

HPC RESPONSE TO HNP EXAMINER, 17TH APRIL 2024

Document 3: Horam Parish Council responses to specific representors comments on the submitted HNP

This document contains, on separate sheets, HPC's responses to representations made by the following parties:

Section 1 - East Sussex County Council
Section 2 - High Weald National Landscape
Section 3 - Welbeck Strategic Land
Section 4 – Mr Field
Section 5 - DL and G Blackden
Section 6 - Gladman

NB The Examiner requested responses to respondents identified in Sections 1, 2, 3 and 5, while HPC has also included the other respondents, Mr Field and Gladman, as these also have made representations in respect of similar land interests.

[Notes:

- The Horam Neighbourhood Plan is referred to throughout as HNP
- The emerging (Reg. 18) Wealden Local Plan is referred to throughout as the Draft WLP.
- When proposing amendments, the standard convention is used, with ~~strike through~~ for deletions and underlining for new text.]

Section 1 - East Sussex County Council

East Sussex County Council (Highways Authority) comment	HPC Response
<p>As previously advised reference should be made to the following County Council transport strategies. These include:-</p> <ul style="list-style-type: none"> • East Sussex Local Transport Plan 3 (LTP3) • East Sussex draft Local Transport Plan 4 (LTP4) 2024 – 2050 • East Sussex Local Cycling & Walking Infrastructure Plan (LCWIP) 2020 - 2030 • East Sussex Bus Service Improvement Plan (BSIP) - 2021 <p>All of these documents have a strong emphasis on supporting sustainable development and the draft LTP4 also specifically refers to the opportunities for supporting the development of connected communities and healthy places. Therefore, to ensure that the NP meets the basic condition of achieving sustainable development and is in alignment with national, regional and County Transport strategy, reference to these documents should be included.</p>	<p>It is noted that LTP3 only covers the period to 2026. LTP4 has recently completed its consultation and ESCC's website states that an updated plan is due to be presented to Full Council in late Spring/Summer 2024.</p> <p>While LTP4 is the more up-to-date document, it would be premature to rely on it. Nevertheless, the HNP's 'Transport and Movement' policies can be seen to align with the Objectives of the Draft LTP4, as shown in Appendix 1 (as was acknowledged by ESCC in its Reg. 14 comments).</p> <p>None of the documents quoted are 'development plan documents' and are among many that, while providing a context for the HNP, do not contain specific references to Horam. Further, ESCC does not suggest any particular places where references should be made; nor are any obvious.</p> <p>Therefore, while appreciating their roles, specific reference to these documents is not considered necessary.</p>
<p>Objective 10 should be updated, and where walking and cycling is referenced in chapter 8, to include reference to wheeling (mobility scooters and wheelchair users): To encourage walking, wheeling, cycling, and public transport services. This will ensure alignment with the most recent national and local strategy in regard to active travel.</p>	<p>HPC is reluctant to amend the overarching Objectives, which are the result of iterative consultations.</p> <p>Notwithstanding this, HPC agrees with providing policy support for wheeling, as part of an overall approach of inclusivity.</p> <p>'Wheeling' is already highlighted in Policy HTM1(2b).</p> <p>For consistency, if the Objective is amended (and possibly anyway), Policy HTM 1(1a) may also need to include a reference to 'wheeling'?</p> <p>On balance, in support of inclusive access, HPC agrees that Objective 10 be amended to read:</p> <p><i><u>"To encourage walking, cycling, all other 'wheeled' modes, (including scooters and wheelchairs), and public transport services."</u></i></p>

<p>Policy HTM2: Active and healthy travel – ESCC is supportive of this policy and the content, however as stated above, please ensure reference is made to the East Sussex LTP4 and LCWIP. Where walking and cycling is referred to it is also suggested that reference is also made to ‘wheeling’ as outlined in paragraph 1.3. This will ensure that it is in alignment with both national and local active travel strategy.</p>	<p>In line with the consideration of Objective 10 above, HPC would support an amendment to Policy HTM2 part 1a to read:</p> <p><i>“Provide walking, wheeling, and cycling routes”</i></p>
<p>Policy HTM3: The Cuckoo Trail – ESCC is supportive of this policy and would emphasise the importance of opportunities to enhance access to this from any new development, as outlined in the East Sussex LCWIP.</p>	<p>Noted</p>
<p>Policy HTM4: Public transport – ESCC is supportive of this policy. However, please ensure reference to the East Sussex LTP4 and BSIP.</p>	<p>Noted. See earlier comments on adding references to ESCC documents.</p>
<p>Traffic Management, p70-72 - Whilst we previously outlined our support to work in partnership to help improve safety for all users. We note references in the plan to aspirations regarding implementing speed limits, HGV restrictions and traffic calming measures. Therefore, it is important that, to ensure conformity with National Guidance and East Sussex Road Safety and Highways Policies, we highlight the following;</p> <ul style="list-style-type: none"> - Restricting HGVs - Our policy (PS 4/5 Control of Heavy Goods Vehicles) in East Sussex sets out that, as few roads in the county are ideally suited for HGV use, it is expected that the “A” and “B” roads in the county should be available to carry heavy lorries thereby allowing them to disperse over the available road network rather than to concentrate them on selected roads. - Speed Limits - Our policy (Local speed limits and 20 zones) is based on National guidance for the setting of local speed limits. <ul style="list-style-type: none"> • Speed limits should be evidence-led, self-explaining and seek to reinforce people's assessment of what is a safe speed to travel. They should encourage self- compliance. 	<p>Noted</p> <p>Noted</p>

<ul style="list-style-type: none"> • Speed limits should be seen by drivers as the maximum rather than a target speed. • Speed limits are only one element of speed management. Local speed limits should not be set in isolation. They should be part of a package with other speed management measures including engineering and road geometry that respect the needs of all road users and raise the driver's awareness of their environment. • The full range of speed management measures should always be considered before a new speed limit is introduced. • The underlying aim should be to achieve a 'safe' distribution of speeds. The key factors that should be considered in any decisions on local speed limits are: <ul style="list-style-type: none"> ▪ history of collisions. ▪ road geometry and engineering. ▪ road function. ▪ Composition of road users. ▪ existing traffic speeds, and ▪ road environment. • In respect to 20mph limits specifically, appropriately set 20 limits need to be self-enforcing. The mean (average) speed of traffic would need to be already at or below 24mph. On roads where mean speeds are higher, appropriate traffic management/calming measures would need to be introduced. This is based on research carried out which shows that by introducing a speed limit by signs alone, speeds are reduced by just under 1mph. - Traffic Management/Calming - All measures must be designed in accordance with current standards, advertised in line with the relevant legislation and will be subject to the road safety audit process. Vertical traffic calming features (speed cushions/raised tables) are not appropriate for A-class roads. 	<p>Noted</p>
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East Sussex County Council (Culture and Tourism) comment	HPC Response
<p>In our Regulation 14 response (Para 3.2) we stated, <i>“Sporting facilities are specifically named, a mention of arts activities would also be welcomed, and the recognition that these usually require an indoor space, so the maintenance of community spaces is key.”</i> However, in the Regulation 16 document, arts activities are still not mentioned. In line with Paragraph 20 of the NPPF and the East Sussex Cultural Strategy we suggest that mention of arts activities is included.</p> <p>Arts activities can require specialist equipment such as dance bars, flexible staging and lighting, access to water/drainage, suitable tables for craft activities and ideally sprung floors. All of these items need specifying in a new build including the necessary storage. Therefore, setting out the principle that arts activities can support community cohesion and health and wellbeing need to be taken into consideration when managing current facilities or commissioning new/replacement community facilities would be advisable.</p>	<p>Noted, but it is considered that opportunities for “arts activities” is embraced within the ‘Community facilities’ policy (HCF1) where it refers to the <i>‘provision of flexible space that can be used for a variety of appropriate community uses’</i>.</p> <p>While recognising the value of arts activities, it is not an issue that has been highlighted in local feedback on the HNP.</p> <p>In conclusion, specific reference is not considered necessary.</p>
East Sussex County Council (Education) comment	HPC Response
<p>The Horam NP does not mention an overall quantum of new housing. We understand that you are yet to receive a definitive or indicative number of dwellings, to be accommodated within the Neighbourhood Plan, from Wealden District Council (WDC). However, the testing for school places forecasting we have undertaken based on WDC’s housing growth options, over the last couple of years, has led us to previously estimate that additional early years and school places would be required.</p> <p>This estimated requirement for additional early years and school places has been based on approximately 1,000 additional new dwellings for Horam Parish.</p> <p>Therefore, as we identified in our Regulation 14 response, it may be prudent for the NP to specifically identify the need for additional school and early years places in line with paragraph 99 of the NPPF.</p>	<p>Noted.</p> <p>However, while the Draft Wealden Local Plan has now been published for consultation, it is considered premature to pre-empt the outcome of the Local Plan process.</p> <p>Notwithstanding this, it is noted that the HNP does not prejudice the overall scale of growth being proposed in the Draft Local Plan.</p>

East Sussex County Council (Infrastructure Provision) comment	HPC Response
Policy HCF3: Infrastructure – ESCC is supportive of this policy in the context that the NP meets the basic condition of achieving sustainable development.	Noted

