

Horam Parish Council

Council Offices
The Horam Centre
Horam
East Sussex TN21 0EH
26.3.2026

Planning Policy

Wealden District Council
Vicarage Lane
Hailsham
East Sussex
BN27 2AX

**RE: DRAFT “FOCUSED” WEALDEN REGULATION 18 LOCAL PLAN
CONSULTATION RESPONSE
FROM: HORAM PARISH COUNCIL**

Please find attached representations submitted by Horam Parish Council on the ‘focussed’ draft Wealden Local Plan (DLP) published under Regulation 18 of The Town and Country Planning (Local Planning) (England) Regulations 2012.

The Parish Council has reviewed those policies with direct implications for its parish, together with the evidence provided in support of the Draft Wealden Local Plan. In some critical respects, the Parish Council has found the evidence to be outdated, inaccurate, and/or simply not robust enough to support certain proposed allocations.

The Parish Council’s reasoning for its comments is set out fully in the attached representations, with alternative proposals or policies, where appropriate, that would help make the Plan sound.

In summary, the Parish Council’s representations on the content of the Draft WLP relate to:

1. Focused Draft WLP
 - a) Policy SS1: Spatial Strategy for Wealden (Q1)
 - b) Policy SS2: Provision of Homes – and Option Sites (Q2a, Q2b)

- c) Policy SS4: Retail Provision and Town Centres (Q4)
- d) Policy SS5: Provision of Employment Floorspace (Q5)
- e) Policy SS6: Strategic Employment Allocations, and potential sites (Q6)
- f) Policy SA1: Housing and Mixed Use Site Allocations (Q11);
 - HOR1 Land adjoining Discovery Way and Village Hall, Horam
 - HOR3 Land at Great Easterfields, Chiddingly Road, Horam
 - HOR4 Clearview Farm, Chiddingly Road, Horam
 - HOR6 Coxlow Farm, Horam Road, Horam and Policy HOR6

NB Comments on SHELAA site assessments are incorporated into comments on the above draft allocations, while comments on site assessments in the Sustainability Appraisal are summarised in comments on the above draft allocations and set out in full in separate representations in response to Question 14, as below.

2. Sustainability Appraisal (Q14)

- Spatial Options
- HOR1 Land adjoining Discovery Way and Village Hall, Horam
- HOR3 Land at Great Easterfields, Chiddingly Road, Horam
- HOR4 Clearview Farm, Chiddingly Road, Horam
- HOR6 Coxlow Farm, Horam Road, Horam

3. Sustainable Settlement Study (Q14)

A number of supporting documents to the Parish Council's comments are attached under Question 15.

In addition, aside from its responses to the substance of the Focused Draft WLP, the Parish Council has also made representations on the consultation process, and specifically the adequacy of the (updated) consultation period in the light of the widespread IT issues. It has separately written to WDC on this point, but its issues are also maintained in response to Question 11 of the consultation.

Yours faithfully

JACKIE COTTRELL

Jackie Cottrell – Clerk to Horam Parish Council

Policy SS1: Spatial Strategy for Wealden

Question 1

a) *Do you agree with the updated draft Policy SS1: Spatial Strategy for Wealden, and if not, why?*

b) *Is there an alternative spatial strategy that we should be considering through this Local Plan? If so, please set out what the alternative spatial strategy should contain and why?*

OBJECTION: Horam Parish Council does not agree with the updated draft Policy SS1, as it does not read as a cogent spatial strategy. While the supporting text identifies critical elements of a spatial strategy, these do not find expression in Policy SS1.

Policy SS1 should be redrafted to provide a clear spatial strategy, along the lines set out below, which draws on the reasoning already largely set out in the text of the Draft Local Plan.

An alternative spatial strategy, that considerably reduces the massive, and unsustainable, housing growth currently proposed at Horam, needs to be considered – and preferred.

Justification in relation to both questions 1a and 1b

The 'general principles' within *Policy SS1: Spatial Strategy for Wealden* are supported, namely:

- a) *Deliver sustainable and high-quality development that meets the needs of our communities for homes and jobs, whilst balancing the impact of growth on our natural environment, protected landscapes and the countryside.*
- b) *Contribute to the continued sustainability of our towns and villages. ...*
- c) *Support our towns and villages to be 'complete, compact and connected neighbourhoods' to help provide health, social, environmental and economic benefits to our communities.*
- d) *Support Neighbourhood Plans where Parishes have designated such areas for this purpose ...*

However, the policy does not offer a cogent "spatial strategy", as the policy title – and the preceding text – suggests.

For example, it is noted that paragraph 3.11 of the Focused Draft WLP states:

'The draft spatial strategy seeks to allocate the majority of growth in and around our market towns and at the edge of regional towns located outside of our district (i.e. Eastbourne and Tunbridge Wells), whilst enabling an appropriate scale of development in a number of settlements where these have a good level of key services and facilities, can access public transport and have good accessibility to larger settlements.'

From a strategic planning perspective, it is also important to recognise the relationship with other larger centres around the district, as noted in paragraph 2.4 of the Reg 18(2) WLP:

‘However, we are also located in close proximity to much larger, regional towns outside of our district including Royal Tunbridge Wells and Sevenoaks to the north, Eastbourne to the south, Lewes and Brighton and Hove to the southwest, East Grinstead, Horsham and Crawley to the northwest, Haywards Heath and Burgess Hill to the west and Bexhill and Hastings to the southeast. These centres also provide important retail, employment, leisure and other services for our communities.’

Also, in paragraph 3.12, it states:

‘A limited amount of housing within the High Weald National Landscape will also provide a continued labour force to support the rural economy, including tourism. Similarly, the draft spatial strategy also seeks to protect the setting of the South Downs National Park, which although it sits outside our administrative boundary, is still a factor to consider in the overall balance.’

Similarly, paragraph 3.13 adds:

‘Outside of the protected High Weald National Landscape, the draft spatial strategy seeks to restrict development in the open countryside to ensure that the character and identity of our settlements are maintained ...’

These are important spatial principles that should also have expression in the policy.

In order to make Policy SS1 read as a cogent spatial strategy, taking the above points on board, it should incorporate the following elements:

- *a recognition of the need to limit the amount of development, especially housing, within the High Weald National Landscape, and to protect the setting of the South Downs National Park and the National Landscape*
- *the presence of international and national nature conservation designations*
- *that the majority of development within Wealden district shall be located in and around its market towns and in other locations in close proximity to the larger, regional towns outside of our district (i.e. Eastbourne and Tunbridge Wells), particularly with those with good rail access*
- *an appropriate scale of development in a number of settlements where these have a good level of key services and facilities, and have good accessibility by public transport to larger settlements, consistent with maintaining and, where possible, enhancing their character and identity*

The need to redraft Policy SS1 is further exemplified by the fact that there is no clear link between it and the consideration of spatial options in the supporting Sustainability Appraisal, to which separate representations are made in response to Question 14, while detailed representations on the allocation of sites in Horam, are set out in response to Questions 2 and 11 below.

Policy SS2: Provision of Homes

Question 2

a) *Do you agree with draft Policy SS2 (Provision of Homes), and if not, why?*

b) *Do you agree with the list of potential sites, the amount of development, and/or the issues identified in tables [sic] 6 (alternative scenario) associated with draft Policy SS2 –Provision of Homes?*

OBJECTION: In response to Question 2a, the number of homes set out in Policy SS2 includes the massive scale of growth proposed at Horam, principally through the allocation of Coxlow Farm, which is considered wholly inappropriate, having regard to the character of the village and its landscape setting, and the availability of, and access, to services and facilities.

Most notably, the amount of housing and employment proposed at Coxlow Farm (Site HOR6) is excessive, having regard to the landscape character and sensitivities of the site, as well as in terms of infrastructure provision.

A mixed-use development at Coxlow Farm, with a significantly reduced scale of development, being contained to the northern and western parts of the site, and which also incorporates education and community provision (including a 'community hub'), together with a 'country park', could be appropriate within the site

In addition, the housing allocation of Land at Discovery Way (HOR1) is unacceptable, as it would involve the complete loss of a valuable green space close to the centre of the village and adjacent to the recreation ground, with the potential for enhancement both as a quiet amenity area and for wildlife, such use being strongly supported by the local community.

Detailed reasoning for changes sought to the above site allocations (HOR1 and HOR6), as well as to Site HOR3 Land at Great Easterfields, Chiddingly Road, Horam and HOR4 Clearview Farm, Chiddingly Road, Horam, are fully set out in response to Question 11 relating to the updated draft Policy SA1: **Housing and Mixed-Use Site Allocations.**

Justification:

Horam Parish Council challenges whether the proposed allocations actually accord with a reasonable spatial strategy, with specific reference to the sustainability, or rather unsustainability, of the massive strategic scale of growth proposed for the village of Horam.

The Focused Draft WLP relies heavily on its draft Sustainable Settlements Study (published in March 2024) as the means to identify which settlements would be the most appropriate to deliver housing and employment growth, stating that those settlements with the most services and facilities and a good level of public transport and accessibility (which cover Types 1 to 4) are the ones regarded as the most sustainable.

As stated in the supporting text of both Policy SS1 and Policy SS2, the logical strategic approach (subject to the limitations of key environmental designations) is to focus housing development in and around its market towns (Type 1 settlements) and at the edge of nearby regional towns (i.e. Eastbourne and Tunbridge Wells) (i.e. Type 2 settlements). Indeed, this is supported by Figure 6, which shows that Wealden is not a 'Housing Market Area' (HMA), but is within the influence of five HMAs based on external regional centres – which also reflects the overall rurality of the district. The strategy also states: *'For other settlements (Type 3 and 4 settlements), a proportion of growth is encouraged taking into account environmental and infrastructure constraints and the location of deliverable sites for housing.'*

Horam is identified as a Type 3 settlement in Table 3, based on the Sustainable Settlements Study.

The distribution of development across the respective tiers within the settlement hierarchy, based on the figures in Table 5, is summarised in Table 1 below.

Table 1 Distribution of housing allocations in Focused Draft WLP		
Tier	Settlement	Allocations¹
Type 1	Crowborough	185
	Uckfield	2,241
	Hailsham	796
	Heathfield	137
	<i>TOTAL</i>	<i>3,359</i>
Type 2	Polegate	131
	Willingdon/Jevington	40
	Stone Cross	503
	Westham	157
	Pevensey	5
	Pevensey Bay	
	Tunbridge Wells fringes ²	657
<i>TOTAL</i>	<i>1,493</i>	
Type 3	Forest Row	
	Horam	807
	Mayfield	
	Wadhurst	20
	<i>Total</i>	<i>827</i>
Type 4	Bells Yew Green	20
	Berwick Station	72
	Blackboys	19
	Buxted	65
	Cross-in-Hand	39
	East Hoathly	380
	Five Ash Down	20

¹ Including proposed allocations in adjacent Parishes which would be contiguous with the built-up areas of the main settlement, based on Table 13 of the Focused Draft WLP.

² Although not classed as a 'settlement' in the hierarchy, the fringes of Tunbridge Wells are treated here in the same way as settlements adjacent to Tunbridge Wells, which paragraph 3.57 identify as being in Type 2.

