

Horam Neighbourhood Plan 2023 – 2040

ESX 359224 and SX 14342

Land Adjacent to Cauldavon, Horebeech Lane, Horam, TN21 9EA

Proposed Local Green Space Designation – ESX 359224 and SX 14342

By way of context, my family have lived, worked and farmed in and around the village of Horam for over six generations and when I first heard talk of a Neighbourhood Plan, I thought this represented an excellent opportunity for the local community to direct future development and create an environment for the sustainable growth of the village to meet local needs whilst preserving and enhancing important elements.

Unfortunately, the process seems to have become distracted by other objectives, namely finding ways to stifle any development whatsoever in and around the village using any means possible.

I received letters on the 10th March 2023 and 2nd June 2023 in relation to our home and the proposed designation of our property as a local green space which is of particular importance to the local community.

After the first letter I wrote to the Clerk of the Parish Council within the timeframe requested, and explained that I did not understand how our land met the criteria set out for Local Green Space.

I also highlighted that the description of the land as “field between laundry Lane and recent Rosemead Development...” was inaccurate in that the land the Steering Group had identified comprises three fields (one of which is not within our ownership) together with stables, a track and buildings used for agricultural and equestrian purposes and a wider yard area used for vehicle parking, equipment, machinery and timber storage.

I ended my response by explaining that I would like to hear from the Steering Group in terms of their justification for this proposal which seemed more relevant to country parks, recreation grounds and sports pitches and asked for details of how my views will translate into amendments to the draft plan.

Several weeks later I received a response from the Clerk apologising for the delay but ignoring the questions I had asked... and simply saying they had been passed on...

There has still been no explanation from the Steering Group of the justification of how my views and those of others were being taken into account. I thought that this was the entire point of consultation and engagement and that the Steering Group were to be accountable?

Despite not hearing anything further, I attended the first exhibition in the Village Hall on the 20th May 2023 to inspect the draft plan.

On arrival, the person manning the reception desk passed me a Regulation 14 Feedback Form and informed me that..... ***“if I didn’t want them to concrete over the whole village and surrounding area I needed to circle all of the number 1’s on the form and return it”...*** Assuming that this was the standard greeting all visitors received, I do not feel that this has produced a representative sample of the opinions of the community.

In light of the above, I object to the biased approach that has been taken in preparing the Neighbourhood Plan and lack of meaningful communication from the Steering Group.

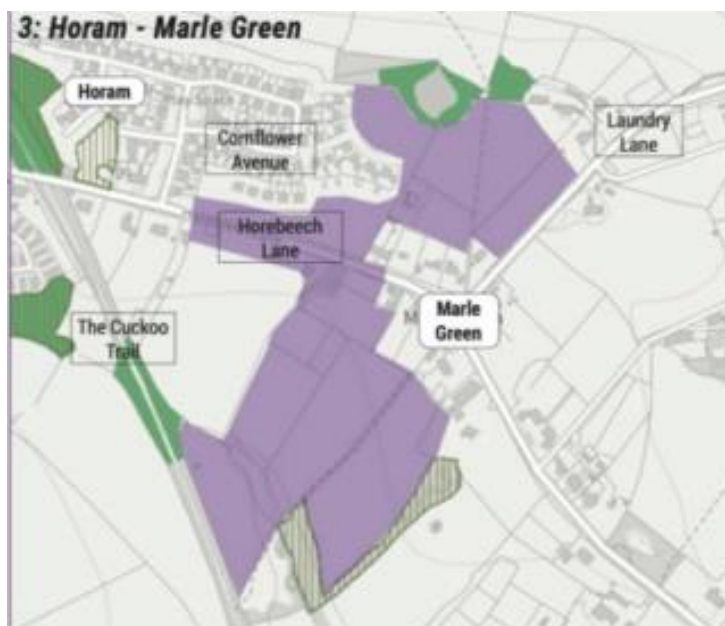
In respect of the Regulation 16 Consultation, I would comment as follows:

Policy HCD2 – Local Settlement Gaps – Horam – Marle Green

Our property is included as part of a local settlement gap policy between Horam and Marle Green.

The boundaries of Horam and Marle Green are not identified in the draft plan (although in the current draft Wealden District Council local plan the development boundary includes all land west of Laundry Lane).

Despite the aims of the Draft Wealden Local Plan, the intention is to apply a settlement gap as detailed below:



This suggestion is wrong for two reasons:

Firstly, because following construction of the Rosemead Farm Development immediately to the west, there is now continuous uninterrupted residential development from Horam High Street all the way along Horebeech Lane to the junction with Laundry Lane. There is no logic whatsoever in identifying three fields which are not visible from the road as a local settlement gap when historically, Laundry Lane forms a natural end to the village of Horam.

As proposed, the settlement gap is less than 10 metres wide at its narrowest point between a house in Horam and one in Marle Green... this is illogical and does not help create a clear identity for the settlements.

I would also query if a stables, yard and buildings, which are in private ownership with no public access other than a public footpath, is an appropriate 'Settlement Gap' or if the real reason for this suggestion is to stifle residential development on a site which only recently received Planning Officer Recommendation for residential development.