Section 2 - High Weald National Landscape

High Weald National Landscape Unit Comment	HPC Response
<p>Policy HCD4: Important local views</p> <p>We are concerned that Point 2 of this policy appears written back to front; since it is a policy which sets out to protect locally important views, it would be better worded with the emphasis switched, i.e. “Proposals for development which would have an adverse impact on important local views identified on Figure 13, for example by virtue of the height, massing or obstructive location of buildings, will be not be supported.”</p>	<p>For ease of reference, the submitted HNP policy reads:</p> <p><i>“Proposals for development which would not have an adverse impact on an Important Local View, as identified on Figure 13, by virtue of height or massing for example, will be supported, subject to other development plan policies.”</i></p> <p>The Unit’s comment has two elements: it changes the policy from being positively, to negatively, written; secondly, it adds wording currently in the supporting text – i.e. “<i>obstructive location of buildings</i>” – into the policy.</p> <p>The first change is not accepted. It is considered more appropriate, in line with national policy that plans ‘<i>be prepared positively</i>’, to be written as drafted and convey a positive approach to development.</p> <p>The second change has been considered, but an amendment to the policy that expects proposals to respond positively to the important views in terms of their height, scale, and mass is preferred, as set out in the response to WDC (and to the Examiner).</p>
<p>Policy HCE1: Nature and biodiversity</p> <p>The second sentence of Point 2 appears negatively written with regard to conserving biodiversity and habitats, contradicting the first sentence and appearing to accept certain loss of natural assets as ‘unavoidable’, which should not be the case within the protected landscape of the AONB. Off-site compensatory provision should only ever be a last resort as part of the mitigation hierarchy and is not necessarily appropriate in all circumstances, for example within the AONB, where existing habitats should be conserved and enhanced. We request this second sentence of Point 2 be deleted.</p>	<p>For reference, the second sentence of Point 2 reads:</p> <p><i>‘Development that necessitates the unavoidable loss of natural assets should replace these within the site or, where this is demonstrated not to be practicable, replace them by way of off-site provision within the Parish.’</i></p> <p>While the concern is appreciated, it is considered that the use of “unavoidable” implies that other steps – avoidance of impacts, then mitigation of them – have been already pursued. However,</p>

	<p>for clarity, an amendment to the last sentence of part 2 along the lines of the following would be agreeable:</p> <p><i><u>“Development that necessitates the unavoidable loss of natural assets (having already pursued and exhausted avoidance and mitigation opportunities) should replace these within the site or, where this is demonstrated not to be practicable, replace them by way of off-site provision, within the Parish wherever possible, and with suitable management arrangements in place.”</u></i></p>
<p>Policy HCD3: Waldron Ghyll</p> <p>Point 2 of this policy might be better framed as one of the yellow shaded Project boxes within the NP, since it appears to be more associated with sustainable land management practices and projects, in the same manner as Projects H(ii) (wildflower verges), and H(iv) (Natural Flood Management), for example. We also recommend the reference to biodiversity net gain within the sentence is replaced with the term 'nature recovery' - nature recovery is a more inclusive term, encompassing a range of initiatives, including LNRS, BNG, and farming practices and environmental land management schemes, so it would be the more appropriate term to use in the context of Point 2.</p>	<p>For reference, the second part of the policy in the submitted HNP reads:</p> <p><i>“Measures to mitigate flood risk and enhance its biodiversity and amenity value shall be supported (including opportunities that contribute towards biodiversity net gain and carbon sequestering through supporting natural regeneration of Ghyll woodland and the restoration of wetland areas.”</i></p> <p>This is intended as a land use policy to be applied to development proposals that come forward within the Valley, and not simply a land management project. Therefore, it is appropriate as part of the policy, and its deletion is not accepted.</p> <p>While “nature recovery” may be supported, in the context of this land use plan and the NPPF references to ‘<i>net gains</i>’, BNG is regarded as more appropriate for planning policy than broader matters of farming practices and environmental land management schemes.</p>

Section 3 - Welbeck Strategic Land

Strutt and Parker Comment for Welbeck Strategic Land	HPC Response
<p>Policy HCE 4 – Local Green Space</p> <p><i>Local Green Space and the National Planning Policy Framework</i></p> <p>The Horam Neighbourhood Plan (HNP) proposes to allocate our client's site as a Local Green Space (LGS). The land is Site o) in Policy HCE4 and referred to as "Field east of Rosemead Place, north of Marle Green, crossed by footpath 11".</p> <p>There are two fundamental reasons why this proposed allocation would result in the plan not meeting the basic conditions.</p> <p>1. Contrary to principles of delivering Sustainable Development</p> <p>Paragraph 105 of the National Planning Policy Framework (NPPF) states that "<i>Designating land as Local Green Space should be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services.</i>"</p> <p>Wealden District Council has recently published its Regulation 18 consultation draft Local Plan. Our client's site is a proposed allocation in the emerging plan for 45 residential dwellings. The Site is one of five housing allocations in Horam which would together deliver some 847 dwellings over the emerging local plan period. Notably WDC will also be undertaking a sperate call for sites exercise during the Regulation 18 consultation period. This is because the Plan as presented at Regulation 18 stage does not meet WDC's housing target as calculated using the government's standard methodology. This fact is noted in the report to the Wealden Local Plan sub-committee on 29th January 2024 by Wealden's head of planning policy.</p> <p>Furthermore, WDC development management officers recommended approval be given on an outline planning application at the site for up to 46 dwellings in June 2023. This was refused by</p>	<p>It is believed that proposal meets the NPPF requirements.</p> <p>Firstly, it should be made clear that this field is proposed as a LGS because it is highly valued locally as a key part of the countryside setting of this part of Horam and of Marle Green, is rural in character and, despite being close to new development, generates a feeling of tranquillity, this being enhanced by its elevated position and resultant outward views, notably across the High Weald National Landscape to the north.</p> <p>Of course, a consequence of LGS designation is to restrict development, but for above reasons (and other factors) it is the strong view of HPC, as well as the overwhelming view of the local community (as evidenced by the overwhelming support for the LGS designations through the HNP consultations - see Consultation Statements) that development here would NOT amount to sustainable development.</p> <p>It is appreciated that WDC officers have recommended approval of development here and are pursuing this position through the emerging Local Plan. However, it was clear from</p>

<p>planning committee members (on landscape grounds) against the recommendation of officers. The application is currently at appeal with a hearing scheduled for 5th March 2024.</p> <p>Our client's site is part of the emerging strategic housing policy for Wealden District. The Council's professional planning officers have considered it suitable for development as evidenced by the recommendation for approval and the proposed allocation for housing. Wealden is an authority with an historic housing land supply shortage, and this is further evidenced by its additional call for sites exercise to deliver more land which can help meet the demand for homes in the district.</p> <p>A local green space designation would effectively sterilise this land and adversely impact the delivery of sustainable development within Wealden District which is contrary to both basic conditions d) and e).</p>	<p>the presentation at Committee that this was a marginal "call" (see Committee webcast). Furthermore, it was clear from the report (and the more recent SHELAA) that officers have not taken into account the role of the field in preventing coalescence or the importance attached to it by the local community.</p> <p>Of course, the merits of development will be considered by the Planning Inspectorate imminently. If a decision on the appeal is published ahead of the Examiner's report, then HPC will review the situation accordingly.</p> <p>Furthermore, the inclusion of this LGS would not bring the HNP out of "<i>general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area).</i>"</p> <p>Having regard to the factors set out in the PPG (<u>Paragraph: 074 Reference ID: 41-074-20140306</u>), this because:</p> <ul style="list-style-type: none"> a) The HNP policy for LGSs, and for this site, upholds existing strategic objectives and policies, namely: <ul style="list-style-type: none"> i. Core Strategy Objective SPO3, which sets out that "<i>The majority of new housing will be accommodated within, or as sustainable extensions to, existing towns, while allowing for limited growth within those villages capable of accommodating development in a sustainable fashion.</i>". While actual housing targets may be out of date, there has been, and is further scope for, limited development at Horam without this site; nor is this site nor any part of Horam a strategic development area identified under Policy WCS4. ii. It aligns with the retention and enhancement of a green infrastructure network (under Policy WCS13). iii. It is supported by Saved (generic) Local Plan policies EN2 and EN8, relating to maintenance of the
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	<p>settlement pattern and of the landscape character of the Low Weald respectively.</p> <p>b) Not only does the proposed LGS allocation not conflict with these adopted strategic policies (to which the basic conditions relate), but there is only a marginal conflict with the emerging Wealden Local Plan, given the modest size of the site and, in any event, this new Plan has not even been consulted upon under Regulation 18 and carries no weight at present.</p> <p>c) The identification of LGS via a neighbourhood plan <i>“provides an additional level of detail and/or a distinct local approach to that set out in the strategic policy without undermining that policy”</i>, as required by the PPG.</p> <p>d) The HNP and its supporting LGS Background Paper provides the rationale for the approach and the evidence to justify that approach, as required.</p>
<p>2. Does not meet the tests for designation</p> <p>Paragraph 106 of the NPPF states <i>“The Local Green Space designation should only be used where the green space is: a) in reasonably close proximity to the community it serves; 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), tranquillity or richness of its wildlife; and c) local in character and is not an extensive tract of land”</i> [our emphasis].</p> <p>The tests set out in Paragraph 106 in respect of LGS designation are necessarily difficult to pass. This is because a LGS designation affords the land the same level of protection as Green Belt. Our previous consultation response included our assessment of the site against the NPPF tests. We have updated this assessment following the continued proposed LGS designation in the Regulation 16 Neighbourhood Plan.</p>	<p>Noted. Responses to comments relating to the specific tests are shown in the following boxes.</p>