	Framfield	
	Frant	5
	Groombridge	21
	Hartfield	11
	Herstmonceux	9
	Isfield	20
	Lower Horsebridge	89
	Maresfield	245
	Ninfield	20
	Rotherfield	
	<i>Total</i>	<i>1,035</i>
Type 5	Hellingly	10
Unclassified	Ringles Cross	40
	TOTAL	6,764

It is evident from Table 1 above that the scale of housing allocations proposed at Horam is disproportionately large for a Type 3 settlement. Its allocations total more than those for the Low Weald, Type 1, town of Hailsham, as well as being considerably more than for Crowborough and Heathfield, and virtually the same as the combined total allocations at all the Type 2 settlements close to Eastbourne.

Taking account of housing completions since the 2021 Census, there are some 1,100 dwellings within the village of Horam at the base date of the Plan.

Table 5 of the Focused Draft WLP identifies expected growth at Horam as a consequence of the Plan to be some 1,041 dwellings.

In other words, the Plan promotes the virtual doubling the size of the village within 17 years.

This is regarded as **not** consistent with the general principle of maintaining the character and identity of settlements and, furthermore, is inconsistent with the stated spatial strategy (of focusing growth on towns and locations close to regional centres).

Table 2 below shows that Horam, at Coxlow Farm, has by the largest site allocation (aside from the 'alternative scenario' allocation at Owlsbury Farm, Uckfield) in the Plan. This is anomalous with its position in the settlement hierarchy (which is discussed further below).

	<i>Policy Ref.</i>	<i>Site</i>	<i>Settlement</i>	<i>Settlement tier</i>	<i>Dwellings</i>
1.	LH1	Owlsbury Farm	Uckfield	Type 1	1,500
2.	HOR6	Coxlow Farm	Horam	Type 3	750
3.	WES5	Sharnfold Farm	Stone Cross	Type 2	350
4.	HA1	Land east of Battle Road	Hailsham	Type 1	300
5.	UCK11	White House Farm	Uckfield	Type 1	240
6.	FF5	Land at Bird-in-Eye	Uckfield	Type 1	215
7.	MA1	Land south of Maresfield	Maresfield	Type 4	210

The fact that none of the spatial options in the Sustainability Appraisal have a scenario with a lesser, more proportionate, scale of growth at Horam is regarded as a significant flaw in the required evaluation of reasonable options.

While the Focused Draft WLP seeks to justify '*some growth*' at Horam (and East Hoathly), and more than other Type 3 and 4 settlements, '*owing to their location in the Low Weald, more limited constraints, and connections with higher order settlements*' (paragraph 3.61), the scale of proposed growth is inappropriate in strategic and site-specific terms:

- ✘ Although not within the High Weald National Landscape, Horam immediately abuts it on its northern side. Its landscape demonstrates many of the characteristics of the High Weald; it is within the High Weald National Character Area, in 'South Slopes of the High Weald LCA in the East Sussex Landscape Character Assessment 2016, and in LCA 6E: High Weald - Cuckmere / Pevensey Catchments, as part of Landscape Type 6: Wooded Slopes (High Weald) in the Wealden Landscape Character Assessment May 2022.

Hence, it is still a sensitive landscape, with important features, notably ancient woodlands, ghyll streams and historic field patterns. These factors, as well as important views identified in the made Horam Neighbourhood Plan, have been considered by independent landscape consultants appointed by HPC in relation to land to the south of Horam (effectively land covered by draft site allocation HOR6, Land at Coxlow Farm). This found that significant swathes of the land, notably to the east and south, are highly sensitive to development (even though within the Low Weald).

- ✘ Rather than having good connections with higher order settlements, Horam is actually one of least well-connected villages in Wealden. It is not close to any of the surrounding regional centres (see Q1 comments above), namely Eastbourne to the south, Tunbridge Wells to the north, Hastings/Bexhill to the west, Lewes/Brighton to the south-west and East Grinstead/Crawley to the north-west. Furthermore, Horam has no railway station (nor nearby station) and its bus services have become notably less frequent in recent years.

In fact, the level of facilities and accessibility are poorer than indicated in WDC's Sustainable Settlements Study, which was published some two years ago (and based on earlier surveys). The Focused Draft WLP notes (at paragraph 3.46) that '*The Sustainable Settlements Study will be updated prior to the Regulation 19 stage.*'

A separate representation on the Sustainable Settlements Study explains why updating the Sustainable Settlements Study is regarded as essential, to take account of the fact that several important services and facilities have been lost locally in the last two years, most notably the closure of the village's Post Office, the closure of the village's only pub, and the withdrawal of frequent (half-hourly) bus services to one with weekday services (see [here](#)) with a about an hour and a quarter frequency. Collectively, these may well impact on where Horam sits in the settlement hierarchy (subject to changes elsewhere) and, in any event, impact on the assessment of its sustainability, including in the Sustainability Appraisal.

Specifically, the proposed strategic allocation at Coxlow Farm, Horam, is not justified in its current form. Many of the sustainability impacts are recognised in the Sustainability Appraisal as 'uncertain' – while, in critical respects, others are found by HPC's own evidence work, to be more negative than suggested, such that the allocation, as presented, is excessive, having regard to both site-specific and strategic factors.

This conclusion is supported by detailed evidence provided in separate representations on the Sustainable Settlements Study and the related SA assessments (see responses to Q14).

In response to **Question 2b**, while none of the option sites are within Horam Parish, the following general comments are made:

1. In respect of all sites along the A22 corridor, the capacity of the A22 itself is a key issue. It appears over-capacity at present. While improvements are planned to certain junctions, the impact of major further sites, including west of Hailsham and at Laughton Park Farm would undoubtedly be significant.
2. Some development at Berwick Station, Buxted and Crowborough would (subject to environmental constraints) be consistent with the preferred spatial strategy (see response to Q1), and with the emerging NPPF, in terms of rail access.
3. The overall scale of development that would result from the option sites listed in Table 6 totals 8,329 dwellings, of which 4,854 (net) dwellings is stated in paragraph 3.63 as being expected to be built within the plan period. As most of the sites, and the two very substantial sites, are in the Low Weald, real concern is expressed at the further urbanisation of the Low Weald. The character of the Low Weald, as described in the current, albeit 1998, Local Plan is worth noting:

4.48 Whilst not covered by a national landscape designation, the Low Weald is nevertheless a very attractive countryside and contains a number of unspoilt villages, historic buildings including moated houses together with a preponderance of vernacular buildings. Away from the main towns and the A22 and A267, it is crossed by a lattice of narrow country lanes which has contributed to a general lack of intrusive or extensive development. Overall, the area retains a strong rural character. This character is evident in the many views across the Low Weald from the higher land to the north and south. The area beneath the scarp slopes of the Sussex Downs is particularly exposed and accordingly sensitive to change.

4.49 There has been considerable growth in recent years of the Low Weald towns in particular, as well as in certain other settlements and along the main road corridors. However, elsewhere the character of the countryside is largely unspoilt. It is almost universally attractive and worth retaining for its own sake. Accordingly, development should be expected to fully comply with the appropriate policies of the Plan.

4. It is apparent that, in the attempt to achieve, or approach, the government's formulaic housing target for the district – which takes no account of environmental capacity or wider sustainability, an inappropriately simplistic, binary approach appears to have been taken - namely to direct virtually all development into the undesignated Low Weald part of the district, in order to (quite understandably) limit development in the High Weald National Landscape and nationally designated nature conservation sites.

The Draft WLP, in effect, looks to “squeeze a quart into a pint pot”, with little, if any, regard to retaining the ‘*strong rural character*’ of the Low Weald away from its main towns.

Policy SS4: Retail Provision and Town Centres

Question 4

Do you agree with the updated draft Policy SS4: Retail Provision and Town Centres, and if not, why?

COMMENT: Horam Parish Council notes that the scale of retail growth will, in part, depend on the eventual scale of housing growth.

In addition, it notes that the actual location of new retail floorspace will have an effect on vehicle movements; hence, wherever these extra floorspace will be built, there will need to be adequate parking and adequate public transport links, as well as highway capacity.

Policy SS5: Provision of Employment Floorspace

Question 5

Do you agree with the updated draft Policy SS5: Provision of Employment Floorspace, and if not, why?

COMMENT: Horam Parish Council notes that the scale of employment growth will, in part, depend on the eventual scale of housing growth.

In addition, it notes that the actual location of new employment floorspace will have an effect on vehicle movements; hence, wherever these extra floorspace will be built, there will need to be adequate parking and adequate public transport links, as well as highway capacity.

Policy SS6: Strategic Employment Allocations, and potential sites

Question 6

a) Do you agree with the updated draft Policy SS6: Strategic Employment Allocations, and, if not, why?

b) Do you agree with the list of potential sites, the amount of development, and/or the issues identified in table 11 associated with draft Policy SS6 – Strategic Employment Allocations?

COMMENT: The strategic employment sites identified in Policy SS6, being at the towns of Hailsham and Uckfield, and on the edge of Eastbourne, is consistent with the overall spatial strategy.

However, serious concern is expressed at the additional potential site identified in Table 11, for Site OEMP2 (SHELAA ref.1235/1950), Land at Laughton Park Farm, East Hoathly. The very large scale of this potential employment site – for some 30,000sqm (300,000sq ft) – would be poorly related to the spatial strategy and further contribute to the erosion of the rural character of the Low Weald, away from the towns.

NB Similar objections are also expressed in relation to large-scale potential housing sites in the Low Weald countryside – see response to Question 2b - which would individually substantially detract from, and cumulatively overwhelm, its rural character.

Policy SA1: Housing and Mixed Use Site Allocations

Question 11

- a) *Do you agree with the updated draft Policy SA1: Housing and Mixed-Use Site Allocations, and if not, why?*
- b) *Do you agree with the site allocations listed within this policy and if not, what are the reasons for this?*

Notes:

The following objections relate to both parts (a) and (b) of Q11, as it appears that the policy simply provides a means of identifying the sites shown in Table 13 as being allocated within the draft Local Plan.

(NB While the policy also states ‘*All housing and mixed-use site allocations must be delivered in accordance with the development plan when read as a whole*’, this is considered unnecessary, as it is a legal requirement.)

OBJECTION: Horam Parish Council objects to the scales of development at the following sites, as presented in Policy SA1: Housing and Mixed Use Site Allocations:

- HOR1 Land adjoining Discovery Way and Village Hall, Horam
- HOR3 Land at Great Easterfields, Chiddingly Road, Horam
- HOR4 Clearview Farm, Chiddingly Road, Horam
- HOR6 Coxlow Farm, Horam Road, Horam and Policy HOR6*

[NB As HPC’s recommended revised form of Policy HOR6 directly relates to its objections to the nature of the allocation put forward in Policy SA1, its response to Question 11 should also be seen as an Objection in response to Question 12 below.]

Objections to site allocations HOR1, HOR3, HOR4 and HOR6 in Policy SA1 are supported by related objections to their assessments in the Sustainability Appraisal, (also having regard to current sustainability, as set out in comments on the Sustainable Settlements Study), as set out in response to Q14).

Comment is also made in respect to HOR5 Horam Flat Farm, to note the recent planning permission affecting the site.

HOR1 (SHELAA Site 1062/3030): Land Adjoining Discovery Way and Village Hall, Horam

OBJECTION: Horam Parish Council remains of the strong view, for the reasons explained below, that the residential development of this site, while having some sustainability benefits, also has clear disbenefits and, critically, that when viewed in the round, the disbenefits of the loss of the greenspace, outweigh the benefits.