The second reason that the above suggested 'Settlement Gap' is inappropriate is because the area identified as 'Marle Green' is not Marle Green.

The hamlet of Marle Green is clearly marked on the 1921 Ordnance Survey Map which is copied below and included in the Neighbourhood Plan itself.

Marle Green is clearly shown as being a significant distance to the South West of the location that the 'Steering Group' have now decided it is located.



Figure 2: Ordnance Survey map, 1921. Source: <https://maps.nls.uk/os/> OS one-inch map series, England and Wales, 1919-1926

Location the 'Steering Group' feel is now Marle Green

I have no idea where the view of the 'Steering Group' has come from, Marle Green has always locally been considered to be some distance to the south, a view which is supported by the Local Heritage Assets Report produced which includes at Figure 4 a Map of Sussex from 1778, which clearly identifies Marle Green as being some distance to the South. This is repeated on a number of subsequent Maps.

The 'Steering Group' have included a number of tilted and misleading photographs in the Background Paper on Separate Identities to support their assertions but the fact remains that there are continuous houses from Laundry Lane to Horam High Street... there is no gap in the location they suggest and the majority of Horam and Marle Green Residents would view all properties west of Laundry Lane to be in Horam (as per our postal addresses).

In relation to the Parish Council's consultation statement, I feel that the responses to the earlier consultation are misleading:

- Firstly, the response states: *"Of those who responded to the survey, 87% strongly agreed with the policy and 9% agreed. The remainder neither agreed nor disagreed. Nobody responding to the survey said they disagreed with the policy."*

This is misleading as a number of responses (including our own) clearly objected.

- Secondly, this is how they respond to our comments: *“One of the landowners whose property lies within the proposed Horam and Marle Green settlement gap objects to this, noting that the gap is narrow at points, as a result of residential development along the main road, and that fields which are not visible from the main road should not therefore form part of a gap that is not experienced as such. A similar objection to this proposed settlement gap is also made by Strutt & Parker on behalf of Welbeck Strategic Land.”*

They go on to say *“HPC notes that WDC has also commented upon this policy and amendments are proposed based upon that. Please see Section 4 for more information.”*

Section 4 relates to WDC comments received. In respect of local gaps it notes that although WDC questioned the need for the policy and noted there was no ‘hook’ for the NP policy to attach, HPC doesn’t agree.

As far as I can see, there is no change to the Local Gaps policy between the Reg 14 plan and the proposed submission version, despite the note that amendments are proposed.

Policy HCD 4, Important Local Views

Our property is identified as forming part of an ‘Important Local View’ (number 12 in Table 1), although the justification as to why is unclear.

Views to the north from our property are dominated by the existing tree line on the boundary a short distance away, as well as the adjacent commercial buildings, workshops, residential property, etc. to the north east at Cauldebec and The Isles. To the west, the views are only of the new Rosemead development over the hedge.

The photograph below shows the commercial buildings to the north of the land



The photograph below taken from the footpath shows the Rosemead development.



There is no inter-visibility between the site and the edges of the AONB to the north as the trees on the boundary prevent this. The view is not considered significant or important enough to be protected by local planning policy.

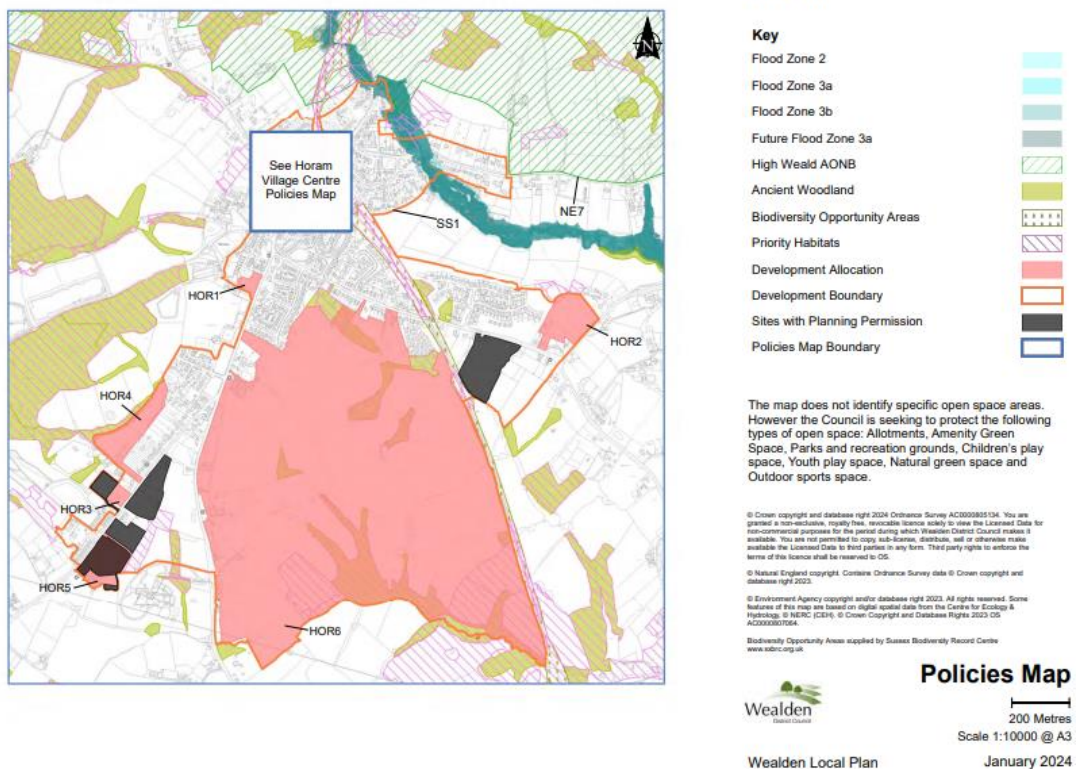
There are no 'Important Views' from the land as can be seen above.