<p>Test 1 - Paragraph 106 (a) - Reasonably Close Proximity To The Community It Serves</p> <p>The site abuts the eastern boundary of the adjacent Rosemead Place development. There is no current direct access, though this is proposed through the development scheme currently at Appeal. A public right of way runs through the site for a distance of approximately 170 metres, providing a route to Vines Cross Road some 500 metres to the north. The site is in private ownership and although crossed by the narrow right of way, is not accessible to the public (see further comments later in this representation on recreational value).</p> <p>The site is not a parcel of land which ‘serves’ the community in any meaningful way.</p>	<p>The comment opposite does not relate to this actual LGS test.</p> <p>There can be no doubt that it is “<i>reasonably close proximity to the community it serves</i>”. Indeed, the objector’s argument for housing on the site is that it adjacent to the built-up area of Horam! Moreover, the sheer weight of support for this designation by local people who cite its value to them bears witness to its accessibility.</p> <p>It is, of course, appreciated that the only public access is along the public right of way that runs south-north, roughly bisecting the site. However, the PPG (<u>Paragraph: 017 Reference ID: 37-017-20140306</u>) states that “... <i>land could be considered for designation even if there is no public access (eg green areas which are valued because of their wildlife, historic significance and/or beauty).</i>”</p> <p>In this case, it is the combination of its visual amenity of the land (beauty), the public access through it, and the contribution it makes to the historic landscape setting of the settlements, that justifies its LGS designation.</p>
<p>Test 2 - Paragraph 106 (b) - Demonstrably Special</p> <p>Paragraph 106 of the NPPF states that, for a site to be designated as LGS, it must be ‘demonstrably special’ to the local community and hold a particular significance, for example because of its beauty, historic significance, tranquillity or richness in wildlife. We take each of these in turn:</p>	<p>Noted. Responses to comments relating to the specified examples of a site being ‘demonstrably special’ are shown in the following boxes.</p>
<p>Beauty</p> <p>The site is not referred to in any local character assessment undertaken by Wealden District Council as part of its local plan</p>	<p>The Landscape and Visual Impact Assessment (LVIA) prepared by David Marlow in his comments on an application for 46 dwellings on the site reviews all the relevant Landscape Character Assessments (LCAs) and</p>

<p>making process. Further, there are no historic references to it as a valued local space.</p> <p>The site itself is an area of grass divided up into paddocks, containing a stables, yard area and track following the grant of planning consent for equestrian facilities a number of years ago. These buildings are not attractive, and the yard area is used by the owner for open storage of equipment used to maintain the land.</p> <p>Additionally, the site is experienced in the context of the Rosemead Place development to its western boundary (which dominates the view to this direction), the existing residential</p>	<p>sets out (at paragraph 64) how the distinctive features of the relevant Landscape Character Areas relate to the site, namely:</p> <ul style="list-style-type: none"> ✓ The small pastoral field that comprises the application land is typical of the National Character Area and of the Local Character Area definitions within which it falls. ✓ Its enclosure by thick hedgerows and small woodlands and ponds is also characteristic of the defining character of the High Weald NCA and South Slopes of the High Weald LCA. ✓ It relates closely to Laundry Lane, which is an historic routeway. ✓ The fact that the field itself is traversed by a Public Right of Way, with links to farmsteads and settlements, can be seen as part of the historical pattern of small-scale agriculture, being often connected by routeways, tracks and paths. ✓ Its elevated position above the valley of a gill of the River Cuckmere is part of the local sense of place. ✓ It is one of the few locations in the parish where there are “<i>long open views to the South Downs and landmark church towers</i>”, which is a characteristic contrast with the more enclosed character. ✓ It is part of a local landscape that is akin to that of the High Weald AONB and forms part of its setting, with intervisibility between it and the AONB. ✓ It contributes to the separation of rural villages and hamlets (in this case Horam and Marle Green) as part of the dispersed settlement pattern. ✓ The land has the perceptual qualities of a sense of tranquillity. <p>His conclusion that the application land contributes positively to local landscape character, with qualities recognised in the respective LCAs, and to the setting to the High Weald AONB, a little to the north, is agreed.</p> <p>The existing stables and associated yard occupy only a small corner of the site, are not untypical of rural fringe locations and do not detract from the general openness and countryside character of the field.</p>
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houses to the south and the highway network (Laundry Lane) to the east. The northern boundary is defined by woodland through which runs the public footpath. This description was agreed with Wealden District Council as part of the Statement of Common Ground which accompanied the appeal submission.

The site is therefore largely detached from the wider landscape and does not offer any valued views. Tellingly, the Wealden Local Landscape Character Area study classifies the site as being part of a landscape with 'medium' value. This does not pass the 'demonstrably special' test set out in the NPPF.

The Horam LGS assessment paper suggests that the beauty of the site is derived from it being "*pastureland integral to the High Weald landscape character of the area, bounded by a historic routeway, and with views across the High Weald AONB to the north and to the South Downs southwards.*"

Views into and out of the site are limited (as noted earlier) by the existing boundary features, the majority of which are residential and urban in character. The historic routeway referred to is a tarmacked road used frequently by traffic. These characteristics do not mean that the site is 'beautiful' by any definition.

While WDC agreed that "*the Site is experienced in the context of the Rosemead Place development on its western boundary*", it did not say that Rosemead Place "dominates" the view to the west, as stated. This is fair. However, rather than diminish the case for its retention as local green space, it is considered to reinforce it, as it would retain the rural setting for the development.

The HNP '[Important Views Background Paper](#)' identifies several important public views in and over the High Weald AONB (being Views 3,11,12 17 and 23) to which the open countryside character of the field contributes. These are carried forward into the Submission HNP (in Policy HCD4), which has received wide support in consultations, as set out in the [Consultation Statement Volume 5a](#) at page 9.

While the recent Wealden 'Strategic Landscape Sensitivity Assessment, November 2023 identifies the Horam fringes as a whole as having '*moderate*' sensitivity to small scale residential housing, it goes on (on page 363) to consider this site, which it assesses as '***Moderate to higher sensitivity***' – the second highest on a 5-point scale.

Furthermore, this assessment does not consider the potential for coalescence of Horam and Marle Green, which is regarded as further increasing its landscape sensitivity. Neither does it factor in the value of the land as open countryside to the local community.

It can be seen that not only is the '*Moderate to higher sensitivity*' rating in the Wealden landscape assessment (which is higher than the average for the village and higher than several other SHELAA sites around Horam), it is consistent with the HPC view that development here would be harmful in landscape terms - which would be further exacerbated by the harm to settlement identities and local amenities.

	<p>As stated in response to comments under 'Test 1' above, it is the combination of its visual amenity of the land (beauty), the public access through it, and the contribution it makes to the historic landscape setting of the settlements, that justifies its LGS designation.</p>
<p>Historic Significance</p> <p>The site does not contain any historic buildings, heritage assets or historic landscape features. Furthermore, the site does not have any relationship with any recorded historic events.</p> <p>The Parish Council's green space assessment makes reference to the site being part of an "historic landscape pattern". The site may be a remnant of an earlier and wider agricultural landscape, but this is not unique in either Wealden or Horam. This does not meet the test of historical significance.</p>	<p>The High Weald is an historic landscape (Quote MP) and the elements that make it up are set out in the various LCAs, the applicability of which to the site is set out in response to comments relating to 'Beauty' above.</p> <p>The approved <u>High Weald AONB Management Plan</u> highlights, on page 14, that "<i>The Plan may be applied to the designated area and its 'setting', especially where the setting falls within the High Weald National Character Area</i>", which this locality is (see HNP Landscape Character Background Paper), while its 'Statement of Significance (on page 23) identifies "<i>five defining components of character</i>", one of which is "<i>Field and Heath – small, irregular and productive fields, bounded by hedgerows and woods, and typically used for livestock grazing; with distinctive zones of lowland heaths, and inned river valleys.</i>"</p> <p>Also, to refer to the field as a "remnant" of an earlier agricultural landscape fails to acknowledge that it adjoins similarly tree and hedge fringed fields to the north, with ponds (themselves likely to be the result of former iron ore workings) between them and, hence, are seen as part of a wider historic landscape pattern.</p> <p>While 'historic significance' is not the primary significance of this land, as stated in response to comments under 'Test 1' above, it is the combination of its visual amenity of the land (beauty), the public access through it, together with the</p>

	contribution it makes to the historic landscape setting of the settlements, that justifies its LGS designation.
<p>Tranquillity</p> <p>The site is immediately adjacent to a housing development of 123 dwellings. Housing is also located to the south on Horebeech Lane and to the east and northeast on Laundry Lane. Passing traffic noise can be heard from within the site.</p> <p>The site is not clearly visible from outside its boundaries given the adjacent residential development and hedgerow planting to the boundary with Laundry Lane. Users of the footpath experience the site in the context of Rosemead Place to the west and the houses on Horebeech Lane to the south. Furthermore, the site is not identified on any map which identifies areas of tranquillity. The Site is demonstrably not tranquil and therefore this test has not been passed.</p>	<p>It is, of course, accepted that the field is not remote, but it nonetheless provides a real sense of tranquillity, especially for walkers along the public footpath, at a clear remove from the urban area. Its elevation and distant views contribute to this feeling, as does it being a continuation of a PROW through fields on the valley side to the north.</p> <p>There is only very limited and occasional background noise, which is not at all intrusive or diminishes the sense of the land being a tranquil haven. In fact, its tranquillity has been commented on by many local residents in making comments on the development of this land.</p>
<p>Richness of Wildlife</p> <p>The Neighbourhood Plan LGS assessment document states the site has “<i>Amphibians and reptiles associated with adjacent ponds.</i>” It presents no evidence to support this statement.</p> <p>Ecological survey work undertaken at the site by our client demonstrates the site is “<i>dominated by short-grazed species- poor semi-improved grassland which is of limited value to Great Crested Newt due to its relatively uniform nature, management regime and lack of hibernation / refuge features.</i>” Indeed, the ecological survey work undertaken at the site shows no evidence that the site contains “<i>a richness of wildlife</i>” to any extent that could suggest the NPPF test on this matter could be met.</p>	<p>The land is not put forward as a LGS for wildlife reasons. However, for transparency, a report commissioned from the Sussex Biodiversity Record Centre advised of records of Great Crested Newt, Smooth Newt, Palmate Newt and Common Frog associated with the pond immediately adjoining the field to the north-west (listed as P2 in the report below).</p> <p>More recently, the Ecological Report accompanying the most recent planning application (Ref WD/2022/1694/MAO) for housing on the site to states that “<i>A medium population of Great Crested Newt was recorded during the survey of ponds P2 and P10. This population is considered to be of importance at the local level. Furthermore, due to the close proximity of pond P3 (unable to be surveyed) to pond P2 and habitat connectivity, it is considered likely that pond P3 supports Great Crested Newt. In addition to this, although no breeding activity was recorded within pond P2, due to the</i></p>