Instead, the site should be retained, and enhanced, as ‘accessible natural greenspace’, to meet an identified need and contribute to the sustainability of Horam, notably in terms of quality of life and local distinctiveness.

Justification:

This draft allocation is supported by assessments contained in the latest Sustainability Appraisal (SA) and the SHELAA documents. However, significant, and critical errors in these are found, which undermine the justification for the loss of this valuable greenspace for housing.

A detailed critique of the SA is set out in a separate representation on that document – see response to Q14. In summary, it finds that while the development of the site with 10 dwellings would have a *Minor Positive* impact against the Housing and Transport & Accessibility Objectives (this being a fairly central location), these need to be balanced with the several Negative impacts. HPC’s assessment is that these are in terms of *Major Negative* impacts in terms of both Green & Blue Infrastructure and Landscape & Townscape Objectives, as well as *Minor Negative* (but still meaningful) impacts in terms of both Biodiversity and Health & Wellbeing Objectives.

As these contrast with those of WDC (which do not recognise any of them as being Negative), the separate representation on the SA examines the differences in turn. The key points are:

- In terms of SA Objective SO8 Green & Blue Infrastructure, the site is designated as a ‘*habitat creation area*’ under a condition as part of the Merrydown development.
- It is identified as one of only two existing ‘Natural Green Spaces’ in the parish (Horam Natural Green Space 2, Site ID 98) in Wealden District Council’s [Open Spaces Study: Parish Area Summary, September 2022](#), which states³ that it ‘*forms part of the green corridor extending along the A267 on the approach into the village*’.
- Moreover, that Study highlights that that Horam Parish lacked 40,578 sqm of Natural and Semi-Natural Greenspace and 11,943 sqm of Amenity Greenspace, based on the 2022 population (which has since grown).
- Although the Open Spaces Study comments that the quality of this Natural Green Space (i.e. the HOR1 site) is considered poor, the ‘*Summary and Priorities*’ for Horam states that, given the deficiency in sites: ‘*The priority for*

³ <https://www.wealden.gov.uk/UploadedFiles/Final-Wealden-Parish-Areas-Summary.pdf>

the area is to enhance lower quality sites where possible. Furthermore, any opportunities for new provision could look to focus on existing quantity shortfalls.'

- In terms of the site's potential for enhancement as a natural greenspace, firstly:
 - during the consultations on the Horam Neighbourhood Plan, it was clear that both the existing and potential value of this site as a greenspace close to the village centre is highly valued;
 - the made Horam Neighbourhood Plan (HNP) identifies this land as a project (*Project H(iii): Land at corner of A267*), to work with partners to manage and enhance this important area of green space at a gateway location into Horam village;
 - although somewhat isolated due to the intervening development around the site, the presence of the large pond surrounded by mature trees, with ancient woodland indicator plants, located in the north-western corner of the site, as well as some hedge boundaries, is a real biodiversity asset;
 - A recent Preliminary Ecological Appraisal of the site commissioned from Arborweald Environmental Planning Consultancy (attached at Q15) has concluded that:

'The site represents an excellent opportunity to retain and enhance an area of natural and semi-natural greenspace, creating a biodiversity uplift combined with provision of a managed area for local people. This would be an ideal opportunity to address the local deficit in greenspace area.'

- In terms of Landscape & Townscape (SO10) impacts, the fact that the site is designated as a 'habitat creation area' does not appear to have been appreciated by the SA authors. In fact, it is outside the development boundary in the current, adopted Local Plan accordingly (not '*within the development boundaries*' as stated in the SA).
- The retention and enhancement of this area as a quiet, refuge in a semi-natural, central and partly historic greenspace, is seen as significant in terms of Health and Wellbeing (SO15), complementing the adjacent Recreation Ground.

Similarly, the SHELAA appears to simply see the site as unused, adjacent to existing development, close to the village centre, and hence suitable for infill development, without really appreciating its local amenity and biodiversity value or its potential for enhancement to meet recognised needs.

In conclusion, HPC remains of the strong view that the residential development of this site, while having some benefits, also has clear disbenefits and, critically, that when viewed in the round, the disbenefits outweigh the benefits; that is, the site's retention as '*accessible natural greenspace*', and consequent enhancement, would contribute more to the sustainability of Horam, notably in terms of quality of life and local distinctiveness.

Hence, its loss for a small number of dwellings cannot be supported by the local community.

HOR3 (SHELAA Site 920/3030) Great Easterfields, Chiddingly Road Horam

OBJECTION: The site contains a historic farmhouse that would require demolition to facilitate the construction of six new dwellings. This would adversely affect the character of the surrounding area. Additionally, the site's location is considered unsustainable due to its distance from the village centre (1,270 metres).

Justification:

While the SHELAA indicates support for the site with a reduced dwelling count, following a recent appeal decision refusing a larger number of dwellings, this is still considered excessive.

It is noted that the Inspector determining the appeal proposal did not consider the local heritage value of the farmhouse, as this was not an issue raised by WDC. However, and while it has not been regarded as meriting statutory Listing, it is still regarded as locally important.

The made Horam Neighbourhood Plan Background Paper: Approach to identifying and protecting local heritage assets recommends that this building be considered a non-designated heritage asset.

The Farmhouse's retention received considerable local support.

A revised allocation, retaining the farmhouse, with reduced dwelling numbers, should be sought.

Such an approach is supported by a comprehensive critique of the SA provided in a separate representation—refer to the response to Q14. In summary, while the development of the site with 5 dwellings represents a *Minor Positive* contribution to the Housing Objective, this must be considered alongside several Negative and uncertain impacts. HPC's evaluation identifies these as *major, minor and uncertain*, effects on Climate Change Mitigation, Historic & Cultural Heritage, Travel & Accessibility, Quality of Life & Place, Landscape and Townscape and Biodiversity Objectives.

As these considerations differ from those of WDC—which does not identify any of these factors as Negative—the separate representation in the Sustainability Appraisal (SA) examines each distinction individually. The key points are as follows:

- In relation to SA Objective SO1 Climate Change Mitigation, the demolition of Great Easterfields would result in unnecessary carbon emissions, which does not align with paragraph 161 of the NPPF 2024
- Regarding SO11 Historic and Cultural Heritage, Great Easterfields represents an important historical record of Horam's growth
- For SA Objective SO13 Travel and Accessibility, current bus services operate circa every 75 minutes

- With respect to SO16 Quality of Life and Place, the 1,200-metre distance to the village centre substantially exceeds the recommended guideline of 800 metres
- Addressing SO3 Flood Risk, existing surface water concerns on Chiddingly Road may be exacerbated by additional development
- Pertaining to SO9 Biodiversity, although potential for enhancement exists, the outcome remains uncertain and should be scored accordingly
- Concerning SA Objective SO10 Landscape and Townscape, previous refusals based on character and appearance indicate that the outcome for this Objective should also be considered uncertain

HOR4 (SHELAA Site 960/3030) Clearview Farm, Chiddingly Rd, Horam

OBJECTION: A development on this site has recently been refused planning permission and, while the SHELAA supports development at a reduced dwelling count, this would still constitute backland development, and would impact on adjacent ancient woodland. These factors, together with the site's distance from the village centre suggests that the development of the site be reappraised, with consideration given to reducing allocation numbers or removing the site.

Justification:

In summary, while the development of the site with 35 dwellings represents an appropriate scale of development for a village location, there are significant locational factors that mitigate against its development.

- the site is located on a prominent ridgeline that is highly visible from distant vantage points
- weekday bus services operate an irregular service with, on average, a bus approximately only every hour and a quarter [Timetable attached](#).
- the walking distance to the village centre (Co-Op) from the furthest point on the site exceeds 1,500 metres, significantly surpassing the 800-metre guideline
- there is potential for the development to adversely affect ancient woodland, as well as the stream and ponds situated downhill from the site
- there are existing surface water concerns on Chiddingly Road, which could be exacerbated by future development

A comprehensive critique of the SA of the draft allocation is provided in a separate representation —refer to the response to Q14, with differences from those of WDC - which does not identify any of these factors as negative - highlighted.

HOR5 (SHELAA Site 1057/3030) Horeham Flat Farm, Chiddingly Road, Horam

COMMENT: It is noted that this site formed part of a scheme granted planning decision in early February 2026. This included 4 of the 6 dwellings identified for HOR5, while the other two dwellings were not included because they would have damaged the root protection area of veteran and notable trees.

It follows that this allocation should be deleted from a future iteration of the Local Plan.

In any event, it is believed that account has already been taken of the permission on the wider site, for 39 dwellings, in the current commitments.

HOR6 (SHELAA Site 875/3030) Coxlow Farm, Horam Road, Horam

OBJECTION: The amount of housing and employment proposed at Coxlow Farm (Site HOR6) is also excessive, having regard to the landscape character and sensitivities of the site, as well as in terms of infrastructure provision and the wider impact on the character of the village.

In terms of landscape impacts, the draft allocation does not take account of the landscape sensitivity of much of the site, as advised in the landscape evidence provided by HPC in September 2025.

(It is noted that both the Strategic Housing and Employment Land Availability Assessment (SHELAA) and Sustainability Appraisal (SA) assessments similarly do not take this into account – see separate representations.)

In terms of wider impacts, the allocation does not adequately take account of the impact of such a massive development on the character of the village, nor of recent changes in services/facilities that further reduce the sustainability of Horam for growth.

(Again, neither the SHELAA and Sustainability Appraisal (SA) assessments take into account current service levels, nor adequately consider wider impacts – see separate representations. Additionally, there are critical anomalies in the descriptions of development being assessed in the SA and that of the proposed allocation which further undermine its selection for allocation – see separate representation on the Strategic Sites SA.)

As a consequence, the site's selection for allocation, for the scale of development proposed, is unsupportable.

However, it is found that a mixed-use development, with a significantly reduced scale of development, being contained to the northern and western parts of the site, and which also incorporates education and community provision (including a 'community hub'), together with a 'country park', could be appropriate within the site. A revised suggested policy wording is put forward accordingly.

Justification:

The Focused Draft WLP does not include any supporting justification for the allocation of sites within it. Rather, it relies on its supporting papers, primarily the SHELAA and the SA, with the SA essentially informing the SHELAA on overall sustainability.

However, there are clear deficiencies and anomalies in these documents, notably in respect of landscape sensitivity and the wider impacts of development.

In terms of landscape sensitivity, the SHELAA assessment of the site (Ref. 875/3030) states:

'The 2023 Landscape Sensitivity Assessment states that the site's landscape is moderately sensitive to residential development overall. A further assessment of landscape impact of any detailed scheme will be required in due course. Development at the site would need to include landscape mitigation to visually contain the site, particularly towards its eastern boundary. This would need to include the protection and

enhancement of existing hedgerows and mature trees as well as the strengthening of existing landscape features to improve green infrastructure connectivity throughout the site. The public right of way that crosses through the southern portion of the site and leads to the Cuckoo Trail would need to be retained and enhanced to ensure pedestrian/cycle connectivity to Horam's centre and beyond. The focus of development should be located within the northern, northwestern and central parts of the site, which are less sensitive and relate better to the existing settlement and expansion along the A267.'

