WEALDEN LOCAL PLAN – REGULATION 19

REPRESENTATIONS OF HORAM PARISH COUNCIL

Horam Parish Council OBJECTS to the following policies, either in whole or part, as it believes they are UNSOUND, primarily as they are not justified by the available evidence:

1. **Policy SS1: Spatial Strategy for Wealden, specifically in respect of the definition of the development boundary for Horam**
2. **Policy SS2: Provision of Homes, specifically in respect of the scale of housing proposed at Horam, including its assessment through the consideration of spatial options in the Sustainability Appraisal**
3. **Policy TC1, insofar as it defines the extent of Horam's village centre as a 'Local Centre'**
4. **Policy SA1: Housing and Mixed-Use Site Allocations, insofar as it relates to:**
    a) **HOR1 Land adjoining Discovery Way and Village Hall, Horam**
    b) **HOR2 Clearview Farm, Chiddingly Road, Horam**
    c) **HOR3 Land at Great Easterfields, Chiddingly Road, Horam**
    d) **HOR4 Coxlow Farm, Horam Road, Horam, and**
5. **Policy HOR4 Coxlow Farm, in relation to several the policy provisions**

[NB Comments on site assessments on the above draft allocations in the Sustainability Appraisal (SA), as well as on SHELAA site assessments, are incorporated into comments on the above-mentioned policies and site allocations.]

Separate OBJECTIONS are also made in relation to the Sustainability Appraisal insofar as:

a) **Consideration of Horam Parish Council representations to the Focused Reg. 18 Local Plan**
b) **Consideration of strategic growth at Horam in relation to the spatial strategy options**

Horam Parish Council specifically SUPPORTS the following policies:

- **Policy NE4 Ancient Woodland and Veteran Trees, part 2** and supporting paragraph 6.72, as helping to protect ancient woodland

- **Policy DE1 Achieving Well Designed and High-quality Places**, insofar as it requires development proposals to demonstrate how they have had regards to relevant Neighbourhood Plan design policies, guidance or design codes
- **Policy HO1: Housing Type and Mix**, insofar as it acknowledges the need to have regard to locally-specific policies and supporting evidence documents of Neighbourhood Plans

Policy SS1: Spatial Strategy for Wealden:

OBJECTION - specifically in respect of the definition of the development boundary for Horam on Inset Map 41.

Horam Parish Council (HPC) notes that Part 2 of Policy SS1 both defines and sets out the use of 'development boundaries', with reference to the 'Policies Map'.

Therefore, insofar as it regards the Development Boundary for Horam as identified on Policies Map 41 as **unsound**, being unjustified by the available evidence, **objection** is made to Policy SS1.

(NB As these are location-specific objections, rather than to the principle of using 'development boundaries', HPC would anticipate that these objections would be most appropriately dealt with concurrently with its objections to specific allocations in Horam.)

WDC's Development Boundary Topic Paper (March 2024)[1] explains the proposals to amend the existing adopted development boundary at both Coxlow Farm (to the south of Horam) and at Land at Discovery Way (adjacent to the A267 and the Recreation Ground), on the basis that they accord with its criteria 1 and 5, namely:

> *1 Development allocations proposed to be included in the Wealden (Regulation 18) Local Plan.*[2]
>
> *5 Small scale development opportunities or land that is too small for allocation, which would provide rounding off opportunities or infill development in areas physically and visually related to the settlement. This was on the basis that development would not result in environmental impacts including when considered either alone or in combination with other development*

However, Horam Parish Council regards proposed the inclusion of eastern and southern parts of Coxlow Farm and the whole of Land at Discovery Way as inappropriate and unjustified.

Similarly, pockets of other greenspaces fronting the A267 in front of the Four Seasons development are also suggested for exclusion.

A further development boundary proposal within the Reg 19 WLP, namely to include open land forming the northern part of the Crematorium, west of the A267, is also regarded as unsound.

The justifications of these objections, together with recommended means of resolving them, are set out in the table and Plan 1 below.

[1] https://wealdengov-b994c1bb48cf487f1616-endpoint.azureedge.net/blobwealdengov-staging/UploadedFiles/Development-Boundary-Topic-Paper-March-2024.pdf

[2] Development Boundary Topic Paper, March 2024, pages 98/99

Development Boundary for Horam – HPC Objections and Recommendations

Location	Comment	Proposed amendment
Coxlow Farm	It is clear from WLP papers, notably the Landscape Sensitivity Study, that built development within the southern and south-eastern parts of the Policy HOR4 allocation would be inappropriate due to environmental sensitivities, including Priority Habitats and locally-important ghyll valleys. This is reinforced by HPC's 'Landscape and Visual Issues Site Study', undertaken by Huskisson Brown Associates.[3] Therefore, it is considered justified to omit these areas from the development boundary, which would also be consistent with an amended urban edge/development boundary west of the A267 (see following recommended amendment) and with the establishment of a major accessible informal open space adjacent to the Cuckoo Trail. This amendment would give the necessary reassurance that the extent of development – which is supported in principle in development boundaries – will be appropriately contained when planning applications come forward, especially in the absence of an indicative land use plan and/or more robust policy wording within the Local Plan. Full details of HPC's evidence and recommendations in relation to development – and the development boundary -for Coxlow Farm are set out in its representation on Policy HOR4.	Omit southern and eastern areas from new development boundary, as put forward on Plan 1.
Land forming north-eastern part of the Crematorium	The Wealden Crematorium is a fairly recent facility, approved in the countryside beyond the southern extent of Horam in a relatively tranquil, but still accessible, location. Considerable concern exists about including some of the land forming part of the Crematorium within an extended development boundary. This land clearly forms part of the Crematorium site and is intended for the relaxation of mourners and contributing to its tranquil setting, as set out in the approved layout plan for the scheme, attached as Plan 2[4]. Furthermore, the tree belt along the northern boundary of the Crematorium visually contains the view of the Hedgerows estate when looking north along the A267 and, in conjunction with the roadside shaw opposite, forms a natural gateway to the village of Horam, as evident in Photograph 1 below. Hence, it provides a logical southern extent of an extended development boundary, retaining the whole Crematorium beyond outside it.	Omit from new development boundary, as put forward on Plan 1

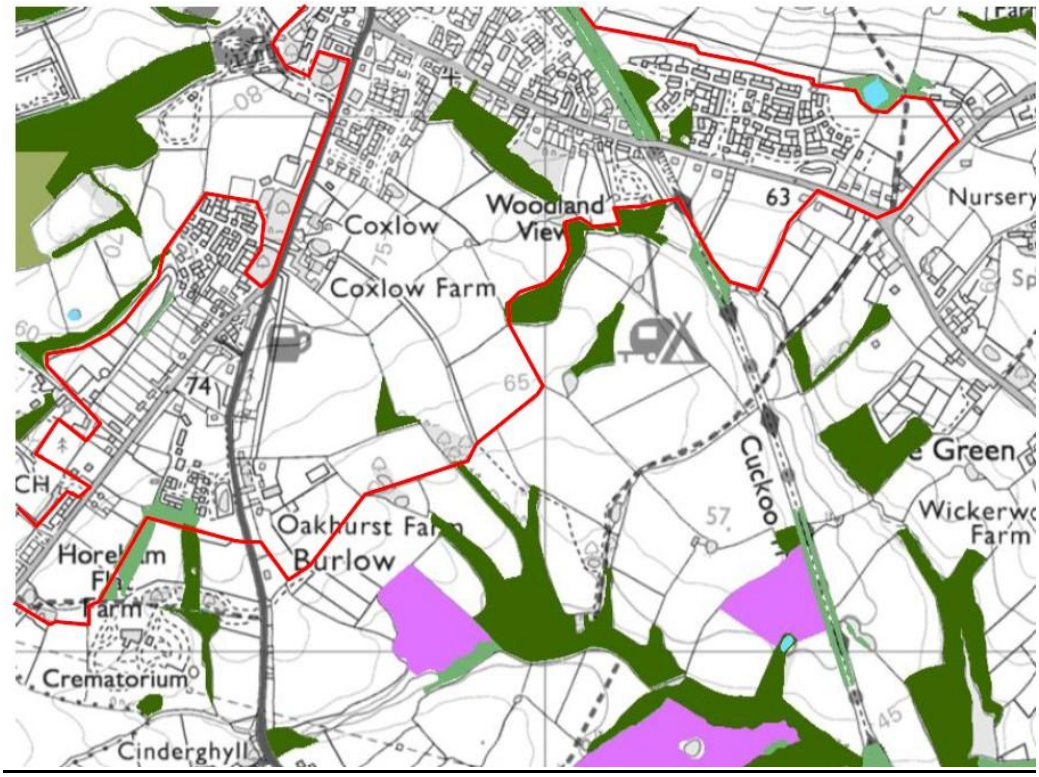
[3] https://horamparishcouncil.gov.uk/wp-content/uploads/2026/01/HBA-971-Final-Land-South-of-Horam-Final-LV-Review-FINAL-AMENDED-with-appendices.pdf

[4] Under reference WD/2016/2533/MAJ, Horeham Flat Farm, Chiddingly Road, Horam

	 Photograph 1 – View along the A267 passing the Crematorium, travelling north towards Horam	
Land at Discovery Way	This site lies outside the current adopted development boundary (see Inset Map 32), reproduced at Plan 3 below. HPC strongly objects to the allocation of this land for development, which should be retained as informal open space -which it is required to be under a permitted (and implemented) adjacent development scheme. Full details of the justification for its continued exclusion, in terms of local amenity, community and ecological benefits, are contained in HPC's separate representation on Allocation HOR1 in relation to Policy SA1. In Wealden District Council's own Open Spaces Study[5] (September 2022), this site is identified as one of only two Natural Green Spaces within Horam Parish (Horam Natural Green Space 2, Site ID 98). The Study specifically recognises its role as part of the green corridor along the A267 approach to the village. Consequently, its value extends beyond the site boundary, contributing to landscape character, ecological connectivity and the wider green infrastructure network. Moreover, its enhancement is an identified project in the adopted Horam Neighbourhood Plan.	Continue to exclude land from the development boundary, as put forward on Plan 1.
Green spaces at junction of A267 and Four Seasons estate	The entrance into this development bisects two greenspaces, each containing small ponds surrounded by mature trees. As well as contributing to the setting of the development, these spaces also contribute more generally to the rural approach into the centre of Horam. In Wealden Council's Open Spaces Study[6] (September 2022) this site is identified as one of only two Natural Green Spaces within Horam Parish (Horam Natural Green Space 1 Site ID 97).	Exclude land from the development boundary, as put forward on Plan 1.

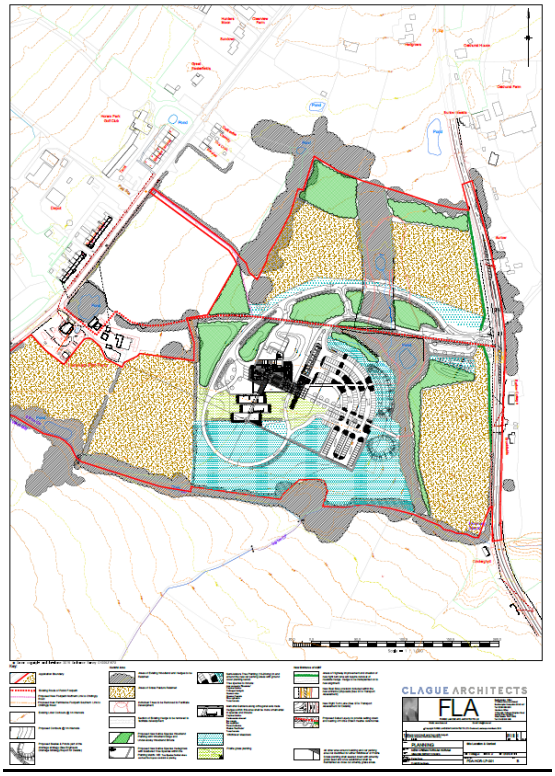
[5] https://wealdengov-b994c1bb48cf487f1616-endpoint.azureedge.net/blobwealdengov-staging/UploadedFiles/Final-Wealden-Parish-Areas-Summary.pdf
[6] Ibid

Plan 1 – Horam Parish Council's proposed amendments to the Development Boundary for Horam

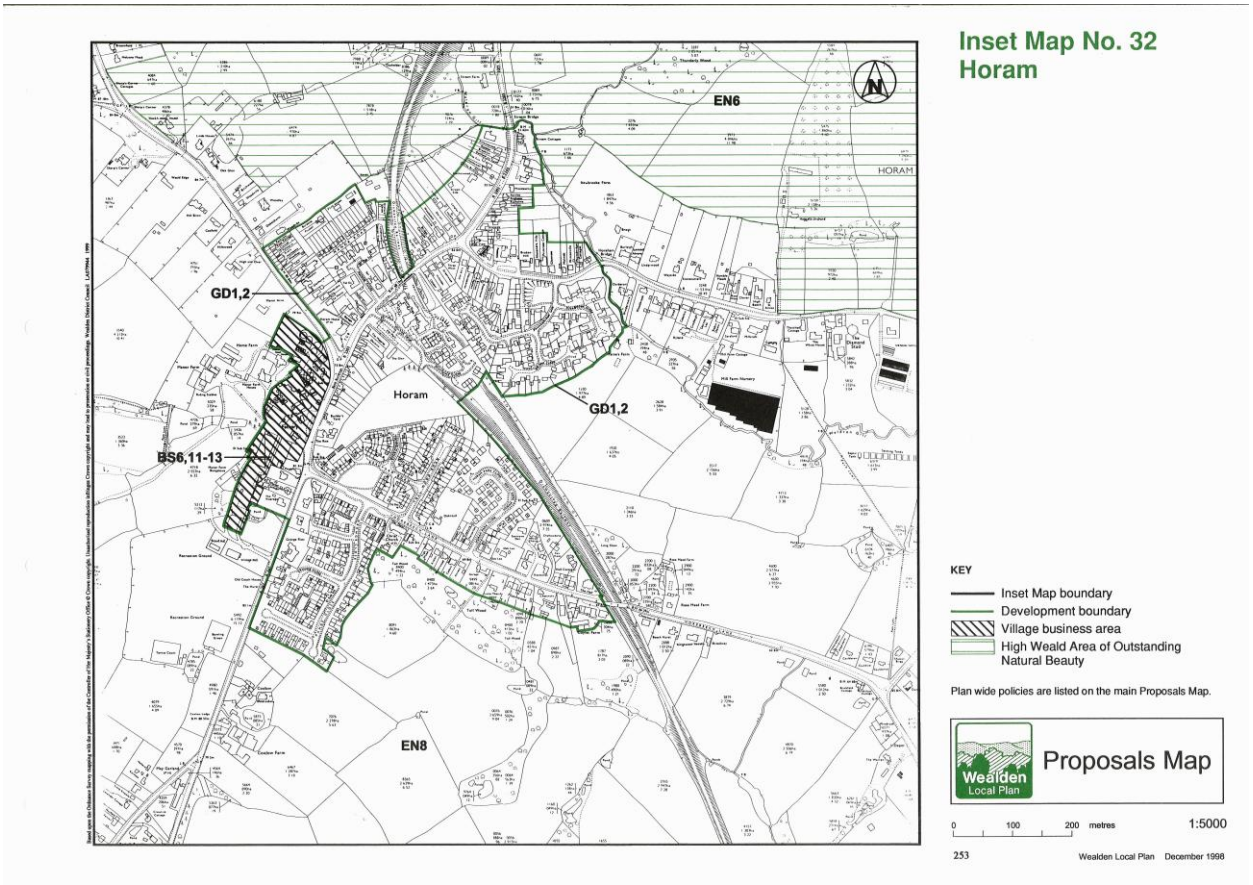


(NB Northern position of the Reg 19 Development Boundary is unaffected)