	<p><i>number of Great Crested Newts recorded, it is considered likely that this pond represents a Great Crested Newt breeding pond despite no breeding activity being recorded during the survey work undertaken.” (paragraph 5.8.6)</i></p> <p>Paragraph 5.8.8 further advises that <i>“The proposals have the potential to affect the local Great Crested Newt population due to the partial destruction of suitable terrestrial habitat (H2 removals) within 50m of a breeding pond (representing the removal of approximately 16% of the area within 50m of ponds P2 and P3). Accordingly, based on the relevant guidance, the proposals could have a medium scale impact on the Great Crested Newt population”.</i></p> <p>The HNP LGS statement that the land forms part of the terrestrial habitat for amphibians is therefore regarded as accurate.</p>
<p><i>Recreational Value</i></p> <p>The site is in private ownership with no public access to the land itself except for the narrow public right of way which crosses from southeast to north west. The site owner experiences multiple counts of trespass every week by users of the public right of way (dogs being let of leads, for example have resulted in a number of incidents of livestock being attacked and killed). This unlawful entry of the site cannot be considered amounting to “recreational value”.</p> <p><i>Test 3 - Paragraph 106 (c) - Local in character and not an extensive tract of land</i></p>	<p>It is agreed that the recreational value relates only to the (popular) use of the public footpath crossing the land.</p> <p>Support is provided by the NPPF paragraph 104, which states: <i>“Planning policies and decisions should protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users, for example by adding links to existing rights of way networks including National Trails.”</i></p> <p>It is clear to HPC that this is important in providing an appreciation of the rural setting of Horam, as well as access to it.</p> <p>The land is clearly not an extensive tract of land.</p>

<p>The site is not an extensive tract of land. In terms of character, the Site is not typical of nearby agricultural land given its recent predominant mix of equestrian use and sheep grazing. The paddocks, stables and yard, together with the residential land use along the boundaries provide an urban edge character. The site is characterised by the three small, isolated paddocks, a yard, track and buildings forming the equestrian use and the highly visible and prominent adjacent residential properties and development. There is nothing demonstrably special about the site in landscape character terms.</p>	<p>While the NPPF reference to “local in character” is understood to similarly relate to scale, it is nonetheless very evident from the landscape evaluation referred to above and the substantial support for its retention by local people, that it meets a wider interpretation of being ‘local in character’ as well.</p>
<p>Summary</p> <p>The site does not meet any of the tests for LGS designation. The Neighbourhood Plan cannot be Made if this proposed allocation remains given it is severely at odds with the Paragraphs 105 and 106 of the NPPF and does not therefore contribute to achieving sustainable development. This means its continued inclusion is contrary to Basic Condition d).</p> <p>Further, the site’s proposed allocation in the Wealden Local Plan demonstrates that a LGS allocation would not be in general conformity with the emerging strategic policies for the area. Indeed, we note that WDC’s own response to the Regulation 14 Neighbourhood Plan consultation states that <i>“This site has been put forward within the SHELAA process under reference 830/3030 and at a high level was found suitable for residential development within the 2019 SHELAA assessment.”</i> Furthermore, <i>“the Council does not agree with the assessment in terms designating the site as a LGS, given its agricultural nature and its proximity to the Poppy Drive development to the west that is largely constructed. It was advised that this LGS should not come forward within the Regulation 14 version of the NDP and this continues to be the advice moving forward.”</i></p> <p>Horam Parish Council are therefore aware of WDC’s position that the site is a part of its strategic policies for delivering housing in the District. Its continued inclusion in the Neighbourhood Plan would</p>	<p>It is demonstrated above, and in the HNP papers, that the proposal for this land being identified as a LGS meets the NPPF tests and, as set out above is consistent with achieving sustainable development of Horam.</p> <p>There is no requirement for ‘<i>general conformity</i>’ with emerging policies, but in any event, this land is not a strategic proposal in the emerging Wealden Local Plan; hence, as set out above in response to the Comment 1 above on achieving sustainable development, this LGS allocation would NOT result in the HNP being out of general conformity.</p>

<p>not be in general conformity with the strategic policies for the area and therefore would offend basic condition e).</p>	
<p>Policy HCD2 – Local Settlement Gaps</p> <p>The site continues to be included as part of a local settlement gap policy between Horam and Marle Green. We have previously raised objections to its inclusion in such a policy. However, the Neighbourhood Plan ‘Summary of Regulation 14 Consultation’ document gives no indication as to what regard these comments were given by the Parish Council.</p> <p>The continued inclusion of the site as part of a Local Settlement Gaps Policy would result in the failure of the Neighbourhood Plan to meet the Basic Conditions, with specific reference to Criteria d) and e).</p>	<p>All comments made at Reg 14 have been considered. The main points made were regarded as essentially covered by the Background Paper, and in responses WDC, where similar points were made.</p> <p>This is not agreed. A full reasoning is set out in the response to comments by WDC on the inclusion of the ‘local settlement gaps’ policy.</p>
<p>d) Contributing to Sustainable Development</p> <p>Settlement gap policies are intended to prevent settlement coalescence. However, there is no defined boundary between Horam and Marle Green. Indeed, local residents have differing opinions as to where Horam ends, and Marle Green begins. This is clearly evidenced in the emerging Wealden Local Plan which includes much of the proposed ‘gap’ within the Horam settlement boundary.</p> <p>Furthermore, our client’s Site is not experienced as a gap between settlements. As noted earlier in this representation, the Site is largely detached from the wider landscape given the adjacent residential development to the west, south and northeast, and the hedge and trees to the eastern and northern boundaries.</p> <p>Nevertheless, even if the Neighbourhood Plan’s assertions as to the location of Horam and Marle Green is taken at face value, the existing ‘gap’ between the built form of Rosemead Place and the western most house on Horebeech Lane from the junction with Laundry Lane is approximately 43 metres – less than the width of a</p>	<p>There appears to be fairly universal consensus on the extent of Horam and Marle Green (excepting the landowner) in this vicinity. Appendix 2 below provides evidence to support the HNP position.</p> <p>It is agreed that the Gap is now minimal, but it is still perceived as such, and valued locally. Moreover, this makes all remaining intervening open land critically important.</p> <p>There are well-understood extents of Horam and Marle Green. (See Appendix A) It is agreed that the gap between the built-up area of Rosemead Place and nearby frontage properties at Marle Green is minimal, they are still perceived as distinct.</p>

<p>football pitch. This 'gap' reduces to 15 metres if measured to the nearest outbuilding.</p> <p>There is therefore no case to be made for a settlement 'gap' given: a) there is no definition as to where Horam ends and Marle Green begins; and b) there is no 'gap' worthy of protecting in the development plan given the existing extremely close relationship between Rosemead Place (which itself has introduced a continuous ribbon of development along Horebeech Lane to the junction with Laundry Lane) and the existing houses at the junction of Horebeech Lane and Laundry Lane.</p> <p>The Settlement Gap policy in its current form would exclude land within Horam which could otherwise be developed sustainably from coming forward. The proposed policy is therefore contrary to the delivery of sustainable development in both Wealden and Horam.</p>	<p>Avoiding coalescence is regarded as a key element of sustainable development in the local context. It follows that development of this site would not amount to sustainable development, aside from other considerations of landscape, visual amenities and poor access to services).</p>
<p><i>e) is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area)</i></p> <p>There is no existing policy in the adopted Wealden Local Plan (1998) or Core Strategy (2013) which designates or otherwise refers to settlement gaps. There is therefore no existing policy 'hook' to which the proposed settlement gaps policy could attach or otherwise conform. There is no such policy in the emerging Wealden Local Plan Regulation 18 document.</p> <p>The policy demonstrably does not conform with WDC's strategic policies.</p>	<p>The fact that there is no 'settlement gaps' policy in the existing development plan does not mean that a locally-specific policy in a Neighbourhood Plan is not in general conformity with its strategic policies.</p> <p>Local Plan policy EN2 provides the necessary "hook". In fact, WDC has used this policy to refuse an application for development on this site.</p> <p>A fuller response is given to related comments by WDC.</p>
<p>Policy HCD 4, Important Local Views</p> <p>A local view of importance has been identified at our client's site, looking north in the direction of the AONB. The image relating to the site included in the Neighbourhood Plan key views assessment is incredibly misleading given it omits the collection of buildings</p>	<p>The views are actual views which fairly represent the aspect along the public footpath.</p>

<p>located at Cauldebec and The Isles. These are residential properties to the northeast of the site which include sizeable outbuildings which are in active commercial use.</p> <p>There are no views of importance which can be seen from the site, and certainly none that should be the subject of a local development plan policy.</p> <p>We trust this submission will be considered and taken into account by the appointed Examiner.</p>	<p>The nature and value of each view is set out in the HNP and supporting Background Paper, together with representative photographs.</p> <p>The Examiner will be able to review the accuracy of the views.</p>
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Section 4 – Mr Field

Mr Field comments	HPC response
<p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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</p>	<p>This is not the case. The HNP provides a local framework for sustainable development.</p> <p>The fact that part of the land was not in the same ownership was picked up (although the title deed previously gave the same address – Cauldavon) and the landowner of that parcel was written to. No response was received.</p> <p>It is appreciated that the fields include timber structures in the south west corner, but these were regarded as part of the “fieldscape”.</p>