This summary relies on landscape work of LUC, undertaken in 2023, which does not fully appreciate the landscape sensitivities of the site in that:

- a) The existing urban development to the north is regarded as having only a limited impact on the site's overall character;
- b) While LUC itself highlights the variation in sensitivity to development across the site, it being higher in the south, south-east and north-east of the site, much of the site is found to have a higher landscape sensitivity, than LUC's overall assessment suggests - see the Landscape and Visual Issues Site Study (LVISS) undertaken by Huskisson Brown Associates (HBA), which is attached as a document at Question 15;
- c) The LUC Study did not take account of the 'important views' across the site identified in the (subsequent) HNP, including across the site to the South Downs National Park;
- d) The area has a virtually intact historic assart field pattern, which is a key characteristic of the High Weald, contained by dense woodland and mature hedgerows, so warrants a higher sensitivity assessment. Indeed, Huskisson Brown Associates' review of the LUC report notes that the southern part of the site lies actually within a wider assessment unit, which LUC find as being of **High** sensitivity, further reinforcing a conclusion that there is at least a **Moderate-High** sensitivity for much of the site.
- e) It follows that LUC's assessment of the site as having **Moderate** sensitivity to small-scale residential development (2-2.5 storey housing) is itself conservative, while the SHELAA also needs to reflect that the proposed allocation also includes to commercial/ industrial development, which LUC (page LUC I B-366) identify as having a **high** sensitivity, as well as the prospect of "medium-scale residential development", namely 3-4 storey flats and/or care homes, which LUC states would be of **moderate-high** sensitivity.

In conclusion, only the north/western edges of the site are subject to any real urban influence and erosion of historic (High Weald) landscape character; hence development should be contained within the north/western part of the site.

LUC does not give any estimate of actual housing capacity of the site, nor is it clear how the SHELAA yield of 750 dwellings has been derived.

However, the recent landscape assessment by HBA identifies an approximate developable area which, at a density appropriate for a village-edge location, would equate to **c450-500 dwellings**, rather than 750 dwellings identified in the draft allocation.

Even at this scale, and allowing for some related uses, there would be some erosion of landscape character, as well as still leading to a substantial growth of the village, by some two-thirds, but it provides significantly more scope to retain sensitive areas and views, mitigate the impacts and provide space for amenity enhancements, including parkland, wildlife areas and informal access.

In conclusion, the SHELAA

- does not fully represent the landscape sensitivity of much of the site,
- does not take account of the further landscape evidence provided by HPC (in September 2025) or recent changes affecting the sustainability of Horam for growth,
- does it adequately take account of the impact of such a massive development on the character of the village.

As a consequence, its selection for allocation, for the scale of development currently proposed in the Focused Draft WLP is unsupportable. It should be reviewed in line with the 'landscape strategy plan' contained in the HBA study, which is attached, for completeness, as a supporting document at Question 15.

HPC notes that the Strategic Site Assessment for Coxlow Farm (Ref. No. 875/3030) in the Sustainability Appraisal Part 3 includes key elements within the 'Development Proposal' which are excluded from Policy HOR6 – Coxlow Farm, as written in the Focused Draft Wealden Local Plan, Regulation 18, February 2026.

For comparison, the draft allocation (Policy HOR6) is for:

750 dwellings, 4,000sqm Employment (E(g), B2 and B8), 1,500sqm community floorspace, 2.4ha Two-Form Entry Primary School

... while the SA describes the proposal as being for:

*c.750 homes, 4,000 sqm of employment floorspace, 1,500 sqm of community floorspace and 2.4ha of land for education, including a 2FE primary school with early years provision and associated sports pitches, **community hub, Country Park** and open space.*
(HPC bold highlighting)

Of particular note is that the SA includes elements not in the draft allocation, namely a 'community hub' and a 'Country Park'. (Note the use of Upper Case letters 'C' and 'P', identifying it a specific facility and separate from the more generic 'open space'. Also, a 'community hub' is discrete from the 'community floorspace').

It is agreed that a Country Park is necessary locally. In fact, it should be a priority in terms of infrastructure provision for Horam, given the evidence of [WDC Open Space Study](#) and its [WDC's Open Space Study Parish Summaries](#), which identifies a substantial deficit in accessible natural and semi-natural greenspace in the Parish (Parish Summaries, Table 20.3) - which will have increased as a result of recent developments, as well as taking account of planned housing growth. Moreover, the WDC Study, 2022 highlights the absence of a natural and semi-natural greenspace of at least 20ha within a 2km catchment (main report, Figure 6.3).

The Coxlow Farm site provides an ideal location for such a greenspace, adjacent to the Cuckoo Trail, and well related to the village and new housing. It follows that the Local Plan should make provision for a substantial, stand alone, defined "Country Park" in addition to and distinct from any areas within the developed area as open space(s) to meet the needs of the development.

Also, in line with the SA assessment, the policy should make specific mention of a community hub. Such a facility, providing a range of meeting rooms, is needed to complement the (fully-utilised) village hall and support a growing community. This would be akin to the Hellingly Hub, which is c500sqm.

[As an aside, the inclusion of 'community hub' and 'Country Park' in the Sustainability Appraisal of the Coxlow Farm site will have meant that it received a far more favourable outcome than it would have done if they had not been included. Without these provisions within Policy HOR6, it follows that the policy has not had an appropriate Sustainability Appraisal and that the Site Assessment for this strategic site is therefore flawed, inappropriate and inadequate for this Policy as it is written. (See also SA representation on HOR6)]

While the earlier Draft WLP referred to '*early years provision*', this is removed from the Focused Draft WLP. No explanation for this change can be seen? However, such provision, alongside a primary school would be logical, and is therefore supported. It is noted that the Sustainability Appraisal includes such provision in its assessment.

Other changes to the policy that are seen as necessary include:

- The inclusion of '*open spaces*' in the Indicative Capacity, for completeness
- Addition of a reference to the Horam Neighbourhood Plan and its component Design Guidance, which should be followed
- Clarification of the broad location for housing within the site
- Amending the amount of employment floorspace to be *up to* 4,000 sqm, as this is considered to be at the top end of what is appropriate for the area
- Specific reference to irreplaceable ghyll habitats
- Elaboration regarding downstream effects of surface water discharges
- Including provision for 'wheeled' as well as pedestrian connectivity, with elaboration in relation to links to the village centre
- Highlighting the provision of green corridors, and retaining pedestrian access to the existing PROW during construction and after
- Demonstrating, before development is started, that the sewage infrastructure is capable of handling the volumes without any spillages of untreated sewage
- Amending the incorrect reference to the A271 to the A267 in criterion 7

In addition, attention is drawn to SHELAA site 1172/3030, Land at Chestnuts Farm, part of which also lies within the red-line outline of the Coxlow site allocation HOR6 (and within the extent of SHELAA 875/3030). The Parish Council has been told by the owner of this site 1172/3030 that he had not agreed to any of it being included as a SHELAA site, he does not want to sell any of it and he will not sell any of it.

A draft revised wording for Policy HOR6 is put forward below, with new text in **red**, with deleted text shown by ~~strikethrough~~:

RECOMMENDED REVISED POLICY HOR6

HOR6 - Coxlow Farm, Horam Road, Horam

Allocated for: Residential, Employment and Community Uses, and a Two-Form Entry Primary School, **and a Country Park**

Site Area (ha): 86.36

Indicative Capacity: ~~750~~ **450-500** dwellings, **up to** 4,000sqm Employment (E(g), B2 and B8), 1,500sqm community floorspace, **a community hub**, a 2.4ha Two-Form Entry Primary School, **with early years provision, supporting open spaces, and a substantial (c20ha) Country Park**

Policy Map Designations: Ancient Woodland, Priority Habitats, **Ghyll Woodland**, Flood Risk

Relevant Planning History: None

In addition to meeting the policies in the plan, any proposal for the development of this site must demonstrate that it will:

1. Be designed to respond appropriately to the character and appearance of the site's edge of village location immediately adjacent to countryside, **having regard to the Design Guidance forming part of the Horam Neighbourhood Plan**, by using high quality materials suggestive of the local vernacular, lower building heights and densities within the site where appropriate, and a looser grain of built form in ~~these parts~~ ~~closer to the countryside edges of the site more closely related to the countryside, namely to the south and east of the site;~~
2. Locate uses where most appropriate on the wider site, **with housing situated in the northern and western parts of the site**, including education and community uses to the northern parts of the site (**and closely** integrated to the built form of the village, and employment development further south/west, **to well related** to the road network and access;
3. **The Country Park should be located in the eastern and southern part of the site, adjacent to the Cuckoo Trail, and provide a buffer to the ancient and ghyll woodland and other priority habitats forming the south and southern edges of the site;**
4. Provide suitable vehicular access(es) to the west of the site, in consultation with the Local Highway Authority and supported by the necessary evidence. The proposals must meet the relevant visibility, capacity and safety standards in liaison with the Local Highway Authority and must consider the reconfiguration of the junction between the A267, Chiddingly Road and access to the draft site allocation;
5. Provide safe and convenient pedestrian **and wheeled** connectivity to northern boundaries of the site and at multiple points along the eastern boundary, connecting with the Cuckoo Trail to provide connectivity north to the village centre, **as well as pedestrian and wheeled crossing A267 at Chiddingly Road;**
6. **Provide multiple green corridors through the site and beyond, retaining pedestrian access to the existing PROW within the site at all times;**

7. Include a site-specific flood risk assessment that sets out measures to manage surface water flooding throughout the site. Proposals must incorporate Sustainable Drainage Systems (SuDS) to enhance blue and green infrastructure and provide attenuation that delivers multifunctional benefits, including water quality improvements, biodiversity enhancement, and amenity value for residents and visitors, **and ensure that there is no increase, and potential betterment, in terms of the downstream flood risk;**
8. **Before development commences, demonstrate that there is sufficient sewage infrastructure within the wider network (without causing spillages), and** Take account of the existing sewerage infrastructure crossing the site and ensure the layout and design allow for its protection and continued operation
9. Provide a suitable buffer to the Ancient **and ghyll** Woodland within the site, which must be incorporated into the scheme's design. This will include setting back development from all designated ancient woodland within and adjacent to the site, including Coxlow Farm Shaw, Coggers Shaw (which includes a further section next to the A271), Marle Green Shaw, Coylet Farm Shaw's 1, 2 and 3 and Toll Wood. For the avoidance of doubt, these buffer areas should be designed so as not to include public access or amenity space, instead providing an undisturbed buffer to the irreplaceable habitat to be protected;
10. Retain, protect and enhance existing woodland within and adjacent to the site to maintain the strong degree of visual enclosure. This will help reduce the presence of built development in views, including from longer distance views to and from protected landscapes including the High Weald National Landscape, **while retaining open views to the South Downs National Park to the south;**
11. Use additional planting/landscaping to screen new development and maintain the rural character of the wider area. Planting should use locally prominent native species to strengthen the green infrastructure network, deliver ecological benefits and enhance the integration of built form within the landscape;
12. Secure and provide on-site infrastructure as appropriate, to include, but not limited to, education (a two-form entry primary school **and**); **early years provision) a substantial Country Park**, community uses, **including a community hub**, sports provision, and employment uses; and
13. Provide adequate phasing for development, uses and infrastructure on site, in accordance with a Phasing and Delivery Plan. Any development of this land must deliver the amount and range of uses set out, and developing the site in a phased manner will be permitted, provided it is in accordance with the Phasing and Delivery Plan that has been agreed with the Council. Each phase of any development should consider the viability of the whole development and not solely on the viability of any single phase.

