

HORAM PARISH COUNCIL

HORAM

NEIGHBOURHOOD PLAN

2023 – 2040

CONSULTATION STATEMENT

VOLUME 5b: APPENDIX TO
REGULATION 14 CONSULTATION
REPORT (WDC Comments and
Response)

SEPTEMBER 2023

Horam Parish Council
Horam Neighbourhood Plan, 2023-2040
Consultation Statement
Volume 5b: Appendix to Regulation 14
Consultation Report
(WDC Comments and Response)
September 2023



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Horam Parish NDP

Summary of Regulation 14 Consultation

Appendix H: WDC Comments and HPC Response

August 2023

HORAM PARISH NDP
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The free-standing appendix to this Regulation 14 Consultation summary tabulates the comments received from WDC at the Regulation 14 stage, how these have been responded to by the Parish Council Steering Group and, where appropriate, how changes to the Neighbourhood Plan have been made. The comments also touch on supporting background material as well as the Design Guidelines prepared alongside the Neighbourhood Plan.

Wealden District Council Officers' comments on the Draft (Regulation 14) Horam Neighbourhood Plan, and Horam Parish Council responses

September 2023

General Points

WDC Comment	HPC Response
It is clear that an enormous amount of work has gone into producing the Neighbourhood Plan and the supporting background papers. The following comments are offered to provide constructive feedback with the aim of producing a robust finished plan that is able to meet the basic conditions. We have provided detailed comments below which we hope you will find useful. In addition, further comments are provided in a table below also. These relate to specific paragraphs or policies set out in the Neighbourhood Plan. Please note there is some cross over between our comments below and the comments in the table.	Noted

Contributing to Sustainable Development

WDC Comments	HPC Response
<p>The Horam Neighbourhood Plan (HNP) is not seeking to meet the future housing needs of the neighbourhood area or allocate sites. Future housing and other development needs in the neighbourhood area will therefore be addressed through the Local Plan process.</p> <p>The Council has considered the environmental designations proposed within the HNP and notes that many of the proposed environmental designations e.g., Settlement Gaps, Waldron Ghyll Valley, Important Local Views and Local Green Spaces cover sites that have been submitted to Wealden as part of its Strategic Housing and Economic Land Availability Assessment (SHELAA). In effect, the designations could result in limiting the supply of potential housing sites and the number of dwellings that can be delivered on these sites to meet the housing needs of the local community in Horam. The NPPF paragraph 28 is clear that Neighbourhood Plans should not promote less</p>	<p>Progress of the Neighbourhood Plan is running ahead of the Local Plan. Beyond the Direction of Travel document there are no emerging policies within the public domain and no clarification on the scale nor spatial distribution of housing across the District.</p> <p>Sites currently put forward for consideration in the SHELAA are just that at the moment. They have not yet been assessed and have no planning status, have not been consulted upon, nor tested as part of an emerging Plan.</p> <p>In fact, the previous SHELAA assessments, including those identified as “potentially suitable”, have no planning status, have not been the subject of consultation or tested through examination or the planning application process.</p>

<p>development than is set out in the strategic policies for the area or undermine those strategic policies.</p> <p>The Council published its SHELAA Report alongside the now withdrawn Wealden Local Plan in 2019 and is currently in the process of updating its SHELAA to inform its emerging Local Plan. This includes reviewing the suitability and deliverability of all sites submitted, this includes both previous sites that were submitted and reported on in the SHELAA 2019 publication, as well as new sites that have been submitted since this date. The SHELAA review will be published alongside the Local Plan Regulation 18 consultation once this takes place later in 2023 and will assist (alongside other evidence) to inform the Council's growth strategy. However, in the interim the vast majority of sites submitted to the Council for its SHELAA are available to view via the Council's online mapping system.</p>	<p>NPPF paragraph 28 relates to neighbourhood plans allocating sites for housing and to existing, adopted Local Plans. At this point, there is no up-to-date Local Plan in place that provides a basis for concluding that the Neighbourhood Plan promotes less development than the strategic policies for the area.</p> <p>The review of SHELAA sites, which cover an extensive area of land in the Parish, should now take account of the aspirations and emerging policies within the Neighbourhood Plan to determine whether they are suitable locations for growth.</p> <p>Even with the Neighbourhood Plan policies applied, there is will be more than sufficient land within the Parish to allocate to both meet local housing needs and make an appropriate contribution to meeting wider housing needs.</p>
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Climate Change

WDC Comment	HPC Response
<p>Climate change is not considered very extensively within the Neighbourhood Plan as a whole and whilst it is referred to within the Design Guide in chapters such as Sustainable Construction, it would have more weight if it was covered in the Plan itself. The design policy for example refers to reducing energy consumption and promoting renewable sources of energy but neither the policy nor supporting text explains why this is necessary.</p>	<p>It is believed that there has been due consideration of climate change in preparing the plan and that this reflected in its policies.</p> <p>Objective 7 is specifically "To help address climate change" and underpins several policies, including HCE6 in relation to the adaptation and mitigation of increasing flood risk and use of SuDS, the support for active travel (policy HTM2), protection of trees and woodlands (policy HCE2), promoting biodiversity (policy HCE1) and conserving permanent grassland (policy HCD1 refers).</p> <p>As the WDC comment notes, policy HCD5(f) "<i>promote[s] the efficient use of energy and water</i>", as well as "<i>maximising opportunities to reduce energy consumption and make use of carbon free sources of energy</i>".</p> <p>Paragraph 4.21 refers to the impact of development on climate change raised during early consultation as part of the background to the policy.</p>

	<p>Wider policies, such as in relation to energy efficiency standards, are beyond the scope of the NDP, being set at the national level and matters for Local Plans.</p> <p>There is no need for the NDP to attempt to go further than it already does to help address climate change issues.</p>
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Structure

WDC Comments	HPC Response
<p>The plan is well structured and easy to navigate. It has a clear contents page and the list of policies on page ii is particularly useful with the policies set out according to what section they are in. Section 1 in particular is concise and easy to read and sets the scene for the plan very well.</p> <p>The history and growth section has been expanded from earlier versions to include reference to the other settlements within the parish, as we suggested, and this extra information is beneficial to the plan. It is clear how the objectives stem from the vision and how the policies stem from the objectives.</p>	Noted

Conciseness

WDC Comment	HPC Response
The plan is easy to read and the supporting text is concise and to the point. However, there is some scope to combine some of the policies or remove parts which are covered by national policy or the statutory development plan to create a more streamlined plan.	Noted. This comment is considered in relation to relevant policies.

Referencing

WDC Comment	HPC Response
When information is stated in the plan it needs to be referenced where that information has come from. For example, in paragraph 1 where it states the population is 3100 people no source is given and no year. This is better than the previous draft, however there are still instances where sources are not cited.	Noted

<p>Throughout the document you have used hyperlinks to sources rather than footnotes, which is consistent, however the hyperlinks do not work. This will need to be addressed before the Regulation 16 Consultation.</p> <p>There are no conformity references on any of the policies. Whilst this is not a requirement, they would be useful to help to demonstrate how the plan is in conformity with the NPPF, Local Plan and Core Strategy. You could also add a summary of the justification behind each policy, i.e. which documents support the policy.</p>	<p>Noted</p> <p>The supporting text does include cross reference to higher level policies where helpful to the reader, but contextual higher level policies will be set out comprehensively in the Basic Conditions Statement, in line with legislative requirements. Notwithstanding this, conformity references in the Plan will be reviewed.</p>
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Accessibility

WDC Comment	HPC Response
<p>The documents are not currently accessible. Please run them through the word accessibility checker and carry out any necessary alterations prior to submitting them to us for the Regulation 15 stage. I attach guidance notes that we have on accessibility for you to use.</p>	<p>Noted</p>

Map

WDC Comment	HPC Response
<p>This document would benefit from a policy map to show all the different proposed designations in one place e.g. LGS, settlement gaps etc. as well as existing designations such as the AONB, Ancient Woodland, Flood Risk Areas etc.</p>	<p>Inset plans are provided within the main body of the NDP as appropriate to enable WDC to update its Policies Map. Notwithstanding this, the need for a single “policies map” presenting the spatial policies of the HNP will be prepared, to be read alongside the detailed plans relating to specific policies already contained within the HNP.</p>

Detailed Comments on the Policies and Background Documents

Landscape Character Background Paper

WDC Comment	HPC Response
<p>Figure 3 in the Landscape Character Background Paper would benefit from the parish boundary being a different colour to the flood zones.</p>	<p>Noted</p>
<p>All maps/figures need to have the sources referenced and weblinks added if appropriate.</p>	<p>Noted</p>
<p>Para 23 - Requires a correction - Horam Parish comprises a number of settlements dispersed settlements,</p>	<p>Noted</p>
<p>Para 33 (above) – Should this read ‘National’ character Areas rather than ‘natural’?</p>	<p>Noted</p>
<p>When talking about the Council’s landscape evidence base, the document should start with the most recent / strategic document first i.e., the Landscape Character Assessment 2022, then the site-specific studies and then the 2014 Landscape Character Assessment. Once the remaining landscape assessments are completed, the 2014 Assessment and the site-specific studies will be superseded. We would argue that the 2014 LCA is actually irrelevant as it has effectively been superseded by the 2022 assessment already. We would recommend deleting reference to the 2014 assessment, or at least making it crystal clear that the 2022 assessment supersedes the 2014 assessment and should be the one to set the character context for Horam, including landscape guidelines. This will then ensure that the HNP is in line with the most up-to-date evidence that will support the emerging Local Plan.</p>	<p>The level of spatial refinement of the later LCAs is less, so are less insightful. Landscape character has not really changed in the recent times, so it is appropriate to refer to all.</p>
<p>Para 64 – This is a long sentence “Given their current, as well as historic, contribution to landscape character, it is considered that the Neighbourhood Plan has a specific policy to ensure appropriate respect to existing trees and woodland cover, as well as historic hedgerows, notably enclosing rural lanes and fields, and to promote sensitive new tree planting.” It is suggested this is reworded as follows:</p>	<p>Noted</p>

<p>“Given their current, as well as historic, contribution to landscape character, it is considered that the Neighbourhood Plan has a specific policy to ensure existing trees, woodland and hedgerows, notably those enclosing rural lanes and fields, are retained and protected. The policy should also promote the sensitive locating and planting of new trees.”</p> <p>Para 64 – the wording of the suggested policy should reflect the new wording suggested in the table of comments that we have provided below.</p> <p>Para 65 - “Indeed, the Wealden LCA states” It is uncertain which LCA is this referring to? Please state. Bearing in mind our comments above, we suggest this should refer to the most up-to-date evidence i.e. the 2022 LCA.</p>	<p>This is the Background Paper and provides recommendations. Any amendments to policies are to be made in the NDP itself. Notwithstanding this, if significant amendments or other updating is necessary for Background Papers in order to support the Regulation 15 HNP, revised versions will be prepared.</p> <p>To be clarified.</p>
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Policy HCD2 Local Settlement Gaps and Settlement Gaps document