<p>and sports pitches and asked for details of how my views will translate into amendments to the draft plan.</p> <p>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...</p>	<p>Unfortunately, the letter coincided with a serious illness of the then Clerk, but was responded to as soon as possible afterwards.</p>
<p>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?</p>	<p>The comments were considered, as were similar ones from the land promoter of the site. However, it was decided, having also received much support for the designation and indications of its value as a green space in comments on planning applications for development of the land, that the LGS designation should be pursued.</p>
<p>Despite not hearing anything further, I attended the first exhibition in the Village Hall on the 20th of 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..... <i>“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”...</i> 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.</p>	<p>The consultation was open and Mr field spoke at length to members of the Steering Group at the exhibition to hear the reasoning and give his own views on the matter, during which he was encouraged to make representations.</p> <p>It is understood that such a comment was made after many people turned up the opening question along the lines of “how do we stop all this over-development of our precious fields?” Nevertheless, it was inappropriate, and the point is noted.</p>
<p>In respect of the Regulation 16 Consultation, I would comment as follows:</p> <p>Policy HCD2 – Local Settlement Gaps – Horam – Marle Green</p>	

<p>Our property is included as part of a local settlement gap policy between Horam and Marle Green.</p> <p>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).</p> <p>Despite the aims of the Draft Wealden Local Plan, the intention is to apply a settlement gap as detailed below:</p> <p>This suggestion is wrong for two reasons:</p> <p>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.</p> <p>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.</p>	<p>The Gap relates to the field, including agricultural/equestrian buildings within it, not to the residential dwelling or its garden.</p> <p>Noted, but this proposal has not yet been consulted upon. Also, it is not regarded as consistent with either the landscape sensitivity of the land, or the proposals in the HNP.</p> <p>It is accepted that there is now only a minimal gap, but it is still both visible and perceived. Of course, the Gap relates to seeing the settlements from both Horebeech Lane and Laundry Lane. It is not the case that Laundry Lane has ever formed the “natural end” of Horam, as is evident from the postal addresses and clear local opinion on the identity of Marle Green (notwithstanding Mr Field’s view).</p> <p>The distance between the closest corners of the end house of Rosemead Place and Horebeech (in Marle Green) is 41metres, while the defined gap is 12.5metres at its narrowest, but this is for a short distance.</p>
<p>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.</p>	<p>The LGS proposal is justified on the basis of it meeting the relevant NPPF tests, especially in terms of being “demonstrably special”, which has been articulated through representations on the planning applications for development, as well as by HNP responses. The two most recent applications were refused, the latter being at appeal. The situation will be reviewed when the appeal decision is known.</p>

<p>The second reason that the above suggested 'Settlement Gap' is inappropriate is because the area identified as 'Marle Green' is not Marle Green.</p> <p>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.</p> <p>Marle Green is clearly shown as being a significant distance to the Southwest of the location that the 'Steering Group' have now decided it is located.</p> <p>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.</p> <p>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).</p>	<p>Not agreed. HPC is confident that the housing around the junction of Horebeech Lane/Marle Green/ and Laundry Lane is 'Marle Green'. Evidence on this was presented at the recent appeal hearing and is reproduced as Appendix 2 below, which addresses all the points raised opposite.</p> <p>This is not accepted and the Examiner will be able to see the views himself.</p>
<p>In relation to the Parish Council's consultation statement, I feel that the responses to the earlier consultation are misleading:</p> <ul style="list-style-type: none"> • Firstly, the response states: <i>"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</i> 	<p>Noted.</p> <p>The Consultation Statement does identify letters received in objection to the proposal, including from Mr Field (as landowner) and from agents for the residential development promoters.</p> <p>However, there was also a survey form that people were asked to fill in, to which the figures quoted relate - and are accurate.</p>

<p><i>the survey said they disagreed with the policy.” This is misleading as a number of responses (including our own) clearly objected.</i></p>	
<p>Secondly, this is how they respond to our comments: <i>“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.”</i></p> <p>They go on to say <i>“HPC notes that WDC has also commented upon this policy and amendments are proposed based upon that. Please see Section 4 for more information.”</i></p> <p>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.</p> <p>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.</p>	<p>As noted above, there was substantial report for the proposal, although not from the landowner and housing promoter.</p> <p>The comments from WDC are separately responded to.</p>
<p>Policy HCD 4, Important Local Views</p> <p>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.</p> <p>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 northeast at Cauldebec and The Isles. To the west, the</p>	<p>The justification for ‘Important Views’ are set out in the supporting Background Paper.</p> <p>It is shown that there is inter-visibility with the HWNL, even in summer and more so in winter.</p>

<p>views are only of the new Rosemead development over the hedge. 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.</p> <p>There are no 'Important Views' from the land as can be seen above.</p>	
<p>Policy HCE 4 Local Green Space Designation</p> <p>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.</p> <p>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'.</p> <p>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:</p> <p>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")</p> <p>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</p>	<p>Comments have not been disregarded, but not accepted as justifying removing the proposed designation.</p> <p>Noted. See earlier response to similar points.</p> <p>The planning permission is for "three stables and a store" to be used for personal equestrian purposes only. Other uses, if continuing, would be unauthorised.</p>

<p>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.</p> <p>The imposition of this designation will likely result in greater public access, trespass and even more of our sheep being killed.</p> <p>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</p>	<p>HPC will liaise with the landowners to ensure that walkers are fully aware of the limited access (to the public footpath) and control dogs.</p> <p>Noted, but the land should not become unmanageable and, as noted above, HPC would liaise with the landowners to ensure that the “countryside code” is adhered to.</p>
<p>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:</p> <p><i>a) Proximity to the Community it serves;</i></p> <p>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.</p>	<p>The criterion is essentially a locational one, which the site clearly meets, adjoining the built-up areas.</p> <p>HPC is aware of some attacks on sheep, notably following recent developments and will liaise with the landowners to ensure against this, as necessary.</p>

<p><i>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;</i></p> <p>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).</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p>	<p>Not agreed. It is clearly well-used.</p> <p>Its value is set out in the supporting Background Paper, and summarised below in relation to the particular qualities.</p> <p>A full response to similar points about LGS criteria is contained in the response to the land promoter's (Welbeck Strategic Land) representations above.</p>
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<p>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.</p>	
<p><i>c) Local in character and not an extensive tract of land</i></p> <p>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.</p>	
<p>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.</p>	<p>These comments are clearly disputed, as stated in the above responses.</p>

Section 5 - DL and G Blackden

Igloo Comments on behalf of DL and G Blackden	HPC Response
<p>Local Green Space (Policy HCE4)</p> <p>In responding to the previous consultation (in April and June 2023), we strongly objected to the proposed identification of land south of Grange Close and adjacent to the A267 Horam Road, as an area of Local Green Space. The land was clearly not demonstrably special to the wider local community. Further, the land south of Grange Close and adjacent to the A267 Horam Road does not hold a particular local significance in terms of its beauty, historic significance, recreational value, tranquillity, or richness of wildlife. We are pleased to see that the Submission Version of the Horam Neighbourhood Plan (Policy HCE4: Local Green Space Designations) does not allocate the land south of Grange Close and adjacent to the A267 Horam Road as Local Green Space. The Local Green Space Assessment, prepared by Troy Planning in support of the Submission Version Horam Neighbourhood Plan, comments in relation to the land south of Grange Close – “...it is not considered that the site is demonstrably special to Horam and moreover, it is difficult to envisage how it would meet the NPPF criteria”. We fully endorse this assessment and the decision not to identify the land south of Grange Close as an area of Local Green Space.</p>	<p>Noted. This site has already been removed from the list of proposed LGS designations, for the reasons set out on page 127 of the HNP LGS Assessment.</p>
<p>Important Local Views (Policy HCD4)</p> <p>The Important Views Background Paper seeks to provide justification for a very long list of views considered by the Neighbourhood Plan Steering Group to be important. The proposed important views are then listed in Policy HCD4 and are shown on Figure 13 of the Local Plan.</p> <p>We do not believe that there is sufficient justification for including Views 2 and 16, which are from a turning circle at the end of a cul-de-sac, with no onward public rights of way.</p>	<p>There is a requirement for an Important View to be visible from a PROW/highway. These views are.</p> <p>There is no expectation for a public right of way to follow the line of the view. Many important views are looking away from the public right of way they are taken from.</p> <p>The Google Streetview image provided by consultee is taken in excess of 40 metres back from where the views are seen from.</p>

See Google Street View image below.



The point we are making is that unless you live in one of the four properties surrounding the turning head (or are visiting someone who lives in one of these properties), your experience of Views 2 and 16 will probably be similar to the Google Street view above. There are glimpses through to the countryside (broadly along the suggested alignment of View 2), but the long-distance view referenced in the Important Views Background Paper is heavily filtered, and only really appreciable by someone who takes the decision to walk to the end of the turning circle for the purpose of trying to see the view referenced in the Neighbourhood Plan.

View 16 is even more problematic.

Due to the alignment of Grange Close, and the proposed angle of View 16, the only way to see the view being referenced in the Neighbourhood Plan is to stand at the edge of the turning circle and look through the hedge. The photo provided of View 16 (in the Important Views Background Paper), shows a shrub/ young tree in the foreground, partially obscuring the view. When the shrub/ young tree is in leaf, the view would be further obscured.



The Google Streetview image above is more representative of what can be seen from the Public Highway and the South Downs (National Park) can be seen in the background as per View 2.