Plan 2 – Approved Site Location and Context plan for Wealden Crematorium



Plan 3 - Adopted Development Boundary for Horam



POLICY SS2, TABLE 2 (SETTLEMENT HIERARCHY), AND TABLE 4 (HOUSING GROWTH BY PARISH)

OBJECTION

The Parish Council's objection has 2 elements:

1) **Table 2 – Based on WDC's own most-recent evidence, Horam should be identified as a Type 4 settlement in Table 2;**
2) **Policy SS2 relies on the proposed housing allocations contained in Table 4, but the scale of growth proposed for Horam is regarded as excessive and would lead to significant harms and, as proposed, is therefore unsustainable.**

1) <u>Settlement hierarchy</u>

As WDC properly recognise, ass stated in WLP Reg 19 paragraph 4.19:

> *'The Sustainable Settlements Study (2026) Addendum, assesses settlements by their role, services, accessibility and public transport provision. Types 1 to 4 settlements are the primary focus for development and will have development boundaries. The hierarchy does not determine growth levels by itself, distribution also reflects suitable land, environmental and heritage constraints, flood risk, infrastructure capacity and the Sustainability Appraisal and Habitats Regulation Assessment.'*

Horam Parish Council acknowledges this, especially that environmental and flood risk factors constrain growth of settlements that would otherwise be "sustainable" in terms of their *role, services, accessibility and public transport provision.* The fact that the greater part of Wealden is within the High Weald National Landscape, while much of the south-east of the district is within a high flood zone inevitably greatly constrains the scope for accommodating development in a sustainable way.

However, the 'sustainable settlement hierarchy' is presented, using a specified methodology, or range of methodologies, to inform the site identification process, independent of further, legitimate planning factors, such as site availability, infrastructure capacity and environmental constraints, including landscape, flood risk, heritage and habitat considerations, which are considered notably through the Sustainability Appraisal and SHELAA processes.

The WLP presents, at Table 2, the proposed Settlement Hierarchy:

Settlement category	Settlement
Type1 settlements (Town)	Crowborough, Uckfield, Hailsham and Heathfield
Type 2 settlements (Settlements that geographically relate to a regional centre out with Wealden District)	Polegate, Willingdon, Stone Cross, Westham, Pevensey, Pevensey Bay
Type 3 settlements (Primary village)	Forest Row, Horam, Mayfield, Wadhurst

Type 4 settlements (Secondary village)	Bells Yew Green, Berwick Station, Blackboys, Broad Oak Buxted, Cross in Hand, East Hoathly, Eridge, Five Ash Down, Framfield, Frant, Groombridge, Hartfield, Herstmonceux, Isfield, Laughton, Lower Horsebridge, Maresfield, Ninfield, Nutley, Rotherfield

The table is based on an updated Sustainable Settlement Study (2026), which states, at paragraph 2.2, that this is '*to identify if there have been any changes in a settlements level of services and sustainable transport access that would deem it to be in a different category of the settlement hierarchy.'*

The updated assessment clearly evidences Horam's reduction in available services and public transport provision in recent years, with its scores under the various methodologies reducing.

Horam's ranking has fallen from 10th to 16th, with its score falling from 58, to 42, 47 and 49, giving an average sustainability score of 46.

Notwithstanding this, it is still regarded as a 'Type 3' settlement, even though it scores more akin to Tier 4 villages in terms of the level of services and accessibility (which provide the basis of the settlement hierarchy), as shown below:

The SSS Addendum presents Settlement ranking 2026. Its Type 3 settlements, which include Horam, are highlighted in **bold**. This shows a high degree of consistency between the ranking under the different methodologies. It also highlights which settlements score similarly. The "best fit" banding is suggested as being as indicated (by the double blue lines) below:

Settlement	**Rank (previous 2024 in brackets)**	**Average Method 1**	**Average Method 2**	**Average Method 3**	**Average 2026**
Crowborough	1 (1)	192	221	127	180
Uckfield	2 (2)	185	224	120	177
Hailsham	3 (3)	183	212	113	170
Heathfield	4 (4)	140	158	101	133
Polegate	5 (5)	99	113	89	100
Forest Row	6 (6)	86	106	82	92
Wadhurst	7 (7)	82	87	79	83
Mayfield	8 (8)	64	77	69	70
Willingdon	9 (9)	64	76	69	69
Herstmonceux	10 (11)	54	58	61	58
Rotherfield	11 (12)	52	57	58	56
Pevensey Bay	12 (14)	49	54	53	52
Pevensey	13 (22)	45	52	53	50
Stone Cross	14 (13)	45	50	54	50
Groombridge	15 (16)	43	50	52	49
Horam	16 (10)	42	47	49	46
Hartfield	17 (18)	42	46	49	45
Ninfield	18 (19)	43	45	47	45

Westham	19 (17)	40	40	49	43
East Hoathly	20 (20)	39	41	46	42
Nutley	21 (23)	39	43	45	42
Buxted	22 (15)	35	44	46	42
Maresfield	23 (21)	38	42	45	41

It is clear that Horam sits well below the other Type 3 settlements (Forest Row, Mayfield and Wadhurst) in terms of the various detailed quantitative methodologies.

However, WDC also allows for a "qualitative" assessment, effectively, enabling refinements to the outcomes of the quantitative methods.

In the case of Horam paragraph 3.11 and 3.12 of the SSS justifies Horam being a Type 3 (rather than Type 4) settlement as follows:

> *3.11 This is due to the fact that Horam still has many of the services and facilities considered in this study to contribute towards a settlement's sustainability. It retains the GP surgery and the Co-Op supermarket on the High Street (which is open 7am – 10pm 7 days a week) both of which are Key Services for the purposes of the settlement hierarchy. Horam also has a dental practice; a pharmacy; the village hall and Horam Centre; the recreation ground and a skatepark (all of which are other important community services) and a selection of cafes and tea rooms including Mermaid Lounge, Lakeside Café, Cadence and the Horam Emporium (all of which are classed as other community services). The Horam Emporium encompasses a range of retail offerings as well as Wesson Café. Horam also has a vets and allotments.*
>
> *3.12 In addition, Stagecoach Route 51 is Horam's main regular bus service, linking the village with Hailsham, Heathfield, Eastbourne and Tunbridge Wells. The Number 51 is a reasonably frequent rural bus service, with roughly one bus an hour through most of the day. First buses towards Heathfield/Tunbridge Wells are around 6:00am and evening services continue until around 7:30pm to 8:00pm through Horam, with later journeys on parts of the route. This service is considered a 'other important community service' for the purposes of the settlement hierarchy.*

Horam Parish Council accept the above points as factually correct, but does not believe that they can justify the considerable "uplift" given to Horam to make it a Type 3 settlement.

Its reasoning is:

a) *The facilities and services listed are already taken account of in the various methodologies, so form part of the scorings.*

- For example, the methodologies include a size banding for convenience stores, while many independent stores also have late opening
- The quantitative methodology also already takes account of situations where there is more than one facility in a particular category
- The GP surgery is physically constrained (in terms of building/site area), as well as operating effectively as a "satellite" surgery of the Buxted-based practice, where patients are asked to go for many appointments (and which is not readily accessed by public transport)

- While Horam is on a bus route, it is a single service, at a normal frequency of 1.25 hourly, while its hours don't allow for evening trips to either Eastbourne or Tunbridge Wells
- Even if additional points are awarded to score for the above qualitative reasons, these surely cannot make up the scoring difference of 24-46 points

As noted above, it is appreciated that settlements with similar roles and functions may have different capacities for growth and that, as WDC state in its Paper go toward explaining

> *'…why some settlements, such as Horam and East Hoathly, have greater opportunities to accommodate more growth than more constrained locations of a similar size and role such as Forest Row and Mayfield.'*

However, those factors are presented as beyond the methodology for ranking sustainable settlements.

On the basis of the Council's own approach, Horam's ranking of 16th and an average score of 46 (from 58), does not warrant it being ranked as a Type 3 settlement within the hierarchy. Rather, its ranking places it within Type 4.

2) Policy SS2 – Objection to the scale of growth for Horam, based on the proposed housing allocations contained in Table 4, which is regarded as excessive and would lead to significant harms

This objection is founded on three mutually-supporting arguments, namely that the massive scale of growth proposed at Horam:

a) is incompatible with its level of service provision and accessibility to higher level services and employment opportunities

b) would substantially undermine the rural identity and character of the village of Horam

c) the amount of development proposed at the strategic site at Coxlow Farm, south of the village, should be significantly reduced in order to properly take account of site constraints and infrastructure, including open space, needs

Context

Horam Parish Council has previously objected to the scale of growth at Horam, based in part on its view that it does not align with the preferred strategy to focus growth on the towns and settlements providing ready access to regional employment centres, either by physical proximity or by virtue of having a railway stations and/or frequent bus services.

In response, WDC has variously stated along the lines that:

- The spatial strategy seeks to direct development to the most sustainable settlements, where access to services, facilities, employment opportunities and public transport is greatest, whilst taking account of environmental constraints and national planning policy requirements
- Horam is one of the larger and more sustainable settlements within the Tier 3 category and the proposed level of growth reflects its role within the settlement hierarchy and the availability of suitable development opportunities capable of contributing to the overall development needs of the district
- Access to public transport, including railway stations and bus services, is an important consideration, but it is one of a range of factors that inform the distribution of growth
- It seeks to balance the need to meet housing requirements across the district and the protection of the district's environmental, landscape and rural character
- It has been informed by a comprehensive evidence base, including assessments of settlement sustainability, infrastructure capacity, transport accessibility, environmental constraints, flood risk, biodiversity, and impacts on designated sites and landscapes

Further consideration – settlement sustainability and accessibility

It is clear that the scale of growth proposed at Horam is seen, in large part, as consistent with its Tier 3 categorisation. However, as shown in HPC's above objection to Table 2, Horam is more akin, in terms of its services and accessibility, to Tier (Type) 4 villages.

This fact further highlights the anomaly of having such huge growth at Horam – which is an outlier in terms of WDC's strategy in any event – as demonstrated in HPC's separate objection to the Sustainability Appraisal of spatial strategy options

Further consideration – settlement character and setting

It is important to appreciate the character and landscape setting of Horam. It lies immediately on the southern edge of the High Weald National Landscape, displaying the same characteristics that are defining features of the High Weald.

Further consideration – scale of growth at Coxlow Farm

While WDC claim that this site "has been assessed through the site selection process having regard to a range of planning considerations, including landscape, ecology, accessibility, infrastructure requirements and the ability to deliver a comprehensive and sustainable development", it is evident that there are serious deficiencies in this. Most notably, the proposed allocation:

(a) will result in significant landscape harm, from both residential and employment developments

(b) does not clearly meet the need for significant informal semi-natural greenspace

(c) does not acknowledge the adverse biodiversity impacts of fragmentation of the landscape,

(d) is seen as actually resulting in, or exacerbating, traffic congestion along the A267 through the village

(e) relies heavily on conclusions in the Sustainability Appraisal, which are not only questioned but, in parts, are seen as inconsistent with the actual allocation

(f) is seen, when relevant factors are considered, to impose a scale of housing and employment development that exceeds what can sustainably be accommodated.

Local residents will strongly challenge the statement in Wealden's Sustainability Appraisal Part 1 (paragraph N70) which states that it is the only Primary Village that is '… *does not experience significant transport congestion'.* Moreover, as fully substantiated in HPC's representation on Policy HOR4 – Coxlow Farm below, not only does it show significant congestion over the plan period (as well as acknowledging it now), modelling limitations suggest that the conditions will be actually be even worse with the scale of development proposed.

In conclusion, HPC finds that, without significant modifications, the scale of growth at Horam is unsustainable and should be reduced in the manner set out in its detailed representations on individual sites.

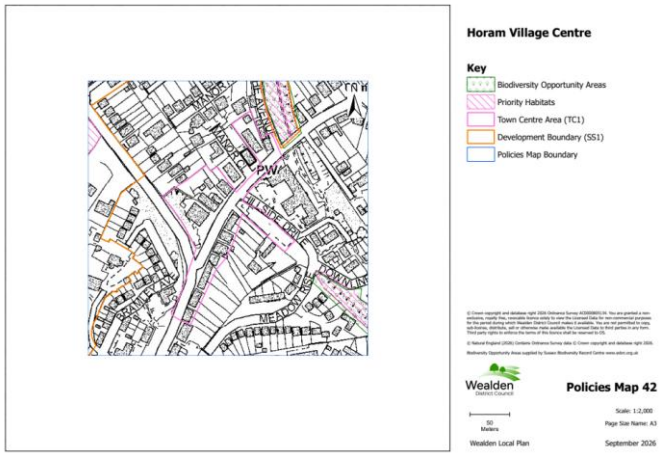
Policy TC1 – District, Service and Local Centre Hierarchy and 'Town Centre First' Principles

OBJECTION to the definition of Horam's a 'Local Centre' insofar as the Horam Chapel should be incorporated with the defined Local Centre Area for Horam.

Its use, including by the range of groups that meet there, is consistent with a village centre location, and situated within (rather than on the edge) of it. Also, amending the boundary in the Local Plan to include it would also bring it into line with that in the recently adopted Horam Neighbourhood Plan.

Also, the title of the Area on Inset Map 42 should be changed to '*Local Centre Area*' rather than '*Town Centre Area*', to reflect its position in the hierarchy in Policy TC1.