WDC Comment	HPC Response
<p>The Council has concerns regarding the proposed Green Gap designations set out in the draft plan. There is currently no strategic policy contained within the district’s development plan framework relating to green gaps and coalescence and therefore it could be questioned as to how an additional designation for green gaps is in line with the Council’s strategic local policies or the National Planning Policy Framework (NPPF). The ‘saved’ policies of the Wealden Local Plan referred to in paragraph 4.4. of the Horam NDP that includes EN2, EN7 (this should be EN6 as commented in detail below) and EN8 largely relates to Landscape Character rather than settlement coalescence.</p> <p>The main policy approach of Wealden District Council used to safeguard land in the countryside is ‘development boundaries’ that includes ‘saved’ policies of the Wealden Local Plan (1998) GD1 and GD2. In short, these development boundaries support new development within them, provided it is in accordance with other policies of the Local Plan. It resists new development outside of those development boundaries,</p>	<p>The identification of important local gaps between settlements relates, as the title of the Background Paper states, to “<i>respecting and retaining the separate identities of settlements in Horam Parish</i>”. This is regarded as in conformity with saved Wealden Local Plan (WLP) policy EN2, which states that “<i>The Council will seek to maintain the existing settlement pattern.</i>”</p> <p>It also responds, in a locally appropriate way, to WLP policy EN8, which states that “<i>particular regard will be had to ...the setting of settlements;</i>”</p> <p>The definition of important gaps between settlements is viewed as a legitimate (as well as locally necessary) policy tool to maintain the settlement pattern and their settings insofar as it is vulnerable to eroding their distinct identities.</p>

<p>unless it is in accordance with other policies of the Local Plan or material considerations suggest otherwise. This approach continued as part of the Wealden District Core Strategy Local Plan (2013) and is very likely to continue as part of the new emerging local plan also.</p> <p>It is noted that some Neighbourhood Plans locally (outside of Wealden District) do have Local Settlement Gap policies (for example Battle in Rother District and Hassocks in Mid Sussex District) but in these cases, the local planning authority does have an adopted strategic Local Gaps/Settlement Coalescence Policy in place that supports the Neighbourhood plan policy. This is not the case for Wealden District, and it is therefore advised that Local Settlement Gaps will not conform with the adopted approach of Wealden District Council. It should also be noted that for some Local Settlement Gaps, there may be also other important designations (i.e. the High Weald AONB) that would protect such land in any case.</p> <p>You have now provided a background document which describes how the settlement pattern has evolved, outlines the community views and sets out how a local policy would in your opinion, be compatible with national and local policy contexts. Please note that Policy EN17 from the Wealden Local Plan that you refer to in paragraph 43 of the background document is not a saved policy and reference to this should be removed. You have provided criteria for designation and an assessment of each of the gaps against these criteria.</p> <p>Despite the background document you have provided, there are sites submitted within the SHELAA process that would form part of these local settlement gaps, with a number of sites being considered (at a high level at least) to be suitable for development within the 2019 SHELAA. Although, at this stage, these are not of course allocations for development (the sites will be assessed on their own merits through the Local Plan process) there may of course be conflicts here at a later stage. There are also some housing development sites within Local Settlement Gaps that are subject to live planning applications, such as at the Horam – Marle Green Gap (see reference WD/2022/1694/MAO) that may be approved/refused and then subject to planning appeal, as relevant. There is also a risk that owners of such land may argue that those settlement gaps are not warranted and there is no evidence for</p>	<p>Therefore, notwithstanding there being no specific “gap” policy in the current Local Plan, the approach is seen as being in general conformity with the strategic policies of the development plan, read as a whole.</p> <p>Moreover, the erosion of the identity of settlements within the Parish has become a peculiarly important local issue in recent years, which warrants this clear, rigorously formulated, local policy.</p> <p>Noted</p> <p>Noted, but the points made do not present any proper planning reason not to define important local settlement gaps, in line with current strategic policies. In fact, they reinforce the need to do so within Horam Parish:</p> <ol style="list-style-type: none"> 1. It is evident that sites are being promoted that, unless clearly shown to be inappropriate by development plan policies, would undermine the distinct identity of settlements with Horam Parish; 2. The example given regarding a site between Horam and Marle Green shows the pressure it is under. It is also noted that it was <u>refused</u> by WDC notably “<i>as the development would significantly impact up on the visual</i>
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this. This is a risk for the NDP. Neighbourhood plans should plan positively and should not be used to constrain the delivery of a strategic site that could be allocated for development in a local plan, and this policy currently does just that. By constraining available sites coming forward, there is a significant risk that this approach would not meet the basic conditions.

*amenity of the rural landscape character of the area, it would result in the loss of a valued open space that contributes to that rural landscape character, **it would undermine the settlement pattern and the gaps between settlements**, and it would harm the rural landscape setting of the High Weald Area of Outstanding Natural Beauty”* contrary to WDC policies. (our highlighting)

3. Hence, it has been accepted by WDC that the maintenance of gaps between settlements is a legitimate planning matter (which it clearly is), is in line with adopted policies and, furthermore, the development of this particular site would unacceptably harm it.
4. The comments regarding developers promoting sites that form part of important gaps between settlements not being happy with the proposal is noted, but these are characteristics that the community firmly believes are just and worth fighting for, even if not the “line of least resistance”.
5. Comments regarding the weight to be given to SHELAA sites (or rather the lack of it) and not providing for less than the strategic quantum of development are responded to in relation to earlier general comments on ‘Contributing to sustainable development’. It is evident that as well as not undermining existing strategic policies for development, there remain significant opportunities for a scale of development appropriate to the role and function, and environmental sensitivities of the Parish’s settlements.
6. There is no current Local Plan proposing either strategic or non-strategic sites, so this would be a matter for consideration through the new Local Plan in due course, having regard to the stage of the HNP. WDC needs to engage with the HNP to validate this objection; otherwise, it is purely speculative. It is also pointed out that the basic conditions relate to adopted Local Plans only.
7. The site quoted in the comments could not be considered

The Council is currently working with consultants to undertake landscape sensitivity assessments. We note that this is not currently publicly available as this is still being drafted, however, it may be relevant to take into account its findings once this document is published alongside the Local Plan.

Under 2(i) of Policy HCD2 in defined Local Gaps, development will only be supported '*demonstrates how the proposal safeguards the open character of the relevant Gap*'. I think it's fair to say that almost all new development will have trouble in terms of meeting that requirement. If this policy was to be considered suitable, it is considered that the criteria under 2 (ii) and (iii) would be needed.

Finally, the maps in the settlement gap background paper do not have a key or copyright statements. These will need to be provided for the Regulation 16 stage.

a "strategic site" in its scale, even if it were regarded as potentially suitable, and which in any event has been found unsuitable by the Council itself, so should clearly not be entertained in the new Local Plan.

The ongoing landscape sensitivity work is noted. Two points are made about its scope:

- a) It should take account of the local value of the landscape, its key components and characteristics that have been identified through the HNP process.
- b) Regard should be had to the contribution of land to the distinct identity of the Parish's settlements, whilst appreciating that the definition of gaps is not based simply on landscape quality.

Noted. The suggestion is that the policy may be more acceptable without Clause 1 as drafted. In applying this criterion, it is pointed out, as stated in the Background Paper (para. 55), that this is not applying a blanket restriction on development and that there will be certain proposals within the gaps which would not have an adverse effect on their function. While significant development may well compromise them, smaller development need not, as is recognised.

It is accepted that there is some overlap between the clauses and that they may be merged, for clarity, consistency and simplicity; the revised part 2 of the policy to read:

In the defined Local Gaps, development will only be supported which maintains the integrity of the relevant Gap.

Map comments are noted.

Policy HCD3 Waldron Ghyll Valley

WDC Comment	HPC Response
<p>This policy covers a large proportion of the parish and in seeking to maintain the openness of the valley is not dissimilar to the previous Local Settlement Gaps policy. It is also unclear as to how this area has been defined? Similarly, there are sites submitted within the SHELAA process that would form part of the area covered by this policy, with a number of sites being considered (at a high level at least) to be suitable for development within the 2019 SHELAA. Although, at this stage, these are not of course allocations for development there could be a conflict here at a later stage. You may wish to consider defining the Waldron Ghyll Valley around SHELAA sites that are considered (at a high level) to be suitable for development. There are other instances where 'rural development' may also be appropriate in this area (i.e. agriculture, equestrian etc.). The term 'existing built-up areas' within the first sentence of the policy is also difficult in this context as there are several housing sites with planning permission that have yet to commence or are part way through construction that may not be shown on Figure 12. On this basis, the approach taken on 'existing built up area' as shown on the map will become out of date very quickly and will then have very limited weight.</p> <p>The fundamental question regarding this policy is whether this policy is necessary? Normal policy considerations like design, landscape protection, drainage and biodiversity will ensure its appropriate protection. There are also questions about the wording of the policy and what is meant by 'the overall openness of the Waldron Ghyll Valley ...shall be maintained'. Is this preventing all new development within the defined area? In which case this would be in contradiction to the NPPF and 'saved policies' of the Wealden Local Plan (1998), which permits</p>	<p>The Waldron Ghyll valley has been identified as a distinctive and valuable landscape asset by both the local community and in published landscape character assessments, as set out in the Landscape Character Background Paper. It has been defined by its watersheds, taken from topographical plans, but excluding the main built-up areas of settlements.</p> <p>See the robust response to similar WDC comments about SHELAA sites that is set out in relation to comments on 'Contributing to Sustainable Development' above.</p> <p>The definition of 'existing urban areas' is provided in the policy by the reference to Figure 12. We are not aware of any planning permission for urban development within the Valley area defined on Figure 12.</p> <p>There is no perceived reason why the policy will become out of-date, as it is not expected that WDC would promote other than possibly minor development within the Valley, given its substantial environmental sensitivity.</p> <p>It is not anticipated that developments that are normally allowed in the countryside under existing Local Plan policies would be restricted by this policy, although they would require careful consideration, as appropriate, of the siting of development, of opportunities to manage flood risk, enhance biodiversity and carbon capture.</p> <p>In relation to the need for the policy, reference is made to the PPG relating to the 'Natural Environment' which states: <i>Where landscapes have a particular local value, it is important for policies to identify their special characteristics and be supported by proportionate evidence.</i> [Paragraph: 036 Reference ID: 8-036-20190721]</p> <p>The local value of the Waldron Ghyll valley is recognised, as</p>

<p>development in rural areas in certain circumstances (e.g. paragraphs, 78, 79 80 and 84 for example). The wording needs to be less vague and perhaps maintaining the character would be a better phrase here.</p> <p>If this policy is to be pursued, evidence on the designation will be needed and this would need to demonstrate why this designation on such a large scale is needed given the existing protections in place (e.g. the northern part of the policy area is within the AONB, part of the area is within a Flood Risk Zone).</p>	<p>noted above. Further explanation of the context for the policy within the supporting text, including in terms of special characteristics, may be considered, as may the phraseology of the policy, which WDC rightly observes, is fundamentally about maintaining its [landscape] character.</p> <p>It is appreciated that the northern part of the Valley lies within the High Weald AONB. The HNP policy for the Valley is seen as complementary to the broader, strategic policies for the much wider AONB, providing useful elaboration specific to a key local landscape feature, which of course also extends beyond the designated area.</p> <p>The extent of the flood zone is limited, but the Valley does offer the potential to mitigate downstream flood risks, which is a matter incorporated within the policy.</p>
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Policy HCD4 Important Local Views and Important Views Document