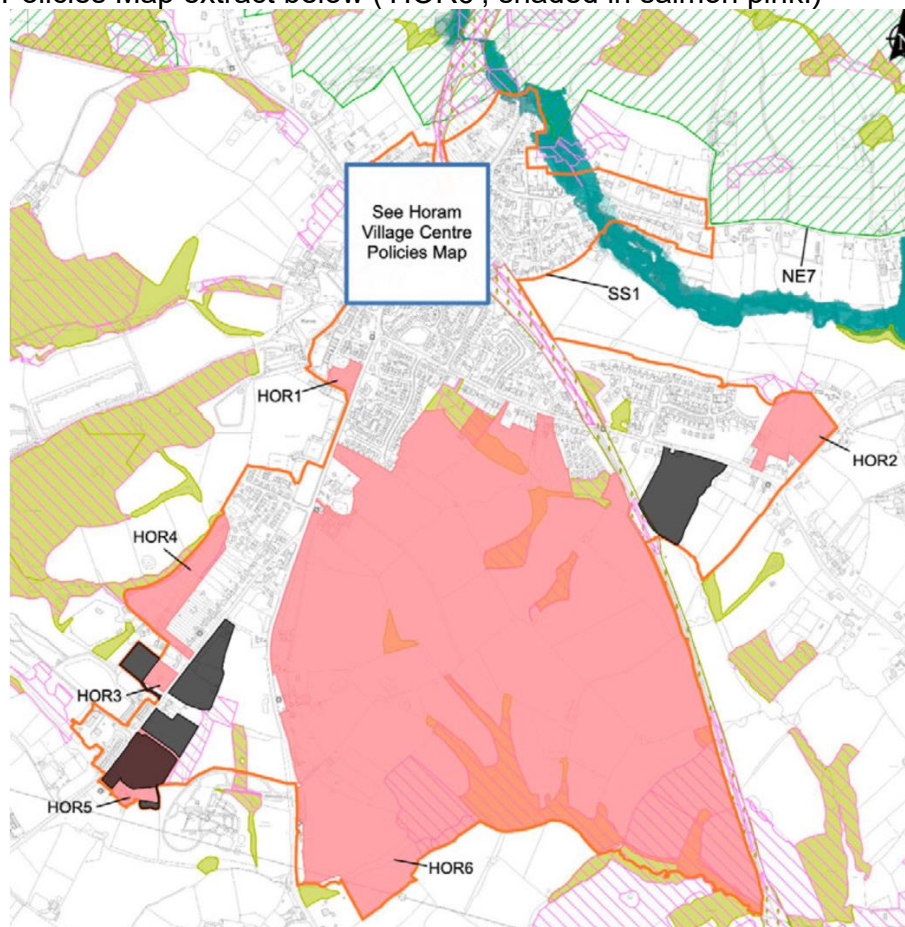
Because the view in question has excellent access, this gives greater emphasis to the importance of the view for all people.

We understand from many residents that these views are not only seen by the occupiers of the last four dwellings and that many others do “use” these views to get a “quick-fix” of the open countryside close to home without getting muddy.

This vantage point has been open since the estate was built, perhaps some 50 years ago and the growth of a single tree is not likely to block it even in summer months.

Views 2 & 16 are dependent on the field boundary being maintained at a low level.

It is also material that the emerging Wealden Local Plan is proposing a significant allocation across a large area to the south of Horam, which would fundamentally change Views 2 and 16. See proposed Policies Map extract below ('HOR6', shaded in salmon pink.)



For all the above reasons, Views 2 and 16 should be deleted from the list of Important Local Views referenced in draft Policy HCD4 (Important Local Views).

The Draft Wealden Local Plan emerged after the HNP Reg 16 consultation had started, and the HNP is much further advanced in its progress.

In approving the Draft Wealden Local Plan for consultation, WDC Councillors highlighted that is a draft and subject to change.

The views already exist, while the Wealden Local Plan has yet to be finalised and agreed on. Furthermore, there would be scope for a development to respect the view in its layout.

<p>Combined Policies Map (Figure 18)</p> <p>The combined Policies Map is a little confusing, as some of the shading shown on the map is not then referenced in the Legend. We believe the issue is caused by the use of Magic Mapping's "OS Colour Mapping" base, which adds in areas of green indicatively. To ensure that only the intended designations are shown on the combined Policies Map, the "OS Black and White Mapping" should be used as the base map.</p>	<p>The "OS Colour mapping" does NOT add in areas of green indicatively. Woodland is shown in dark green, allotments, playing-fields and golf courses are in pale green. The coloured mapping visually, and intuitively, differentiates, by colour, watercourses (ponds/streams/Ghylls) in blue from woodland/playing-fields in green; these features are much more difficult to differentiate in the grey-scales of the "OS Black and White Mapping".</p> <p>For the avoidance of doubt, the area behind Grange Close is shown in green because it was classed as woodland. Although the trees were cut down during the August Bank Holiday 2022, they were not done so under any felling licence. The area is now (we understand) subject to environmental/forestry enforcement proceedings which (we understand) would require the woodland to be replanted.</p>
<p>We would like to be kept informed of progress with the Neighbourhood Plan.</p>	<p>Noted The progress of the HNP is made public by WDC on their website so that all interested parties have access to the same information at the same time. In completing representations, WDC ask if respondents would like to informed of key future stages.</p>

Section 6 – Gladman

Gladman Comments	HPC Response
<p>Policy HCD4 Important Local Views</p> <p>Policy HCD4 seeks to identify a number of ‘key views’. Gladman welcome the amendments to this policy following the Regulation 14 consultation to account for new developments’ ability to accommodate views and landscape considerations through the design and layout of proposals.</p> <p>Notwithstanding this, for views to be identified for protection there should be demonstrable physical attributes that elevate its importance ‘out of the ordinary’, rather than seeking to protect views of the open countryside due to a pleasant sense of place.</p> <p>At present Gladman consider that a number of the proposed important local views, including 2, 6, 16 and 28, do not meet the tests set out by case law or national policy guidance, and the supporting evidence base does not provide a robust justification for the views identified.</p> <p>A long-distance view towards open countryside which is partly or wholly screened by trees and wooded areas; views across playing fields from a car park with residential development and other buildings in the background; or glimpsed views through vegetation looking across agricultural fields and pylons are not ‘out of the ordinary’ and do not meet the required tests.</p> <p>Further consideration is required in relation to whether the identified views in Policy HCD4 are justified and meet the basic conditions.</p>	<p>The important local views have been identified locally as clearly contributing to the “sense of Place”, which is a key driver for the HNP.</p> <p>The identified views have been found to meet clear criteria, as well as receiving local support, while their particular qualities and rationale for identification, including for those views referred to opposite, are set out in the ‘Important Views’ Background Paper. This evidence is considered to be both robust and proportionate.</p> <p>The qualities of individual views varies; some provide a panorama, while others are important for the aspect, perhaps most notably where the view extends to the South Downs, which are emblematic of this part of East Sussex, and also Grove Hill. Indeed, there very few views of these landmark features in the Parish.</p>
<p>Policy HHD1 Housing Type, Size and Mix</p> <p>Gladman support the above policy and welcome the recognition of the critical need for specialist older persons’ accommodation as set out in the NPPF1 and PPG2.</p>	<p>Noted.</p>

<p>To ensure that the policy is sufficiently flexible and that it aligns with future strategic policies the Parish Council may want to consider the following amendment to the wording (green text) of criterion 2:</p> <p><i>An alternative mix of housing will only be supported where justified by appropriate data on housing needs [an up-to-date assessment of housing needs] or where the mix would result in a development wholly out of character with the setting, although it is recognised that a higher proportion of smaller homes may be appropriate for affordable housing.</i></p>	<p>The current policy wording, which provides flexibility and refers to “appropriate data on housing needs”, is regarded as robust.</p>
<p>Policy HCE1 Nature and Biodiversity Gladman support the general thrust of this policy and welcome the changes to criterion 2.</p>	<p>Noted.</p>
<p>Policy HCE4 Local Green Space Designations The designation of land as Local Green Space (LGS) is a significant and restrictive policy tool. In order to designate land as LGS the Parish Council must ensure that it is able to demonstrate robust evidence to meet national policy requirements as set out in the Framework.</p> <p>The Framework makes clear at paragraph 105 that the role of local communities seeking to designate land as LGS should be consistent with the local planning for sustainable development. Further guidance is provided at paragraph 106, which sets out three tests that must be met for the designation of LGS and states that:</p> <p><i>“The Local Green Space designation should only be used where the green space is:</i></p> <ol style="list-style-type: none"> <i>1. a) In reasonably close proximity to the community it serves;</i> <i>2. 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), tranquillity or richness of its wildlife; and</i> 	<p>Noted.</p>

<p>3. c) <i>Local in character and is not an extensive tract of land.</i>”</p> <p>Gladman welcome the amendments to Policy HCE4 and consider that the policy and proposed local green spaces identified in the Regulation 16 draft Neighbourhood Plan meet the tests in national policy and basic conditions.</p>	<p>Noted.</p>
<p>Policy HCE5 New Amenity Green Spaces</p> <p>Gladman support the above policy which seeks ensure that new residential development delivers accessible, inclusive and meaningful green spaces and play spaces for children.</p>	<p>Noted.</p>
<p>Policy HCE6 Flood Risk</p> <p>Gladman support the principles set out in the above policy, however as previously highlighted, paragraph 16(f) of the NPPF states that plans should:</p> <p><i>“serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant).”</i></p> <p>In this regard, the requirements of Policy HCE6 are a duplication of guidance and requirements set out in Chapter 7 of the PPG and Chapter 14 of the NPPF and therefore it is not necessary for the Neighbourhood Plan to reiterate them.</p> <p>The Parish Council have made amendments Policy HCE6 since the Regulation 14 consultation, however it is considered that Criterion 3c) ii) is more restrictive than national policy by seeking a reduction in peak run-off rates. As outlined previously in the policy, development proposals must simply ensure that they do not increase run- off rates. Therefore, requiring major developments to achieve a reduction in run-off rates is not appropriate.</p> <p>The Parish Council could amend the policy wording to state:</p>	<p>Noted, but the policy addresses locally important issues and is regarded as complementing – as well as being consistent with – national policy guidance.</p> <p>For clarity, Criterion 3c(ii) of the policy only applies to any future developments upstream of the high-risk flood areas, and not to those downstream, such as the Coxlow Farm area.</p> <p>The justification for this localised, specific approach is set out in the Water Management and Flood Risk Background Paper, with supplementary evidence contained in the responses to WDC’s comments that are contained in the accompanying Document 2.</p>