Question 12

Draft Site Allocations - Please provide the site reference and site name that you wish to comment on. You can comment on as many sites as you wish to. If you would like to comment on a SHELAA site or parish, please provide the SHELAA reference and site or parish name?

NB Horam Parish Council's comments on the draft allocations, in response to Question 11, embrace comments on the respective SHELAA assessments.

The only additional comment (over and above its objections to key aspects of the allocation at Policy SA1, and to the separate allocation policy for the site, set out in response to Q11 above) relates to SHELAA site ref. 875/3030, Coxlow Farm, Horam.

OBJECTION: The SHELAA assessment of site ref. 875/3030 - Land at Coxlow Farm does not adequately, or appropriately, justify the conclusion that the site is suitable for the scale and form of development proposed by draft allocation.

Specifically:

- × It relies on a landscape assessment finding that does not take account of the further landscape evidence provided by HPC (in September 2025, and re-submitted in response to Q15), which concludes that the extent of development should be more limited, essentially limited to the north and west of the site;
- × It fails to consider the impact of the massive scale of development envisaged on the character of Horam, or of the village's wider sustainability for growth (which has been further eroded by the withdrawal of services/facilities);
- × There is no consideration of the objectives, or needs, for Horam, as set out in the made Horam Neighbourhood Plan, including in relation to greenspace;
- × It states that 'the area provides good proximity to the centre of Horam', but only the northern part of the site is within 800m (a reasonable walking distance), as measured from the Co-op). The nearest likely access points are 575 metres along the current roads from the Co-Op, while the centre of the site is some 975 metres distant as the crow flies (i.e. straight-line distance) from the Co-Op, but would be even further in practice when the development is laid out;
- × Access, as well as the impact on the local road network, is unresolved.

Further elaboration of the above points is set out in response to Question 11 above regarding the site's allocation, as well as in related representations on the SA for spatial options and for the site, and on the Sustainable Settlements Study).

NB In order to retain the rural setting the Crematorium, (as originally intended with its siting) and to respect the need for a calming environment for mourners, the south-west corner of the site, opposite the Crematorium, should remain undeveloped, as should the two fields immediately north of the exit road from the Crematorium. Hence, these areas should both be excluded from the future development boundary.

Question 13

Please use this box to make any general comments that you may have that are not covered by any other question within the draft 'Focused' Wealden Local Plan?

For the first four weeks of this consultation period (up to 9th March) there was only intermittent access to the Wealden website due to a Forbidden 403 error message. This means that there was only intermittent access for residents to the online Local Plan documents and to the response forms. Horam Parish Council wrote to WDC and WDC did extend the closing date of the Consultation initially by one week and then by a further 3 days totalling a ten-day extension, instead of the 4 weeks that were impacted and requested by HPC. This brings the validity of this whole consultation process into doubt as residents have been denied the full 6 weeks of uninterrupted access to the documents and means of responding that the legislation requires.

Horam Parish Council has noted that the fully trained Clerk for the Parish Council has not found the portal easy to use. It did not allow tables incorporated in a word document to be copied onto the portal and remain in a legible format when downloaded as a PDF. Additionally, the portal is unable to format Horam Parish Council's recommended revised policy HOR6 correctly - none of the text which the parish council highlighted to be crossed out or other highlighted text shows up in that form on the portal. Therefore, the HPC responses to questions 2a, 11a, 11b, and 14 have had to be submitted by uploading a separate document under question 15.

Also, when submitting responses the portal only showed a small section of the text, so it was only possible to see approximately nine lines of the submission text at one time. This made the whole process really time consuming and pressurised. The Clerk has reported to the council that this has put her under a lot of pressure as she wants to get it right on behalf of the parish.

The portal also did not allow the uploading of multiple documents under question 15. This was reported to WDC on the 27.3.2026 in the morning. Therefore, the parish clerk had to compile all of the responses which had included tables and/or highlighted text into a separate single document for uploading. All of the intended attachments were emailed to Planning Policy and cc Nichola Watters and James Webster on the 27.3.2026. A screenshot from the Clerk's sent box has been included in the single attachment that was allowed to be uploaded. Therefore, as all of HPC's intended attachments are listed here it is deemed that they are part of the response even though they arrived by email.

HPC Full Focused Draft WLP reps FINAL

12.3.2026 Letter to Nichola Watters

Bus 51 Timetable through Horam

HOR 1 Ecology Report for HPC – Final

HOR 1 Concept DWG 103

HOR1 D&A Statement WD-2011-2817-MAJ-079

HOR1 Decision WD20112817MAJ

HOR6 Coxlow HBA-971-landscape Report for HPC FINAL with appendixes

Wealden-Open-Space-Report-26.05.22

However, during this process, a phone call was received from WDC advising us that although the situation could be remedied it would involve taking the portal down and rebooting it which would mean that anyone who was using the portal at that time would lose their work. Therefore, it was advised to submit our entire response with attachments as a single email. The Clerk could have done this in within 15 minutes on Tuesday afternoon but has spent 10.5 hours of abortive work trying to send the parish councils full response and attachments via the portal which was WDC's preferred method.

QUESTION 14

SUSTAINABILITY APPRAISAL (SA) COMMENTS

Horam Parish Council (HPC) has reviewed the SA appraisals for:

- Spatial Options
- HOR1 Land adjoining Discovery Way and Village Hall, Horam
- HOR3 Land at Great Easterfields, Chiddingly Road, Horam
- HOR4 Clearview Farm, Chiddingly Road, Horam
- HOR6 Coxlow Farm, Horam Road, Horam

For each of the site allocations, has undertaken its own SA, using the SA Framework in Appendix 2 of Part 1 of the document. The main differences between its appraisal and those undertaken by/for WDC are highlighted, and reasons for the different scoring explained, and justified. Finally, the implications of the revised scoring on the selection of the site/proposed development are reviewed.

The respective appraisals are set out, in turn, below:

Spatial Options

COMMENT:

OBJECTION: The SA continues to fail to consider a distinct, reasonable alternative spatial strategy that more appropriately differentiates between the greater sustainability of towns, as well as other locations accessible to higher order centres outside but connected to the district, relative to that villages in lower tiers in the settlement hierarchy.

This fundamental omission is reinforced by the description of the preferred spatial strategy outlined in the supporting text to Policy SS1 of the Focused Draft WLP, which states that the focus of growth is on the towns and locations with good accessibility, notably by rail, to the main employment/service centres around Wealden.

It follows that the consideration of whether rural villages should be subjected to massive growth in order to help meet the Government's housing need figure for the district, notwithstanding that this may change their character, should, at least, be considered as a spatial option.

The corollary of this is that there must be a spatial option that acknowledges the relative unsustainability of the strategic growth at villages, also having

regard to their position in the settlement hierarchy and access to employment/higher-order services.

Justification:

While similar representations were made at the previous stage on the need to consider options to the allocations at Horam and Frant, as acknowledged in the Non-Technical Summary, at paragraph N.14 on page 6 of the SA Part 1 - to which it states: '*The inclusion of allocations at these locations will be reviewed as part of the Growth Option review.*' – the SA does not, inexplicably, consider such an obvious, reasonable option.

Table 1 below highlights the differences between the four spatial options that are identified in Table 7.1 of Part 1 of the SA in terms of overall dwelling numbers, employment floorspace and strategic sites:

Table 1: Comparison of SA Spatial Options				
		Dwellings	Employment floorspace	Strategic Sites
Option 1	Residential Development in / adjacent to Sustainable Settlements	15,612 homes	175,421 sqm	+ Owlsbury (1,525) + Ashdown 60,000sqm
Option 2	Small & Medium Sites around Sustainable Settlements	19,011 homes	205,421 sqm	+ W of Polegate (230) + A22 empl. 90,000sqm + Beechwood, Crow (120-150) + Uckfield 4 sites (1,190 1,000sqm) + T Wells 2 sites (940) + E Hailsham (1,000 + 16,750sqm) + Westham/SX 2 sites (640) + Ringles Cross (240)
Option 3	Small & Medium Sites + Significant Extensions to Existing Settlements	22,211 homes	262,421 sqm	Option 2 + + Owlsbury (1,525) + W of Polegate (1,075) + Ashdown 60,000sqm +N Polegate 87,000sqm
Option 4	Small & Medium Sites + Hesmonds Stud +Laughton New Villages	24,911 homes	315,921 sqm	As Option 3 + + W of Hailsham (1,450) + Hesmonds Stud, EH (925 + 23,500sqm) + Laughton Park Farm, EH (925 + 30,000sqm)

Paragraph N.28 advises that '*The Spatial Strategy is based upon focusing growth in and around sustainable settlements (including strategic extensions), and to the edge of major towns that lie adjacent to the District (i.e. Eastbourne and Tunbridge Wells),*

whilst also seeking to limit growth in those sustainable settlements that are located within or washed over by the HWNL designation.'

The same text is used at paragraph 7.1.2, in providing a 'Spatial strategy Overview'.

Hence, the four options are seen as options within this general approach.

Paragraph 7.7.1 highlights that potential strategic sites, as identified in Table 7.1, have been subject to their own assessments, although paragraphs N.31 and 7.8.1 advise that the spatial options have been drawn up prior to the SA of sites.

Key points to note:

1. Coxlow Farm, Horam (750 dwellings) is included in all Options, so there is no comparison with an option that considers a lesser, more proportionate, scale of development in the village.
2. Coxlow Farm is the only major strategic site situated in a village that is not on the edge of Eastbourne (with a site at Ringles Cross, near Uckfield identified for 240 dwellings).
3. The inclusion of Coxlow Farm is justified in the SA on the basis that it was included in the initial Draft WLP. However, this overlooks several critical points, namely that:
 - a) The Non-Technical Summary identified the need to consider options to the allocations at Horam and Frant as part of the Growth Option review.'
 - b) Notwithstanding the statement in the 'Summary of Assessment' for Coxlow Farm, the strategic growth of Horam does not fit well with the focus of growth in the spatial strategy, as set out at paragraph 11 of the Focused Draft WLP: *'The draft spatial strategy seeks to allocate the majority of growth in and around our market towns and at the edge of regional towns located outside of our district (i.e. Eastbourne and Tunbridge Wells) ...'*
 - c) The level of sustainability of Horam has reduced, with the significant curtailment in the frequency of bus services and in the loss of key facilities (see separate comments on the Sustainable Settlements Study)
 - d) The SHELAA assessment of Coxlow Farm is based on a Landscape Sensitivity Study, which has been subsequently shown to understate the sensitivity of much of the site, as detailed in the separate representation in response to Q11 of the current consultation.

As all spatial options promote 'Land at Coxlow Farm, Horam' as a "strategic site" notwithstanding its village context, and is clearly an outlier in terms of the preferred spatial strategy, it follows that **the SA must, at least, consider a further spatial option that involves a reduced (i.e. less than strategic) growth of Horam:**

- ❖ *locating the majority of development in and around the towns*

- ❖ *providing for further strategic growth in locations close to, and readily access to, the regional towns located outside of the district (i.e. Eastbourne and Tunbridge Wells), particularly with those with good rail access*
- ❖ *an appropriate scale of development in a number of settlements where these have a good level of key services and facilities, and have good accessibility by public transport to larger settlements, consistent with maintaining and, where possible, enhancing their character and identity, including reduced/less than strategic growth at Horam*
- ❖ *limiting growth at settlements within the High Weald National Landscape, and within its setting and that of the South Downs National Park*

SUSTAINABILITY APPRAISAL COMMENTS

Site HOR1 (SHELAA Ref. 1062/3030) Land Adjoining Discovery Way and Village Hall, Horam

Firstly, it is noted that WDC has changed its scoring in relation to six of the twenty Objectives since its SA of the first Draft WLP in 2024. The reasons for this are unclear, especially as there have been no obvious changes in circumstances or new key evidence studies published relating to the issues, so should be clearly explained.