WDC Comment	HPC Response
<p>You have now provided a background document. However, it lacks a full analysis and explanation of the methodology used to assess the views. Who nominated the views? Who assessed the views? Were there any views nominated that did not meet the criteria? Have local residents had any involvement in the process? There is a section on assessment criteria, however, it is still not entirely clear what the criteria are. Perhaps in addition to the text, a table setting out the criteria and why they have been chosen would help. There needs to be a clear rationale that relates to the quality/importance of the view in the neighbourhood area and that the assessment of each view relates back to the criteria for designation and states how the view meets the criteria, or not. You could look at the Stanton Drew NP Protected Views Document as an example.</p> <p>28 proposed protected views (30 if you include 21 b and c) is a high number for a parish of this size. Refining so that just those which are of the highest quality/ importance are included would be beneficial. Also, there are some views which are on the edge of the parish looking out.</p>	<p>This criticism is unreasonable; the criteria for selecting views are set out at paragraphs 5-12 of the Background Paper, the application of which is incorporated into the descriptions of each view, which explain their value locally.</p> <p>Furthermore, it is found to be comparable with other Neighbourhood Plans.</p> <p>Nevertheless, the document will be revised to explicitly state how the assessment criteria apply to each specific view.</p> <p>Of note, the views have all put forward by Parish residents. An initial set of important views was compiled and consulted upon at the “Emerging policy ideas” stage, at which point more were suggested, evaluated and, as appropriate, included in the Regulation 14 version of the NNP, which has of course been consulted upon.</p>

Bearing in mind that the policies in the Neighbourhood Plan will only relate to development in this parish it is difficult to see how the policy could have any effect on these views. Lastly, there a number of views that are largely covered by Policy HCD2 and HCD3, for example View 8 (Gap between Horam and Maynards Green) and View 11 (Hook Wood southeast across Waldron Ghyll) that means there will be duplication in terms of designations.

The wording of the policy is currently too vague. There needs to be some clarification. For example, you state these views should be retained but does this mean as they are with no change or development allowed? This would contradict Local Plan policies and the NPPF. Under part 2, what type of impact are you thinking of and what would you like to prevent? It could be reworded to provide clarification e.g. proposals for development which would have an adverse impact on the landscape character of an Important Local View as defined in Figure 13 of this NDP will not be supported. Alternatively, what would be supported – if you are to plan positively? This policy should be worded positively rather than negatively? I.e. development proposals will be supported where they.....? Landscape mitigation is also something to consider in this policy.

Many of these views are across sites put forward in the SHELAA process and there may be issues around trying to restrict development and meeting the basic conditions as discussed as Policy HCD2 and HCD3. Again, neighbourhood plans should plan positively and should not be used to constrain the delivery of future sites.

Each view is justified and regarded as locally important. All viewpoints are within the Parish. It seems inevitable, given the continuity of landscape, that views extend beyond the Parish boundary in a few cases. It is considered that it would be contrived to omit part of a view, simply because the horizon is beyond the parish, although it appreciated that the HNP will only apply to proposals within the Parish. The revised policy wording will clarify this.

Different designations have different purposes and policy effects. Identifying and having regard to important views is quite different from, and does not duplicate other policies, such as those mentioned. If anything, it shows a consistency of local values.

The policy wording is not a blanket restriction on development, but requires consideration of the nature of the effect on the relevant important view(s). Appropriateness (or “adverse impact”) will be dependent on the nature of the view and the impact of the proposal on it.

The first suggested alternative is itself restrictive – as, indeed, are many Local Plan policies. Notwithstanding this, a more constructive wording that still places the importance of the view at its heart, would be:

Proposals for development in the Neighbourhood Plan area will be supported (subject to other development plan policies) which would not have an adverse impact on an Important Local View, as identified on Figure 13.

See previous comments about SHELAA Sites. In essence, it is a falsehood to say that NDP policies cannot have a managing, or restraining, effect on future development, so long as there are sound reasons for the relevant policies – in the same way that Local Plans set parameters, or limits, for development.

Policy HCD6: Non-designated Heritage Asset. Horam Parish: Historic Overview, Character and Issues Statement, and Approach to Identifying and Protecting Local Heritage Assets Document

WDC Comment	HPC Response
The policy is titled Non-designated Heritage Assets. However, the wording of the policy is quite general and does not relate to non-designated heritage assets directly. The parish itself as a whole does not have heritage significance. The policy either needs to be amended to relate to non-designated heritage assets specifically or if you want to cover the broader historic environment, the title and supporting text need to be changed (however is a wider heritage policy needed when we have district wide policies on heritage and the NPPF?). Despite not identifying and assessing potential non-designated heritage assets you can still have a policy outlining how applications affecting them should be considered/what will be supported.	<p>It is accepted that, while the policy provides a basis for having regard to non-designated heritage assets – which the related Project proposes to help identify – it is more broadly concerned with local heritage as a whole. Indeed, the supporting text already reflects this broader approach. The title will be amended.</p> <p>There is value in the policy in that it requires regard to be had to the historic character and evolution of the Parish, as set out in supporting studies, which are not referenced elsewhere. Indeed, reference may also be made to the relevant Background Paper.</p>

Approach to Identifying and Protecting Local Heritage Assets Document

WDC Comment	HPC Response
If you are not proposing to identify and assess non designated heritage assets as part of the Neighbourhood Plan is this document necessary? It may lead to confusion amongst local residents.	The Background Paper is regarded as helpful in explaining the local context in relation to the consideration of heritage, both in relation to planning applications as well as in relation to the proposed project. However, it will be updated to better reflect the policy.

Horam Parish: Historic Overview, Character and Issues Statement

WDC Comment	HPC Response
This is a detailed document which will undoubtedly be of help when you come to identifying non-designated heritage assets at a later date. It describes the character of each settlement and what should be protected and preserved and where there are opportunities for enhancement, which will be a useful resource for those involved in future development in the parish, both planners and applicants as well as the Parish Council when commenting on applications as part of the planning process.	Noted

Project H(i) Local Heritage

WDC Comment	HPC Response
<p>As explained in the Historic England guidance, the legitimacy and weight within the planning system of local heritage lists is increased when the list has been prepared in accordance with defined criteria and has been subject to public consultation.</p> <p>There is not a mechanism for producing a local list other than via a Neighbourhood Plan, via a future review of the Neighbourhood Plan or via the District Council. We wonder therefore whether the statement should be tweaked to instead be a community project to nominate non designated heritage assets for the production of a local list in the future? The wording of H(i) will need to be amended accordingly.</p>	<p>Noted. The intention is to identify buildings and other structures regarded as of local historic importance. The wording of the project on page 36 deliberately does not refer to this being “Local List”.</p> <p>To help clarify this, it is proposed that the wording of the project (on pages 36 and 83) be amended, as follows:</p> <p><i>Project H(i): Local Heritage</i> <i>1. The Parish Council is keen to ensure sensitive conservation of the historic environment and will promote and support the identification of local heritage assets, drawing on the initial background work and approach set out in the Horam Neighbourhood Plan Background Paper: Approach to identifying and protecting ‘Local heritage’ assets. It anticipates this being a community-led project, carried out in close liaison with partner organisations, notably Wealden District Council and East Sussex County Council, through their respective conservation/archaeology officers. <u>Buildings and other structures regarded as being of local historic importance will be put forward for inclusion on a ‘local list’ of non-designated heritage assets when this is produced by Wealden District Council.</u></i></p> <p><i>Project H(i): Local Heritage - To identify a list <u>buildings and other structures regarded as being of local historic importance</u> of local heritage assets</i></p>

Housing Needs Assessment

WDC Comment	HPC Response
<p>Executive Summary - Paragraph 17: If new housing development was to come forward within Horam Parish, there would still be a district wide need for rented accommodation and this will need to be considered as part of neighbourhood plan policy and the district council's emerging Local Plan, particularly to meet the needs of those most vulnerable.</p> <p>Paragraph 43 relates to accessibility and adaptability standards. The government is intending to mandate M4(2) standards in all new homes, but has not yet done this. Given the above, and that the Council is also expecting to do this through its emerging Local Plan, I am not sure it is needed, as stated at Policy HHD1.</p> <p>Paragraph 46 states 'It is considered that Horam's position in the settlement hierarchy makes it a relatively less suitable location for specialist accommodation on the basis of the accessibility criteria and the considerations of cost-effectiveness above.' We do not believe it is for the local HNA to determine where specialist housing accommodation should go, so would advise to remove this.</p>	<p>Noted. However, it is still a significant finding, as the level of local housing need in parishes should be a factor informing the district's housing distribution strategy, on the basis that housing need, especially for affordable housing, should be met as close to where the need arises as possible.</p> <p>Noted. (This is why Policy HHD1 of the NDP does not refer to these standards.)</p> <p>Noted; however, this is a professional viewpoint and has been provided to inform the HNP approach to meeting the needs of local elderly people, which is regarded as legitimate for a HNP. However, it is further noted that Policy HHD1 includes only a simple set of criteria, but does not seek to set any quantitative need or supply, as this is scoped out of the HNP.</p>
<p>Context</p> <p>Paragraph 72 states 'The Wealden LHNA (August 2021) states that 1,225 dwellings are needed per annum across the district. This can be loosely apportioned to Horam with reference to population statistics. Horam represents 1.77% of Wealden's population and might therefore be expected to need 22 dwellings per annum (rounded). Over the period of the LHNA (2019-2039) this equates to 434 dwellings. Over the anticipated Neighbourhood Plan period (15 years) it equates to 330.'</p>	<p>Noted</p>