Policy TC1 defines a hierarchy of centres for use in the application of a "town centre first" approach and refers to their definition on the Policies Map. For Horam, this is Policies Map 42, as reproduced below:



However, comparison of the corresponding designation in the adopted (in October 2024) Horam Neighbourhood Plan (reproduced below) and the above Proposed Submission Local Plan, shows a small anomaly, with the Horam Chapel, on the High Street, being included in the latter but excluded from the former.



Figure 16: Horam Village Centre

Policy SA1 – Site Allocation HOR1 Land adjoining Discovery Way and Village Hall, Horam

The proposed allocation of HOR1 Land adjoining Discovery Way (1062/3030) lacks sufficient justification and is therefore considered to be unsound.

The proposed allocation also conflicts with several policies within the emerging Local Plan. Policy INF8 3.3 and Policy SS9 (c)

Horam Parish Council remains firmly of the view that, whilst residential development of the site may offer some sustainability benefits, these are outweighed by the significant and irreversible harm arising from the loss of an important area of natural green space. When assessed in the round, the disbenefits clearly outweigh the benefits.

The site should instead be retained and enhanced as accessible natural green space to meet an identified local need and contribute positively to Horam's sustainability, particularly in relation to health and wellbeing, quality of life, biodiversity and local distinctiveness.

The site lies outside the existing settlement boundary and has been deliberately excluded from the village development boundary established by the 1998 Wealden Local Plan. At that time, the boundary was drawn around the operational footprint of the former cider factory, recognising the meadow's important role as an environmental buffer between the village and the A267 transport corridor.

The site currently performs an important open space function and contributes significantly to the character, amenity, appearance and environmental quality of the area. Development would result in the loss of land that supports residents' wellbeing while also removing a valuable green buffer between the village and the A267.

There has been little meaningful change between the Regulation 18 and Regulation 19 Sustainability Appraisals. While the assessments for Health & Wellbeing and Education & Skills have been revised from *Not Significant* to *Uncertain*, the overall conclusions remain largely unchanged. The proposed allocation continues to place insufficient weight on the site's amenity value, biodiversity importance, and ecological function within the wider landscape and ecological network.

Importantly, HOR1 has been reduced from 10 dwellings at Regulation 18 stage to 8 dwellings in the current draft. Consequently, the development falls below the threshold established by Policy INF8 Paragraph 6, whereby residential development of 10 or more dwellings is required to provide or contribute towards publicly accessible open space and recreation. The allocation would therefore result in the loss of a significant green space without securing compensatory open space provision.

WDC concludes that the site's environmental constraints can be appropriately addressed through policy requirements. However, this conclusion is inconsistent with the findings of the Council's own Open Spaces Study (September 2022)[7].

[7] Open Spaces Study: Parish Area Summary, September 2022

The site is identified as one of only two Natural Green Spaces within Horam Parish (Horam Natural Green Space 2, Site ID 98). The Study specifically recognises its role as part of the green corridor along the A267 approach to the village. Consequently, its value extends beyond the site boundary, contributing to landscape character, ecological connectivity and the wider green infrastructure network.

The Open Spaces Study also identifies significant deficiencies within Horam Parish, as set out in the Parish Council's representation on Policy HOR4 Coxlow Farm.

Furthermore, the Open Spaces Study makes clear that sites assessed as being of lower quality should not automatically be regarded as suitable for development:

> *"A site rating low for quality should not automatically be viewed as being fit for development. It is also necessary to understand its value, access and role within the community it serves. It may for example be the only site serving an area and should therefore be considered a priority for enhancement."* (Paragraph 54)

The Study further states:

> *"The approach to these sites in areas of identified shortfall should be to enhance their quality provided it is also possible to enhance value."* (Paragraph 246)

The evidence therefore supports enhancement, not development.

This position is reinforced by Wealden District Council's Infrastructure Delivery Schedule[8], which sets out to:

> "*Provide user security, signage, seating and bins at Horam Natural Green Space 1 and Horam Natural Green Space 2."*

The Council's own evidence base therefore identifies a need to invest in, improve and safeguard these natural green spaces, rather than allocate them for development.

The proposed allocation would result in the loss of one of only two designated Natural Green Spaces in Horam Parish and would further reduce provision in an area already experiencing significant deficiencies in accessible natural greenspace.

The findings of a recent Preliminary Ecological Appraisal, undertaken by Arborweald Environmental Planning Consultancy[9] provide further evidence of the site's importance. The appraisal concludes:

> "*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."*

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[8] ttps://wealdengov-b994c1bb48cf487f1616 endpoint.azureedge.net/blobwealdengov-staging/UploadedFiles/Reg-19-WDC-IDS-Infrastructure-Delivery-Schedule-final-draft.pdf Pages70/71

[9] https://horamparishcouncil.gov.uk/wp-content/uploads/2026/03/Ecology-Report-for-HPC-FINAL-Land-adjoining-Discovery-Way-Horam-Site-HOR1.pdf

It further states:

> *"The site is currently considered to have high ecological value within a local context as it comprises habitats that are locally common within the context of the Low Weald but are immediately scarce. These habitats are likely to support locally abundant but scarce species typical of the wider landscape."*

This evidence confirms that the site already performs a valuable ecological function and could deliver substantial biodiversity gains if retained as open space. By contrast, development would inevitably result in habitat loss, fragmentation and increased recreational pressure. Whilst mitigation measures may reduce impacts, they would not fully replace the site's existing ecological functions.

The allocation is also inconsistent with the environmental objectives of the National Planning Policy Framework, which require planning policies and decisions to contribute to and enhance the natural environment through the protection and enhancement of valued landscapes, biodiversity and ecological networks.

The importance of retaining and enhancing this site has already been recognised through the Horam Neighbourhood Plan process. The Neighbourhood Plan Inspector specifically highlighted the value of the Parish Council's proposed habitat enhancement projects, stating:

> "*The Parish Council has approached the identification of non-land use Projects in a very positive way. They are commendably locally distinctive."*
>
> Project H(iii) of the Horam Neighbourhood Plan, relating to land at the corner of the A267, identifies the site as:

1. "*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.*

The Project further notes that the Section 106 Agreement associated with the Merrydown development specifies that the green space, described as the existing meadow and pond, should be retained and enhanced as part of a habitat creation area. The Parish Council has expressed its commitment to working with partners to manage and enhance the site for the benefit of biodiversity and the local community.

The proposed allocation would undermine these established objectives. Rather than facilitating the retention and enhancement of a recognised habitat creation area, it would result in the loss of a significant proportion of one of only two designated Natural Green Spaces within the parish.

The allocation is therefore inconsistent with both the aspirations of the Horam Neighbourhood Plan and the long-standing objective of enhancing the site as a locally distinctive community asset.

The proposed allocation raises highway safety concerns. Discovery Way provides the sole vehicular access to many important community facilities, including Horam Village Hall, the Scout Hut, Bowls Club, tennis courts, play park, skate park, pump track, allotments, football pitches, the Gap pathway and the touring caravan park. These facilities generate regular use by children, older residents and other vulnerable road users.

The proposed development is located on a prominent corner fronting the A267 immediately adjacent to the Discovery Way junction. Residential development of the site would increase turning movements at an already busy access point and place additional pressure on a junction serving a concentration of community facilities.

Given the existing high levels of pedestrian activity and the presence of numerous vulnerable road users, the allocation fails to prioritise pedestrian safety and would increase risk at a key community access point. This concern should be considered alongside the Parish Council's representations on local traffic and highway conditions, set out in relation to Policy HOR4.

In summary, Wealden District Council’s own evidence base identifies both a deficiency in Natural Green Space provision and a requirement to improve, retain and enhance existing open spaces. The allocation is inconsistent with the findings and recommendations of the Open Spaces Study, the Infrastructure Delivery Schedule and the aspirations of the Horam Neighbourhood Plan. It conflicts with Policy INF8, and with Policy SS9(c), and there is insufficient evidence to demonstrate that the site's role within the green corridor, its ecological functions, and its contribution to the wider green infrastructure network can be maintained following development. Also, the proposal would place further pressure on the already constrained Discovery Way junction, and it has not been demonstrated that safe and suitable access can be achieved for all users.

For these reasons, the HOR1 allocation is not justified, is inconsistent with the Plan's own evidence base and policy objectives and is therefore unsound. The allocation should be removed from the Local Plan.

Policy SA1 – Site Allocation HOR2: Clearview Farm, Chiddingly Road, Horam

Horam Parish Council **objects** to the proposed allocation insofar as it appears to rely upon access through the existing 'Four Seasons' housing estate to the northeast, which is regarded as inappropriate, as well as seemingly unachievable.

Subject to being able to achieve an acceptable access, the reduced scale of development of 35 dwellings now being proposed (relative to a previous planning application) may address previous concerns about impact on adjacent Ancient Woodland.

However, whereas the Regulation 18 Local Plan showed access on to Chiddingly Road, the Policies Map[10] now shows a link through the existing housing estate.

The proposed access route would pass through a constrained corridor at the northern end of the site where the distance between the Ancient Woodland on the western boundary and existing properties in Summer Avenue is less than 25 metres. As Policy NE4 (part 2) requires a minimum 25-metre buffer to Ancient Woodland, it is not evident how a compliant access arrangement can be achieved within this corridor without encroaching into the required buffer zone. The proposal therefore raises a significant concern regarding compliance with Policy NE4:2 and the protection of this irreplaceable habitat.



The estate roads were designed to serve the current residential development and their use as the sole or principal access route for an additional housing allocation would result in a significant increase in vehicular movements through an established neighbourhood. More critically, the junction of Summer Avenue with Autumn Drive is

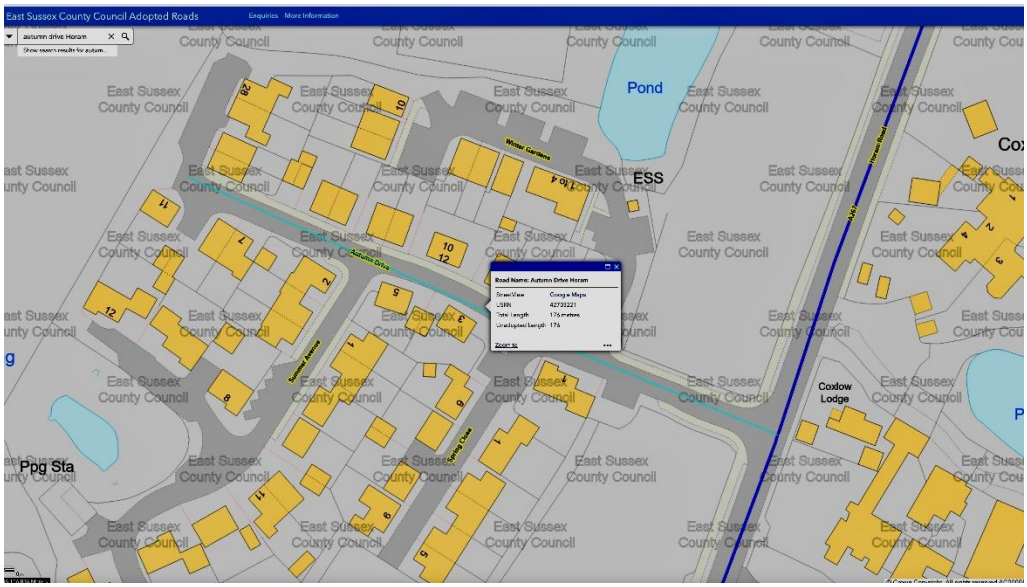
[10] https://wealdengov-b994c1bb48cf487f1616-endpoint.azureedge.net/blobwealdengov-staging/UploadedFiles/41-Horam.pdf

a paved surface where pedestrians, cyclists and vehicles interact within a constrained residential setting.

Consequently, such an arrangement would adversely affect the living conditions of existing residents through increased traffic, noise, disturbance and loss of residential amenity. It would also increase the potential for conflict between vehicles, pedestrians and cyclists, particularly given that estate roads are characterised by lower vehicle speeds, on-street parking and frequent pedestrian activity.



It is noted that East Sussex County Council has not adopted the roads within the Four Seasons development.



Also, the refused application for 51 dwellings (WD/2022/1781/MAJ) proposed access from Chiddingly Road, and neither the Highway Authority nor the Appeal Inspector raised objections to that access arrangement. This demonstrates that an alternative means of access exists which would avoid directing development traffic through the existing residential estate.

While the SHELAA commentary notes: '*It is acknowledged that the current vehicular arrangements need improvement*', it remains unclear whether the implications of an alternative access through the adjoining estate have been adequately considered.

Consequently, it has not been demonstrated that the nature and level of traffic associated with the allocation can be accommodated without adversely affecting the safety, amenity and character of the surrounding area, as required by Policy INF2, paragraph 3(a)**.**

Until it can be shown that the existing estate roads have sufficient capacity and can accommodate the additional traffic without adverse impacts on highway safety, residential amenity and local character, the allocation cannot be regarded as fully justified or deliverable.

For these reasons, vehicular access through the existing housing estate should be resisted and alternative access arrangements should be pursued.

A pedestrian and cycle link between Clearview Farm and Four Seasons, however, would be supported as it would improve connectivity, encourage active travel and integrate the two developments without generating additional vehicular traffic through the estate, thereby aligning with the objectives of Policy INF2.

HOR3 (920/3030) Land at Great Easterfields, Chiddingly Road Horam

The proposed allocation of eight dwellings is not supported by the available evidence and significantly overstates the site's demonstrated capacity. The site is affected by two inter-related constraints, namely flood risk and site constraints due to the desirability of retaining the existing farmhouse building.

Both the Draft Focused Regulation 18 WLP and, more recently, Appendix B of the *Wealden Local Plan Shared Transport Evidence Base Regulation 19*[11] (reference 920/3030) identify Land at Great Easterfields, Chiddingly Road, Horam as having a capacity of six dwellings.

No clear evidence has been provided to explain or justify the subsequent increase to an allocation of eight dwellings particularly considering the evidence advanced by the Council at appeal APP/C1435/W/25/3360712[12] and the conclusions subsequently reached by the Inspector.

In appeal APP/C1435/W/25/3360712, the Inspector concluded that they could not be satisfied that the proposal would not place people or property at risk of flooding and found conflict with paragraph 175 of the National Planning Policy Framework. This finding identifies a fundamental constraint on the site's development potential. It demonstrates that the extent of land capable of accommodating residential development safely has not been established and that the implications of surface-water flood risk remain unresolved.



The significance of this finding extends beyond flood safety alone. Any requirement for attenuation features, drainage infrastructure, exceedance routes, buffers or other mitigation measures will reduce the net developable area available for housing. In the absence of robust evidence identifying the developable area after such constraints have been applied, there is no sound basis for assuming that the site can accommodate eight dwellings.