Table 1 below shows WDC's assessment contained in the SA of the Focused Draft WLP, alongside HPC's own assessment against the Sustainability Objectives, drawing on the decision-making criteria. It includes a summary explanation of the HPC scoring where this differs from that in the Focused Draft WLP, with further elaboration of the background in the following text.

Table 1 Comparative SA scores				
Sustainability Objective	Wealden Score 2024	Wealden Score 2026	HPC Score	Summary reasoning for HPC score
SO1 Climate Change Mitigation	Minor Negative	Minor Negative	Minor Negative	
SO2 Climate Change Adaption	Uncertain	Uncertain	Uncertain	
SO3 Flood Risk	Minor Positive	Major Positive	Minor Positive	Within FZ1, but limited SUDS scope - see below
SO4 Water Resources & Quality	Not Significant	Not Significant	Not Significant	
SO5 Soil, Land & Minerals	Uncertain	Uncertain	Uncertain	
SO6 Waste	Minor Negative	Minor Negative	Minor Negative	
SO7 Pollution	Minor Negative	Minor Negative	Minor Negative	
SO8 Green & Blue Infrastructure	Minor Positive	Uncertain	Major Negative	Loss of important greenspace – see below
SO9 Biodiversity	Minor Positive	Minor Positive	Minor Negative	Erosion of habitat, and enhancements-see below
SO10 Landscape & Townscape	Not Significant	Minor Positive	Major Negative	Loss of valued central open area – see below
SO11 Historic & Cultural Heritage	Not Significant	Not Significant	Not Significant	NB Historic greenfield site, formerly of war memorial
SO12 Digital Infrastructure	Uncertain	Uncertain	Uncertain	
SO13 Travel & Accessibility	Minor Positive	Minor Positive	Minor Positive	

SO14 Housing	Minor Positive	Minor Positive	Minor Positive	
SO15 Health & Wellbeing	Uncertain	Not Significant	Minor Negative	HNP project to enhance as quiet refuge -see below
SO16 Quality of Life & Place	Uncertain	Uncertain	Uncertain	
SO17 Social Deprivation	Uncertain	Uncertain	Uncertain	
SO18 Economy & Employment	Not Significant	Not Significant	Not Significant	
SO19 Town & Village Centres	Not Significant	Minor Positive	Not Significant	Increase of 5 dwellings on Draft WLP not significant
SO20 Education & Skills	Uncertain	Not Significant	Not significant	

From the above, it is agreed that the development of the site with 10 dwellings (as 5 in the Draft WLP) would have a *Minor Positive* impact against the Housing Objective, and in terms of Transport & Accessibility, this being a fairly central location.

However, these need to be balanced with the several Negative impacts. HPC's assessment is that these are in terms of *Major Negative* impacts in terms of both Green & Blue Infrastructure and Landscape & Townscape Objectives, as well as *Minor Negative* (but still meaningful) impacts in terms of both Biodiversity and Health & Wellbeing Objectives.

These assessments contrast with those of WDC, which do not recognise any of them as being Negative, variously see them as Uncertain, Not Significant or indeed Minor Positive. Looking at these discrepancies further, in turn:

a) SO8 Green & Blue Infrastructure

The site's permitted use is as a '*habitat creation area*' under a condition as part of the Merrydown development (Ref. WD/2011/2817/MAJ) approved on 6th August 2013. Condition 33 states '*This planning decision relates solely to the following plan(s) and (where appropriate) documents*', the reason given for this condition was '*For the avoidance of doubt*' and, included in the subsequent list of documents, is the '*Design and Access Statement dated 13 August 2013*'.

The Design and Access Statement, Section 5 (Design) states:

'The principles of the design proposals will be achieved:-

– By carefully designing a scheme which does not harm the existing habitats on site but allows them to be preserved and enhanced'.

'Existing Site Constraints -- there are trees located on the site along the northern and north-eastern boundaries, the perimeter of the 'Great Crested Newt Pond' and....'

'The site contains a number of ecological features as follows:

- 1. An existing pond to the south of the site containing Great Crested Newts*
- 2. Slow worms to the south of the site, with a dispersal route westward towards Home farm*
- 3. Bat foraging and activity routes along the northern and eastern boundaries and around the pond'*

'Site Layout

The key features of the layout are set out below:.....

Majority of significant trees and vegetation retained.....

Existing meadow and pond at the southern boundary to be retained and enhanced as part of a habitat creation area' –

It is highlighted that Wealden District Council's [Open Spaces Study: Parish Area Summary, September 2022](#) states⁴ that Horam Parish lacked 40,578 sqm of Natural and Semi-Natural Greenspace and 11,943 sqm of Amenity Greenspace, based on the 2022 population (which has since grown).

Furthermore, this site is identified as one of only two existing 'Natural Green Spaces' in the parish (Horam Natural Green Space 2, Site ID 98), which it notes *'forms part of the green corridor extending along the A267 on the approach into the village'*.

While the quality of the Green Space is considered poor, the 'Summary and Priorities' for Horam states:

'The priority for the area is to enhance lower quality sites where possible. Furthermore, any opportunities for new provision could look to focus on existing quantity shortfalls.'

This is exactly what is proposed through the made Horam Neighbourhood Plan (HNP). It identifies this land as a project, as follows:

Project H(ii): Land at corner of A267

1. *This is an important area of green space at a gateway location into Horam village. The s106 agreement associated with the Merrydown development specified that the green space (referred to as the existing meadow and pond in the s106 agreement) is to be retained and enhanced as part of a habitat creation area. The Parish Council is keen to work with partners to manage and enhance this space.*

It follows that, having regard to the decision making criteria for Green and Blue Infrastructure, notably in relation to contributing to nature recovery, preventing the loss of green infrastructure, and increasing or improving access to green space, then its development with 10 dwellings (which would occupy all of the developable area) would lead to the loss of this valuable greenspace, in a Parish that is already considered deficient in Natural Green Space; hence, it would be a *Major Negative* against this Sustainability Objective.

While WDC appreciates the presence of trees and hedgerows along the boundaries, and bushes and scrub throughout the site, it balances this with the comment that they do not connect into a wider network due to the intervening development around the site. However, the presence of the large pond surrounded by mature trees located in the north-western corner of the site is a key biodiversity asset, and the area as a whole has both existing and potential value as a greenspace close to the village centre is highly valued.

b) SO9 Biodiversity

WDC assesses the site as Minor Positive on the basis of it not being a designated site and will benefit from BNG. However, this does not take account of the fact that the site is actually

⁴ <https://www.wealden.gov.uk/UploadedFiles/Final-Wealden-Parish-Areas-Summary.pdf>

set aside, as stated under (a) above, as a '*habitat creation area*'. Details of this are shown on plans referred to above and submitted as supporting material under Q15 (or here).

The site has significant biodiversity value at present, in terms of the presence of a good-sized pond, and surrounding mature trees, as well as the presence of ancient woodland indicator plants, reflecting the fact that the site has never been developed.

As importantly, it has the potential for significant enhancements to its biodiversity value, in line with the recommendations of a report by ecologists, attached under Q15.

Such a level of biodiversity gain would be far greater than that provided as part of BNG, which would be within the context of the site being virtually fully occupied by housing.

Also highlighted, as noted under Q1, that the delivery of such improvements is a local priority, alongside its retention as a quiet refuge, within the HNP.

Therefore, the impact under this Objective would undoubtedly be negative. This may be viewed as *Major Negative*, but a more conservative view is taken, as the site is not designated, or is known to have priority species, of it being *Minor Negative*. If protected species were found, then the adverse effect under this objective would be even greater.

c) SO10 Landscape & Townscape

WDC scores the site positively, as it is '*within the development boundaries and appears to be of low sensitivity to small-scale residential development due to its proximity to the A267 and surrounding development.*'

These are very weak points:

- The site is outside the development boundary in the adopted Local Plan. It is only proposed to be included in this draft Plan – as it is now proposed as a housing site.
- The position close to the A267 does not appear to be a real consideration in terms of the decision-making questions, accessibility being the subject of SO13, while housing is under SO14.

In contrast, this Objective relates essentially to local distinctiveness, valued landscape features and the public realm. The retention of this site as green space "hits" all these criteria, for the reasons set out above. It is not only 'part of the green corridor extending along the A267 on the approach into the village', as recorded in the WDC Open Space Study, but it is a valuable part (as evidenced by its inclusion in the HNP) and one that fulfils a separate function – namely for quiet rest in a biodiversity-rich semi-natural setting – than the adjacent Recreation Ground.

For these reasons, HPC is confident that its assessment against this Objective is fairer.

d) SO15 Health & Wellbeing

While WDC comment that the impacts on this Objective '*are not considered to be significant*' and '*can be addressed through mitigation measures*', the retention and enhancement of this area as a quiet, refuge in a semi-natural, central and partly historic greenspace, is surely significant in terms of the Objective's elements of improving health and well-being? It is reasonably viewed as *Positive* on this basis.

Sustainability Appraisal comments:

Site HOR3 (SHELAA Ref. 920/3030) Land at Great Easterfields, Chiddingly Rd, Horam

The context for the allocation of this site is that it contains an historic farmhouse, which would need to be demolished to accommodate the development, to the detriment of the character and appearance of the area. It is also, clearly, in an unsustainable location due to the distance from the village centre (1,270 metres) and the danger in accessing the bus stops.

A critique of aspects of the published SA assessment is provided below:

Comparative SA Scores			
Sustainability Objective	Wealden Score	HPC Score (only differences from WDC score are highlighted)	Summary Reasoning for HPC Score
SO1 Climate Change Mitigation	minor negative	major negative	Carbon release if the historic farmhouse is demolished. (see below)
SO2 Climate Change Adaption	uncertain		
SO3 Flood Risk	minor positive	Uncertain	Chiddingly Road already has surface water issues. The surface conditions are not suitable for infiltration and until details are submitted of how surface water will be dealt with this objective should be scored uncertain.
SO4 Water Resources & Quality	not significant		
SO5 Soil, Land & Minerals	uncertain		
SO6 Waste	minor negative		
SO7 Pollution	minor negative		
SO8 Green & Blue Infrastructure	minor positive		
SO9 Biodiversity	minor positive	Uncertain	As providing a betterment of biodiversity is only listed as likely not certain in the SA. Therefore, this objective should be scored uncertain.
SO10 Landscape & Townscape	not significant	uncertain	As this site has already been refused permission on character and appearance this can only be uncertain prior to an application. The

			SA acknowledges that it will have a limited impact.
SO11 Historic & Cultural Heritage	not significant	major negative	Great Easterfields Farmhouse is a valuable record of the evolution of Horam. (see below)
SO12 Digital Infrastructure	uncertain		
SO13 Travel & Accessibility	minor positive	minor negative	Residents face significant risks crossing the A267 to reach the south-bound bus stop (see below), which is now a less frequent service
SO14 Housing	minor positive		
SO15 Health & Wellbeing	uncertain		
SO16 Quality of Life & Place	uncertain	minor negative	The site is 1270 metres from the village centre (Co-op)
SO17 Social Deprivation	uncertain		
SO18 Economy & Employment	not significant		
SO19 Town & Village Centres	not significant		
SO20 Education & Skills	uncertain		

Where differences exist, further explanation of, and justification for, the Parish Council's assessments is given below.