<p><i>"4. Development proposals which seek to achieve a reduction in peak run-off rates will be supported".</i></p>	<p>Accordingly, the suggested amendment would not provide the necessary safeguards for the most vulnerable, north-eastern part of Horam.</p>
<p>Policy HLE2 Employment New local employment uses alongside residential growth help to retain the vitality and sustainability of local services enhancing the community in which they are located. Therefore, Gladman support the proposed employment considerations within the above policy which support the retention and development of small businesses and provide design considerations for new employment proposals.</p>	<p>. Noted</p>
<p>Summary Gladman welcomes the opportunity to comment on the Regulation 16 Horam Neighbourhood Plan that is currently being explored by the Parish Council. These representations have been drafted with reference to the National Planning Policy Framework and the Planning Practice Guidance.</p> <p>Gladman have provided comments on a number of the issues and policies that have been identified in the consultation material and recommend that the matters raised are carefully explored during the next stage of preparing the Neighbourhood Plan.</p> <p>Nonetheless, Gladman consider that it would be prudent for the Parish Council to pause the Neighbourhood Plan preparation to allow the preparation of the new Wealden Local Plan to take place. This will provide greater certainty for the Council in preparing the Neighbourhood Plan and ensure that they are aligned with the strategic policies for Wealden, to meet the basic conditions and requirements of the NPPF.</p> <p>We hope you have found these representations informative and useful towards the preparation of the Horam Neighbourhood Plan and Gladman welcome any future engagement with the Parish Council to discuss the considerations within the representations.</p>	<p>HPC cannot support this suggestion. It has developed the HNP from a wide range of evidence studies and consultations, which would be at risk of becoming dated if there were any delay in the process.</p> <p>Of course, WDC is only at an early stage of Local Plan preparation, with no expectation of its adoption for at least another 2 years.</p> <p>There is no suggestion in national policy that neighbourhood plans should await a local plan. It is an opportunity to ensure that well-founded community policies inform future developments.</p>

APPENDIX 1 – RELATIONSHIP BETWEEN HNP POLICIES AND EAST SUSSEX TRANSPORT PLANS

HNP POLICY	KEY DRAFT LTP4 OBJECTIVE/OUTCOME
Policy HTM1: Traffic Management	<p>Objective 1: Deliver safer and accessible journeys</p> <ul style="list-style-type: none"> - Outcome 1.2: Contribute to reducing the number of casualties and collisions on our transport networks <p>Objective 2: Support healthier lifestyles and communities</p> <ul style="list-style-type: none"> - Outcome 2.3: Redesign road space to balance the needs of different road users, including encouraging people to walk, wheel, cycle and use the bus <p>Objective 4: Conserve and enhance our local environment</p> <ul style="list-style-type: none"> - Outcome 4.1: Conserve and enhance our local and natural environment by mitigating negative impacts of transport design and delivery - Outcome 4.2: Enhance and create attractive connected communities and public spaces
Policy HTM2: Active and healthy travel	<p>Objective 2: Support healthier lifestyles and communities</p> <ul style="list-style-type: none"> - Outcome 2.1: Increase the proportion of walking, wheeling, and cycling journeys - Outcome 2.3: Redesign road space to balance the needs of different road users, including encouraging people to walk, wheel, cycle and use the bus <p>Objective 3: Decarbonise transport and travel</p> <ul style="list-style-type: none"> - Outcome 3.1: Increase the proportion of people travelling by walking, wheeling, cycling, public and shared transport - Outcome 3.2: Facilitate the uptake of ultra-low and zero-emission vehicles for journeys, through the delivery of supporting infrastructure - Outcome 3.4: Support clean technologies and fuels that contributes towards the decarbonisation of transport
Policy HTM3: The Cuckoo Trail	Objective 2: Support healthier lifestyles and communities

	<ul style="list-style-type: none"> - Outcome 2.1: Increase the proportion of walking, wheeling, and cycling journeys - Outcome 2.6: Improve access to green spaces, public rights of way and leisure and health facilities <p>Objective 4: Conserve and enhance our local environment</p> <ul style="list-style-type: none"> - Outcome 4.2: Enhance and create attractive connected communities and public spaces - Outcome 4.3: Support habitat connectivity and increase in biodiversity through the delivery of enhanced and new transport infrastructure and public spaces <p>Objective 5: Support sustainable economic growth</p> <ul style="list-style-type: none"> - Outcome 5.4: Enhance sustainable access to key visitor and cultural destinations
Policy HTM4: Public transport	<p>Objective 1: Deliver safer and accessible journeys</p> <ul style="list-style-type: none"> - Outcome 1.5: Improve access to key local services by all modes <p>Objective 2: Support healthier lifestyles and communities</p> <ul style="list-style-type: none"> - Outcome 2.2: Increase active travel and public transport journeys through education, training, travel behaviour change initiatives and information - Outcome 2.3: Redesign road space to balance the needs of different road users, including encouraging people to walk, wheel, cycle and use the bus <p>Objective 3: Decarbonise transport and travel</p> <ul style="list-style-type: none"> - Outcome 3.1: Increase the proportion of people travelling by walking, wheeling, cycling, public and shared transport <p>Objective 5: Support sustainable economic growth</p> <ul style="list-style-type: none"> - Outcome 5.2: Contribute to reducing deprivation and inequality through improved accessibility for all to employment, education, and training

APPENDIX 2 – HPC EVIDENCE ON THE EXTENT OF MARLE GREEN, RELATIVE TO HORAM

NB The following information was submitted to the Inspector conducting the Hearing into the current appeal against the refusal of planning permission (under reference WD/2022/1694).

Appeal reference: APP/C1435/W/23/3334439

Briefing Note: Horam and Marle Green extents

Introduction

1. This Briefing note is being provided to the Inspector in response to the question asked of the main parties regarding the settlement boundaries/ location of Horam, Marle Green, and Hellingly in relation to the appeal site.
2. The question raised is a matter which the **Horam Parish Council** feels well qualified to advise on and offers its assessment below.

Historic growth

3. The evolution of Horam and Marle Green can be seen on old maps included in the submitted [Horam Neighbourhood Plan Background Paper: 'Approach to identifying and protecting local heritage assets'](#). Within it, [Figure 4](#) 'Extract of Yeakell & Gardner's 1778-83 Map of Sussex', shows the origins of the settlements, with "Horeham" appearing as a cluster of buildings to the west of the main road, based on the manor house. "Marl Green" is distinct, well to the south east, comprising 3 to 4 dwellings.
4. The growth of Horam followed the arrival of the railway and opening of Horeham Road station in 1880. At that point, the arrival of the station had not led to much new building, but by 1929 Horam had considerably expanded along the main road (A267), the High Street, Horebeech Lane, and Vines Cross Road. Marle Green had also consolidated somewhat, including northwards to the junction with Laundry Lane, with Dunmore House and Brickfield Cottages.
5. The post-War years between 1945 -1979 saw the development of housing estates in Horam at Toll Wood Road/Beauford Road and Grange Close (both off Horebeech Lane) and the start of Paynsbridge Way (off Vines Cross Road). The properties around the junction of Horebeech Lane and Laundry Lane were also built at this time.
6. More recently, there has been the redevelopment of the former Merrydown Cider site in the middle of Horam, as well a significant easterly expansion through the development of the Rosemead Place housing estate. Also, Marle Green has seen some consolidation, with the construction of two detached houses on the former woodyard between Dunmore House and Marle Green Cottages, as well as a large single dwelling opposite (The Warren).

Settlement extents

7. Simply, Horam and Marle Green have grown towards each other over time. Even so, prior to the construction of Rosemead Place, there was no doubt as to the separate identities of Horam and Marle Green, there being a substantial green gap between them.
8. Of course, the development of Rosemead Place has a major impact on the separate identities of Horam and Marle Green, but it was still recognised by both Inspectors considering quite recent appeals¹ for land to the south of Horebeech Lane ('Land at/east of Old Orchard House), even when Rosemead Place had permission and was under construction.
9. The separate identity of Marle Green, from Horam, is clear from the postal addresses of properties, for example:
 - Horebeech/Alberdene, Horebeech Lane, Marle Green
 - Dewlyn, Horebeech Lane, Marle Green (see photograph at Appendix 1)
 - Willow Cottage/Brickfield Cottage, Horebeech Lane, Marle Green
 - Dunmore House, Laundry Lane, Marle Green
 - Shipton Brigg, Laundry Lane, Marle Green
 - Cauldwell, Laundry Lane, Marle Green
 - Cauldebec, Laundry Lane, Marle Green
 - The Isles, Laundry Lane, Marle Green
 - Marle Green Cottages, Marle Green
 - NP Veteran Engineering Ltd, The Old Dairy, Marle Green
 - Moorings, Marle Green
 - Marle Green Farm, Marle Green
 - Tanglewood, Marle Green
10. It is also worth highlighting that the appeal site itself is shown in the Land Registry Title Deed as being at "Marle Green, Heathfield". (See Appendix 2)
11. In contrast, all properties on the Rosemead Place development all have a 'Horam' address.
12. For completeness, as the Council has advised, Hellingly is a considerable distance, some 4.5km, to the south, just to the north of Hailsham. (It is believed that Hellingly is mentioned in a few representations, as there is substantial growth underway on the northern side of Hailsham, which people may see as continuing to Horam, over time.)