[11] https://wealdengov-b994c1bb48cf487f1616-endpoint.azureedge.net/blobwealdengov-staging/UploadedFiles/IM-0163-Wealden-DC-Local-Plan-Issue-5_Reg-19_Admin_Full_Appendices_signed_appendixB.pdf
[12] https://acp.planninginspectorate.gov.uk/ViewCase.aspx?caseid=3360712

This issue must be considered alongside the site's planning history. In appeal APP/C1435/W/23/3320804[13], the Inspector dismissed a proposal for nine dwellings, concluding that the development would appear overly crowded when compared with the established character of surrounding development and would provide limited space between dwellings. Whilst density and garden provision were not found unacceptable in isolation, the overall form of development was considered harmful because of its cramped and visually intrusive appearance.

These findings are highly material to the proposed allocation. They demonstrate that the site was already considered to be exceeding its acceptable capacity before any allowance is made for the land that may be required to address flood-risk constraints. If flood mitigation reduces the area available for built development, pressure on the remaining developable land inevitably increases, exacerbating concerns regarding building separation, layout quality, landscaping and overall character.

Wealden's subsequent assessment of the later seven-dwelling application[14] reinforces this conclusion. The Council expressly found that the reduction in dwelling numbers had not overcome the character and overdevelopment concerns identified by the Inspector and considered that the site could not be laid out in a manner that would produce an appropriate form of development sympathetic to local character.

Taken together, the appeal decisions demonstrate that there is no evidential basis for concluding that eight dwellings can be accommodated within a safe, policy-compliant and locally appropriate scheme. On the contrary, the evidence indicates that flood-risk constraints are likely to reduce the effective developable area of the site, whilst previous planning decisions have already identified significant concerns regarding overdevelopment and character impacts at a comparable scale.

Additionally, the proposed allocation appears to have been derived without adequately assessing a development scenario that incorporates the retention of Great Easterfields farmhouse, which occupies a central position within the site and is a building of recognised local historic significance. Whilst not statutorily listed, the farmhouse contributes positively to the character and distinctiveness of the site and its rural setting. Wealden's own Landscape Assessment acknowledges its contribution to local character, whilst the made Horam Neighbourhood Plan Background Paper, *Approach to Identifying and Protecting Local Heritage Assets*[15], recommends that the building be recognised as a non-designated heritage asset.

The significance of Great Easterfields farmhouse is evidenced not only by its contribution to local character but also by the substantial public support for its retention during the preparation of the Horam Neighbourhood Plan.

[13] https://acp.planninginspectorate.gov.uk/ViewCase.aspx?caseid=3320804
[14] https://planning.wealden.gov.uk/Planning/Display/WD/2024/0812/O
[15] Background Paper- Approach to identifying and protecting local heritage assets.

As one of the few remaining features reflecting the site's agricultural origins, the farmhouse provides a clear and tangible connection to the historic development of the area and contributes positively to local distinctiveness and sense of place. Its loss would undermine an important element of the site's character and historic identity, while its retention would help ensure that any future development responds positively to the site's context and reflects the qualities valued by the local community.

The available evidence instead suggests that the site's realistic capacity is likely to be lower than that proposed. No clear evidence has been provided to explain the increase from the six-dwelling capacity identified in earlier evidence base documents to the proposed allocation of eight dwellings. Furthermore, the implications of accommodating flood mitigation measures, drainage infrastructure and an appropriate site layout have not been satisfactorily addressed. The proposed allocation also fails to adequately consider a development scenario that retains and sensitively incorporates Great Easterfields farmhouse, a locally important building that contributes significantly to the character and historic identity of the site.

To ensure the allocation is sound, it should be revised to reflect the site's realistic development capacity. A lower housing yield would better respond to the site's constraints, including those identified through previous appeal decisions, and support a form of development that appropriately accommodates flood risk mitigation and other site-specific considerations. This would deliver a more sustainable, evidence-led and genuinely deliverable scheme that respects the site's character and local context while continuing to contribute towards meeting the district's housing needs.

HOR4 Coxlow Farm, Horam Road, Horam

OBJECTION: The proposed allocation of Coxlow Farm, Horam (Policy HOR 4) in the Reg 19 WLP is, based on all available evidence and local knowledge, found to be unsustainable and unjustifiable at the scale of development proposed. Hence, the allocation is UNSOUND.

An alternative allocation is advocated, being 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, as well as a major accessible informal greenspace.

Full reasoning for this Objection, and for the far more sustainable alternative, is given below.

Context:

This is a substantial tract of countryside to the south of Horam, extending between the A267 on the west site and the Cuckoo Trail – which is part of a national cycle route – on the east, which slopes gradually down to stream to the south.

It comprises a mix of irregular grassland fields, with a number of mostly smaller woodland areas. It is in several ownerships.

The allocation proposes mixed-uses, with an 'indicative capacity' for 750 (net) dwellings, 4,000sqm (net) employment, 1,500sqm (net) community floorspace, a two-form entry primary school and open space.

It is identified as a 'Strategic Site' subject to Policy HOR4 (with SHELAA ref. 875/3030).

Issues:

HPC does not object to some development in this general location in order to help meet housing needs in a sustainable way, but **OBJECTS** to it in its current form on the grounds that it:

a) is the main proposal that will erode the rural, village character and sensitive landscape setting of Horam

b) will result in significant landscape harm, from both residential and employment developments

c) does not highlight the need to retain important views, as identified in the Horam Neighbourhood Plan

d) is ambiguous in terms of meeting the need for significant informal semi-natural greenspace

e) is seen as actually resulting in, or exacerbating, traffic congestion along the A267 through the village

f) is not supported by adequate infrastructure, both in the village and in terms of providing good accessibility to larger centres

g) relies heavily on conclusions in the Sustainability Appraisal, which are challenged and, in parts, are seen as inconsistent with the actual allocation

h) does not provide the necessary clarity in relation to the provision and extent of principal uses

i) does not mention 'early years provision' in the policy, even though it is highlighted in the SA and the IDP (in which it is a 'critical element')

Assessment

a) Site Capacity

The capacity of a site to accommodate built development is, in large part, determined by its landscape sensitivity. Indeed, the first part of Policy NE6: Landscape Character of the Reg. 19 WLP states:

> *1. All new developments are to adopt a landscape-led approach from the outset, proportionate to scale, nature and location of the proposal. Proposals should avoid adverse effects on the landscape character, visual amenity and local distinctiveness, before consideration is given to any mitigation measures.*

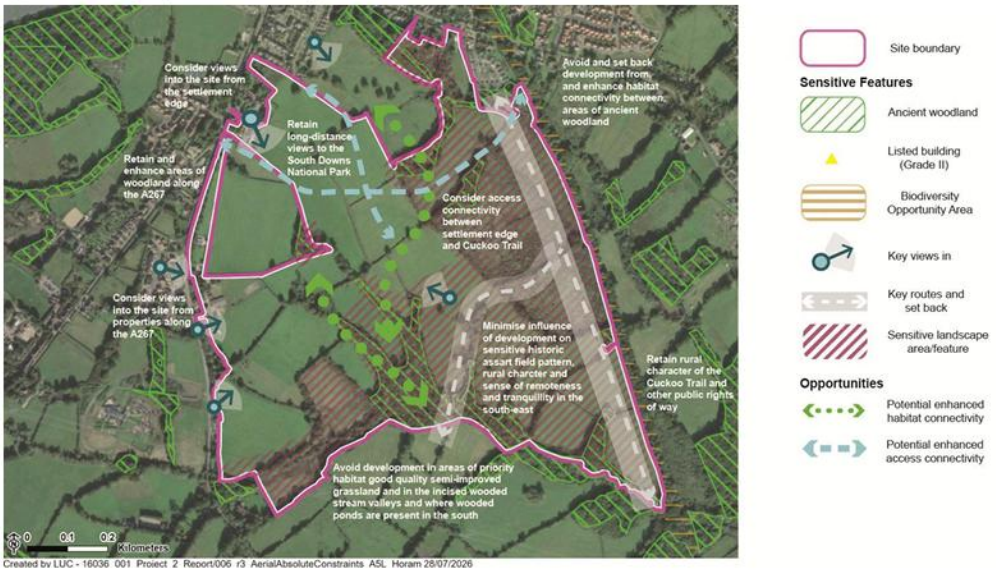
WDC published a Landscape Sensitivity Study[16] for the district (undertaken by Land Use Consultants), with a supplementary report on major sites, entitled Wealden Landscape & Visual Appraisal – New Settlements and Large Urban Extensions (2023)[17]. These are supporting papers to the Local Plan.

HPC sought independent verification through its own assessment, which resulted in a report[18] published in 2025 by Huskisson Brown Associates, a respected landscape architecture practice based in Tunbridge Wells.

Most recently, WDC has published updated reports by LUC to support the Regulation 19 Local Plan. Its assessment of Coxlow Farm is updated within a further Large Urban Extensions report[19]. However, this only adds references to, and acknowledges the local value of, views to the South Downs National Park (effectively endorsing a factor highlighted in the Huskisson Brown critique). Its 'Summary map of constraints and opportunities' is reproduced below.

[16] https://wealdengov-b994c1bb48cf487f1616-endpoint.azureedge.net/blobwealdengov-staging/UploadedFiles/Wealden-Project-2-LSA-FULL.pdf
[17] https://wealdengov-b994c1bb48cf487f1616-endpoint.azureedge.net/blobwealdengov-staging/UploadedFiles/3.-Landscape-Visual-Appraisal-New-Settlements-and-Large-Urban-Extensions.pdf
[18] https://horamparishcouncil.gov.uk/wp-content/uploads/2026/01/HBA-971-Final-Land-South-of-Horam-Final-LV-Review-FINAL-AMENDED-with-appendices.pdf
[19] https://wealdengov-b994c1bb48cf487f1616-endpoint.azureedge.net/blobwealdengov-staging/UploadedFiles/Wealden-Landscape-Sensitivity-Assessment-%E2%80%93-New-Settlements-and-Large-Urban-Extensions-2025.pdf

Figure A.35: Summary map of constraints and opportunities



LUC's conclusion regarding the site's suitability for development is, itself, highly circumspect:

> *'If the site is considered for development, the site would need to be planned with great care and consideration, especially in relation to the key sensitive features within and adjacent to the site, including the complex topography of the incised wooded stream valley at Cogger's Shaw to the south; areas of ancient woodland concentrated predominantly to the south and north-east; the historic assart fieldscapes with thick hedgerows and hedgerow trees (particularly in the south-west); several wooded ponds associated with the stream corridor in the south of the site and smaller watercourses and ponds in the north-east of the site; areas of priority habitat good quality semi-improved grassland located in the south; intervisibility with the South Downs National Park from the south-western settlement edge around Coxlow Farm and Grange Close; and sense of tranquillity and experience of dark skies in the south-east of the site away from the edge of Horam and the A267.*

While the above commentary picks up on most of the key sensitivities to development, it tends to understate them - and the implications in terms of the overall sensitivity assessment. This critique is demonstrated below:

- <u>Historic assart field pattern:</u>

  Rather than, as LUC suggest, that there are

  > '*Some areas of intact historic field patterns, particularly small scale assarts in the south-west of the site, which provide a strong rural setting to the existing settlement of Horam*' …

Huskisson Brown Associates have been able, though a comparison of current aerial photography and mapping, and historic Ordnance Survey (OS) mapping, to show that deterioration of field pattern and boundaries has, in fact, been minimal and that field pattern is mostly intact across the majority of the site, notably through the southern half of the Site and the central and eastern portions, with only a small area of loss/change noted around existing farm buildings and the development of Grange Close .

This is important because historic assart field patterns are one of the defining 'key characteristics' of the High Weald National Landscape, as well as being a 'key sensitivity' for LUC in relation to assessing site's suitability for development.

In fact, the LUC's strategic guidance for the area includes:

> *'Preserve historic field patterns, locating development away from intricate small-scale historic field patterns, particularly medieval assarts which are concentrated in the south-east of this assessment unit.'*

It follows that all but the northern and western edges of the site are sensitive landscapes.

The fields, as well as their surrounding thick hedges and fringing woodland, are all valued. Simply retaining hedge-lines would not be sufficient, as it would still be a fragmentation, and undermining, of the historic character.

- Views:

  As noted above, LUC has now recognised the importance of the views across the site to the South Downs, although there is no commentary on the impact of this on development capacity

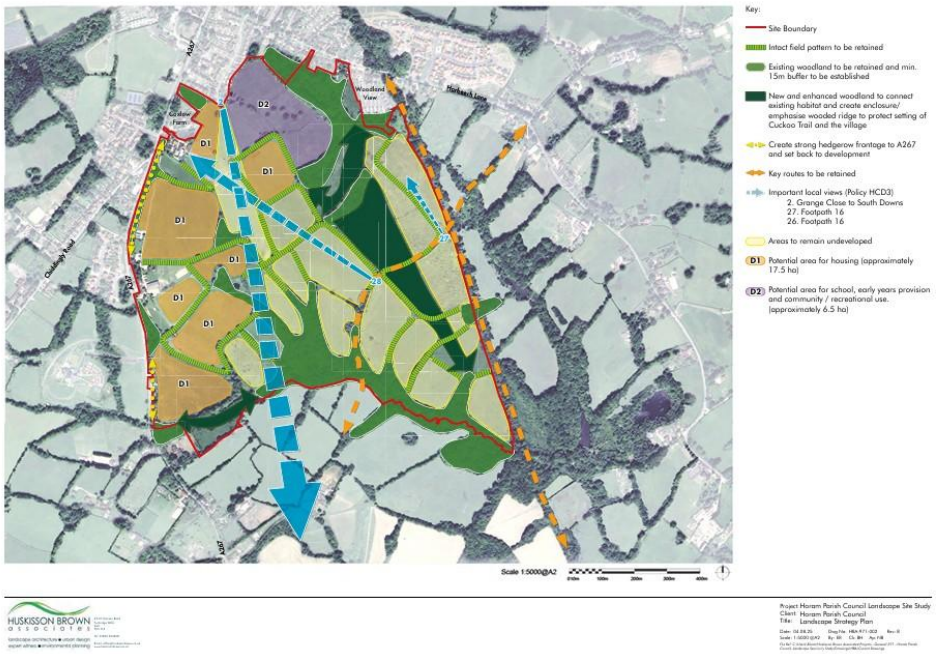
  Moreover, it is still the case that the LUC documents do not reference the 'Important Local Views' that cross the site, as identified, in policy terms[20], in the Horam Neighbourhood Plan.

- Sensitivity of the central area:

  Huskisson Brown and LUC agree that areas to the north and west of the site are less sensitive to development. With regard to the central area of the site, LUC's 'Summary map of constraints and opportunities' indicates sensitive landscape areas and features around this part of the site.