SO1 Climate Change Mitigation

Major Negative. Demolishing the existing Great Easterfields farmhouse would result in an unnecessary and high release of carbon (much of which has been stored for centuries) and contradict paragraph 161 of the NPPF (2024), which highlights the planning system's fundamental role in shaping places to radically reduce greenhouse gas emissions, minimise vulnerability, enhance resilience, and promote the reuse of resources, including the conversion of existing buildings.

Preserving and retrofitting historic buildings such as this farmhouse — and thus retaining the significant embodied carbon they contain — is essential if Wealden District Council is to adhere to both national policy requirements and its own commitment to achieving net-zero carbon emissions by 2050.

SO11 Historic & Cultural Heritage

Major Negative. The site features an historic Wealden farmhouse dating back to at least the 1600s—a rare and significant survivor in the Parish. It retains several notable architectural elements, and numerous original timber beams. Although certain portions of the building have been modified, the building's association with the original Horeham Manor House adds substantive local significance, and although the manor house no longer exists, there are several 17th Century (and earlier) houses on the outskirts of the parish still standing. Great Easterfields remains a valuable record of the area's heritage and the evolution of Horam.

Given that there is no evidence to suggest the existing structure is unsound and acknowledging its documented historic and cultural value within this part of Horam, we contend that the substantial harm resulting from its total loss cannot be justified. The proposed demolition does not represent sustainable development from an environmental perspective.

SO13 Travel & Accessibility

Minor Negative Children, Disabled, elderly as well as able bodied residents encounter substantial risks when crossing the busy A267 near the May Garland to reach the south bound bus stop close to the Chiddingly Rd junction with the A267 (some 490m from the site). The danger is intensified by speeding vehicles (it is within a 40mph limit), a lack of pedestrian crossings, and no central refuge, all of which makes crossing safely extremely challenging and raises the potential for accidents. When attempting to cross the A267, you must also check in three directions — not only both ways along the A267 itself but also Chiddingly Road at a junction that is already close to capacity. The bus stop is sited 150 metres from the change in the speed limit from 50mph 40 mph going north. There is also only a short, narrow paved standing area for passengers when waiting at this southbound bus stop, where passengers are exposed to the noise and 'bow-waves' of passing traffic and the spray from the wheels when raining. The north bound bus stop is no better (the narrow footway is longer on this side of the road but provides no more protection from the effects of the speeding traffic) and to access this requires crossing Chiddingly Road at an acutely angled corner because of the footway configuration. All of these factors make these bus stops (in both directions) very unappealing and dangerous to use.

The bus stops at the Crematorium are further away (600m), only accessed via muddy grass paths, have similar small, paved passenger standing/waiting areas (although there is a central reservation here). These bus stops (in both directions) are difficult to access by the able bodied and are equally unappealing and dangerous to use.

Summary and Conclusion

HPC consider Great Easterfields to be capable and worthy of being retained, restored and sympathetically extended as part of any future redevelopment of this site. In doing so, a key part of Horam's architectural heritage would be preserved for future generations and the challenges of climate change met in a positive manner.

This site should not be included in the Local Plan unless it is clearly proven that new homes can be built without demolishing the historic farmhouse and still preserve the character and appearance of the area. It is also, clearly, in an unsustainable location due to the distance from the village centre (1,270metres) and the danger in accessing the bus stops.

SUSTAINABILITY APPRAISAL COMMENTS:

Site HOR4 (SHELAA Ref 960/3030) Clearview Farm, Chiddingly Road, Horam

HPC determined that the appraisal provided by WDC in SA Parts 3 and 4: Strategic Sites Assessments does not adequately address potential negative impacts.

Consequently, a revised assessment recommends either reducing or removing the site allocation numbers.

A critique of aspects of the published SA assessment is provided below:

Comparative SA Scores			
Sustainability Objective	Wealden Score 2024	HPC Score (only differences from WDC score are highlighted)	Summary Reasoning for HPC Score
SO1 Climate Change Mitigation	minor negative		
SO2 Climate Change Adaption	uncertain		
SO3 Flood Risk	minor positive	uncertain	Chiddingly Rd already has surface water issues. The surface conditions are not suitable for infiltration and until details are submitted of how surface water will be dealt with.
SO4 Water Resources & Quality	not significant		
SO5 Soil, Land & Minerals	uncertain		
SO6 Waste	minor negative		(see below)
SO7 Pollution	minor negative		(see below)
SO8 Green & Blue Infrastructure	minor positive	uncertain	Potential for negative impact on the ancient woodland, streams and ponds downhill of this site.
SO9 Biodiversity	minor positive		
SO10 Landscape & Townscape	not significant	minor negative	Clearview Farm is visible from distant locations. (see below)
SO11 Historic & Cultural Heritage	not significant		
SO12 Digital Infrastructure	uncertain		
SO13 Travel & Accessibility	minor positive	minor negative	Residents face significant risks crossing the A267 to reach the south bound bus stop (see below)
SO14 Housing	minor positive		

SO15 Health & Wellbeing	uncertain		
SO16 Quality of Life & Place	uncertain	minor negative	The site is 1200 metres from the village centre
SO17 Social Deprivation	uncertain		
SO18 Economy & Employment	not significant		
SO19 Town & Village Centres	not significant		
SO20 Education & Skills	uncertain		

Where differences exist, further explanation of, and justification for, the Parish Council's assessments is given below.

Objective SO3 Flood Risk

Uncertain. Chiddingly Road already has surface water issues. The surface conditions are not suitable for infiltration and until details are submitted of how surface water will be dealt with on this sloping site this objective can only be scored uncertain. As the site slopes down towards ancient woodland, it is important that the surface water drainage system is adequate for the scale of development and any future permitted development and that the discharge, be it the water &/or conduits carrying the water, from e.g. any attenuation ponds do not damage this ancient woodland.

Objectives SO6 Waste & SO7 Pollution

Sewage is a known problem in Chiddingly Road with repeated reports of sewage egress from inspection covers into residents' gardens. All foul drainage from this site will be into that sewer and can only add to the problem. In addition, care must be taken to ensure that pollution does not enter the SUDS e.g. attenuation pond(s) because the discharge from these would be downhill into the stream that runs for over 800 metres through ancient woodland to its confluence with a tributary of the Bull River, feeding/filling five woodland ponds on the way. Also, because the Ardingly Reservoir is filled by pumping water from the Cuckmere River (to which the Bull River is a major tributary) any water-borne pollution from this site could end up in the drinking water supply.

Objective SO8 Green and Blue Infrastructure

Uncertain, as potentially it may have a negative impact on the ancient woodland, the stream, and ponds downhill of this site.

Objective SO10 Landscape and Townscape

Minor negative. Developing Clearview Farm will have an impact on the Landscape and Townscape. The site is located along the edge of a ridge line and is visible from distant vantage points, highlighting the necessity for any proposed dwellings to be sensitively integrated with the surrounding landscape. It is also essential to prevent

'sky-lining' from remote viewpoints and to ensure that no adverse impact occurs within the root protection area of the ancient woodland. During the appeal process, the Inspector expressed reservations regarding the potential effects of development on the site's visual character.

Objective SO13 Travel and Accessibility

Minor Negative. Public transportation in the area is limited to a single bus service. In summer 2025, the schedule for Bus No. 51 was reduced from every half hour to approximately every hour and a quarter (refer to the timetable [here](#)).

In addition, children, people with disabilities, older adults, and able-bodied individuals—face significant risks when crossing the busy A267 near May Garland to reach the southbound bus stop. High vehicle speeds, lack of dedicated pedestrian crossings or a central refuge, and a complex junction at Chiddingly Road (which is already at capacity) worsen these dangers. Crossing the road requires checking traffic from three directions, which increases both difficulty and risk of accidents.

The bus stop sits 150 metres north of where the speed limit drops from 50mph to 40mph. Passengers waiting at the southbound stop must stand on a short, narrow paved area exposed to constant traffic noise, passing vehicles' "bow-waves," and wheel spray during rain. The northbound bus stop offers little improvement: although its narrow footway is longer, it still fails to protect waiting passengers from speeding vehicles. Accessing the northbound stop involves crossing Chiddingly Road at a sharply angled corner due to the footpath's layout.

Taken together, these conditions make both bus stops extremely unappealing and hazardous for users.

Objective SO16 Quality of Life and Place

Minor Negative. The distance from the entrance of Clearview to the village is 1,200 metres, while the farthest point on the site exceeds 1,500 metres. This is well outside the 800m guideline.

Summary and Conclusions

Because of its unsustainable location (a minimum of 1,200 metres from the village centre and with the poor bus service and the personal danger involved in accessing it), the concerns about the adequacy of foul drainage/sewage, the appeal Inspector's comments about the impact on the landscape and the justifiable concerns about the effect on the ancient woodland and watercourse downstream, it is unclear why this site has been included.

If this site is not removed from the Local Plan, then very strict and enforced planning conditions would need to be applied to mitigate these issues and the detail included in any planning application would need to be thoroughly reviewed, and where appropriate challenged and/or changed, prior to any planning decision.

SUSTAINABILITY APPRAISAL COMMENTS:

Site HOR6 (SHELAA Ref. 875/3030) Land at Coxlow Farm, Horam

OBJECTION

On close review, having considered the sustainability of the proposed allocation for Coxlow Farm, Horam (HOR 6) against the Sustainability Objectives, and applying the decision-making criteria, the WDC appraisal, as set out in SA Part 3: Strategic Sites Assessments, is found to underplay the negative impacts of the proposal, as proposed, such that, when reappraised, it should not be selected.

Justification:

Firstly, it is noted that Coxlow Farm (SHELAA ref. 875/3030) has been further assessed in the SA for the Focused Draft WLP. There are changes to the assessment against four of the Sustainability Objectives, as shown below:

Sustainability Objective	Draft WLP score	Focused Draft score
SO3 Flood Risk	Uncertain	Minor Positive
SO9 Biodiversity	Minor Negative	Uncertain
SO13 Transport & Accessibility	Minor Positive	Uncertain
SO19 Town & Village Centres	Minor Positive	Uncertain

However, it is not evident on what basis these changes have been made. It is also notable that the description of development has been updated and, in some respects, differs from the Focused Draft WLP allocation.

