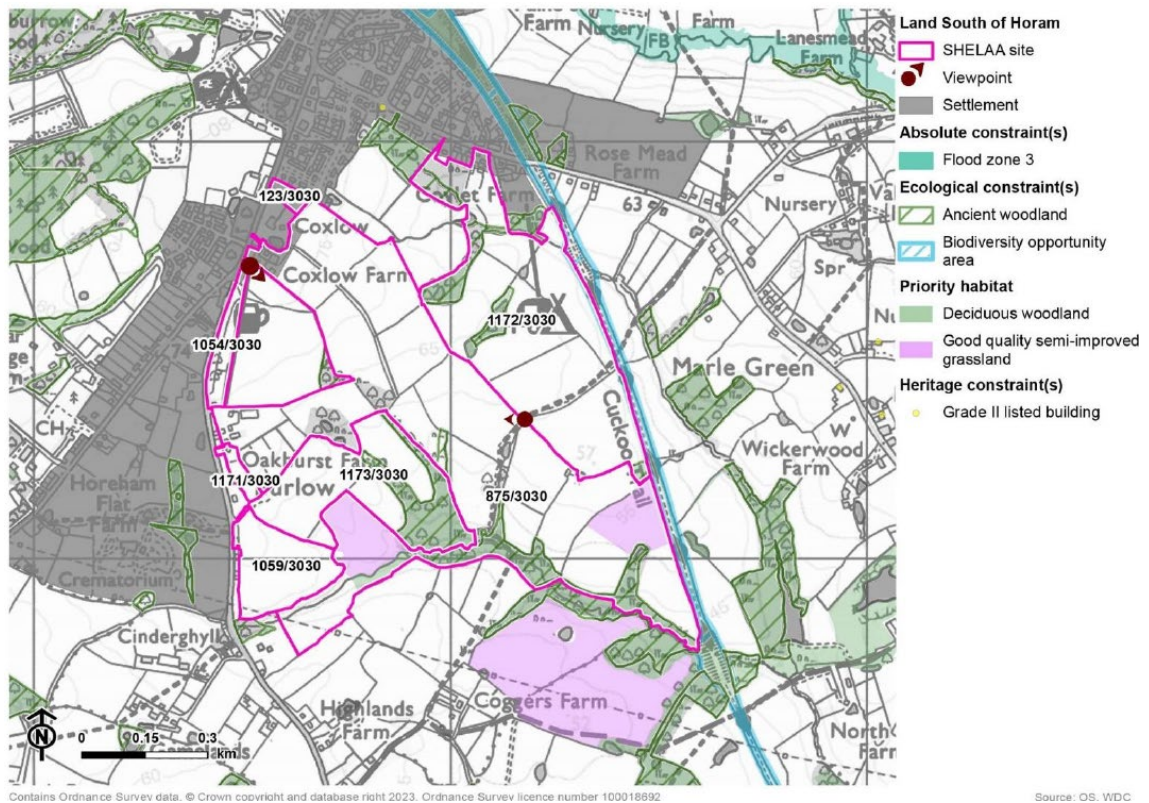
[WDC - Landscape and Visual Appraisal New Settlements and Large Urban Extensions \(LVA-NSLUE\), \(LUC, November 2023\)](#)

2.34 The LVA-NSLUE follows on from the earlier landscape character assessment and LSA-RED work

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and aims to provide a landscape and visual appraisal of the suitability (in landscape and visual terms) of eleven potential growth areas (potential development sites) located at the fringes of six settlements across the district. The LVA-NSLUE is intended to help WDC to determine the suitability of the sites to accommodate growth and to determine any site-specific constraints and design considerations.

- 2.35 The Site is addressed in the LVA-NSLUE as the potential development site ‘South of Horam’ which contains six individual sites submitted for assessment in the SHELAA and also addressed in the earlier study at Appendix B of the LSA-RED.
- 2.36 The LVA-NSLUE sets out the Landscape Sensitivity Context and Settlement Context and provides a summary of the key landscape sensitivities to develop [sic] identified for the relevant LSA assessment unit and LSA Guidance, drawing from the earlier LSA-RED study. The Site Details note a ‘Potential Development’ of “750 residential dwellings, Primary School, Employment Uses” at page A-124 of the LVA-NSLUE but this is not understood to be a landscape capacity judgment.
- 2.37 The Site Baseline is illustrated on Figure A.51 ‘Site Location and Constraints’ in the LVA-NSLUE, reproduced at **HBA Figure 5** below:



HBA Figure 5 - 'Site Location and Constraints' as illustrated in the LVA-NSLUE

- 2.38 Two ‘Representative Site Photographs’ are provided in the LVA-NSLUE For Land South of Horam, based upon the viewpoints indicated on the Site Location and Constraints Plan. These are reproduced below at **HBA Figure 6**:



Viewpoint 1: View west towards wooded field boundaries from the public right of way near the eastern site boundary.