<p>The figure for the district has altered slightly since then and it now stands at 1,200 dpa exactly in 2023. This work is of course very straightforward in terms of its methodology and does not account for any spatial strategy from WDC, or provide a constraints-based approach to the Parish (that could either be lower or higher based on these).</p> <p>The NPPF at paragraph 66 confirms within the local planning authority overall requirement, strategic policies should also set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations. At paragraph 67, it confirms that if an exact figure can't be provided, an indicative figure should take into account factors such as the latest evidence of local housing need, the population of the neighbourhood area and the most recently available planning strategy of the local planning authority. It does not appear that the latter issue or constraints has been considered in coming to the conclusion that has been reached.</p> <p>RQ 1: Tenure, Affordability and the Need for Affordable Housing</p> <p>Paragraph 118 states 'First Homes are to be offered at a discount of at least 30% on equivalent market prices (i.e., new build, entry-level properties). Local authorities and neighbourhood plan qualifying bodies will have discretion to increase the discount on First Homes to 40% or 50% where there is evidence to suggest this is appropriate.'</p> <p>Agree with the statement above and this is highlighted in the PPG. Not for this document, but we would expect for the viability of this higher figure to be tested in some way in terms of viability also. The Council itself will be revisiting this issue through its local plan evidence base and this will be viability tested although, this may not be at a 50% discount for the district wide plan, so may not be relied upon.</p> <p>Paragraph 152c states 'For 10% of all housing to be affordable ownership in Wealden, where 35% of all housing on eligible sites should be affordable, 29% of affordable homes should offer a route to ownership.'</p> <p>This is a very strict interpretation of affordable housing policy in the NPPF</p>	<p>Noted, although in defence of the consultants, they did use the latest '<i>evidence of local need</i>' as the starting point for housing growth in the district and they did use '<i>the population of the neighbourhood area</i>'.</p> <p>The consultants were also clearly aware that the '<i>most recently available planning strategy of the LPA</i>', is to provide for the "limited growth" of service centre villages.</p> <p>Noted.</p> <p>Noted.</p> <p>Again, in defence of the consultants, what they say is basically correct. In fact, it is believed that WDC itself appreciates that its current policy does not align with the NPPF.</p>
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<p>and there are several exemptions to this listed that should be included here, including self- build. I would state that many local planning authorities are continuing to prioritise rented accommodation.</p> <p>Paragraph 155 states ‘Since shared ownership appears to be the most affordable route to ownership in Horam, it should represent 10% of the affordable mix after the minimum First Homes share is allocated. Rent to Buy can be seen as the least affordable tenure locally and thus, is given 5% of the mix. Rent to Buy is not common and it may be prudent not to specify an exact percentage if it is not known to be deliverable locally’. We cannot see that Rent to Buy has been covered elsewhere in the analysis before, but it features here in any case and is included in the mix. This is not mentioned in the accompanying policy either.</p> <p>Paragraph 157 states ‘Where the neighbourhood planning group wish to develop policy that deviates from that outlined in the Local Plan – either by differing from the headline split between renting and ownership or by specifying a greater level of detail around sub-tenures, it is important that they liaise with WDC to gather more detailed income and viability information, and to ensure that departures from the local policy context have their support.’</p> <p>Agree with the above comments. This has not been verified by the Council at this stage in terms of viability evidence, particularly on the tenure split and first homes discount.</p> <p>RQ2: Type and Size</p> <p>Paragraph 215 states that ‘The size mix remains generally larger than the national average but slightly smaller than the Wealden average.’</p> <p>We consider on this basis, whether there are actually strong reasons to deviate from the assumptions made for market homes in the Council’s own LHNA? There are substantial differences between the two assessments in terms of the housing mix (particularly around 2- and 3-bedrooms) and it does not appear to be sufficiently justified by the text that precedes the suggested dwelling mix.</p>	<p>Noted. (It is mentioned for completeness, but as observed, it is not carried forward into the relevant policy as it is “not common”.)</p> <p>Noted. This issue was raised in discussions with WDC prior to Reg. 14. The tenure split between rented affordable housing and affordable home ownership is less financially onerous than the current WDC policy, so should be viable.</p> <p>It is accepted that a 50% discount on First Homes would potentially be unviable, which is why the policy is caveated in terms of its impact on viability.</p> <p>Noted, but it is pointed out that the Wealden LHNA (Table 13.1) relates to the population of the district as a whole and provides separate proportions for market and affordable housing, while the HND study is specific to that of Horam parish and relates to all housing.</p> <p>The thrust of HNP policy is that at least 70% of homes are 1,2 and 3-bed, which actually compares closely to the WDC LHNS target of 75% for market homes.</p> <p>AECOM regards its method as robust, having been used for</p>
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<p>The HNA does not consider the housing mix for affordable homes (rented or ownership) so the proposed policy within the NDP can only consider the housing mix of the whole scheme, and this should be made clear in the respective policy.</p> <p>RQ3: Specialist housing for older people, including disabilities</p> <p>Paragraph 269 states that ‘the current adopted Local Plan does not provide explicit encouragement for development to accommodate specific groups such as older people. Also, it does not set specific targets for the proportion of new housing that might be required to meet national standards for accessibility and adaptability (Category M4(2)), or for wheelchair users (Category M4(3)). The evidence gathered here would appear to justify the Parish Council approaching the LPA to discuss setting requirements on accessibility and adaptability at District level. It is unclear whether Neighbourhood Plans can set their own requirements for the application of the national standards of adaptability and accessibility for new housing and so discussions with the LPA are advised if this is a</p>	<p>many plans that have been found to meet the ‘basic conditions’. In any event, part 2 of the policy allows for alternative housing mixes where evidenced.</p> <p>Notwithstanding this, the respective HNAs have been reviewed and it is concluded that the most appropriate indicative local housing mix is for</p> <p><i>1-bed - 10%</i> <i>2-bed - 30%</i> <i>3-bed - 30%</i></p> <p>The reasoning is set out in an Addendum to the HNA for the Parish.</p> <p>The HNP consultants, AECOM, have confirmed that the housing mix assessment applies to all homes, as it is demographically led. However, it is acknowledged in paragraph 5.8 of the supporting text to Policy HHD1 that <i>“Within the overall size mix sought below from new housing in the Parish, it is recognised that in practice it applies primarily to market housing, while Affordable Housing is likely to require a greater weighting towards smaller sizes.”</i> This appears to cover the query.</p> <p>Agreed re M4(2) and M4(3) standards. They are not within the HNP</p>
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<p>key priority’.</p> <p>The Council through its emerging Local Plan will consider the implementation M4(2) standards for all new dwellings and a percentage of M4(3) dwellings where this is possible to do so. This will of course be subject to financial viability testing that the Council is currently undertaking. We note that the Horam NDP is currently not supported by a viability assessment and without this, implementing such standards within policy is likely to come under scrutiny.</p> <p>Given the above and the fact that M4(2) standards may be made mandatory by government in the future, it is not considered that this is necessary for the Horam NDP to consider any further.</p>	
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Policy HHD1: Housing type, size and mix

WDC Comment	HPC Response
<p>Under Policy HHD1, point 4 outlines that <i>‘development proposals which include the provision of homes suitable for older residents, including supported and specialist housing, and independent living, will be supported where it is located within easy access of shops, facilities and public transport services’</i>. However, it does not confirm the type of older person, specialist accommodation that is supported? This is described in the PPG and it would be helpful to include in this policy, unless all types of specialist older persons housing are supported.</p>	<p>Policy refers to supported and specialist housing, and independent living as per the range of housing types outlined in the PPG. This is expanded upon in supporting paragraph 5.12.</p>

Policy HHD2: Affordable Housing

WDC Comment	HPC Response
<p>Under Policy HHD2, point 2, we assume that the affordable housing splits relate to your local HNA but this has not been tested in terms of viability yet. This is a risk to the NDP and could be questioned by housing developers/ agents etc (i.e. what evidence do you have on this point?)</p> <p>After reviewing the HNA, it is noted that due to recent developments in Horam, there is already a higher percentage of such affordable housing in</p>	<p>Policy says 'should', not 'must'. This allows for flexibility in approach. The words '<i>subject to viability</i>', could be added after '<i>should</i>' to help provide clarity.</p> <p>Noted, but see earlier comment in relation to prioritising meeting local housing needs locally.</p>

<p>Horam but this does not necessarily diminish the need for such accommodation at the district wide level. This split in tenure may be appropriate locally, but the council may seek to allocate land through the emerging Local Plan with a different affordable housing tenure mix to meet the district wider need.</p> <p>The Neighbourhood Development Plan would need to provide viability evidence to confirm that this affordable housing tenure mix is viable in Horam.</p> <p>Under point 3, a similar issue arises in respect of the 50% discount to First Homes which is steep and is contrary to our district wide evidence that suggests that a 'discount of 30% looks generally reasonable for first homes, although higher discounts may be suited for 3-bedroom homes'. You may not be able to rely upon the Council's evidence base for this in terms of viability evidence. It is noted that the policy only supports the 50% First Homes discount rather than requiring it, but it should be noted that the District Council's own policy on this matter may override the NDP on this point.</p>	<p>Clause 2 could be updated as above. Clause 3 already refers to viability. No further change needed.</p> <p>Noted. The NDP will take precedence until such a time as the Local Plan is adopted. The policy has already been amended to reflect previous discussions with WDC. No further change needed.</p>
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Local Green Space Assessment Paper

WDC Comments	HPC Response
<p>In relation to paragraph 3.7 of the Local Green Space Report, the latest Open Space Assessment is available on our website, so the following paragraphs will need updating. The Council produced its Wealden District Council Open Space Assessment Report - April 2022 and Wealden District Council Playing Pitch and Outdoor Sports Strategy (April - 2022) that can be found here: Open space, sports and recreation. - Wealden District Council - Wealden District Council</p> <p>On the tables of the Local Green Space Report, if you have no comment to make, we suggest you add a N/A to make this clear.</p>	<p>Noted.</p>

Suggested Site	Comment	HPC Response
Site 1- Land at Corner of A267	<p>Part of this site is within the Council's SHELAA process (reference 1062/3030) and will therefore be considered for both employment and housing use, which it is being promoted for (excludes the pond). Its designation as a Local Green Space may be seen as removing an opportunity for development and meeting the basic conditions test.</p> <p>Of course, it goes without saying, that the landowner (given the site has been submitted to the SHELAA process) will likely dispute this and this is therefore a risk to the NDP.</p> <p>The Council would not consider this site as tranquil, given its location adjacent to the A267 to the east and employment uses to the west.</p> <p>Given the above we do not believe this site is appropriate for Local Green Space designation.</p>	<p>This land is subject to a s106 Agreement as part of the approval for the "Merrydown Village" development to be retained and managed as open space.</p> <p>That it is now being promoted for development is contrary to the decision of WDC in relation to this development. It cannot be seen as failing the 'basic conditions' test'.</p> <p>It is accepted that the land is not currently being managed, which <i>WDC is requested to investigate as an enforcement matter</i>.</p> <p>However, it is still seen locally as a valuable "green break" to development, connecting with the recreation ground.</p> <p>A positive approach to its management will help maximise its contribution to the local amenities and the character of the area. To this end, it is now proposed as a community project.</p>
Site 2- Land in front of Four Seasons	We would question the tranquility issue once more here, given the proximity to the A267 and being bisected by Autumn Drive.	Noted, but each area provides a sense of calm and an appreciation of nature, notwithstanding nearby traffic.
Site 5- Memorial Garden, Hillside Drive	Is there more that can be added here? We do understand the purpose of the Local Green Space designation, but given it is owned by HPC is there any need for this designation? Is there some historical significance as this has been left empty in the Local Green Space Report?	The designation recognises its value in line with the NPPF criteria, and is consistent with the identification of other proposed LGSs.
Site 6- Corner of Paynsbridge Way with Vines Cross Road	It is good quality residential amenity space, but does it meet the high bar of being demonstrably special to the community? Although the public can access the green space, there is no seating or other places to dwell / spend time.	The absence of seating barely detracts from the frequent use of the space for informal play, walking, relaxing, social gatherings, etc., nor does it impact on its visual amenity value. The addition of a bench by WDC, as landowners, would still be welcomed.