A review of both the SA Commentary and the assessment on Impacts is provided below:

a) Response to 'Commentary'

Commentary heading	SA Commentary	HPC Response
Site	The site is described as being 26ha and includes <i>sporadic residential development</i> , and that it is <i>within the settlement boundary</i>	<p>The site is actually outside the current Horam development boundary.</p> <p>Reference to '<i>sporadic residential development</i>' is misleading, as there are but a few properties confined to the A267 frontage. It is essentially open countryside.</p> <p>It is unclear what the area of 26ha relates to, as the SHELAA identifies the site as much larger? 26ha is clearly wrong, as it could not accommodate 750 dwellings (at a suitable density), and the other elements in the proposal (i.e. 4,000qm employment</p>

		<p>floorspace, two-form entry primary school, early years, community hub, etc.)</p>
Parish/ Settlement	<p>Horam is categorised as a Type 3 Settlement</p>	<p>This is based on the March 2024 Sustainable Settlement Study, but the level of services/facilities and accessibility has decreased notably since, which should be reviewed both via an updated Sustainable Settlements Study – see below and separate comments on that Study.</p>
Development Proposal	<p>A comprehensive development, with several specific components, including 750 dwellings, is set out, also including a <i>community hub</i> and a <i>Country Park</i></p>	<p>Inclusion of a Country Park as part of development proposal is inconsistent with the proposed Policy HOR6, which makes no reference to a Country Park.</p> <p>Also, the Policy does not specifically identify a community hub, which is presented as distinct from the proposed community floorspace.</p> <p>Therefore, the validity of the SA in supporting the proposed allocation is undermined.</p>
Summary of Assessment	<p>The inclusion of a new two form entry primary school on site, in the northern section of the site, is stated as providing <i>greater capacity for school children in Horam in a more accessible location.</i></p> <p>The SA notes the <i>retention of existing trees and hedgerows across large parts of the site, and ancient woodland with necessary buffer zones.</i></p> <p>It highlights that, based on the LUC Landscape Sensitivity Assessment that <i>the site's landscape is moderately sensitive to residential development overall.</i></p> <p>It states that the proposed development <i>would considerably increase the size and extent of the village, increasing the settlement</i></p>	<p>It is agreed that a primary school within Horam would have clear advantages for the village's children. At the same time, the existing Maynards Green Primary School also serves the southern part of Heathfield, as well as Maynards Green itself, such that a relocation would also have disadvantages for a significant proportion of pupils from the Maynards Green/Heathfield area, particularly in the short term.</p> <p>While the retention of trees and hedges is welcomed, the development would still involve the fundamental erosion of an essentially intact historic field pattern and the loss of its landscape character, which is regarded as moderate-high over much of the site, and high for its southern parts (See response to Q11.)</p> <p>Accordingly, the assessment against SO10 Landscape and Townscape should be major negative, consistent with other assessments for sites with a moderate-high landscape sensitivity, (and reinforced by the next point).</p> <p>By virtually doubling the size of the village – to be more like a town (according to some WDC members and officers)- it is agreed that the character of the village would be changed - fundamentally - by this development. Hence, it</p>

	<p><i>pattern and changing the character of the village by extending into the landscape that abuts it.</i></p> <p>The provision of 4,000 sqm of employment floor space is now proposed to be in <i>the south-west corner of the site, close to the A267 for connectivity to the road network, bus stops, and sitting away from residential amenities.</i></p> <p>In terms of services, records that <i>bus services currently run half hourly.</i></p> <p>Finally, it finds that <i>the proposals confirm (sic) with the Spatial Strategy.</i></p>	<p>would have clear negative implications for the scoring in relation to SO10 and SO16.</p> <p>The scale of employment provision is considered unnecessarily large for the village, being more than two-times the floorspace at Discovery Way, which serves the village and its environs presently. While siting of business units adjacent to the A267 is sensible in terms of residential amenities, industrial buildings at the very edge of the village could be an unattractive entrance, as well as detract from the rural setting of the Crematorium.</p> <p>This frequent service has since become far less frequent, with services approximately every 1¼ hours.</p> <p>It is not agreed that Horam is an appropriate village for such substantial strategy growth, including having regard to the strategy to focus growth the district's towns and locations close to higher order centres around it, especially those with rail accessibility.</p>

b) Response to assessment of impacts

Sustainability Objective		SA score	HPC score	Reason for different score
SO1	Climate Change Mitigation	Minor negative	Minor negative	
SO2	Climate Change Adaptation	Uncertain	Uncertain	
SO3	Flood Risk	Minor Positive	Uncertain	Although within a low-risk flood zone, the site feeds into the R Cuckmere at Hellingly village, which suffers regular flooding. The mitigation of development run-off, and downstream impacts, is currently uncertain.
SO4	Water Resources	Uncertain	Uncertain	
SO5	Soil, Land & Minerals	Uncertain	Minor Negative	Virtually wholly greenfield site, in agricultural use
SO6	Waste & Materials	Major Negative	Major Negative	
SO7	Pollution	Major Negative	Major Negative	<i>NB This relates to both light pollution and loss of tranquillity</i>
SO8	Green & Blue Infrastructure	Minor Positive	Uncertain	This major development will fragment trees and hedges, reducing its intrinsic qualities and restricting habitat connectivity.

				While there may be improved access to much-needed, natural and semi-natural greenspace, with a County Park, this is not part of the allocation. Hence, the benefit is, at best, Uncertain. Similarly, links to the Cuckoo Trail may be positive, but the proximity of development is likely to erode its valued countryside setting.
SO9	Biodiversity	Uncertain	Minor Negative	The introduction of such a major development would inevitably impact on the priority habitats, ancient woodlands, wetland and other habitats, indirectly through fragmentation and human (and pet) activity, even allowing for mitigation measures.
SO10	Landscape & Townscape	Uncertain	Major Negative	The landscape is of varying sensitivity, and moderate-high overall, while the scale of development is so great as to feel it would fundamentally change, and overwhelm, the rural character of the village.
SO11	Historic & Cultural Heritage	Not Significant	Minor Negative	The loss of a virtually intact historic field pattern, typical of the landscape, is regarded as having some adverse effects.
SO12	Digital Infrastructure	Uncertain	Uncertain	
SO13	Transport & Accessibility	Uncertain	Uncertain	NB There are unresolved concerns about highway capacity. While the development will have some facilities and is adjacent to the existing built-up area, only the northern part of the site would be within 800m of the village centre.
SO14	Housing	Major Positive	Major Positive	It is understood that this objective primarily relates to the contribution to meeting housing need, but it is also noted that the Parish has a relatively low affordable housing need.
SO15	Health & Wellbeing	Uncertain	Uncertain	NB There is limited potential for increased capacity at the village's surgery. While there is potential for community facilities in a new 'hub', this is uncertain; nor is it specified in the policy.
SO16	Quality of Life & Place	Uncertain	Uncertain	The quality of life within the development has the potential to be relatively good, but not its contribution to the sense of place

				of this sensitive site or of the wider community.
SO17	Social Inclusion	Uncertain	Uncertain	
SO18	Economy & Employment	Minor Positive	Minor Positive	NB Positive score subject to location, type and scale of provision.
SO19	Town & Village Centres	Uncertain	Uncertain	NB Should increase footfall but may detract from trade without increase in parking provision.
SO20	Education & Skills	Major Positive	Minor Positive	A new school would serve Horam well, but it is understood that there is capacity for Maynards Green School, which also serves a wider catchment, to expand.

In conclusion, the SA is found to underplay the negative impacts of the proposal.

The balance of positive/negative scores for the Draft WLP allocation are drawn out below:

Objective	Impacts
SO1 Climate Change Mitigation	
SO5 Soil, Land & Minerals	
SO6 Waste & Materials	
SO7 Pollution	
SO9 Biodiversity	
SO10 Landscape & Townscape	
SO11 Historic & Cultural Heritage	
SO14 Housing	
SO18 Economy & Employment	
SO20 Education & Skills	

The *Major Positive* in relation to the Housing Objective, as well as the *Major Negatives* in relation to the Waste & Materials, and Pollution Objectives, can be seen as directly related to this being a strategic proposal.

There is a more scheme-specific *Minor Positive* benefit for the Education Objective, due to the inclusion of a primary school, and for the Economy & Employment Objective, due to the inclusion of land for businesses.

However, these are more than offset by the scheme-specific *Major Negative* in terms of the Landscape & Townscape Objective, and the *Minor Negative* scores for the Soil, Land & Minerals, Biodiversity, and Historic & Cultural Heritage Objectives.

In conclusion, the SA is found to underplay the negative impacts of the proposal, such that, when reappraised, it is evident that the balance of positive and negative scores, the development should not be selected for allocation, as proposed.

An alternative development allocation, more appropriate in terms of both strategic and site-specific considerations, is put forward in response to Question 11 of the consultation.

Such a revised allocation would result in a more positive SA score, with improved scores in relation to the Landscape & Townscape Objective, Biodiversity, Green and Blue Infrastructure, and Historic & Cultural Heritage Objectives in particular – making it supportable in SA terms for allocation.

Sustainable Settlement Study Wealden Draft Local Plan (Regulation 18) Wealden District Council March 2024, and its Addendum (re updated bus services)

Horam Parish Council (HPC) notes that this Study, with its Addendum, currently form a key part of the evidence base for the Focused Draft Wealden Local Plan (WLP).

However, it is aware that the level of services/facilities and accessibility are now poorer than indicated in the Sustainable Settlements Study, which was published some two years ago (and based on earlier surveys).

On this basis, HPC **strongly supports** the statement in the Focused Draft WLP, at paragraph 3.46, that '*The Sustainable Settlements Study will be updated prior to the Regulation 19 stage.*'

Also, HPC wishes to identify changes in circumstances for some of the measures used to gauge 'sustainability':

a) Bus services

The Study, at paragraph 6.38, identifies Horam as having '*a very frequent bus service providing half hourly services Mon – Sun between the village and Heathfield, with a journey time of approx. 12 mins.*' The Addendum does not update this.

However, there has been a subsequent withdrawal of frequent (half-hourly) bus services to one with weekday services (see [here](#)) with a variable frequency, averaging about 1¼ hourly on a weekday, , with several about 1½ hourly, and none less than an hourly frequency.

Hence, Horam should now be rated as no longer having a very frequent service and score correspondingly less against this criterion.

b) Presence of a Post Office

The village's Post Office has closed since the Study was published.

This represents the loss of a key 'Other Important Community Service'.

c) Presence of a pub

The May Garland Public House, the village's only pub, has also closed down since the Study.

d) Nearby hospital - minor injury – 15-minute travel time

Appendix C of the Study states that one criterion is '*Nearby hospital - Must have a minor injuries unit identified by the NHS*'.

Minor Injuries Units (MIU's) in East Sussex are identified on the East Sussex NHS Healthcare Trust's [website](#). This states that, in addition to facilities at the Conquest Hospital and Eastbourne District General Hospitals:

Minor injuries and urgent treatment centres in East Sussex

There are other urgent treatment centres and minor injury units (MIU) in Sussex that are also able to treat minor injuries or illnesses.

[Crowborough War Memorial Hospital Minor Injuries Unit \(MIU\)](#)

[Lewes Victoria Hospital Urgent Treatment Centre \(UTC\)](#)

[Uckfield Community Hospital Minor Injuries Unit \(MIU\)](#)

The UTC at Victoria Hospital in Lewes is a walk-in centre that assesses and treats patients with any minor injuries or illnesses that are urgent but not life-threatening.

The MIUs at Uckfield Community Hospital and Crowborough War Memorial Hospital also treat a range of minor ailments.

The journey times of the closest of these to Horam, as measured to the junction of the A267 and Horam High Street (B2203) using Google Maps is:

Crowborough War Memorial Hospital – 22-23 minutes

Uckfield Community Hospital – 18-19 minutes

Eastbourne DGH – 22-23 minutes

Therefore, contrary to the scoring in the Study, Horam does not meet the accessibility criterion.

Collectively, the above changes may well impact on where Horam sits in the settlement hierarchy (subject to changes elsewhere) and, in any event, impact on the assessment of its sustainability, including in the Sustainability Appraisal.