Viewpoint 2: View east from A267 near Coxlow Farm, with some existing influence of electricity infrastructure.

HBA Figure 6 - Representative Site Photographs illustrated in the LVA-NSLUE

- 2.39 The 'baseline landscape character' of the South of Horam site is described in relation to the Wider Assessment Unit, which is noted in the first paragraph as being *"the Horam assessment unit"*. (LVA-NSLUE, p A-126) No reference is made to the site also lying within the LCA 6E Wider Area assessment unit that is defined in the LSA-RED.
- 2.40 'Key Features and Qualities of the Site' are for the most part described as being *"typical of the Horam assessment unit"*. The relatively irregular and medium scale field pattern is noted, which as noted in the earlier work although outside of the designation, should also be highlighted to be *"a defining component of the character of the High Weald AONB"* (LSA-RED). The intactness of the historic pattern is not referenced with reference only to assarts.
- 2.41 Perceptual aspects are noted as *"typical of the assessment unit, proximity to Horam and the A267 influences dark skies. However, woodland minimises the influence and areas in the south-east of the site have relatively dark skies. Proximity to Horam, the busy A267, the Wealden Crematorium, and overhead electricity infrastructure also influences the sense of rural tranquillity, particularly in the north and west of the site."*
- 2.42 The baseline visual character is described as:
- *"One public right of way passes through the south-east part of the site, connecting the Cuckoo Trail to the north-east with Cogger's Cross on the A267 (via Cogger's Shaw) to the south-west. Whilst views south from the footpath are partially screened by woodland, more open views are afforded north and north-west across the site. Views from the Cuckoo Trail (including National Cycle Route 21), which passes approximately 50m to the east of the site at its nearest point, are largely screened by tree cover and linear woodland along the route.*
 - *Residential properties located at Grange Close to the north-west have views into the north of the site; however, wooded field boundaries limit more distant views across the site from this location. Residential properties located to the east of the A267, have relatively open views across the site, however views of the site from the road are screened and filtered by vegetation. From elsewhere, the site is relatively enclosed by woodland, resulting in limited views into the site. This includes from the residential properties located along Chiidingly Road to the west and along Horebeech Lane to the north-east."*
- 2.43 Intervisibility with the High Weald AONB/South Downs National Park is described as:
- *"There are limited glimpsed views of the distant wooded ridges of the High Weald AONB to*

the north and north-east. Views back towards the site from within the AONB are also generally limited by the high proportion of woodland cover."

2.44 The LVA-NSLUE considers 'How the Site Relates to the Sensitivity of the Wider Assessment Unit' by drawing comparison to the Horam assessment unit (as defined in the LSA-RED). No reference is made to the site also lying within the LCA 6E Wider Area assessment unit. On this basis, the LSA-NSLUE considers that:

- *"The site demonstrates many of the characteristics of the wider assessment unit which increase sensitivity, including areas of more complex topography in the south of the site; small pockets of ancient woodland, concentrated predominantly to the south; the historic assart field pattern with mature and wooded field boundaries; several wooded ponds associated with the stream corridor in the south of the site..... areas of priority habitat good quality semi-improved grassland located in the south; and sense of tranquillity and experience of dark skies in the south-east away from the edge of Horam and the A267. However, proximity to the A267 and edge of Horam to the west and north-west reduces influences [sic] the sense of rural tranquillity, the semi-enclosed character of the site, and some deterioration of the histproc field pattern and field pattern in the north and west decreases sensitivity.*
- *Overall, it is considered that the site conforms to the **moderate** sensitivity to accommodating new small scale residential development (2-2.5 storey housing) that has been determined for the wider assessment unit and the **moderate-high** sensitivity for medium-scale residential and **high** sensitivity commercial/ industrial development"*

2.45 The potential effects of developing the site are summarised and include that the development could affect the network of thick hedgerows with hedgerow trees, particularly in the south-west of the site, areas of priority habitat good quality semi-improved grassland in the south of the site, some areas of intact historic field patterns, particularly small scale assarts in the south-west of the site, which provide a strong rural setting to the existing settlement of Horam and the rural character of the landscape particularly to the south-east. In relation to 'Designated Landscapes' glimpsed views to the wooded ridges of the High Weald AONB with development on the site considered *"unlikely to adversely affect the defining components of character of the High Weald AONB"*. Available views looking across the site to the backdrop and wider setting of the South Downs National Park are not referenced.

2.46 Users of the public right of way extending across the south-east of the site are noted as potentially having their visual amenity affected by any development. Users of the Cuckoo Trail are not referenced, presumably on the basis that views out are *"largely screened"*. (LVA-NSLUE page A-127).