Settlement areas and boundaries

¹ Appeal Refs: APP/C1435/W/19/3235754 and APP/C1435/W/22/3297371

13. As for all settlements in Wealden District, the extent of Horam as such is not defined. Larger settlements do have a 'development boundary' defined in the adopted Local Plan, which essentially distinguishes between their main built-up areas and the countryside, for planning/development purposes.
14. The current Local Plan 'development boundary' for Horam is reproduced at Appendix 3. It can be seen that this boundary excludes fringes of the village, notably ribbons of development extending into the surrounding countryside.
15. Of course, it does not take account of the more recent Rosemead Place development, the site plan for which is reproduced at Appendix 4. As noted above, Rosemead Place is accepted as being part of Horam.
16. Marle Green is not defined with a 'development boundary' by the Council. This is not untypical of smaller villages and hamlets, others nearby being Cowbeeche, Hellingly, Little London, Maynards Green, Vines Cross, and Warbleton.
17. There is a general recognition locally of the extent of Marle Green as a hamlet, being from around the junction with Laundry Lane south (along the road also called 'Marle Green' towards "North Corner").
18. It is also noted that there are also properties a little further along Laundry Lane to the north-east (Cauldwell, Cauldebec, and The Isles), along with Pheonix Lodge and Sedgefield to the south, which also have a Marle Green postal address. However, as they are somewhat more detached from other properties, they are not included in the core settlement extent, which it is believed the Inspector wants clarification on, even though they are part of Marle Green in its wider sense.
19. Therefore, on the basis of the available information and our local knowledge, to assist the Inspector, the extent of Marle Green is regarded as best represented (indicatively) by the plan at **Appendix 5** attached.
20. For clarity, the names of properties around the junction of Marle Green, Horebeeche Lane and Laundry Lane are shown on Appendix 6.
21. For the inspector's information, although it has not been necessary to identify the extent of Marle Green as such in the Submission [Horam Neighbourhood Plan](#), it does identify the extent of the "Gap" between it and Horam, on Figure 11, which Policy HCD2 seeks to retain in order to prevent their complete coalescence. The policy and Figure are reproduced, for convenience, at Appendix 7.
22. It is noted that the extent of the Gap is consistent with the northern extent of Marle Green, as well as with the extent of existing and approved (notably that at land east of Old Orchard House) developments.

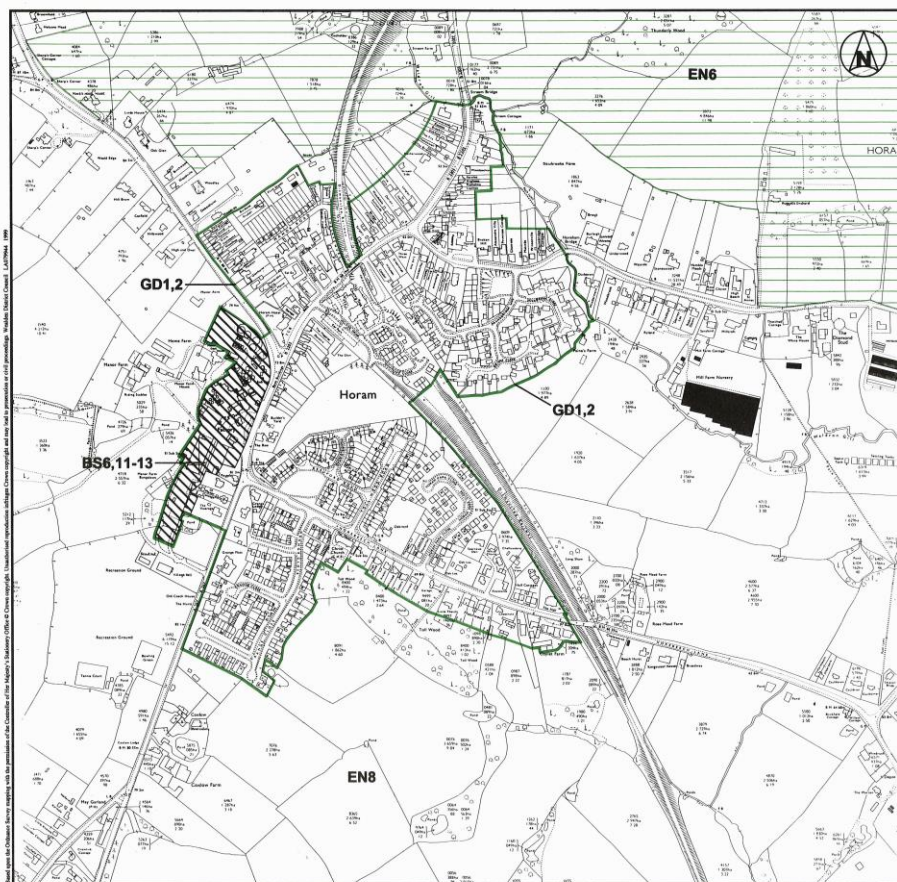
Susan Lane

Horam Parish Councillor and Chairman of the Horam Neighbourhood Plan Steering Group

Appendix 1: Photograph of Dewlyn (next to Cauldavon) house sign



Appendix 3: Horam Inset Map from the saved Wealden Local Plan

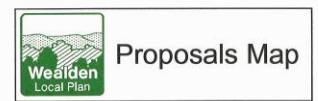


**Inset Map No. 32
Horam**

KEY

- Inset Map boundary
- Development boundary
- Village business area
- High Weald Area of Outstanding Natural Beauty

Plan wide policies are listed on the main Proposals Map.



0 100 200 metres 1:5000

253 Wealden Local Plan December 1998

Appendix 4: Rosemead Place site layout plan, highlighting landscaped areas



Appendix 5: Marle Green – indicative extent of settlement



(Base map taken from DEFRA MAGIC website)

Appendix 6: 1. Names of properties around the junction of Marle Green, Horebeech Lane and Laundry Lane



Appendix 7: Submission Horam Neighbourhood Plan extract – Policy HCD2 and Figure 11

Policy HCD2: Local settlement gaps

1. Local Gaps (as defined in Figure 11) should be retained as essentially open countryside, to protect the setting and identity of settlements and avoid their coalescence, between:
 - i) Horam and Maynards Green
 - ii) Horam and Vines Cross
 - iii) Horam and Marle Green
2. In the defined Local Gaps, development will only be supported which maintains the integrity of the relevant Gap.

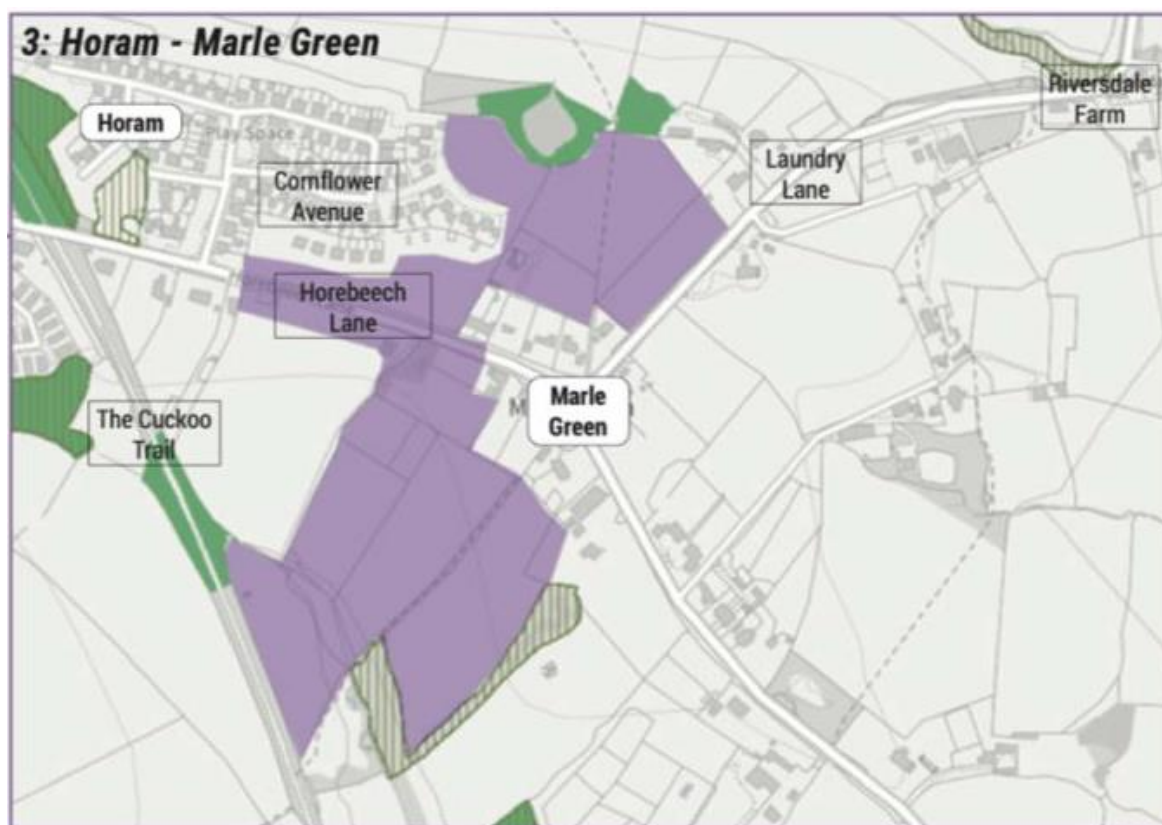


Figure 11: Local settlement gaps in the Neighbourhood Plan area (Map 3 of 3)