Policy HCE 4 Local Green Space Designation

In the same way that objections to the Local Settlement Gaps were ignored by the 'Steering Group', this has essentially again been the case in respect of our earlier objections raised in relation to Policy HCE4, where they have been disregarded.

In addition, Wealden District Council identified the land for residential development in their January 2024 Draft Local Plan which is currently being progressed, and the Wealden District Council Planning Team specifically recommended that the Local Green Space designation was not appropriate to this site... this has been ignored by the 'Steering Group'.

Wealden District council have also recommended the site as suitable for residential development in a recent Outline Planning Application for 46 Houses.... Please see the extract from the current Draft Local Plan identifying the site as HOR2 and showing the new settlement boundary in red below:



Our land is also identified as proposed Local Green Space (site reference 27 - described as “field between laundry Lane and recent Rosemead Place development, crossed by footpath 11”)

On several occasions, I have explained to the Steering Group that the description is inaccurate and misleading. The land which has been identified comprises an equestrian stables, yard and track which were built with planning consent and which in association with other buildings on site and a larger yard area are used for the storage of domestic and agricultural equipment, caravans, trailers and even a boat... The land is split into three parcels one of which we do not own.... Whilst it is many things, the land identified is definitely not “a field” as it has been described, it is far more urban in nature and intensive in use than this suggests.... But this description does not support the biased approach which has been taken.

The imposition of this designation will likely result in greater public access, trespass and even more of our sheep being killed.

This 4 acre block of land is the only parcel that we own (we rent a number of other small parcels of land locally in association with our sheep business), the designation has a real risk of taking us to a point which is unmanageable, and essentially putting us out of business.

I have looked at the NPPF requirements for this designation and there seem to be a number of areas where the situation on the ground does not appear to meet the requirements:

a) Proximity to the Community it serves;

Whilst the land is adjacent to Rosemead Place, and is crossed by a footpath, other than this, it does not serve the community. We have had a number of incidents of trespass and

vandalism, and in addition to this, a number of incidents of dogs being allowed to chase, attack and kill our sheep. This is not an area of land that 'serves' a community. With the public viewing the designation the same as the local recreation ground, the likelihood of these incidents will increase.

b) Demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquility or richness of its wildlife:

The land is not special to the Community, and never has been, the footpath is used by a modest number of dog walkers and ramblers (largely as the preference is to use the Cuckoo Trail which is surfaced and more convenient).

There is no Local Significance of the land, other than to us as a family trying to earn a living whilst being subject to many challenges arising as a result of the footpath.

It is not beautiful, although we try to keep the area tidy, the buildings, equipment, vehicles and other items which are stored on the land mean this description is inappropriate, there are houses and gardens on three sides of the land, and a road on the other. It is not possible to see beyond the boundaries, other than to the adjacent residential development.

It has no historic significance other than as an equestrian yard / smallholding. Horam emerged as a village around the railway and there is little by way of historical significance nearby.

The only recreational value is the footpath, which is in itself already protected, and brings with it dog faeces which mean we cannot use the land for making hay (as the worms from the dog faeces cause the sheep to abort their lambs). My concern is that with a new designation, the public will see this as more of a playing field and place to picnic and we will suffer even more issues.... If we can continue at all.

The site is not tranquil, we operate our farming business from there and because it is adjacent to so many back gardens, there is constant noise. It is in an urban setting now.

The site is used by us intensively, and includes buildings and a yard, the land is improved pasture and there is no richness of wildlife.

c) Local in character and not an extensive tract of land

In terms of character, the Site is not typical of local agricultural land and its appearance is a result of the predominant land use which is currently paddocks associated with the stables and yard which are on the land. Its character is small scale equestrian / smallholding... not typical of the locality.

I attach a photograph of the land below taken from the footpath, this is not special, beautiful, historic, tranquil, or rich in wildlife, it is not locally typical.



In summary, the character of the site can be described as three small, isolated paddocks, a yard track and buildings surrounded by adjacent residential properties, a road, and a small cluster of woodland to the north. There is nothing demonstrably special about the site in landscape character terms and other than residential properties, there are no views into or out of the site.

I hope that for the reasons detailed above, our objection will be treated seriously and considered as the draft plan moves to the next stage.

Yours sincerely

Anthony and Camilla Field