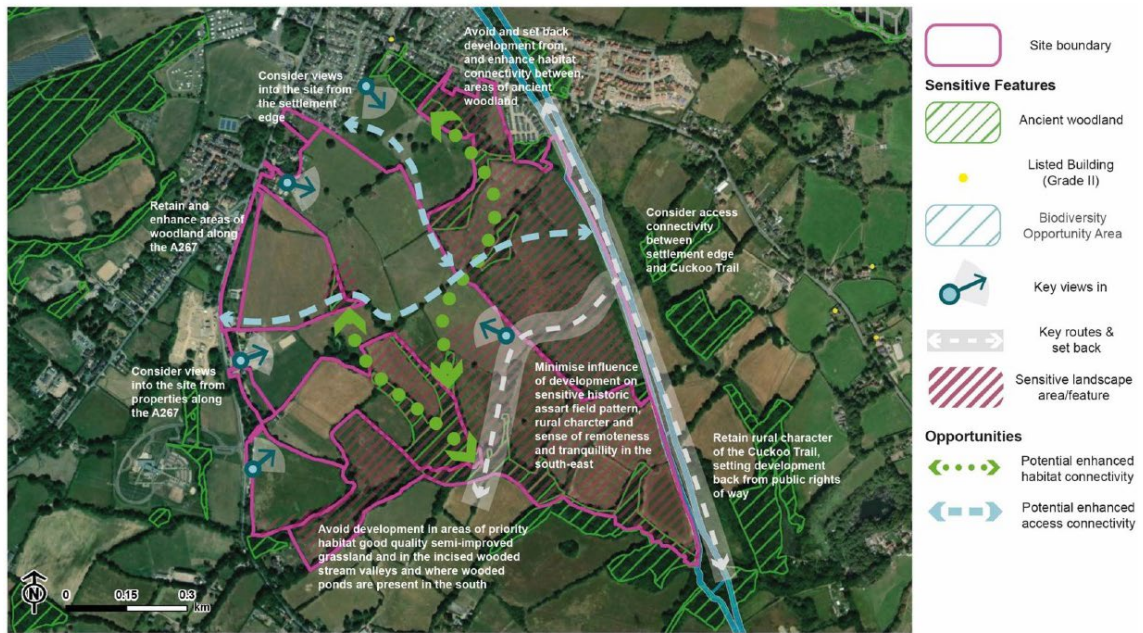
2.47 A range of guidance is provided on how landscape and visual effects could be avoided/minimised.

2.48 The LVA-NSLUE summarises that if the site is considered for development, it would need *"to be planned with great care and consideration, especially in relation to the key sensitive features within and adjacent to the site"*. It considers that *"Development should focus on northern, north-western and central areas of the site which are less sensitive, so as to relate better to the existing settlement and expansion along the A267"*.

2.49 A summary of key constraints and opportunities, indicating areas more sensitive to

development is mapped on figure A.52) of the LVA-NSLUE. This is reproduced below at **HBA Figure 7**

Figure A.52: Summary map of constraints and opportunities



Source: Esri, Maxar, Earthstar Geographics, and the GIS User Community

Source: WDC LVA-NSLUE

HBA Figure 7 - Figure A.52 'Summary map of constraints and opportunities' from LVA-NSLUE

3 HBA ANALYSIS AND COMMENT ON PUBLISHED LANDSCAPE STUDIES

- 3.1 The following comments are made based upon our broad desk-based review of the WDC landscape evidence base documents alongside other relevant published studies (as referenced separately below) and from our own site visits to the area.
- 3.2 We have drawn upon the findings of our desktop review and site visits to develop the analysis set out within the WDC landscape evidence base studies for the Site. This is outlined in the comments below and indicated on a **Landscape Opportunities and Constraints Plan** (at **HBA Appendix A**) which indicates the additional considerations that in our professional opinion ought to be considered in relation to the Site. The 'Summary map of constraints and opportunities' (Figure A.52) from the LVA-NSLUE is therefore used as a basis for this drawing.
- 3.3 Our analysis is based upon the same overall principles and methodology relating to sensitivity used in the WDC landscape evidence base documents and builds upon and makes observation on those findings. It does not provide a landscape and visual appraisal or a landscape and visual sensitivity assessment in its own right.
- 3.4 The Parish Council may wish to use some of our comments to inform future discussions or representations to WDC.

Application of LSA-RED Assessment Units to the LVA-NSLUE

- 3.5 The LVA-NSLUE appears only to consider the Site in relation to it lying within the Horam assessment unit (assessed in the LSA-RED as having an overall 'moderate' sensitivity to small-scale development). No reference is made to a large part of the southern half of the Site lying within the LCA 6E Wider Area assessment unit (assessed in the LSA-RED as having an overall 'high' sensitivity to all development). Whilst the boundary between the two assessment units in the LSA-RED is based upon an arbitrary distance from the settlement edge, there is a correlation

between the noted characteristics of higher sensitivity recorded for the Site in the LVA-NSLUE and the recorded sensitivities for the wider assessment unit. Despite the 'High' sensitivity of the parts of the Site that fall within the LCA 6E Wider Area assessment unit, the whole of the Site is assessed as having 'Moderate' sensitivity in the LVA-NSLUE, effectively two 'levels' of sensitivity below the ranking of 'High' sensitivity considered in the LSA-RED for the southern portions of the Site. The justification for this is unclear. It is noted that much of the southern portion of the Site is subsequently indicated as a 'Sensitive landscape area/feature' on the 'Summary map of constraints and opportunities' at Figure A.52 of the LVA-NSLUE which would suggest it relates more strongly to the LCA 6E Wider Area than the Horam assessment unit and should be considered to be 'High' sensitivity.