Site 7- Land behind Maynards Green School	If it's a school playing field, then does this need an extra level of protection. We therefore, question whether it should be designated as a Local Green Space.	This site is not included in the HNP for designation as a LGS.
Site 8- Area by Hillside Car Park	It is good quality residential amenity land for residential development, but does it meet the high bar of being considered as demonstrably special at this stage. Although the public can access the green space, there is no seating or other places to dwell / spend time.	The absence of seating barely detracts from the frequent use of the space for relaxing, especially in connection with the use of the adjacent Cuckoo Trail, etc., nor does it impact on its visual amenity value. The addition of a bench by WDC, as landowners, would still be welcomed.
Site 10- Field and bank north of solar farm	<p>It appears from the wording that the origin of the ponds has not been agreed, so perhaps don't use this unless it can be certain that it relates to the Wealden iron industry.</p> <p>If support was to be given (it appears from the summary table that you do not intend to designate) then the justification will need to be thought out more thoroughly. We agree that there may be some difficulty in making the connection that this land is demonstrably special to the local community.</p>	This site is not included in the HNP for designation as a LGS.
Site 15- Land at Foords Farm	We would question whether this green space is in close proximity to the community it serves, given its location outside of Vines Cross and with no substantive pedestrian connectivity. Can the general public use it?	<p>This green space is part of the setting of Foords Farm, the buildings of which adjoin the main built-up part of the village.</p> <p>Notwithstanding that it is regarded as intrinsic to the character of the approach to the village, it is accepted that it is safeguarded as part of the setting of the Listed farmhouse.</p> <p>It is proposed that this LGS designation is accordingly withdrawn from the HNP.</p>
Site 16- Golf Course	Agree with the conclusion here, but we consider it to be an extensive tract of land in our view and should not be brought forward as a LGS. Of course, part of the golf course is also outside the Parish as well so cannot be included.	Noted

Site 18- Area between Cuckoo Trail and Maynards Green Road	Agree with the conclusions, the site is already in the High Weald AONB, heavily treed, narrow and is owned as part of the Cuckoo Trail. There is no further requirement to designate as an LGS.	Noted
Site 19- Corner of Laundry Lane and Horebeech Lane	Agree with summary, that this is a very small parcel of land that relates to a highway verge and vehicle crossovers and is not demonstrably special, albeit those trees of course hold amenity value. This should not be an LGS.	Noted
Site 20- Wooded strip of land on west side of Chiddingly Road	Agree with the conclusion that states a TPO is potentially the most likely protection here and that a LGS is not necessary.	Noted
Site 21- Green strip between electricity sub station and Crematorium	Part of this site is included within the SHELAA process (reference 911/3030) and also forms part of a planning application for new homes under reference 2022/1899. There is planning permission for housing development (38 (net) dwellings) for the site under WD/2018/2526/MAO that was granted in November 2022. We would advise strongly that this not included as a LGS, given the risks to the NDP. I have noted that your summary concludes that you will not bring this forward as a LGS and we agree with this.	This site is not included in the HNP for designation as a LGS.
Site 24- Land behind the Brewers Arms	<p>Agree with conclusion to this LGS candidate. The site use is no longer in operation and is located within the High Weald AONB, so is sufficiently protected.</p> <p>We would note that the field itself was submitted to the SHELAA under reference 239/3320 but was found 'unsuitable' in the latest assessment in 2019. Nonetheless, there is a risk the landowner would not support the designation of a LGS here and this in turn would be a risk to the NDP.</p>	Noted

Site 25- Field behind the Brewers Arms, Vines Cross	<p>See comment above for the smaller part of this site. Agree with the conclusion and would strongly suggest that you do not designate this site as a LGS. The site is within the HighWeald AONB in any case.</p> <p>Is there a reason why this has been considered separately to Site 24, given they form part of the same field?</p>	Noted
Site 26- Strip of land alongside Nettlesworth Lane	Agree with conclusion that the site is not suitable for LGS designation, given its existing protection as part of the HighWeald AONB and its narrow form, as well as its lack of recreational value.	Noted
Site 27- Field between Laundry Lane and Rosemead Place development	<p>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. The site has also been subject to several planning applications in recent years for residential development including the latest planning application under reference WD/2022/1694/MAO for 46 homes that was refused in June 2023 following a committee decision.</p> <p>It is noted that there will likely be strong resistance from the developer during the NDP preparation and this is of course a substantial risk to the NDP. In addition, 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.</p> <p>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.</p>	<p>This comment is inconsistent with WDC's formal decision to refuse planning permission for the application cited (and a previous one).</p> <p>Central to that decision was that "the development would significantly impact up on the visual amenity of the rural landscape character of the area, it would result in the loss of a valued open space that contributes to that rural landscape character, it would undermine the settlement pattern and the gaps between settlements, and it would harm the rural landscape setting of the High Weald Area of Outstanding Natural Beauty".</p> <p>It is strongly believed that the site meets the NPPF criteria, which does not exclude agricultural land from designation. Its proximity to the recent Rosemead Place ("Poppy Drive") development only increases its local amenity value.</p> <p>WDC officers are respectfully asked to review their position in the light of their own Council's decision noted above.</p>

Site 28- Open space alongside the Waldron Ghyll	<p>Part of this site to the south has been submitted to the Council under the SHELAA process (reference 925/3030) and was found unsuitable for development due to TPO protections, views to the AONB and flood risk in the 2019 SHELAA.</p> <p>Given the environmental protections in place, including flood risk, it is not considered necessary to designate this site as a LGS as stated, as there are limited options for development in this location.</p> <p>In addition, as stated before, given the submission of the land within the SHELAA process, there is a risk that the landowner will actively disagree with the assessment as an LGS, and therefore, this is a risk to the NDP.</p>	<p>As noted in earlier comments regarding the SHELAA, it has no planning status. It can also be seen that there is still some landowner interest.</p> <p>In any event, WDC is mis-applying the test as to the appropriateness of the LGS designation. It is not a designation that relates to a perceived threat of potential development, but is based on its merits in line with the NPPF criteria for LGS designation.</p> <p>The environmental merits of this stream-side corridor appear to be agreed.</p>
Site 29- Main part of Clearhedge Wood	Agree with the conclusion to this assessment as almost all of the land is Ancient Woodland so strongly protected, and moreover, this is an extensive tract of land. Therefore, we would agree with the conclusion that this site should not be a LGS.	Noted
Site 30- Eastern arm of Clearhedge Wood	Agree with conclusion that there is no need to designate this site as an LGS given its existing protection as Ancient Woodland.	Noted
Site 31- Main part of Coneyburrow Wood	Agree with conclusion that there is no need to designate this site as a LGS given it is largely still protected as Ancient Woodland. The site is also an extensive tract of land and quite some distance from the local community.	Noted
Site 32- Ancient woodland south west of Horam Manor	Agree with the conclusion that there is no need to designate this site as an LGS given its existing protection as Ancient Woodland.	Noted

Site 33- Field enclosed by Ancient Woodland	Agree with the conclusion that the site is not demonstrably special and it is also not publicly accessible, meaning it is unlikely to pass the NPPF criteria at paragraph 102.	Noted
Site 35- Land and banks behind units in Discovery Way	<p>This site is within the SHELAA process (reference 117/3030) and was considered suitable for residential development within the 2019 SHELAA report. It is also known that there is a live planning appeal for residential development with the Planning Inspectorate (reference 2022/1180) so it is likely that the landowner will challenge this designation as an LGS.</p> <p>This is of course a risk to the NDP and will likely be challenged. There is also a risk that the appeal succeeds. Given the above, it is advised that this parcel of land is not designated as an LGS.</p> <p>That this site is subject to an ongoing planning appeal for residential development should be stated in the assessment.</p>	This site is not included in the HNP for designation as a LGS. It is accepted that it does not reach the threshold for a LGS, notwithstanding that it has some value in providing a semi-rural edge to the adjacent countryside.
Site 36- Land south of Grange Close	<p>This site has been submitted to the SHELAA (reference 123/3330 and 875/3030) and was previously considered as part of an allocation for housing within the withdrawn Wealden Local Plan (2019) and is actively promoted for residential development. Both sites were considered suitable for residential development as part of the 2019 SHELAA report.</p> <p>This is a significant risk to the NDP and designation as a LGS has been actively criticised by the developer/landowner through the Regulation 14 consultation process. In addition, it is not considered that this site is demonstrably special to Horam and moreover, it is difficult to envisage how it would meet the NPPF criteria.</p>	<p>The proposed designation should not be swayed by whether a landowner or developer is promoting the site for development. It is not in an adopted Local Plan and is beyond its 'development boundary'</p> <p>The proposal for a LGS recognises the contribution that the trees - now felled – made to the setting of this part of the village.</p> <p>It is understood that there is ongoing enforcement action in respect of the felling and that, if there is a requirement to replant, then this may be re-established. However, at this point, the outcome is not known and, moreover, the replanting would be subject to separate legislation.</p> <p>Therefore, it is concluded that, on balance, the proposal for a LGS would be premature.</p>

Policy HCE4: Local green space designations

WDC Comment	HPC Response
For clarity, and as discussed above in relation to the Local Green Space background paper, we can confirm that Wealden District Council supports/does not support the following Local Green Spaces Designations in Policy HCE4: Local Green Space Designations:	See table below

Local Green Space Designations in Policy HCE4	Wealden District Council Stance at Regulation 14	HPC Response
a) Land at corner of A267/accessway to Village Hall (Site Ref. 1 in LGS Report)	Does not support	See comments above – To be retained
b) Land in front of Four Seasons adjacent to the A267 (bisected by the entrance road to Four Seasons) (Site Ref. 2 in LGS Report)	Support	Noted
c) Allotments (Site Ref. 3 in LGS Report)	Support	Noted
d) Horam Recreation Ground (Site Ref. 4 in LGS Report)	Support	Noted
e) Memorial Garden, Hillside Drive (Site Ref. 5 in LGS Report)	Support (although it is not thought to be necessary given the land is owned by Horam Parish Council)	Noted
f) Land on corner of Paynsbridge Way and Vines Cross Road (Site Ref. 6 in LGS Report)	Does not support	See comments above – To be retained
g) Area by Hillside Car Park, junction with Meadow Rise (Site Ref. 8 in LGS report)	Does not support	See comments above – To be retained

h) Station area, Horam, including access land from B2203 (Site Ref 9. In LGS report)	Support	Noted
i) Land between Horebeech Lane and Beauford Road (Site Ref. 11 in LGS Report)	Support	Noted
j) Land between the High Street and garages in Beauford Road (Site Ref. 12 in LGS Report)	Support	Noted
k) Vines Cross Pond, Foords Lane junction with Ballsocks Lane (Site Ref. 13 in LGS Report)	Support	Noted
l) Land at Hurst Shaw, Vines Cross (Site Ref. 14 in LGS Report)	Support	Noted
m) Land at Foords Farm with duck pond (Site Ref. 15 in LGS Report)	Does not support	See comments above – Not retained
n) Strip of land between Merrydown estate and the A267 (Site Ref. 22 in LGS Report)	Support	Noted
o) Pond between tennis/football pavilion and Winter Gardens (Site Ref. 23 in LGS Report)	Support	Noted
p) Field east of Rosemead Place, north of Marle Green, crossed by footpath 11 (Site Ref. 27 in LGS Report)	Does not support	See comments above – To be retained
q) Treed rural fringe along banks of Waldron Ghyll and footpath, between Maynards Green Road and Vines Cross Road (Site Ref. 28 in LGS Report)	Does not support	See comments above – To be retained

r) Fishing Lakes and surrounds, opposite Lakeside Cafe (Site Ref. 34 in LGS Report)	Support	Noted
s) Land south of Grange Close, adjacent to A267 (Site Ref. 36 in LGS Report)	Does not support	See comments above – Not retained