  Huskisson Brown also notes the role that the central area of the site plays in the Important Local Views from the settlement edge to the wider setting of the South Downs (and its contribution therefore to the settlement setting) and from footpath 16 looking across the recognised characteristic and historic intact field pattern of this landscape (itself a key sensitivity). It believes that these should also be considered to be key sensitive features that, from a landscape and visual perspective, should also inform the suitability of the site for development.

[20] Policy HCD3 of the Horam Neighbourhood Plan https://horamparishcouncil.gov.uk/neighbourhood-plan



- Landscape Sensitivity:

The site overall is assessed by LUC as having overall *moderate* landscape sensitivity to small-scale residential, this increasing to *moderate-high* overall landscape sensitivity to medium-scale residential and *high* overall landscape sensitivity for commercial / industrial development.

However, LUC also note 'Variations in sensitivity', commenting:

> *'The south-east of the site also demonstrates many of the characteristics of the Wider LCA 6E assessment unit, which increases sensitivity, particularly the ancient woodlands and interconnecting shaws and hedgerows, areas of priority habitat good quality semi-improved grassland, the wooded and rural backdrop provided to Horam, rural character with areas of remoteness and tranquillity. The north-west of the site has intervisibility with the South Downs National Park. Although this is at a distance, the South Downs provides a backdrop to views from the settlement edge of Horam, which increases sensitivity.'*

In fact, the south-eastern part of the is within the wider assessment unit which has a '*high'* sensitivity to all development. This is reinforced by the presence of Priority Habitats -which should be retained – and extend across much of the southern portion of the site.

Deciduous and Ancient Woodland extends in fingers up the slope from the south, with further pockets within both the central and northern areas. There is also a substantial block of regenerated woodland along the eastern edge of the site.

LUC do recognise the above features in identifying 'Sensitive landscape area/feature' on the above 'Summary map', which extend to cover both the southern and eastern portions of the site, effectively confirming their high sensitivity. Therefore, it is difficult to understand how this has resulted in an overall assessment of 'Moderate' sensitivity. In fact, with the further regard to the significance of the historic field pattern over most of the site, important views across the site (especially across the central area), it is believed that the overall assessment should be at least ***Moderate-High*** sensitivity to small-scale housing.

This is considered a very fair assessment. Moreover, it should also be appreciated that this relates to typical 2-storey dwellings, whereas 3-storey dwellings, such as flats and older persons schemes, are accepted as being of *Moderate-High* sensitivity. It seems inevitable in a large scheme that there would be elements of these. Furthermore, industrial development – for which a significant provision is made – is given a *High* sensitivity score. This not only reinforces a ***Moderate-High*** sensitivity rating, but also raises questions on the both the siting and scale of industrial development (which is discussed further below).

Conclusion on landscape capacity

Elsewhere, a *Moderate-High* score has meant that sites are rejected.

However, if development is focused in the northern and north-western areas of the site, which are less sensitive - being better related to the existing bult-up area and development/activity along the A267 - then it is accepted that the degree of landscape harm is less.

b) Provision of open space

There are indications in the policy and supporting documents that WDC accepts the appropriateness of providing a significant area of open space within a comprehensive development. However, it is currently ambiguous. It needs clarification, as this is regarded as critical component of any scheme, to meet a clear community need.

The need for a significant informal semi-natural greenspace

In 2022 WDC produced an Open Spaces Study[21], which highlighted that Horam is significantly deficient in 'Natural and Semi-natural green space'.

Table 11.3: Recommended quantity standards

Typology	Quantity standards (hectares per 1,000 population)
Parks & gardens	0.53
Amenity greenspace	0.56
Natural & Semi-natural greenspace	1.91 (10.91 for analysis)
Multifunctional Greenspace	3.00
Provision for children & young people	0.25 (0.05 for analysis)
Allotment	0.25 (0.10 for analysis)

These standards may be applied to the latest (2024) population estimate of 3,409.[22] In addition, regard should also be given to planned housing. The Reg 19 WLP

[21] https://wealdengov-b994c1bb48cf487f1616-endpoint.azureedge.net/blobwealdengov-staging/UploadedFiles/Final-Wealden-Parish-Areas-Summary.pdf

[22] Source: East Sussex in Figures, 2024 Mid-Year Estimates population of LSOAs Wealden 011D+011E (which together equate to Horam Parish)

identifies (in Table 4) a total of 976 additional dwellings as being planned for in Horam over the plan period (to 2042), excluding any windfall element, of which 175 dwellings are outstanding commitments, while further 801 dwellings are proposed on new allocations.

The following table presents existing provisions, relative to the quantity standard now and in the future, with varying levels of new housing. It takes both the Reg 19WLP housing figure and a lower figure of 700 dwellings, which includes the 175 committed dwellings and a reduced capacity at Coxlow Farm of c475 dwellings. An average household size of 2.4 has been assumed, this being the figure for the Horam Parish in 2021 Census[23].

Table 1: Application of open space quantity standards to Horam

Typology	Actual current (2024) provision[24]	Current (2024) target provision	Future (2042) target provision based on +976 dwgs[25]	Surplus/ Shortfall based on +976 dwellings	Future (2042) target provision based on +700 dwgs[26]	Surplus/ Shortfall based on +700 dwellings
Parks & gardens	5.65 ha	1.81 ha	3.05 ha	+2.6 ha	2.7 ha	+2.95 ha
Amenity greenspace	0.4 ha	1.91 ha	3.23 ha	-2.83 ha	2.85 ha	-2.45 ha
Natural & semi-natural greenspace	1.38 ha	6.51 ha	10.98 ha	-9.6 ha	8.72 ha	-7.34 ha
Multifunctional Greenspace[27]	7.43 ha	10.2 ha	17.22 ha	-9.79 ha	15.24 ha	-7.81 ha
Provision for children & young people	0.14 ha	0.85 ha	1.44 ha	-1.3 ha	1.27 ha	-1.13 ha
Allotment	0.59 ha	0.85 ha	1.44 ha	-0.85 ha	1.27 ha	-0.68 ha

This indicates that Horam should have a significant additional area of Natural and Semi-natural green space. There will also be a need for additional Amenity greenspace. These combined shortfalls will amount to some 10-12.5 ha over the plan period, depending on the level of growth.

It also highlights that Horam is actually well provided with formal sports pitches in the form of the village's Recreation Ground, which supports a thriving young people's football club, tennis club and scouts, etc clubs.

[23] 2021 Census Horam Parish – population: 3,121; households: 1,298; average household size: 2.4

[24] Table 20.1 of OSS report

[25] 6.51 + 4.47 (976x2.4 = 2,342 persons x 1.91)

[26] 6.51 + 3.21 (700x2.4 = 1,680 persons x 1.91)

[27] Multifunctional Greenspace (MFGS) is the typologies of parks and gardens, amenity greenspace and natural/semi-natural greenspace combined.

However, it is the opportunity for informal recreation within a natural and semi-natural setting – somewhere to appreciate nature and biodiversity - that it clearly, and is recognised, as being missing.

A further measure of access to natural greenspaces is Natural England's Accessible Natural Greenspace Standard (ANGST)[28] standard. As quoted in the WDC Open Space Study this recommends that there is:

- *An accessible natural greenspace of at least two hectares in size, no more than 300 metres (five-minute walk) from home.*
- *At least one accessible 20-hectare site within two kilometres of home.*

At present, there is no natural greenspace in the Horam Parish of 2 ha or more. It is clear from the Open Space Study's Figure 6.3 that neither is there an accessible larger (20 ha) informal greenspace within any part of the parish:

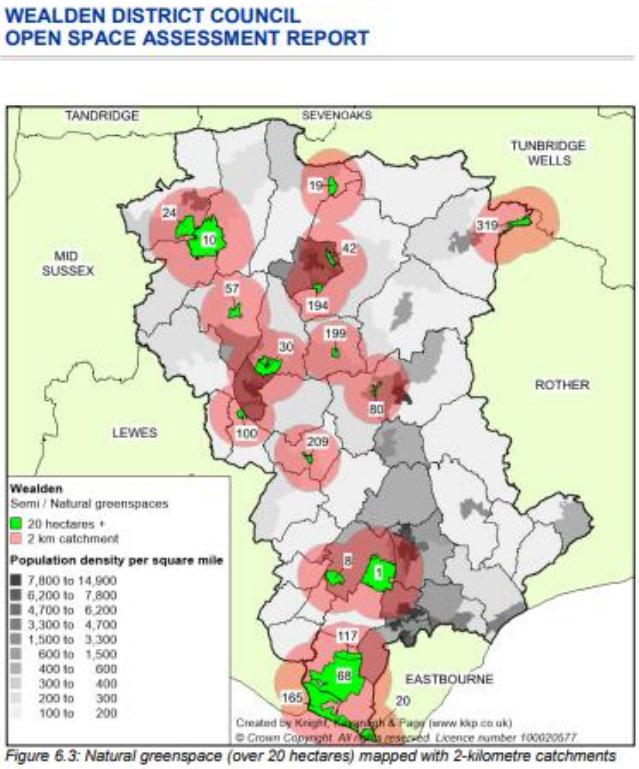


Figure 6.3: Natural greenspace (over 20 hectares) mapped with 2-kilometre catchments

Hence, HPC concludes that a major, informal greenspace needs to be provided in Horam, within the plan period, and that this should be of 10-20 ha.

In terms of accessibility, the Open Spaces Study (at Table 11.2: Recommended accessibility catchments) recommends that Natural and semi-natural greenspaces should be within a 20-minute walk time (or 2,000m).

[28] https://www.wealden.gov.uk/UploadedFiles/Wealden-Open-Space-Report-26.05.22.pdf

To best meet this criterion, a major greenspace should be provided as part of the comprehensive development of the Coxlow Farm area. It meets the accessibility criteria, including from the significant additional population at any development.

To be easily accessible by existing residents, it should be along the eastern side of this site, and accessible from the Cuckoo Trail, and adjacent to but not interfering with the Priority Habitats or Cinderghyll stream* and associated Ancient Woodlands extending from it to the south.

*The Wealden ghylls (streams) lie in sinuous, narrow, deeply incised V-shaped valleys with steep, wooded sides. The enclosed nature of the valleys is believed to create a local warm and moist microclimate. Therefore, the Wealden ghyll woodlands are a unique habitat that supports vascular and non-vascular plant communities that are not found all together anywhere else in Europe; and includes, for example, nationally rare bryophyte species. This type of unique habitat is recognised as important in terms of regional and national biodiversity. One such Wealden ghyll, Cinderghyll, (presumably named for the Roman bloomery found on its banks) forms the southern boundary to this site. A number of tributaries, smaller Wealden ghylls (fractals), drain into Cinderghyll from the north; therefore, fingers of Wealden ghyll morphology and woodland extend into the site and are not just confined to the main Cinderghyll valley, some of these fingers extend for over 350metres from Cinderghyll. There are fewer tributaries on the southern side, as a result of the gentle southerly dip of the land surface.

c) Transport considerations

Firstly, it should be appreciated that Horam has developed around the junction of the A267 with the B2203 (High Street), around which is the village centre, with its shops and services. Hence, there is a concentration of vehicle movements through the village on these roads, with the A267 being primary route. Hence, these are limited opportunities for traffic diversion off these roads. This is significant as the Reg 19 WLP proposed allocations are all in locations where they would need to use the A267 Horam Road to access the village centre.

Congestion at peak times can regularly experience congestion, both along the A267, from the junction with Furnace Lane to the north of the village centre, extending to its junction with Horebeech Lane to the south of the centre.

Congestion is most pronounced at the junction of the A267 with the B2203, often resulting in long queues along the latter to turn on to the A267. Right-hand turning traffic often does not have space to turn on to the A267 unless someone holds up traffic to let them out. Right-turn movements off the A267 at this junction also often cause hold-ups.

The Parish Council is therefore very concerned that the scale of development currently proposed at Coxlow Farm will significantly exacerbate these delays.

The Parish Council has reviewed the transport evidence base documents prepared for the WLP, most recently the WLP Transport Study (September 2026)[29] and has the following observations:

1) Table 6-3 - Junctions Close to or Exceeding Capacity – which looks at traffic conditions over the plan period (2042) before adding in proposed growth – shows that these is congestion each of the junctions analysed through Horam:
    - The A267 Horam Road/Horebeech Lane Roundabout is over-capacity at both the peaks (AM: 100% of capacity; PM 107% of capcity), while it still approaching capacity in the Inter-peak (93%)
    - A267 Little London Road/A267 Horam Road/B2203 High Street junction is also at or approaching capacity at peak times (AM: 96%; PM: 104%)
    - A267 Little London Road/Furnace Lane is over-capacity in the PM peak (105%)
2) The above capacity ratios mean that all of the junctions in Horam would have noticeable delays along the relevant links, as shown on 'Table 6-4 - Option 1 Links with delays over 90 sec'. Most notably:
    - A267 Horam Road/Horebeech Lane Roundabout - delays on the A267 Horam Road (southbound) of 175 secs in the PM peak
    - A267 Little London Road/A267 Horam Road/B2203 High Street – delays on the B2203 High Street arm of 126 secs in the PM peak
    - A267 Little London Road/Furnace Lane - delays on Furnace Lane of 162 secs in the PM peak
3) Each of the assessed junctions in Horam feature in the list of most impacted junctions in relation to the impact of the proposed allocations, on top of any delays without growth, as shown on Table 6-9 - Option 2 vs Option 1, Most Impacted Links (Delay Differences in Seconds. Most notably:
    - A267 Little London Road/A267 Horam Road/B2203 High Street A267 - Horam Road (northbound) delay increases in AM peak of 193 secs and 87 secs in the pm peak
    - A267 Little London Road/A267 Horam Road/B2203 High Street B2203 – additional delay on the High Street of 52 secs in the AM peak
    - A267 Little London Road/Furnace Lane – additional delay on Furnace Lane of 130 secs in PM peak
4) The implications of these additional delays are summarised in paragraph 6.3.17. This says (HPC underlining):

    The analysis shows that the largest increases in delay resulting from Local Plan development are concentrated on approaches to junctions that are already operating

[29] https://www.wealden.gov.uk/planning-and-building-control/planning-policy/new-local-plan/planning-policy-evidence-base/transport/

under significant pressure or are forecast to experience substantial increases in traffic demand. The most notable delay increases relevant to Horam are summarised below:

- *Junction A267 Little London Road/A267 Horam Road/B2203 High Street, approach from A267 Horam Road (northbound) with an increase of 249 seconds;*
- *Junction A267 Little London Road/Furnace Lane, approach from Furnace Lane with an increase of 129 seconds*

5) There are both benefits and disbenefits to delays at the junctions under Options 3 and 4, based on modal shift and planned infrastructure respectively, but these are regarded as having a high level of uncertainty attached to them. For example, there are limited opportunities for modal shift locally, not least as bus services are infrequent, while infrastructure improvements along the A22 are not anticipated to affect traffic flows.