Settlement Setting and Intervisibility with the South Downs National Park

3.6 The methodology sets out the indicators of landscape sensitivity that are used to assess each assessment unit at Table 2.2 (extract provided in **HBA Figure 8** below). This identifies that for 'Settlement setting and coalescence' a 'Higher' sensitivity would relate to a landscape where *"The assessment unit provides a distinctive backdrop to the settlement(s) or contributes to views that are important to the character of the settlement..."*

Settlement setting and coalescence		
<i>The extent to which the landscape contributes to the identity and distinctiveness of the settlement by way of its character and/or scenic quality e.g. by providing an attractive backdrop or setting to the settlement.</i>		
<i>This criterion also considers the potential for coalescence of two settlements with separate identities should development occur in an area.</i>		
Lower	Moderate	Higher
<p>The assessment unit does not contribute/detracts from the character of the settlement and does not play a particularly important role in settlement separation.</p>	<p>The assessment unit provides some contribution as a backdrop to the settlement.</p> <p>The assessment unit plays some role in separation of settlements although development could be designed so as to retain a sense of separation between settlements.</p>	<p>The assessment unit provides a distinctive/scenic backdrop to the settlement(s) or contributes to views that are important to the character of a settlement. Examples include areas occurring in views highlighted in Conservation Area appraisals.</p> <p>The assessment unit plays an important role in the perception of a gap between distinct settlements.</p>

HBA Figure 8 - Extract from Table 2.2 of LSA-RED 'Indicators of Landscape Sensitivity' relating to 'Settlement setting and coalescence'

3.7 The LSA-RED assesses 'Settlement setting and coalescence' to be of 'Moderate sensitivity' but makes no reference to the available public views looking from the settlement edge at Grange Close across the Site to the South Downs National Park and the distinctive backdrop of the South Downs scarp (illustrated at **HBA Figure 9** below)



HBA Figure 9 – Panoramic photo from end of Grange Close looking south across the Site to the South Downs