Water Management and Flood Risk Background Paper

WDC Comment	HPC Response
<p>1.6- Much of the area described in this paragraph is outside and downstream of the parish.</p> <p>2.6- This is unproven – there may just be no capacity left within parts of the foul sewage network.</p> <p>The statement at paragraph 2.8 “Increased impermeable surfaces increases run-off and can impact on both fluvial flood risk and surface water flooding incidents” is misleading as surface water runoff and flooding can, and is, managed by the inclusion of Sustainable Drainage Systems (SuDS) within developments. The NPPF is clear that development should only be allowed in areas at risk of flooding where, in the light of a site specific flood risk assessment (and the sequential and exception tests, as applicable) it can be demonstrated that it incorporates sustainable drainage systems, unless there is clear evidence that this would be inappropriate (paragraph 167(b)). This sentence should be caveated to this effect.</p> <p>The Council’s SFRA should be referred to more extensively and the data within it used within this paper (and particularly within Section 3), rather than simply relying on the EA Flood Map for Planning (Figure 5) as the Council’s SFRA is based on more up to date flood modelling, and this is for flood risk from all sources taking into account the climate change allowances to represent potential future flood zones.</p>	<p>Agree that the paragraph and associated Figure 4 cover the Upper Cuckmere River catchment which extends beyond Horam, but it is very relevant context.</p> <p>Surcharging has been reported and recorded and Southern Water has noted the issue of storm water infiltration.</p> <p>This paragraph is simply providing contextual information. The fact that impermeable surfaces <u>can</u> impact on flooding is the reason why SuDS and permeable paving requirements have been introduced. The document, and the HNP, go on to promote SuDS.</p> <p>It is agreed that the SFRA is particularly useful in relation to considering future flood risks; hence, it is duly referenced and drawn upon, as are other useful sources.</p>

<p>Paragraph 3.4 refers to the “areas of most serious and/or persistent flooding” being upstream from where the watercourse is bridged by a road, track or footpath. However, this cannot be a certain conclusion as the Flood Zones shown on Figure 5 represent the floodplain of the watercourse/river. They do not show persistence or severity of flooding, just where the river floods. Furthermore, within this paragraph there is no evidence to support the assertion that “Stream Farm Bridge and Horeham Bridge (shown by red circles on Figure 5) are recognised as restricting high flows and causing upstream flooding”.</p> <p>3.9- Built-up areas are over-represented on such mapping as incidents are more easily observed and have potential for an adverse flood impact than a more rural equivalent area.</p> <p>3.12- This is true nationally and is one of the reasons our drainage engineer and the LLFA comment on new development drainage.</p> <p>Paragraph 4.2 is again misleading. The NPPF is clear that “All plans should apply a sequential, risk-based approach to the location of development – taking into account all sources of flood risk and the current and future impacts of climate change – so as to avoid, where possible, flood risk to people and property”. They should do this, and manage any residual risk by, amongst other measures, “using opportunities provided by new development and improvements in green and other infrastructure to reduce the causes and impacts of flooding, (making as much use as possible of natural flood management techniques as part of an integrated approach to flood risk management)”. The NPPF does not explicitly say, as paragraph 4.2 does, “land at the lowest risk of flooding from all sources, should be considered for development; i.e. land in Flood Zone 1 with no surface water or other sources of flood risk” as surface and other flood risk can be mitigated.</p> <p>Paragraph 4.4 is superfluous to the NDP as it is a policy requirement of the Local Plan preparation to undertake the Sequential, and potentially Exceptions, Tests. The NPPF clearly stipulates this and the NDP does not need to repeat this fact. Would also argue that the statement in this paragraph “Given the clear evidence that Horam is susceptible to flooding” is misleading as the areas susceptible are contained to along the river (fluvial flooding) and some parts of the Parish to surface water flood</p>	<p>Flood zone information provides the cornerstone of planning to mitigate flood risk. Regard has also been had to other sources of flooding, but the locations identified are consistent not only with EA mapping but with local knowledge of flood incidents. The Lead Local Flood Authority has not raised any objections.</p> <p>Noted, although this does not detract from the evidence on the number of recorded flood events locally.</p> <p>Noted.</p> <p>The paragraph is not misleading. It firstly quotes from the NPPF for clarity. For clarity, the paragraph states: “. to ensure that land at the lowest risk of flooding is considered first.” This is considered a fair reflection of the Sequential Test.</p> <p>In essence, the sequential test is absolute, which is what the paragraph conveys.</p> <p>Agree that the text should clarify that it is “parts of Horam” that are susceptible to flooding.</p>
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<p>risk. The entire Parish is not shown to be covered by fluvial or surface water flood risk and in any case surface water flooding can be effectively managed through the provision of SuDS and in such cases should not be considered a constraint to development.</p> <p>4.8- This is a somewhat new approach and would require landowner cooperation.</p> <p>At paragraph 4.16, it states that “it is considered both reasonable and necessary that development in the Heathfield – Horam – Hellingly areas should seek to contribute to reducing flood risk in the catchment of the Waldron Ghyll/Bull River/Cuckmere River” however development is only expected to reduce its own flood risk and ensure it doesn’t contribute to increasing flood risk elsewhere. This does not cover remediating issues that are beyond that required for a development to address. This comment also applies to the final bullet point of paragraph 4.17. They go beyond what can be asked of developers.</p> <p>There is little / no evidence to support the requirement at paragraph 4.18(c), and this approach does not align with the national policy approach to flood risk. The national policy approach does not specify “upstream” or “downstream” of specific infrastructure, rather it requires all developments to assess flood risk on a case by case basis through a site specific flood risk assessment following the sequential test and potentially exceptions test.</p> <p>In addition, paragraph 4.18(e) does not align with the national policy approach. It would be dependent on the location and size of the site and space for water would need to be considered on a case-by-case basis taking account of flood risk and all other material considerations.</p> <p>Furthermore, paragraph 4.18(f) does not align with national policy and this is not something that would be able to be requested of developers. Also, it is unclear whether the strategy would be just for the site or would it cover a much wider area. In addition, who would develop the strategy?</p> <p>In approaching the management of flood risk and general principles, it would be beneficial to follow the national approach and the recommendations within the Council’s SFRA.</p>	<p>Noted.</p> <p>Attention is drawn to the expectations of the LLFA in its Flood Risk Management Strategy, referenced in the Paper, as well as the PPG which states, in relation to “How can it be demonstrated that development will reduce flood risk overall?”:</p> <p><i>“Developers should refer to the Strategic Flood Risk Assessments and site-specific Flood Risk Assessments to identify opportunities to reduce flood risk overall and to demonstrate that the measures go beyond just managing the flood risk resulting from the development.”</i></p> <p>Paragraph: 037 Reference ID: 7-037-20220825</p> <p>See above response.</p> <p>The “strategy” referred to here is simply the policy approach within the HNP and through related projects.</p> <p>Noted. See related responses.</p>
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<p>In the Natural Flood Management section, you will need to provide evidence to support the claim that “Given the terrain and landscape and flashy nature of the ghylls, the local area is suited to the use of NFM measures to mitigate the effects of extreme rainfall events and the most damaging impacts of flooding”. This approach would require agreement and cooperation of landowners and could be difficult to implement.</p> <p>The use of leaky dams (paragraph 4.22) is a relatively new approach and is yet to be comprehensively proven to work. There is the risk that debris from the leaky dam is washed down stream and in fact could cause blockages to pipes or the watercourse further downstream.</p> <p>The NPPF does state that local plans should manage residual flood risk by (alongside other measures) safeguarding land from development that is required, or likely to be required, for current or future flood management (paragraph 161(b)), however the use of flood storage areas has issues as it is likely to involve the flooding of private land and therefore requires landowner approval / cooperation. This matter is best addressed through the production of the Wealden Local Plan rather than the NDP in the first instance (paragraph 4.23 of the NDP).</p> <p>At paragraph 4.24, would urge caution as to the sweeping statement that “The most suitable locations are woodlands, as occasional, short-term flooding does not cause real damage to the woodland flora”. There is no evidence given to support this statement. Whilst ‘wet woodland’ may be suitable, some woodlands may actually be damaged by letting them flood for example. The NPPF makes no specific mention of the types of habitats that could be used in NFM.</p> <p>4.28- They have effectively been mandatory for some years now.</p> <p>4.31- This should be determined by a site-specific percolation test to BRE Digest 365.</p> <p>4.33- ‘Targeted woodland planting can slow water across the landscape’- or lead to loose wood blocking downstream assets</p> <p>Water Management and Flood Risk Strategy- see comments on this in the table below.</p>	<p>This is a surprising comment given the national support now being given for NFM, the evidence of the topography, the EA conclusions on the reasons for previous flood events and the current work being done, led by the EA working through the High Weald AONB Unit, to install NFM locally, as illustrated by the cover photograph.</p> <p>Noted, but see above, where initiatives are undertaken. <i>[WDC is asked to consider the national and local evidence in relation to NFM in relation to evolving its approach to reducing flood risks.]</i></p> <p>It is to be noted that the background paper was shared with the LLFA and the EA which have contributed to the approach outlined within the Paper.</p> <p>See above response. The text will be reviewed.</p> <p>The statement about SuDS becoming mandatory is correct, although they have been sought as a matter of policy for some time.</p> <p>Noted</p> <p>This is taken from national NFM guidance.</p>
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Specific Points in the Main Plan Document

Para/Policy Reference	WDC Comment	WDC Suggested Change/ Recommendation	HPC Response
Paragraph 1.5	This looks like it should be a link but it does not work. Any quotations should be fully referenced.	Add link to the source	Noted. To update
Figure 1	Would be better if the map was around the right way.	Move map 90 degrees. If you need help with mapping please advise us.	Noted. To update
Paragraph 1.7	'it will be submitted to WDC for a further consultation'	We would suggest adding here the following: 'It will be submitted to WDC at the Regulation 15 stage when the District Council will confirm it meets regulatory requirements - this could be a footnote.	This is not needed as the next version is the submission version
Paragraph 1.25	There are some initial stages that have admittedly past now that have not been included here such as SEA/HRA Screening and the formal designation of the area.	Suggest that these are added in at the appropriate places.	Not necessary. The text says these are 'broadly' the stages
Paragraph 2.2	The second sentence is quite long and doesn't read very well.	Adjust the commas and add in 'meant that' before the Weald	Noted. To update
Paragraph 2.13	Typo 'High Weald Area of Natural Beauty'	Add 'Outstanding'.	Noted. To update
Paragraph 2.24	'iron extraction, with and forges are noted in the area'.	Amend the wording so that this sentence makes sense.	Noted. To update