6) There are apparent omissions in the scope of the proposed allocations, in that the WSP modelling report includes 750 dwellings at Coxlow Farm, but does not refer to 4,000sqm employment nor, as significantly, a new two-form entry primary school.

   Of course, a primary school has particular traffic dynamics. School drop-off activity is highly concentrated within a narrow 45-minute period each morning and directly coincides with the principal commuting peak. In this rural setting, it should also be appreciated that pupils are likely to travel from surrounding villages by car, while a high proportion of primary-age children are taken to school by car. This will create a pronounced "peak-on-peak" traffic demand, significantly exacerbating the congestion that on this section of the A267 through Horam that the modelling already shows.

   Turning movements of heavy lorries and vans associated with the proposed industrial area on to and off the A267 – which again is apparently not factored in to the modelling - would further slow traffic movement and contribute further to congestion.

7) The forecast extent of congestion resulting in queuing traffic on the High Street, as highlighted by the modelling, is a particular concern, as it would have significant pedestrian safety and air pollution implications for residents, many elderly, looking to access local shops and services.

8) Given the amount of development committed and planned off Chiddingly Road – being some 100 dwellings – the fact that the A267/Chiddingly Road junction is not assessed in the model is surprising, not least as it joins the A267 in the same vicinity as the HOR4 allocation. It is likely that it will experience delays as committed and planned developments are built out.

9) It can reasonably be anticipated that could be knock-on effects of congestion at each of the A267 junctions, as there is only a few hundred metres of highway between junctions, as well as other junctions and accesses between them.

It is therefore concluded that the scale of development proposed under Policy HOR4 Coxlow Farm is likely to have a severe cumulative impact on the A267 corridor, in conflict with Policy TR8 of the National Planning Policy Framework (NPPF) and emerging WLP Policy INF2, Paragraph 3(a), as the nature and level of traffic generated by would adversely impact upon the safety, amenity and character of the surrounding area. This is notwithstanding any deliverable management measures which, in any event, have not been identified.

d) Other infrastructure considerations

Horam's infrastructure is generally limited and, in a number of respects, under strain:

- It does not have ready access to a railway station. The nearest, Polegate, is 8.7 miles away and although accessible by bus, the buses run approximately only every 75 minutes. The next nearest, Buxted, is 8.8 miles distant with Stonegate 9.4 miles away. Neither Buxted nor Stonegate have a bus service from Horam and each only has one train per hour.

- The Horam GP surgery (Manor Oak Surgery) is at capacity, with no space for expansion. It is also only a satellite surgery from the main practice in Buxted. Often, the only/soonest available appointments are in Buxted or the other satellite surgery in East Hoathly; but neither has a bus service from Horam so are only accessible to those who can drive and/or have access to a car.

- The bus service, number 51, was cut in the summer of 2025 from half-hourly to roughly every 75 minutes[30]. At such a frequency (infrequency), it is difficult to remember what time the bus runs and it is no longer possible to 'just pop to the shops' in Heathfield or Hailsham without careful planning or accepting the possibility of a long wait for the return service.

- Overall, it has a modest level of services for its size, but with some critical omissions – there is no post office, the last pub (May Garland) closed 3 years ago and the Hillside Drive car park is already full most of the time, thus limiting the ability of the High Street offering to grow and change to meet the needs of a growing population.

- The pre-school that had run at the Village Hall for many years closed in July 2026. There is no replacement or alternative in Horam.

- There is heavy traffic along the A267 through the village, which both results in extended queuing at its High Street junction in particular, which poses pedestrian safety and air quality risks for users of the shops and services, as well as highway safety issues. There is also queuing at peak times at other junctions close by along the A267, as discussed more above.

- The Wealden 2022 Open Space Report describes Horam as deficient in Natural and semi-natural greenspace and also lacking in Amenity greenspace, as discussed above

[30] https://bustimes.org/services/51-eastbourne-polegate-hailsham-heathfield?date=2026-11-02

In terms of new infrastructure anticipated over the plan period, the following are referred to in the WLP and/or its supporting IDP:

- Provision of a 2FE primary School, which is classified as *Critical*
- Although not specifically included in the REG19 WLP, Early Learning provision is included in the REG19 Infrastructure Delivery Schedule, September 2026, indicating that would be associated with the primary school
- The IDS provides for both Horam Natural Green Space 1 and 2 to be improved as part of the social facilities for local communities. These improvements are to be done in the short to medium term. (However, Horam Natural Green Space 2 is actually being put forward as a site allocation for development (Policy HOR1) in the WLP.)

<u>Sewerage:</u>

Specific regard should be given to foul water capacity, due to serious local issues.

There are continuing and ongoing problems with sewage in the Horam parish, these fall into two serious categories:

i) There have been many instances of sewage flowing out of manholes into residents' gardens and overflows from tanks/local pumping stations (for example the one in Horebeech Lane). In fact, it was from such problems in Horebeech Lane that Wealden devised their 'Gold Star' amelioration procedure. However, it must be stressed that this is amelioration rather than eradication; it just prolongs the period during which factors elsewhere can improve so that it doesn't overflow here.

ii) There have been frequent and prolonged periods of unplanned discharge from the Vines Cross Treatment Works (which is within Horam parish) into the Waldron Ghyll which is a major tributary of the Cuckmere River. Water is pumped from the Cuckmere River into the Arlington Reservoir when the water quality allows. Therefore, the sewage problems in the parish of Horam contribute to the poor water quality further downstream and hence lack of water in the reservoir and the resultant hosepipe bans and drought orders. These are the factors which affect the human population, such discharges also have an effect on the biota of the river system and ecology downstream.

Southern Water's Drainage and Wastewater Management Plans listed the upgrade for the **Vines Cross Wastewater Treatment Works** (Vines Cross WwTW) as **postponed**, and an exact upgrade completion date has not been officially scheduled or published.

However, the same document shows that out of the 15 factors which were applicable or not flagged, there were 10 where the risks of an event happening were moderately significant or very significant while the proposed investment strategy was to improve it as the level of concern was moderate. It should also be noted that the other treatment works with a strategy to improve and a level of concern as moderate were all major (Wealden tier 1) settlements such as Hailsham, or large towns

neighbouring towns such as Bexhill, Hastings and Eastbourne, all significantly larger than rural Horam. It is clear from the Southern Water Table shown below that Horam (Vines Cross Waste Water treatment Works) is an anomaly in that it causes enough concern to warrant a proposed investment strategy but is in a rural area with, until recently, a limited ‘catchment’ area. in order to maintain the accepted modern standards of hygiene and public health, it is vital to either bring the proposed investment forward or to curtail the planned development in the site allocations.

Southern Water Drainage and Wastewater Management Plans

Cuckmere and Pevensey Levels River Basin Catchment

BRAVA Result for each Planning Objective

System Ref	Wastewater System	Population	PO1 - Internal Sewer Flooding Risk	PO2 - Pollution Risk	PO3 - Sewer Collapse Risk	PO4 - Risk of Sewer Flooding in a 1 in 50 year storm		PO5 - Storm Overflow performance		PO6 - Risk of WTW Compliance Failure		PO7 - Risk of flooding due to Hydraulic Overload		PO8 - Dry Weather Flow Compliance		PO9 - Good Ecological Status / Potential	PO10 - Surface Water Management	PO11 - Nutrient Neutrality		PO12 - Groundwater Pollution	PO13 - Bathing Waters	PO14 - Shellfish Waters	% Forecast growth increase from 2020		Proposed investment strategy	Level of Concern
			2020	2020	2020	2020	2050	2020	2050	2020	2050	2020	2050	2020	2050	2020	2020	2020	2050	2020	2020	2020	2035	2050		
VINE	VINES CROSS	13,883	H	O	O	H	H	H	H			H	H			Q							17%	25%	Improve	Medium
WART	WARTLING	55																					17%	25%	Maintain	Low
WILM	WILMINGTON	202																					19%	26%	Maintain	Low
WIND	WINDMILL HILL HERSTMONCEUX	2,146				H	H				Q				Q								16%	25%	Prepare	Low

Key:	Primary Drivers
Customer	C
Hydraulic	H
Operational	O
Quality	Q
Unknown	U

Key:	Cell Colour Coding
	Not Flagged *
	Not Applicable **
	Not Significant
	Moderately Significant
	Very Significant

Southern Water Drainage and Wastewater Management Plans

Cuckmere and Pevensey Levels River Basin Catchment

BRAVA Result for each Planning Objective

System Ref	Wastewater System	Population	PO1 - Internal Sewer Flooding Risk	PO2 - Pollution Risk	PO3 - Sewer Collapse Risk	PO4 - Risk of Sewer Flooding in a 1 in 50 year storm		PO5 - Storm Overflow performance		PO6 - Risk of WTW Compliance Failure		PO7 - Risk of flooding due to Hydraulic Overload		PO8 - Dry Weather Flow Compliance		PO9 - Good Ecological Status / Potential	PO10 - Surface Water Management	PO11 - Nutrient Neutrality		PO12 - Groundwater Pollution	PO13 - Bathing Waters	PO14 - Shellfish Waters	% Forecast growth increase from 2020		Proposed investment strategy	Level of Concern
			2020	2020	2020	2020	2050	2020	2050	2020	2050	2020	2050	2020	2050	2020	2020	2020	2050	2020	2020	2020	2035	2050		
ALFR	ALFRISTON	816						H	H					O	???								11%	11%	Improve	Low
BERW	BERWICK	300																					14%	18%	Maintain	Low
HABX	BEXHILL AND HASTINGS	141,300	C	O	O	H	H	H	H						Q	Q	H	U	Q		U		11%	15%	Improve	Medium
BOSG	BODLE STREET Low	62																					79%	84%	Maintain	Low
CATS	CATSFIELD	645									Q							U	Q				12%	19%	Prepare	Low
EADE	EAST DEAN	1,624																					11%	15%	Maintain	Low
EAHO	EAST HOATHLY	1,061						H	H			H	H			Q							15%	24%	Improve	Low
EALP	EASTBOURNE	116,948	C	O		H	H	H	H			H	H		Q		H			O	U		11%	14%	Improve	High
HAIN	HAILSHAM NORTH	12,023	C	O	O	H	H	H	H		Q	H	H		Q	Q	H						61%	70%	Improve	Medium
HAIS	HAILSHAM SOUTH	29,543		O	O	H	H	H	H	Q	Q	H	H		Q		H						17%	23%	Improve	Medium
HOOE	HOOE	1,533									Q	H	H			Q		U	Q				15%	24%	Improve	Low
HERS	LIME PARK HERSTMONCEUX	44																					66%	76%	Maintain	Low
NINF	LUNSFORDS CROSS	248						H	H							Q		U	Q				11%	19%	Improve	Low
RUGR	RUSHLAKE Low	152																					43%	54%	Maintain	Low
VINE	VINES CROSS	13,883	H	O	O	H	H	H	H			H	H			Q							17%	25%	Improve	Medium
WART	WARTLING	55																					17%	25%	Maintain	Low
WILM	WILMINGTON	202																					19%	26%	Maintain	Low
WIND	WINDMILL HILL HERSTMONCEUX	2,146				H	H				Q				Q								16%	25%	Prepare	Low

Key:	Primary Drivers
Customer	C
Hydraulic	H
Operational	O
Quality	Q
Unknown	U

Key:	Cell Colour Coding
	Not Flagged *
	Not Applicable **
	Not Significant
	Moderately Significant
	Very Significant

e) Sustainability Appraisal (SA) assessment

Horam Parish Council OBJECTS to the SA assessment of the Coxlow Farm site (SHELAA ref 875/3030).

When tested against the Sustainability Objectives and having applied the decision-making criteria, HPC finds that the negative sustainability impacts are greater than suggested, such that the proposed allocation, in its current form, does not represent sustainable development.

HPC nonetheless also finds that some development in the locality, more limited to the northern and western parts of the site, to avoid the most sensitive landscape areas, and allow for vital green infrastructure would represent sustainable development, far more in keeping with the character of the village and its setting.

Review of SA of Coxlow Farm as contained in the Regulation 19 Sustainability Appraisal Part 3: Strategic Sites Assessments

Sustainability Objective		**SA score Reg 19 2026**	**HPC score**	**Reason for different score, where applicable**
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 mitigation of development run-off is currently uncertain, especially as the scale of development would inevitably bring it close to the sensitive habitats, with limited scope for attenuation areas. Also, the site feeds into the River Cuckmere at Hellingly village, which suffers regular flooding so, without a clear understanding of mitigation measures, concerns remain on downstream impacts.
SO4	Water Resources	Uncertain	Uncertain	
SO5	Soil, Land & Minerals	Uncertain	Minor Negative	A negative impact clearly flows from this being a virtually wholly greenfield site, in agricultural use.
SO6	Waste & Materials	Minor Negative	Minor Negative	
SO7	Pollution	Minor Negative	Major Negative	The majority of the site (all but the northern part next to the existing built-up area and the western edge) fall within the 'Darkest' level possible in Dark Skies mapping. Also, the site

				(apart from the northern and western edges have a high level of tranquillity.
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 large accessible greenspace (a Country Park), the allocation does not clearly provide for this. Similarly, links to the Cuckoo Trail may be positive, but the proximity of development is likely to erode its valued countryside setting, as well as there being a question-mark over third-party land.
SO9	Biodiversity	Minor Positive	Minor Negative	The introduction of a major development would inevitably impact on the priority habitats, ancient woodlands, wetland areas and other habitats, at least indirectly through fragmentation of habitats and loss of thick hedgerows, through proximity of human (and pet) activity, light and noise pollution, etc., even allowing for mitigation measures.
SO10	Landscape & Townscape	Minor Negative	Major Negative	The landscape sensitivity is recognised as variable, being less to the north and west, but its historic character, typical of the High Weald, its overall intactness, as well as general tranquillity and value to the setting of the village, with important views across it, is found to be *moderate-high* overall. Furthermore, the scale of development is so great as to fundamentally change, and overwhelm, the rural character of the village.
SO11	Historic & Cultural Heritage	Not Significant	Minor Negative	The loss of the 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	Minor negative	While there is uncertainty on traffic implications, the evidence on likely future congestion is enough to warrant a negative score, without any clear prospect of overcoming them. Also, 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. In terms of access to towns, the SA refers to 'Bus services currently run half hourly', whereas they are roughly every one and a quarter hours.
SO14	Housing	Major Positive	Major Positive	
SO15	Health & Wellbeing	Uncertain	Minor negative	There are uncertainties about the provision of new green spaces, but the rightly acknowledged lack of GP surgery capacity, without a clear means of increasing it locally is regarded as significant to the community and, hence, is currently seen as a negative.
SO16	Quality of Life & Place	Uncertain	Uncertain	*NB It is regarded as Uncertain, as there is no masterplan, and it is assumed that design principles are followed, but there are negatives in terms of the wider 'sense of place' of Horam (See Landscape/Townscape above), and accessibility to higher-order centres, including for employment.*
SO17	Social Inclusion	Uncertain	Uncertain	
SO18	Economy & Employment	Minor Positive	Minor Positive	
SO19	Town & Village Centres	Minor Positive	Minor Positive	
SO20	Education & Skills	Major Positive	Minor Positive	A new school would serve Horam, but the catchment is wider, including Maynards Green and extending up to Heathfield.