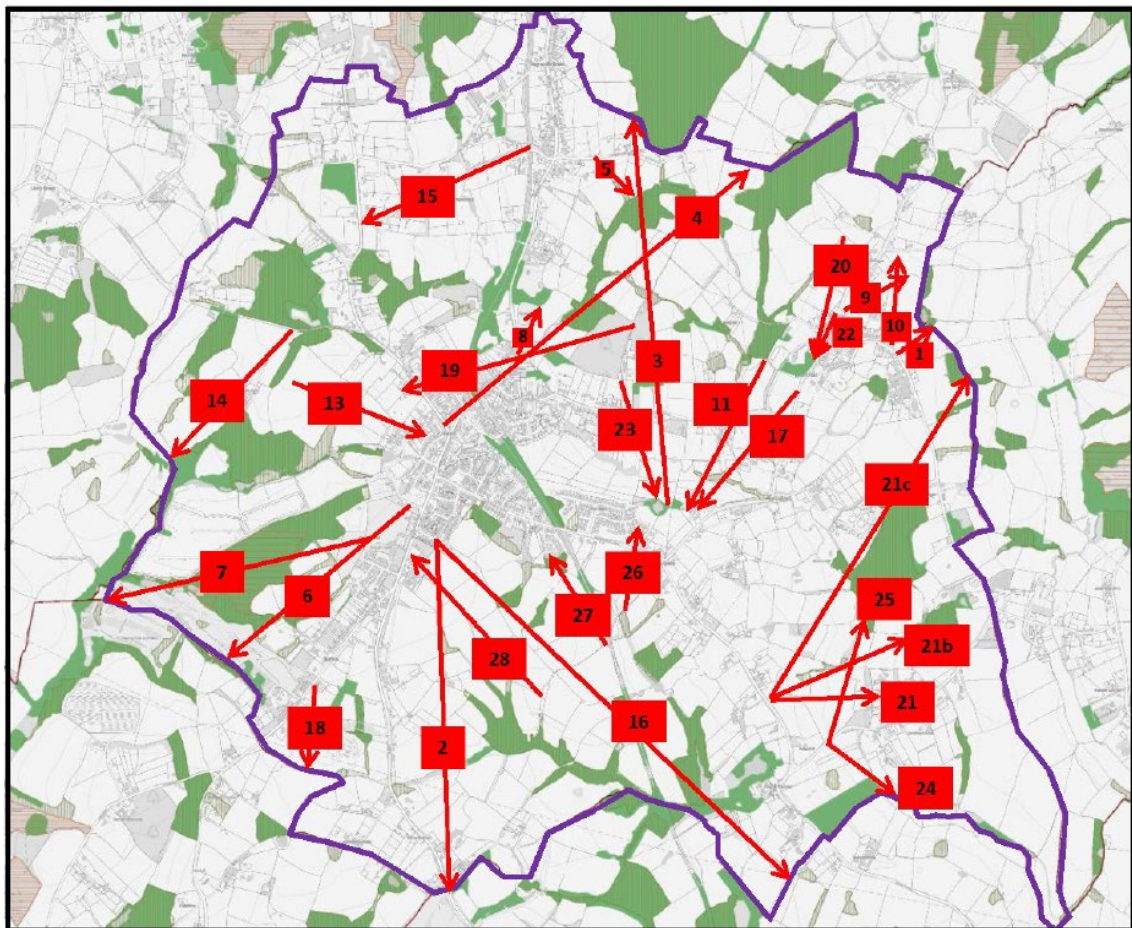
- 3.8 Representative Photograph (Viewpoint 2) for the Site in the LVA-NSLUE shows the presence of the South Downs scarp as the backdrop to views from the Site but does not acknowledge it as a feature.
- 3.9 The contribution of the South Downs to the setting of this part of Horam or intervisibility between the settlement and the National Park is not addressed in the landscape evidence base relating to the Site in terms of landscape sensitivity. There is no implicit mention of the intervisibility with the South Downs National Park and its role in the wider setting to this part of the settlement. Consequently, the potential effects of development upon are this component of the setting are not considered and potential development guidelines and mitigation not provided.
- 3.10 It is noted that for other parcels of land, glimpsed views of the South Downs National Park are considered as part of the site analysis and the intervisibility with the South Downs is evaluated to increase sensitivity (an example of this is on page A-41 - land to the west of Hailsham).
- 3.11 Whilst the LVA-NSLUE summarises (page A-129) that “...development should focus on northern, north-western and central areas of the site, which are less sensitive...” this does not take into account the publicly available view out of Horam from Grange Close to the South Downs (the ridge close to Jevington) (HBA Figure 9) or as indicated in Representative Photograph Viewpoint 2 which should be considered to increase the sensitivity of the north-west/central part of the Site that contributes to the views and degree of invisibility.
- 3.12 The Methodology for the LVA-NSLUE, Process of Appraisal section (LVA-NSLUE, page 7) also states that the study includes identification of the potential effects of development on:
- *“Designated landscapes – How potential development could affect the special qualities or defining components of character of the South Downs National Park or High Weald AONB.”*
- 3.13 The LSA-RED specifically mentions ‘...occasional intervisibility with the High Weald AONB...’ but does not reference any intervisibility with the South Downs National Park. The LVA-NSLUE also concludes that “glimpsed views are afforded towards the wooded ridges of the High Weald AONB, intervisibility is limited. Development on the site is therefore unlikely to adversely affect the defining components of character of the High Weald AONB.” No intervisibility with the South Downs is recorded or consideration of potential adverse effects, which we consider to be an omission from the evidence base.

Important Local Views

- 3.14 Neither of the landscape evidence base documents reference the range the Important Local Views identified in the Horam Neighbourhood Plan. Two ‘Representative Site Photographs’ are provided in the LVA-NSLUE For Land South of Horam, however surprisingly neither coincide with the Important Local Views identified across the Site.
- 3.15 This is pertinent as the **Horam Neighbourhood Plan** identifies a range of **Important Local Views** under Policy HCD3, that “*exemplify the sense of place of Horam Prish and integral to peoples’ enjoyment and appreciation of the landscape of the parish, as well as the relationship between built-up areas and their countryside setting. Indeed views help to define local distinctiveness and, in connecting people to their environment, can be important for psychological and social well-being*”. The **Horam Neighbourhood Plan** now forms part of the **WDC** statutory

development plan. The identification of these views stemmed from local community identification, consultation and were examined and accepted by WDC.

- 3.16 Policy HCD3 requires that “As appropriate to their scale and nature, development proposals should respond positively to the identified Important Local Views (as shown on Figure 12) in terms of their layout, height, scale and massing.” Whilst landscape assessment and the landscape evidence base documents do not intrinsically relate to policy, the consideration of the Important Local Views in assessing sensitivity would seem an oversight. Their omission from the evidence base documents means that their recognised contribution to the sense of place and local distinctiveness of Horam is not taken into consideration in subsequently informing the suitability of the Site for development or indeed the potential effects of development upon this part of the landscape or potential mitigation strategies.
- 3.17 The locations of Important Local Views are indicated on Figure 12 of the Neighbourhood Plan, reproduced at HBA Figure 10 below:



HBA Figure 10 - Figure 12 'Important Local Views' from the Horam Neighbourhood Plan.