	This sentence does not make sense.		
Paragraph 2.32	‘It is referred to as a hamlet but as is’ Unfinished sentence	Finish the sentence.	Noted. Amend to read: “but as is more of a small group of dwellings centred on the road junction.”
Objective 10	‘These should be inclusive and accessible.’	This could be changed to something like ‘To encourage and enable inclusive and accessible cycling, walking and public transport services’.	The support for cycling, walking and public transport services reflects a general principle of inclusivity. This also applies to a number of other policies. Amending the Objective is not considered necessary.
Paragraph 4.4	The NPPF at paragraph 130 does state planning policies should ensure that developments are sympathetic to local character and history, including the surrounding built environment and landscape setting, but also states (my emphasis) ‘ <i>while not preventing or discouraging appropriate innovation or change (such as increased densities)</i> ’. In addition, reference to the Wealden Local Plan and Policy EN7 is not correct as this only relates to the Ashdown Forest.	We are not sure that paragraph 130 of the NPPF is necessarily reflected in full in the Neighbourhood Development Plan. Reference to Policy EN7 of the Wealden Local Plan should be removed from paragraph 4.4. Believe the reference you are referring to is EN6.	Noted. No change. It doesn’t preclude innovation or change where these do not impact on the general openness of the gap. Noted. To update

Policy HCD2 Local Settlement Gaps	See separate detailed comments above.		See previous response
Policy HCD3 Waldron Ghyll Valley	See separate detailed comments above		See previous response
Policy HCD4 Important Local Views	See separate detailed comments above		See previous response
View 14	'View from Furnace Lane looking SSW across Hook's Farm listed building'	What does the 'SSW' mean in this phrase? This should be spelt out. We assume south-southwest?	Agreed
View 17	States N/A?	We assume this view will need a title? It is noted that this suggested view was not incorporated so why is it here? Is this a list of potential views?	The former View 17 was not included in the HNP. However, following the Regulation 14 consultation, another important view has been identified, which is given this number (rather than change all other view numbers). This is the view leaving from Nettlesworth Lane on leaving Vines Cross to the south, looking south-westward across the Waldron Ghyll valley towards the north-facing valley slopes and skyline.
Policy HCD5 Design of New Development	Criteria c) 'Normally be of one or two storeys in height' Criteria j) 'Have safe vehicular and pedestrian access and not result in unacceptable traffic or transport conditions, including congestion'	Very specific – a reference to reflecting character and height is sufficient. What justification/evidence is there for this specific reference to storey heights? This is still not defined particularly well here and will be judged by the local highway's authority in any case as part	Heights based on supporting character work / Design Code. No change. The wording draws out congestion as a local issue, which is not specifically referred to in the NPPF paragraph

		of a planning application process. Could use similar wording to the NPPF at paragraph 111?	referred to. However, it is agreed that the criteria may be better aligned – without repeating – national policy, to read: <i>Have <u>acceptable</u>, safe vehicular and pedestrian access and not result in <u>severe unacceptable traffic or transport</u> conditions on the local road network, including <u>in terms of</u> congestion.</i>
Paragraph 4.28	The final sentence of the paragraph 4.28 requires a fullstop.	Add full stop.	Noted. To update
Policy HCD6 Non designated Heritage Assets	See separate detailed comments above		See previous responses
Paragraph 5.3	'There are some 1,350 dwellings in the Parish as of 2021'	Is this known as the Census has not dealt with lower geographies than the district level at this stage. Is this estimated from tax banding? It would be helpful to have a source added.	It is confirmed that this is the 2021
Paragraph 5.9	'The total population of the Parish, as of the 2021 Census, is 3,100 people'.	See comment above, but I am not sure this was released in the 2021 Census, I assume this is an estimate. In any case, can the source be added, it may be the HNA estimate.	It is confirmed that this is the 2021 Census figure.
Policy HHD1: Housing type, size and mix	See separate detailed comments above		See previous responses
Paragraph 5.17	(An income multiple of 3.5 is used by the Financial Conduct Authority as the standard assumption for single mortgage applicants...)	The term 'conduit' is used here, but I assume it's 'conduct' here. Could this be a footnote?	To be updated with 'Conduct'. Will not be a footnote as these are not recommended in accessibility standards.

Paragraph 5.20	<p>'subject to viability considerations'</p> <p>Has this work been undertaken? This will be key for this policy moving forward and without this work there will be risk for the NDP (I.e. what's the evidence to suggest this is financially viable?)</p>	Add viability evidence	As per previous discussion with WDC, viability work has not been undertaken. Hence why the text and policy includes the wording 'subject to viability'
Policy HHD2: Affordable Housing	See separate detailed comments above		See previous responses
Paragraph 6.2	'...in a net gain for wildlife'	Should be ..in a net gain for biodiversity...	Noted. To update
Paragraph 6.3	'...that biodiversity gains'	Should read ... that biodiversity net gains (see last sentence).	Noted. To update
Paragraph 6.5	..the Cuckoo Trail..	This isn't really a habitat. Suggest removing and refer to it as part of the GI network instead.	While the Cuckoo Trail does not carry any designation, it is a valuable corridor for wildlife, as well as having a broad range of trees and other vegetation along it, having been established over 100 years ago. The wording will be rephrased to highlight this in the context of its GI role.
Paragraph 6.9	<p>'Planting of locally native trees and shrubs'</p> <p>Need to consider the possibility that non-native species may be more appropriate due to things such as climate change. Native species may not be well suited to a changing climate for example.</p>		Text says 'preferably'. This does not preclude non-native species. It is not a specified requirement of the policy in any event.

Policy HCE1: Nature and biodiversity	Point 1 ‘... as minimum,’	Should read ‘as a minimum’,	Noted. To update
Policy HCE1: Nature and Biodiversity	<p>Point 3</p> <p>‘Where development incorporates green infrastructure, either through retention and or provision of new infrastructure, it should:’</p> <p>This makes it sound as though developments don’t have to provide GI whereas I am assuming the point of the policy criteria and the policy itself is to ensure GI provision, enhancement and protection.</p> <p>The list that follows is fine, although some thought may be needed around d) as walking and cycling could be at odds with nature conservation / enhancement opportunities.</p>	<p>Consider rephrasing:</p> <p>‘Development should incorporate green infrastructure within the scheme design and layout where possible, either through retention and or provision of new infrastructure, and in so doing, the GI provided should:’</p> <p>For point d) wording to the effect of the following could be used:</p> <p>‘Maximise opportunities for people to interact with nature and encourage walking and cycling, ensuring that opportunities will not cause harm to wildlife and habitats’</p>	Noted. To update
Policy HCE2: Trees and Hedgerows	<p>Criteria 2 says:</p> <p>‘Development that incorporates, or is likely to impact on, existing trees, woodlands or hedges should provide for their retention and long-term management’.</p> <p>It can be the case sometimes that the removal of certain trees is needed / acceptable to ensure the wellbeing of others, and this would be decided on an application basis. Also, maybe tricky to ask for ‘long-term management’.</p>	<p>Having spoken to the Council’s Arboricultural and Biodiversity Officer, we suggest rewording:</p> <p>‘Development that incorporates, or is likely to impact on, existing trees, woodlands or hedges should provide for their retention, where appropriate, and ongoing management.’</p>	<p>It is agreed that ‘<i>ongoing</i>’ is a better phrasing than ‘<i>long-term</i>’.</p> <p>However, the addition of ‘where appropriate’ is considered unhelpful, as trees and hedges generally require some degree of ongoing management.</p>

Policy HCE3: Dark Skies and Lighting	Criteria 1 'Provision of street lighting is not normally appropriate within new development'.	This is a statement rather than a policy requirement. Suggest deleting as Criteria 2 covers this point. A good example of a dark skies policy which looks at lighting is Wadhurst's (Policy WAD17)	This comment has been carefully considered, but the prevailing view is that street lighting is not appropriate in a village setting, except where there is an overriding public safety concern. Therefore, it is proposed to amend part 1 of the policy to read: <i>'New street lighting will only be supported where there are significant public and highway safety concerns, and will not normally be supported within residential and rural areas.'</i>
Policy HCE 4: Local Green Spaces	See separate detailed comments above		See previous responses
Policy HCE5	(1) '... established in the Wealden Open Space Study'	There are two reports related to the openspace study: https://www.wealden.gov.uk/UploadedFiles/Wealden-Open-Space-Report-26.05.22.pdf or https://www.wealden.gov.uk/UploadedFiles/Final-Wealden-Parish-Areas-Summary.pdf It will be necessary to identify the correct report with the title and link from our website.	Noted.
	(c) '... within walking distance'	Should read 'within walking or wheeling distance'	Noted. To update

	(e) 'Provide a range of open space types, including areas of play, opportunities for growing food, and quieter areas for relaxation'.	Provide a range of open space types, including areas of play, opportunities for growing food, and quieter areas for relaxation that meet the minimum size requirements as set out in the WDC Open Space Report April 2022	Not needed as this is already established in the main part of Clause 1
	(g) '... Enable play spaces to be accessible for all children'	Consider elaborating on this point: Enable play spaces to be accessible and inclusive for children of all levels of ability whilst incorporating elements relating to nature and landscape in addition to play equipment.	Noted. To update
Paragraph 6.32	'means that that it'	Delete repeated 'that'	Noted. To update
Paragraph 6.34	<p>'areas of most serious and/or persistent flooding are almost all at, or immediately upstream from where the watercourse is bridged by a road, track or footpath'</p> <p>This cannot be a certain conclusion as the Flood Zones shown on Figure 5 represent the floodplain of the watercourse/river. They do not show persistence or severity of flooding, just where the river floods.</p> <p>'It follows that, unless the capacity of such bottlenecks can be increased, that any additional run-off upstream of them would increase flood risk in those areas'</p>	Add evidence for this or remove	<p>See previous response.</p> <p>The Background Paper will be amended to include further evidence to support the statement, which has been the subject of discussions with both the LLFA and the EA.</p>

	Is there evidence to support this or is this anecdotal?		
Paragraph 6.37	'Given that most <u>of</u> land'	Given that most of <u>the</u> land	Noted. To update
Paragraph 6.38	<p>'should take opportunities to help reduce flood risk in Horamand the wider catchment of theWaldron Ghyll'</p> <p>Development is only expected to reduce its own flood risk andensure it doesn't contribute to increasing flood risk elsewhere.This does not cover remediating issues that are beyond that required for a development to address.</p>		<p>Attention is drawn to NPPF paragraph 161(c):</p> <p><i>c) using opportunities provided by new development and improvements in green and other infrastructure to reduce the causes and impacts of flooding, (making as much use as possible of natural flood management techniques as part of an integrated approach to flood risk management);</i></p> <p>Also, the PPG states:</p> <p><i>'Local Planning Authorities should take an integrated approach to flood risk management when preparing plans, as per National Planning Policy Framework paragraph 161(c). This is a collaborative, catchment-based approach delivering coordinated management of water storage, supply, demand, wastewater, flood risk, quality of water and the wider environment. It can help to identify the most effective and efficient approaches to addressing too much or too little water, enabling sustainable and climate resilient development in a way which reduces flood risk whilst</i></p>

			<p><i>delivering multiple wider benefits.</i> Paragraph: 009 Reference ID: 7-009-20220825</p> <p>This Guidance is carried forward into the East Sussex Flood Risk Management Strategy, which identifies areas where an improvement in greenfield run-off rates should be sought in order to minimise downstream surface water flood risk.</p>
Paragraph 6.39	This is a somewhat new approach requiring landowner cooperation.		Noted. No change
Paragraph 6.40	<p>'The most suitable locations for these measures are woodlands. Open, low-lying land adjacent to watercourses, where flood waters can safely overspill for short periods, may also be appropriate. Potential areas of opportunity for Natural Flood Management are shown indicatively on Figure 16'</p> <p>There is no evidence given to support this statement. Whilst 'wet woodland' may be suitable, some woodlands may actually be damaged by letting them flood for example. The NPPF makes no specific mention of the types of habitats that could be used in NFM.</p>	Add evidence for this.	This statement reflects national EA advice, discussions with the EA's local NFM officer and its practice of establishing NFM features within woodlands locally. It is not intended to imply that woodlands should be simply flooded, which can be made clearer.
Paragraph 6.41	<p>'The use of sustainable drainage systems (SuDS) is encouraged'</p> <p>This is a requirement on new development.</p>	Reword	They are connected - as explained in next para. Text to be reviewed to see if para 6.41 and 6.42 can be combined.