From the above, it can be seen that the Parish Council's assessment of the proposal against the Sustainability Objectives is more negative than positive, notably in terms of:

- **Landscape & Townscape**
- **Pollution**
- Biodiversity
- Historic & Cultural Heritage
- Transport & Accessibility
- Health & Wellbeing
- Soil, Land & Minerals

Regard has also been given to the Commentary within the SA, on which a number of comments are also worth making, for clarity:

Commentary heading	**SA Commentary**	**HPC Response**
Site	The site is described as *'comprising agricultural fields, woodland and sporadic residential development, … within the settlement boundary.'*	The site is actually **outside** the current Horam development boundary. What little development there is, only amounts to a few properties confined to the A267 frontage. It is essentially open countryside.
Parish/ Settlement	Horam is categorised as a 'Type 3 Settlement'	Based on the most recent Sustainable Settlement Study, Horam is seen to more closely align with Type 4 settlements, as demonstrated in a separate representation on Policy SS2.
Development Proposal	This refers to '*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.*'	While a Country Park is mentioned here, the following Summary of Assessment refers to '*a Country Park and/or public open space, in addition to recreational green space*.' In contrast, Policy HOR4 only mentions '*open space*', which may be taken as only relating to the basic needs of the new housing, and not the expectation of a significant accessible informal greenspace for the wider benefit. Also, the Policy does not specifically identify either '*early years provision'* or a '*community hub*'. The latter may be seen as embraced by the community floorspace requirement, but early years provision is critical and should be sited adjacent to the primary school. These anomalies question the alignment of the SA with the policy.
Summary of Assessment - 4th bullet	This refers to '*Enhancements are proposed with notable areas of green space around and through the development, …*'	This is welcomed and corresponds largely with HPC's vision for the site, BUT the provision of such notable areas both around as well as through the development is not clearly carried through into policy, at present.
5th bullet	This states: '*The Landscape Sensitivity Assessment, 2026 identifies the site's landscape as **moderate-high** sensitivity for medium scale residential development'*, adding '*Developing this site will introduce built form into a largely rural area and considerably increase*	This is a key point. It highlights the **moderate-high** landscape sensitivity to medium scale residential development, whereas the SA previously (Reg 18) only mentioned its view that the site is only *moderately* sensitive to small scale residential. As stated earlier, HPC regard this proposal as inevitably medium scale. Even if it were regarded as small scale housing, HPC's own landscape evidence finds that its impact on both the village and its landscape setting, warrants a *moderate-high* rating.

	the size and extent of the village, increasing the settlement pattern and changing the character of the village by extending into the landscape that abuts it.'	This clearly challenges the acceptability of the current proposal – as well as how it should be assessed in relation to SO10.
6th bullet	The provision of 4,000 sqm of employment floor space is stated to be in *the south-west corner of the site, close to the A267 ...* '	The scale of employment provision is considered unnecessarily large for the village, being more than two-times the floorspace at Discovery Way. While siting of business units adjacent to the A267 is sensible in terms of residential amenities, industrial buildings at the very southern edge of the village is questioned, as it has a high landscape sensitivity, adversely impact on adjacent habitats, may present an unattractive entrance, as well as detract from the rural setting of the Crematorium.
7th bullet	In terms of services, is records that *bus services currently run half hourly*.	As advised on the SA assessment, this service has since become far less frequent, with services approximately every 1¼ hours.
10th bullet	This states that *the proposals broadly conform with the Spatial Strategy.*	It is noted that the word '*broadly'* has been introduced since Reg 18. There is an apparent acceptance now that Horam is an appropriate village for such substantial strategy growth, 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.

Taken together, based on the its review of SA scores and the associated assessment of impacts, it is clearly concluded that the current policy proposal represents sustainable development.

However, an alternative development allocation, as put forward in the following section, produces a far more positive SA assessment, with much improved scores in Landscape & Townscape, Pollution, Biodiversity, Green and Blue Infrastructure, Historic & Cultural Heritage, Transport & Accessibility Objectives, in particular.

Conclusions, revised proposal and policy wording

The proposed allocation of Coxlow Farm, Horam (Policy HOR 4) in the Reg 19 WLP is, at the scale of development proposed, based on all available evidence and local knowledge, found to be unsustainable. Hence, the allocation is UNSOUND.

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, as well as a major accessible informal greenspace could be accommodated – while still making a significant housing contribution – and be worthy of inclusion in the Local Plan.

The key components of such an allocation that would differ from the current allocation would be:

A. Inclusion of an unambiguous requirement for a major accessible informal greenspace, broadly in line with the Open Space Study/ANGST standards, to the east and south-east of the site, with an area commitment (of at least 10-20 ha) and effective links to the Cuckoo Trail

B. A reduction in the capacity for housing to some 450-500 dwellings, to be sited in the north and west of the site

C. A lesser scale of employment uses, up to some 2,500sqm, located adjacent to the A267

D. Specific reference to Early Years educational provision

It is also suggested that the allocation would benefit from either an indicative land use plan and/or an amended development boundary that essentially contains the proposed built-up area. The former would help clarify the broad relationship between principal uses, while the latter would provide a clear basis for effective development management.

Draft revisions to Policy HOR4 are presented below, followed by a broad Indicative Land Use Plan, to assisting understanding the policy, also showing a revised development boundary (as put forward in the context of Policy SS1).

WLP Reg 19 Policy HOR4 Proposed Policy Revisions (HPC amendments in red):

POLICY HOR4 (HOR): Coxlow Farm, Horam Road, Horam as identified on the Policies Map

Allocated for: Residential, Employment and Community Uses, and a two-form entry primary school, with early years provision and a major greenspace.

Site Area (ha): 86.36

Indicative Capacity: ~~750~~ 450-500 (net) dwellings, some 2,500 ~~4,000~~ sqm (net) Employment (E(g), B2 and B8), 1,500sqm (net) community floorspace, a two-form entry primary school and open space, including a major open and accessible natural semi-natural greenspace of some 20 hectares

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

Relevant Planning History: None

In addition to meeting the relevant policies in the development plan, development proposals for this site must demonstrate that it will:

1. Be designed to respond appropriately to the character, appearance and constraints of the site, including its edge-of-village ~~location adjacent to the~~ countryside location and the National Grid Electricity Transmission (NGET) Overhead Cable Route, through a high-quality masterplanned layout which applies the NGET Design Guide and Principles, reduces the impact of associated assets through good design, and uses materials, building heights, densities and development grain that reflect the local vernacular and respond sensitively to landscape characteristics of the site, and the retained, open southern and eastern ~~edges~~ areas of the site.

2. Locate uses in the most appropriate parts of the site, with education and community uses to the northern ~~eastern~~ part of the site, integrated with the built form of the village, housing in the western and central parts of the site and employment development ~~further south and~~ close to the A267 in the west, where it can relate effectively to the road network and access;

2a Set aside land in the eastern and southern parts of the site as a major area of parkland, comprising some 20 ha. of accessible natural and semi-natural space, to be adjacent to, and connected with, the Cuckoo Trail, and extending around the built development adjacent to, but not extending into the Priority Habitats to the south;

3. Secure and deliver the required mix of development, uses and on-site infrastructure, including, but not limited to, education (a two-form entry primary school and early years provision), community uses, sports, open space, including a major greenspace, and employment provision, in accordance with an agreed Phasing and Delivery Plan. Development may be delivered in phases, provided that each phase contributes appropriately to the delivery of the required mix of uses and infrastructure and has regard to the viability of the whole development, rather than the viability of any single phase alone;

4. Provide safe and suitable vehicular access(es) from the west of the site, including any necessary junction reconfiguration and highway improvement works, in consultation with the Local Highway Authority and supported by appropriate evidence. This must include measures to meet relevant visibility, capacity and safety standards, improve accessibility for all users, including those with mobility impairments, and provide or contribute towards necessary active travel infrastructure;

5. Provide safe, direct and convenient pedestrian and active travel connections within the site and to the north-western and eastern boundaries, maximising opportunities for links to the Cuckoo Trail, Horam village centre, bus stops, schools, employment areas, community facilities and the wider walking, cycling and public rights of way network. Where connections require third-party land, rights or agreements, development should facilitate such links and make appropriate financial contributions towards their delivery, where justified and necessary;

6. Prepare and deliver a comprehensive Sustainable Transport, Monitoring and Management Strategy which demonstrates how walking, cycling, public transport and shared transport use will be maximised, reliance on the private car minimised, and the effectiveness of transport and infrastructure mitigation monitored throughout the phased delivery of the site, with additional measures identified and delivered where required;

7. Protect and enhance ancient woodland, existing woodland and boundary vegetation within and adjacent to the site through a landscape-led layout, suitable buffers and appropriate setbacks from designated ancient woodland, including Coxlow Farm Shaw, Coggers Shaw, Marle Green Shaw, Coylet Farm Shaw's 1, 2 and 3 and Toll Wood. A minimum 25 metre buffer will be required unless site-specific ecological evidence demonstrates that a lesser buffer would be appropriate and would not result in adverse effects on the ancient woodland. The layout and landscaping must avoid isolated pockets of ancient woodland wherever possible, retain the strong visual enclosure of the site, retain historic field boundaries, reduce the presence of built development in views, including from the High Weald National Landscape and 'Important Views' identified in the Horam Neighbourhood Plan, and use locally prominent native species to strengthen green infrastructure, deliver ecological benefits, maintain rural character and integrate built form within the landscape;

8. Deliver a minimum 20% biodiversity net gain, measured using the relevant statutory biodiversity metric and UK Habitat Classification system;

9. Take account of the existing sewerage infrastructure crossing the site and ensure the layout and design ensure its protection and allow for its continued operation. Phase occupation of development to align with available capacity within the wider network and the delivery of sewerage infrastructure, in consultation with the service provider, or in accordance with any alternative interim arrangements agreed by the Local Planning Authority and ensure an appropriate layout that safeguards the easement required for Southern Water's infrastructure crossing the site; and

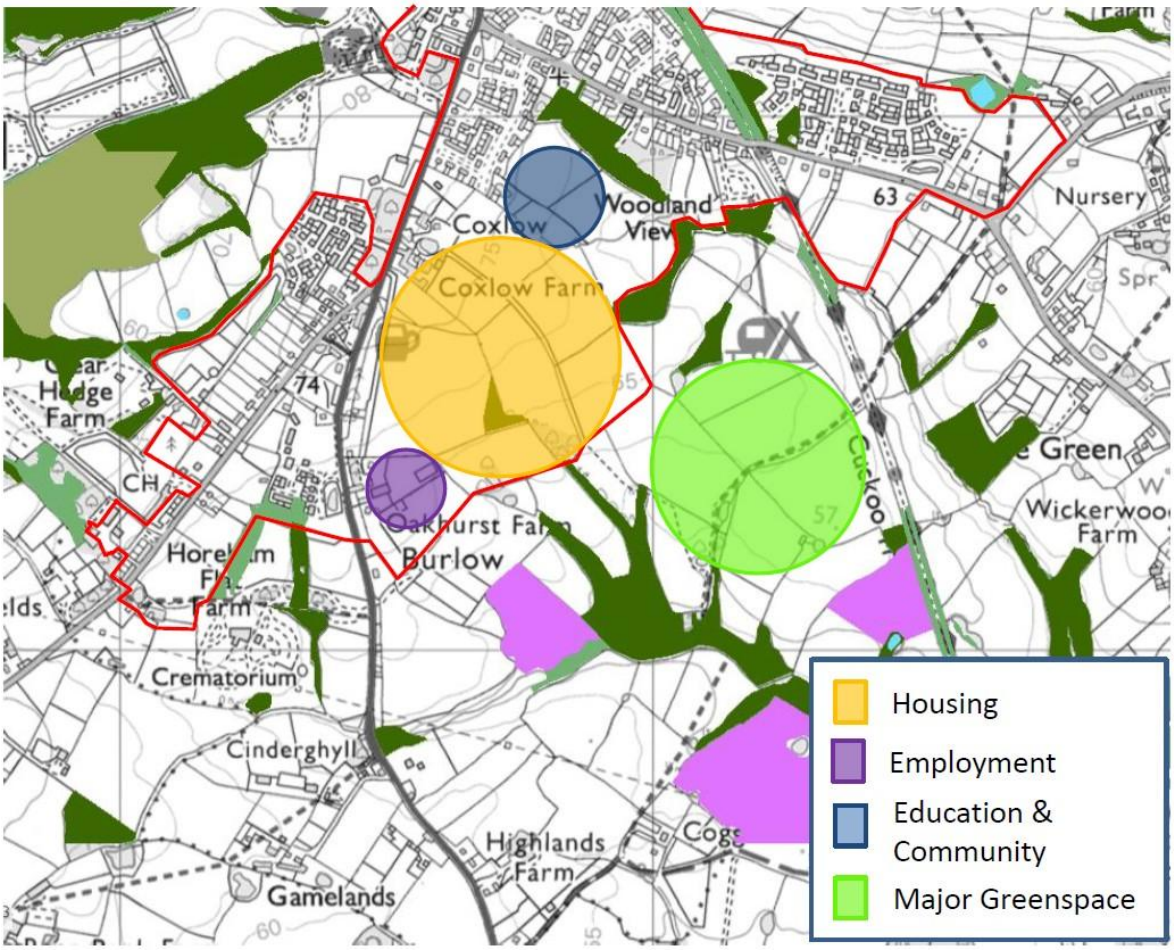
10. Demonstrate that development will not result in the sterilisation of minerals resources within the Horam Brickworks Mineral Safeguarding Area or prejudice associated safeguarded mineral operations in accordance with the requirements of the adopted Waste and Minerals Local Plan for East Sussex. Development must be planned and designed to maintain the effective operation, viability and future potential of safeguarding mineral extraction, processing and associated activities, as agreed with the Local Planning Authority in consultation with the Minerals Planning Authority.