- 3.18 Important Local View 2 is from Grange Close. A photograph of the view taken in late spring 2025 is provided at HBA Figure 9 above. Important Local View 16 is a continuation of Important Local View 2, panning south east (essentially looking to the left side of the mature Oak tree in the HBA Figure 9 photograph). An area of the northern and central part of the Site forms the open countryside foreground to this view (indicated on the Landscape Opportunities and Constraints Plan at HBA Appendix A) and is sensitive to development. In our professional judgement, this area should be considered a key sensitivity of the site and should remain open

(with any development set to the west and below the localised ridge upon which Horam sits) in order to retain the intervisibility between the village and the South Downs. There is an opportunity to create new public views from this area of the Site towards the wider backdrop of the South Downs scarp and looking south-east across the ghylls to Grove Hill in the High weald National Landscape if designed carefully.

- 3.19 Important Local Views 27 and 28 look north-west from footpath 16 within the Site. The eastern end of the footpath and Important Local View 27 was inaccessible at the time of our site visit but looks north-north-west along the relatively open fields on the east facing valley slopes that lie on the eastern side of the Site and to the west of the Cuckoo Trail and roll up to the localised ridge that extends out of Horam.
- 3.20 Important Local View 28 looks north-west across the central area of the Site towards Coxlow Farm from footpath Horam 16 near Coggers Shaw. A photograph of the view taken in late spring 2025 is provided at **HBA Figure 11** below.



HBA Figure 11 – Photograph from footpath 16 at Important Local View 28

- 3.21 Important Local Views 28 looks across an open foreground towards Coxlow Farm (building in central backdrop). A key feature of the view is the quite striking ‘layering’ effect of the field boundary hedgerows and intact pattern that forms the middleground to a portion of the view. The open foreground and area of intact pattern are sensitive features of the landscape and should remain. The view is influenced by some glimpses of development beyond hedgerows and trees. Any new development in the areas of the Site within the view should retain the same sense of glimpsed development and should not interrupt or detract from the prominent hedgerow pattern.
- 3.22 Whilst these are Important Local Views in the Neighbourhood Plan, the **WDC Landscape Character Assessment (May 2022)** also refers to “...long open views to the Pevensy Levels, South Downs and landmark church towers” that provide visual interest and a sense of place to the landscape. (WDC Landscape Character Assessment, page 186). They should be considered

a key sensitivity in the assessment of the landscape of the Site and inform its potential for development. The potential loss of these views would diminish the setting of Horam

Intactness of field pattern and contribution to time depth

- 3.23 Within the reasoning for an assessment of Moderate sensitivity for the site in the LVA-NSLUE, the study notes there has been “...some deterioration of field boundaries in the northern sites (Site 1172/3030, 1174/3030 and 875/3030)” and suggests this reduces sensitivity.
- 3.24 A comparison of current aerial photography and mapping, and historic Ordnance Survey (OS) mapping shows that deterioration of field pattern and boundaries has been minimal and that field pattern is mostly intact across the majority of the Site, notably through the southern half of the Site and the central and eastern portions, with only a small area of loss/change noted around existing farm buildings and the development of Grange Close . Important Local View 28 in the Neighbourhood Plan looks across this intact pattern and is characterised by a striking ‘layering’ of field boundary hedgerows from footpath 16 looking back towards Coxlow Farm.
- 3.25 An overlay of the 1st edition OS Mapping (1840-1880) with aerial imagery is indicated at **HBA Figure 12** below:



HBA Figure 12 - 1st edition OS 6 inch Map overlaid with Esri World Imagery. Data taken from National Library of Scotland Historic Map online database.

4 LANDSCAPE STRATEGY

- 4.1 A **Landscape Strategy Plan** is provided at **HBA Appendix A** that is based upon the above landscape comments and analysis and the Landscape Opportunities and Constraints Plan. It provides an overall landscape-led concept for how development could be accommodated on the site within an appropriate landscape structure that responds to the identifies key landscape and visual sensitivities (including those identified above by HBA). It should be noted that this is based upon landscape and visual considerations only and that issues such as Biodiversity Net Gain (BNG) have not been taken into account and may impact upon the acceptability or viability of potential land uses and landscape treatments.
- 4.2 The Landscape Sensitivity Assessment Residential and Employment **Development** document by **LUC** identifies constraints on development by the identification of priority habitats including ancient woodland, wooded ghylls and semi-improved grasslands.
- 4.3 Given the sensitivities of the site, any commercial or employment space should be sited close to the A267 and well screened from the road. Commercial development should not be large in scale, but should be of a smaller, artisan / craft / shop nature and generally of a scale in keeping with the rural, village character

5 CONCLUSION

- 5.1 The published landscape evidence base reports by LUC (dated November 2023) – LSA-RED and LVA-NSLUE, are noted as being high-level and ‘strategic’ in both their purpose and preparation. They include a clear scope, methodology and approach, but there appears to be some inconsistency in how the assessment units considered in the LSA-RED are taken into the LVA-NSLUE and how the methodology is applied. Some characteristics and features of the landscape have not been recorded or have not been considered in any detail due to the nature of the studies, and in our professional judgement should inform the underlying sensitivity of the Site and any potential development strategy. In particular, additional considerations should include:
- 5.2 The Site spans two assessment units in the Strategic Landscape Sensitivity Assessment provided in Appendix A of the LSA-RED: lying predominantly within the Horam assessment unit but with the south-east portion of the Site lying within the LCA 6E Wider Area assessment unit. The Site is referenced by its’ SHELAA site references in the Landscape Sensitivity Assessments of SHELAA Sites in Appendix B of the LSA-RED. The Site is referenced as ‘South of Horam’ in the LVA-NSLUE. The LVA-NSLUE draws upon the findings of the LSA-RED but only appears to consider the ‘South of Horam’ site in relation to the ‘Horam assessment unit’ and not the LCA 6E Wider Area assessment unit. Whilst the boundary between the two assessment units in the LSA-RED is based upon an arbitrary distance from the settlement, there is a correlation between the noted characteristics of higher sensitivity recorded for the Site in the LVA-NSLUE and the recorded sensitivities for the wider assessment unit. It is unclear why the whole of the Site is therefore assessed as ‘Moderate’ sensitivity in the LVA-NSLUE, effectively two ‘levels’ of sensitivity below the ranking of ‘High’ sensitivity considered in the LSA-RED for the southern portions of the Site, albeit it is noted that much of this area is subsequently indicated as a ‘Sensitive landscape area/feature’ on the Summary map of constraints and opportunities at Figure A.52 of the LVA-NSLUE.
- 5.3 The South Downs is explicitly mentioned in both methodologies as a key factor in assessing

sensitivity and suitability for development (in landscape and visual terms) both in terms of the designation itself and its contribution to settlement setting. Neither the LSA-RED nor the LVA-NSLUE refer to the intervisibility between the Site and the settlement edge of Horam and the distinctive ridge of the South Downs. This is pertinent as a view from the settlement edge to the South Downs is identified as an Important Local View in the Horam Neighbourhood Plan (Policy HCD3). The Neighbourhood Plan identifies such views on account that they *“exemplify the sense of place of Horam Parish and are integral to peoples’ enjoyment and appreciation of the landscape of the Parish, as well as the relationship between built-up areas and their countryside setting”* (Neighbourhood Plan para 4.11).