(The proposed indicative land use plan is overleaf.)

Proposed indicative land use plan and development boundary plan

The indicative land use plan below serves both to demonstrate that the proposed revised development provisions can be accommodated, while retaining the more sensitive parts of the site free from development, and to aid understanding of how these relate to the foregoing analysis, and to each other.

It is presented in a manner to reflect its indicative nature, showing the basis disposition of principal uses, rather than actual extents of each use.



WLP REG 19 SUSTAINABLITY APPRAISAL REPRESENTATIONS

Horam Parish Council (HPC) has several discrete objections to the Regulation 19 Sustainability Appraisal (SA), namely in relation to:

1) **General matters – re. regard to duly-submitted representations**
2) **Spatial Strategy and Options**

NB There are also objections to aspects of the SA assessments of Policy SA1 in relation to proposed allocations at HOR1 Land adjoining Discovery Way and Village Hall, Horam; HOR2 Clearview Farm, Chiddingly Road, Horam; HOR3 Land at Great Easterfields, Chiddingly Road, Horam; and HOR4, Coxlow Farm, Horam Road, Horam. Relevant issues are incorporated in representations on the respective sites, with a detailed analysis and review in relation to Policy HOR4 Coxlow Farm. Hence, the SA issues for those sites are not repeated here.

(NB The above objections, elaborated on the following pages, are regarded as Soundness issues, with the exception of the first representation, which may be a Legal-compliance matter.)

1) Objection to the apparent lack of regard to Horam Parish Council's (HPC) duly-made comments on the Regulation 18 Focused Draft Wealden Local Plan

HPC is very concerned that its representations on the SA at the earlier, Focused Draft Reg 18, stage, both on the Spatial Strategy and individual sites, appear not to have not been duly considered.

The SA Part 1 Appendix 3, which summarises representations on the Focused Draft Reg 18 WLP states, at paragraph 11 on page 13, that Horam Parish Council's representation was:

'*Consultation inadequate due to IT issues.'*

In fact, Horam Parish Council submitted detailed representations on both the SA of Spatial Options and on the SA's of certain individual sites (including the proposed strategic allocation), over eighteen pages. A link to HPC's full comments is provided below[31], with the SA comments on pages 27-44.

The fact that there is no reference to any of these submissions (while summaries of the representations of other parish councils are given), strongly suggests that WDC has failed to give consideration to them.

Indeed, there is no indication in the Reg 19 SA assessments of consideration of the Parish Council's comments at the Focused Reg 18 WLP stage.

Therefore, the Parish Council questions whether WDC has met its obligations to: (a) consider all duly-made comments, (b) have regard to them, and (c) provide a summary of the responses received specifically on the SA.

Of course, this may be a genuine oversight, but it still questions the soundness of the further assessments that have not benefited from at least consideration of HPC's points.

In addition, given that there are requirements in relation to local plan consultations, which are set out in the Council's Statement of Community Involvement. This states, on page 13, that in relation to the preparation of a Draft Local Plan (Regulation 18), the Council will:

- *Engage and consult on the draft plan and provide a minimum period of six weeks for comments to be made;*
- *Make certain supporting documents available as part of the consultation on the Council's website including the Sustainability Appraisal, HRA and EFIA;*
- *Consider responses and provide a summary of the responses received*[32]*; and*
- *Continue to collect and finalise evidence, as required.*

[31] https://horamparishcouncil.gov.uk/wp-content/uploads/2026/03/HPC-full-Focused-Draft-WLP-reps-FINAL-1.pdf

[32] HPC underlining

This is elaborated upon in paragraphs 4.35 and 4.36:

4.35 Once an early consultation stage or an 'Regulation 18' consultation stage has ended, we will add all the representations we have received to our consultation database, and review and consider them alongside the available evidence to consider how the Plan and other development plan documents should be developed. Once we have processed a response, a confirmation email/letter will be sent to the person who submitted the response.

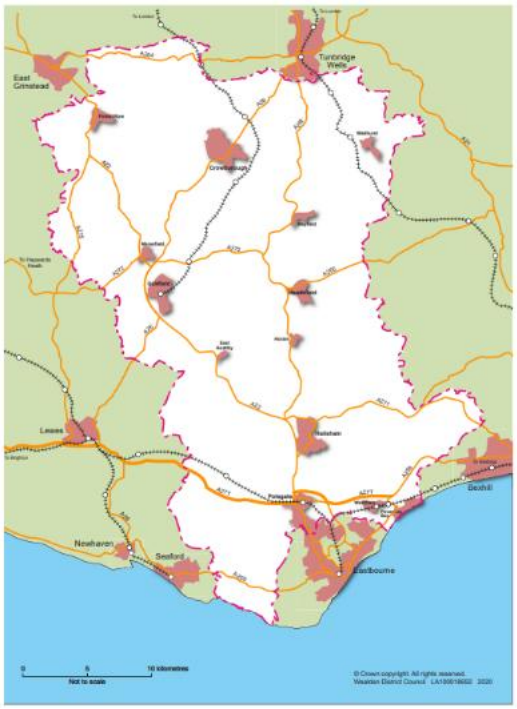
4.36 The Council will also produce a 'Summary of Responses' document where a summary of the comments made is publicised. The Council may consider the use of Artificial Intelligence (AI) to summarise the responses, but officers will manually check such summaries to ensure that they are fit for purpose. The report will be presented to the relevant committee or meeting, including the Planning and Development Cabinet Advisory Group (CAG), Local Plan Sub Committee and Full Council (if needed). The report will be noted and agreed by our Council Members before we move onto the next stage in the plan making process. Council decisions on the Local Plan will be made publicly available on the Council's website.

2) Sustainability Appraisal (SA) of Spatial Strategy and Options

OBJECTION: The proposed massive, growth of the village of Horam, virtually doubling the size of the village, is an inappropriate strategic option which should have been more explicitly and carefully assessed through the Sustainability Appraisal in developing the Spatial Strategy and, moreover, should be reduced more in line with the level of growth in Option 1 to be sustainable.

Background

Horam is a medium-sized village, adjacent to the High Weald National Landscape. Also, being located centrally in Wealden district, it is the most distant of Wealden towns and villages in terms of accessibility to employment centres (Tunbridge Wells and Sevenoaks to the north, Eastbourne to the south, Hastings and Bexhill to the east, Lewes, Brighton/Hove to the south-west, Haywards Heath and Burgess Hill to the west, East Grinstead, Crawley and Horsham to the north-west[33]) and from railway stations, as the figure below[34] shows:



Notwithstanding this, the Wealden Local Plan (WLP) proposes massive growth of the village, as shown by the proposed distribution of housing allocations shown on Table 10 of the Reg 19 WLP, and summarised below, in order of number of dwellings by adjoining settlement:

[33] Regional employment centres as stated in WLP Reg 19 paragraph 2.4
[34] Figure 14 of the WDC Direction of Travel consultation document

	Table 1 Distribution of housing allocations in Reg 19 WLP		Urban/Rural[35]	Close relationship to regional centre[36]	Rail access[37]
	Settlement	**Allocations**			
1	Uckfield	2,029	Urban	No	Yes
2	Hailsham & Lower Horsebridge	1,365	Urban	Yes	No
3	Tunbridge Wells fringes	885	Urban	Yes	Yes
4	***Horam***	***801***	***Rural***	***No***	***No***
5	East Hoathly	386	Rural	No	No
6	Stone Cross	383	Urban	Yes	Yes
7	Crowborough	356	Urban	Yes	Yes
8	Lunsford Cross	300	Rural	Yes	No
9	Westham	147	Urban	Yes	Yes
10	Polegate	131	Urban	Yes	Yes
11	Ringles Cross	235	Rural	No	Yes
12	Maresfield	205	Rural	No	No
13	Heathfield	125	Urban	No	No
14	Buxted	90	Rural	No	Yes
15	Berwick Station	87	Rural	No	Yes
16	Willingdon	40	Urban	Yes	Yes
17	Cross-in-Hand	39	Urban	No	No
18	Herstmonceux	22	Rural	No	No
19	Groombridge	21	Rural	No	No
20	Wadhurst	20	Rural	No	Yes
21	Bells Yew Green	20	Rural	Yes	Yes
22	Isfield	20	Rural	No	No
23	Ninfield	20	Rural	Yes	No
24	Blackboys	19	Rural	No	No
25	Five Ash Down	15	Rural	No	No
26	Broad Oak	12	Rural	No	No
27	Hartfield	11	Rural	No	No
28	Rotherfield	8	Rural	No	Yes
29	Laughton	5	Rural	No	No

The two main points to note are:

1. Given that the most sustainable settlements within the district are the towns, followed by settlements well related to regional centres outside the district, the scale of growth at Horam is a clear anomaly. It has more growth than many of those settlements and, along with East Hoathly, stands out as being the only ones in the top ten (in terms of growth) which is neither an urban area or well-related to a regional centre. Nor does it have a railway station in it or close by.

[35] Defined as being either a town or contiguous with a town, or a village

[36] Includes WDC Type 2 settlements AND other settlements within 5 miles of a regional centre (measured from centre of settlement to edge of regional centre)

[37] Defined as a settlement with a railway station or within 2 miles of a railway station with public transport links

2. Furthermore, it is evident that the scale of growth proposed at Horam -virtually doubling the size of the village in one plan period, as shown below - would be **transformational.**

Proposed allocations and total housing growth at Horam

Settlement	Dwelling stock[38]	WLP allocations[39]	WLP total housing	Allocations as % of stock	Total growth as % of stock
Horam	1,015**	801	976	78.9%	**96.2%**

As such, HPC would have expected this strategic option to have been specifically considered through the SA process, as well as an option with a lesser, more proportional, scale of growth.

However, these were never considered in the preparation of the Local Plan through its Regulation 18 stages.

Rather, it appears that the massive growth of Horam is basically the consequence of a land promoter-led submission through the SHELAA even though this would give Horam more of the character of a town.

A new option (Option 1) for the Spatial Strategy is introduced in the SA accompanying the Reg 19 WLP with an overall somewhat lesser amount of housing growth than the preferred strategy, and that this includes a reduction, of 25%, in the growth at Horam, as well as at Uckfield/Maresfield and Frant, relative to the preferred Option 2.

Several points are made in relation to this:

1) The fact that a lesser scale of development at Horam is highlighted as being worthy of consideration confirms the extent of local adverse reaction to such massive growth and validity of the issues raised.
2) While Option 1 is rejected largely for housing supply reasons, it is noted that the lesser scale of growth at Horam in Horam alone would only reduce the overall housing supply by 1.5% (some 250 dwellings) - while being more sustainable.)
3) While Horam Parish Council (HPC) is not in a position to comment on the reduced housing supply in Option 1 at Uckfield and Frant, it believes that the benefits of Option 1, as identified in the SA commentary (at section 9.3.1) are relevant to Horam:
    - less pressure from growth on existing settlements and the potential for coalescence.
    - the district's employment needs will still be met
    - Development is directed to the areas of least sensitivity around the existing settlements, maintaining the existing character of the area as far as possible

[38] Based on WDC calculation of distribution of total windfall allowance based on households and manual count of number of dwellings in the built-up area of Horam in 2025.
[39] From WLP Reg 19 Figure 9

- The location of development will put less pressure on the existing transport network
- The reduced scale of development in Horam will result in less impact upon the character of the area

In relation to the identified 'uncertain and 'negative' impacts (at section 9.4 and 9.5 of the SA Part 1), HPC would comment that:

- there is insufficient headroom at a significant number of Wastewater Treatment Works, (*notably at Vines Cross, serving Horam*)
- As stated, development will still have an impact on the open countryside and rural character of the area, including the setting of the South Downs National Park and High Weald National Landscape, but HPC shows in its landscape evidence in relation to the Allocation Policy HOR4 that a reduced scale of development notably reduces the impacts
- Horam's strategic site is not near a railway station and may encourage use of the private vehicle
- A recent Parish Housing Needs Survey[40] showed a very limited need for affordable housing due to capacity for relets of existing stock.
- The supposition that a decrease in development could have a negative impact upon the vitality and viability of existing villages and centres as new facilities and services is unlikely, as there are currently hardly any empty units, there are already significant outstanding commitments, and the village centre suffers from parking congestion
- The suggestion that a somewhat reduced scale of development is unlikely to provide the necessary growth to support new infrastructure or have a negative impact upon the viability of proposals, particularly the strategic sites, is not evidenced
- In terms of the 'Community' Objective, the main issue of loss of rural village identity and character is not mentioned, but would be very important locally.

The Non-technical Summary of the Reg 19 SA states, at paragraph N.70:

> *'The quantum of development in Horam (750 homes) has not been reduced in this option. Concern was raised by some respondents that the amount of development proposed in a Tier 3 Primary Village was inappropriate. However, Horam is the only Primary Village, which is relatively unconstrained and does not have transport congestion issues, unlike the other primary villages. Providing development in Horam therefore enables a reduction in development pressure on other lower tier settlements, which are less suitable for large scale proposals, whilst providing for housing need and necessary supporting infrastructure.'*

This explanation for pursuing the huge scale of growth of Horam is flawed in that:

[40] https://wealdengov-b994c1bb48cf487f1616-endpoint.azureedge.net/blobwealdengov-staging/UploadedFiles/Horam-Neighbourhood-Plan-Housing-Needs-Assessment-1.pdf

1) Horam itself is a medium-sized village, more akin to Tier 4 villages in terms of the level of services and accessibility (which provide the basis of the settlement hierarchy).[41]

2) Promoting major development at Horam on the basis that it "*enables a reduction in development pressures on lower tier settlements*" completely overlooks the question of the sustainability of such massive growth, wholly out of scale with, and hugely impactful on, the rural character of Horam.

3) While Horam is not within the High Weald National Landscape, it is within the High Weald Landscape Character Area, and has many of the same landscape characteristics and features, which are shown to be sensitive to development, especially of a significant scale.[42]

4) The village does suffer congestion at the key junctions along the A267 through the village – which will be exacerbated by the proposed level of future development.[43]

Given the above, it is strongly contended that a lesser (and sustainable) growth at Horam should not only have been clearly considered through the SA, but that the massive level of growth at Horam is unsustainable and should be rejected in favour of a lesser scale of growth.

Also, insofar as Horam is concerned – and while fully appreciating the need to "leave no stone unturned" in seeking to meet the housing need figure – the scale of growth in Option 1 is found to be more sustainable than the preferred Option 2.

[41] As set out in WLP Reg 18 Table 4 and see separate representation on Table 2 Settlement Hierarchy
[42] See also representation on Site Allocation Policy HOR4
[43] See separate representation on Site Allocation HOR4