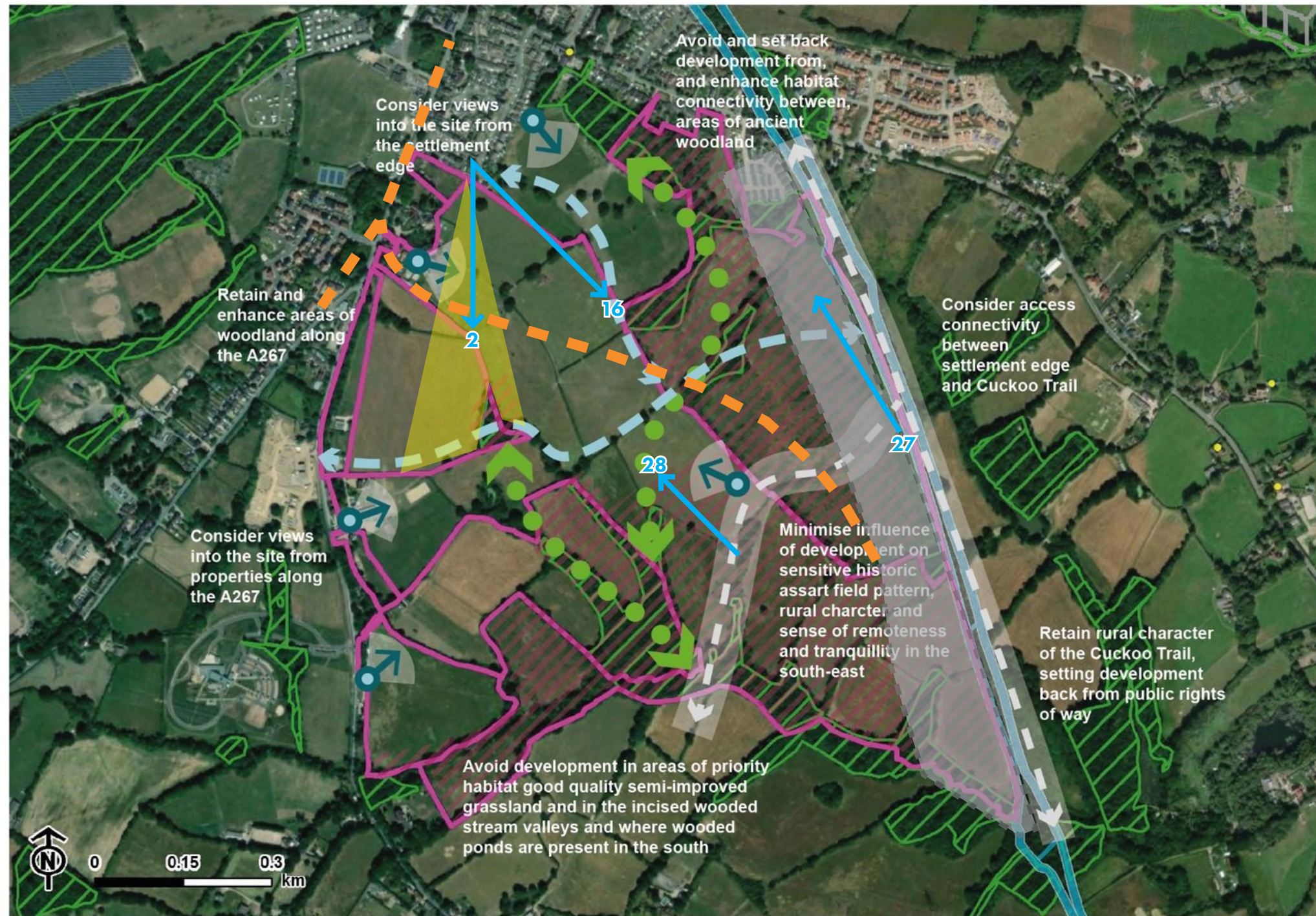
- 5.4 Whilst the LVA-NSLUE considers that *“some deterioration of the historic field pattern and field boundaries in the north and west decreases sensitivity”*, a comparison of current aerial photography and historic OS mapping indicates that field pattern is intact across the majority of the Site, notably through the southern half of the Site and the central and eastern portions, with only a small area of loss/change noted around the existing farm buildings and in the vicinity of Grange Close at the very north of the site. Important Local View 28 in the Neighbourhood Plan looks across this intact pattern and is characterised by a striking ‘layering’ of field boundary hedgerows looking from footpath 16 looking back towards Coxlow Farm.
- 5.5 None of the four Important Local Views that look across the Site are mentioned in the landscape evidence base reports. Surprisingly neither of the two Representative Photographs provided for the Site in the LVA-NSLUE demonstrate those views.
- 5.6 We agree with the general summary finding in the LVA-NSLUE (page A-129) that if the site is considered for development it *“would need to be planned with great care and consideration especially in relation to the key sensitive features within and adjacent to the site”* which should also include the considerations above. We also agree that development should focus on the northern and north-western areas of the site. With regard to the central area of the site, whilst this is summarised in the LVA-NSLUE as being *“less sensitive”* we note that the Summary map of constraints and opportunities indicates sensitive landscape areas and features around this part of the site. We would add that the role that the central area of the site plays in the Important Local Views from the settlement edge to the wider setting of the South Downs (and its contribution therefore to the settlement setting) and from footpath 16 looking across the recognised characteristic and historic intact field pattern of this landscape should also be considered to be key sensitive features that from a landscape and visual perspective, must also inform the suitability of the site for development.

APPENDIX A

HBA LANDSCAPE OPPORTUNITIES AND CONSTRAINTS PLAN










HBA LANDSCAPE STRATEGY PLAN

Figure A.52: Summary map of constraints and opportunities







Source: Esri, Maxar, Earthstar Geographics, and the GIS User Community

Source: WDC, NE, HE

-  Site boundary
- Sensitive Features**
-  Ancient woodland
-  Listed Building (Grade II)
-  Biodiversity Opportunity Area
-  Key views in
-  Key routes & set back
-  Sensitive landscape area/feature
- Opportunities**
-  Potential enhanced habitat connectivity
-  Potential enhanced access connectivity

HBA additional considerations:

-  Important local views (Policy HCD3)
-  Area forming the open foreground to key views
-  Additional set back to Cuckoo Trail
-  Local ridgeline that contributes to the character and setting of the village and Cuckoo Trail

Note: All field boundaries are intact since 1st edition OS 1878



- Key:
- Site Boundary
 - ▨ Intact field pattern to be retained
 - Existing woodland to be retained and min. 15m buffer to be established
 - New and enhanced woodland to connect existing habitat and create enclosure/ emphasise wooded ridge to protect setting of Cuckoo Trail and the village
 - ▨ Create strong hedgerow frontage to A267 and set back to development
 - ▨ Key routes to be retained
 - ▨ Important local views (Policy HCD3)
 - 2. Grange Close to South Downs
 - 27. Footpath 16
 - 26. Footpath 16
 - Areas to remain undeveloped
 - D1 Potential area for housing (approximately 17.5 ha)
 - D2 Potential area for school, early years provision and community / recreational use. (approximately 6.5 ha)

Scale 1:5000@A2 010m 100m 200m 300m 400m ↑