	<p>This paragraph is true but the two sentences in the paragraph are unconnected.</p>		
Paragraph 6.42	<p>'Depending on the height of the water table at the location of any proposed development site, restrictions may be placed on the types of SuDS appropriate to certain areas'</p> <p>This is standard national practice, not unique to Horam.</p>	<p>If this has come from the ESCC SuDS guidelines, then it should be made clear that this is where the information has come from. At the moment, it appears to be just anecdotal evidence.</p>	<p>Text is based upon Background Paper, drawing on ESCC. This can be highlighted.</p>
Paragraph 6.43	<p>'Where SuDS are appropriate to the location, they should be compatible with and contribute to local landscape character'.</p> <p>This is desirable/aspirational rather than enforceable.</p> <p>Above ground features such as a pond provide more contribution to the area, are cheaper to build and easier to maintain than the equivalent underground feature such as a tank.</p>		<p>Noted. No change necessary</p>
Paragraph 6.45	<p>'Where hard landscaping is needed the use of porous materials should be maximised to enable infiltration'.</p> <p>Subject to soakage tests to BRE Digest 365.</p> <p>'Applicants shall consult with East Sussex County Council and Environment Agency (EA), as well as Wealden District Council, as appropriate to inform an appropriate drainage solution'</p>		<p>Noted. No change necessary</p>

	The Council would do this as part of the planning process.		
Paragraph 6.47	<p>'Separate consent may be required from the EA for works close to the Waldron Ghyll upstream as far as Horam, where it is classed as a 'main river''</p> <p>and from the LLFA on the remaining "ordinary watercourses"</p>	Add further explanation.	If the suggestion here is to add the extra text starting 'and from the LLFA...' this can be added
Figure 16	Where has this map come from? Where are these NFM measures detailed?	This map needs to be backed up by evidence.	It has been agreed with the EA's local NFM officer.
Policy HCE6: Flood Risk	Criteria 1a) 'Strictly applying'	Don't need to say 'strictly' as the sequential test will need to be applied in areas of flood risk. Delete.	Noted. To update
	<p>Criteria 2a</p> <p>Southern Water are obliged to accept new properties whatever the capacity (or not) of the foul system. They normally use developer contributions to fund improvements to their infrastructure and capacity. The Council has no control over this.</p>	Consider reframing this part of the policy as Southern Water are obliged to accept new properties regardless of capacity and this is outside of the planning system.	Noted. The point may be addressed by deleting 'to the satisfaction of Southern Water' within the clause.
	<p>Criteria 3Ci</p> <p>Should consider rephrasing this. We can't insist on a holistic GI strategy, however, you could ask for measures to contribute to GI.</p>	Suggest rewording this.	Noted. To revise as 'incorporate surface water management measures that, where possible, connect with and contribute to the wider green infrastructure network, and that provide etc'

	<p>Criteria 3cii</p> <p>We could not apply this to any watercourse. The legislation provides for peak run off rates not being increased or maintained at the present level.</p> <p>This section is fine as an aspiration but goes well beyond what the planning system can insist on.</p>	<p>Cii should be removed.</p>	<p>National guidance encourages reducing run-off rates in appropriate situations, as noted in response to comments on the Background Paper. The wording of the clause, in terms of “seeking to” reflects that it is an aspiration and a legitimate factor to be borne in mind in considering the merits of a proposal.</p>
Paragraph 7.5	<p>‘A mix of uses is considered appropriate in Horam village centre (the extent of which is defined in Figure 17, reflecting the area defined in the now withdrawn Wealden Local Plan),’</p>	<p>The withdrawn Wealden Local Plan (2019) holds no weight at this stage so defining the extent of that boundary through that process is not appropriate. These are not defined as part of any adopted Local Plan, so perhaps defining this is not helpful at this stage. Most of our current Neighbourhood Plans do not attempt to define this (see Policy 5 of Herstmonceux NDP for example, although slightly out of date). The emerging new local plan will however look to define this.</p>	<p>Previous comments from WDC asked for explanation of where the boundary comes from. The text explains this. Just because the Local Plan has been withdrawn does not make it inappropriate to show the boundary, not least as it is still up-to-date.</p> <p>The comment is also wrong as the Hailsham NDP includes a town centre boundary based on the withdrawn Local Plan.</p> <p>It is appropriate for the NDP to define the boundary so that the policy can be applied. Suggest this is retained but that the text does not say what this is based upon.</p>
Policy HLE1: Horam Village Centre	<p>Criteria 1. ‘Proposals for development in Horam village centre (as defined in figure 17) should, where appropriate, incorporate a mix of uses’</p>	<p>Given the comment above on paragraph 7.5, we consider that this should be reworked to just talk to town centre uses within rather than defining that area. The criteria from 1(a) to (d) is considered appropriate.</p>	<p>As above. No change. Note support for criteria.</p>

	Criteria 4 (a) and (b)	The timing of the periods for both 4(a) and (b) is inconsistent as written currently, with criteria 4(a) stating a period of 18 months and criteria 4(b) stating 12 months. This will make things complicated for the case officer in determining the planning application and the applicant. We suggest that 18 months is appropriate for both criteria?	Noted. To update
	Criteria 4 (b) 'subject to peerreview'	From the policy, it is not clear what is meant by 'peer review' here. Of course, the Council would deal with the planning application and the marketing evidence provided as part of that process. Normally speaking, the applicant would need to pay the costs of that peer review to the District Council and that should be included as part of the planning application process; this should be stated within the planning policy.	Unclear what this is referring to - there is no 'per review' requirement in the Policy Clause. No change.
Policy HLE2: Employment	Criteria 2. This criteria does not define where new employment uses are acceptable. From the emerging Wealden Local Plan perspective, we would suggest that development would be acceptable in the development boundaries, but not outside of them unless it's an intensification of an existing business. At the moment this reads as its acceptable anywhere in the Parish?	Amend policy to define where new employment uses are acceptable and where extensions/intensifications to existing employment sites are supported.	Noted. To update
	Criteria 2(d). 'do not result in a significant increase in large and heavy vehicle traffic movements on non-strategic routes within the Neighbourhood Plan Area'	The NPPF talks to demonstrable harm, and this could be included within the policy here?	Noted. Wording to be amended

	Criteria 2(f) 'where appropriate, they enable active travel through delivery of new walking and cycling routes'	Is this not a duplication of the active travel policy?	Noted. No need to remove. No change.
Policy HLE3: Home working	<p>We are not convinced a separate policy is needed. If ancillary and no new building being built or a new building is Permitted Development, planning permission is not required.</p> <p>If planning permission is required for an outbuilding and use ancillary to the existing house, then the use will be assumed to be residential so normal householder planning considerations will apply.</p> <p>If not ancillary, then a change of use is proposed, which would be subject to other policies – namely the employment policy and policies about general character.</p> <p>Ultimately, this policy seems unnecessary.</p>	We would advise that you remove this policy.	Noted. It is agreed, on balance, that this policy and its supporting text may be deleted for the reasons given.
Paragraph 7.16	Agree with the sentiment here, and of course that Council wishes to avoid permanent residential homes in the countryside, but provided that static caravan, chalets and lodge style development is tourism development and acceptable in character, then that should be the same as other forms of tourism accommodation.	Re – phrase the last sentence of paragraph 7.16.	No Change. This is important to the area.
Policy HLE4: Visitor Accommodation and facilities	Criteria 1. We would suggest that this should only be acceptable within development boundaries, or as small-scale extensions to existing holiday parks outside of development	Amend criteria 1.	The HNP seeks to support, rather than stifle, visitor accommodation situated outside of Horam village, where this is consistent with the conditions set out in the criterion.

	boundaries. Criteria 1, final sentence is missing a full stop.		There are a number of such premises providing visitor accommodation which do not detract from the rural scene and which contribute to the local economy. No need to amend. Noted re: full stop
	Criteria 3a. Proposals for development will not be supported where they would result in the loss of camping and caravan sites	Again, laudable aim but should this apply in all circumstances which is implied. If a camping and caravan site is no longer viable and closes, this cannot be prevented	Change to 'they would result in the loss of sites in active use for camping and caravans'
	Criteria 3b. 'They involve the replacement of camping plots with static units, including single storey chalet or lodge style development for holiday purposes.	This should be subject to the design of the chalet, lodge style development and its location. See comments on paragraph 7.16.	No change. This is important to the area
	Criteria 4 'Proposals should seek to retain existing visitor attractions, tourist and hospitality facilities ... unless demonstrated to be unviable.	How would they prove they are unviable through the planning application process? It is not clear here.	To include similar text to Policy HLE1, Clause 4, as to marketing efforts etc
Paragraph 8.2	'... Concerns were expressed through consultation as to the speed and volume of traffic on roads across the Parish'	Consider re-phrasing: Concerns were expressed throughout the consultation process.....	Noted. To update
Policy HTM1: Traffic Management	(1) 'Proposals for new development should ensure that they would not have a material adverse impact on road safety, including through any resultant congestion'.	Would recommend rephrasing: Proposed new development should ensure that it has no adverse impact on road safety or increase in levels of congestion, both alone or in combination with other development.	Noted. To update
	(2d) '... Avoid engineered solutions, such as humps, cushions and chicanes, but as far as practicable, achieve traffic calming through use of	We would recommend rephrasing as follows: "Ensure that traffic calming measures	Noted. To update text. However, ESCC has not requested that reference to their design guide is included here. Also, this only applies

	landscaping and building layout’.	<p>can be achieved via landscaping and development layout; engineered speed humps, cushions and chicanes should only be used where no alternative options are appropriate.”</p> <p>The final layout is subject to approval by ESCC Highways if the road is to be adopted and maintained by them. We would recommend that any policy is compliant with ESCC Local Design Guide for Residential Development</p> <p>The comment above regarding the ESCC Design Guide would also apply to the use of raised crossing points as detailed in HTM1 (2f).</p>	to residential development.
Paragraph 8.6	This last sentence is national legislation and not needed.	Remove last sentence.	Noted - but no harm in stating here. No change
Paragraph 8.8	‘... quality and attractiveness of the walking and cycling network though is only as good as the missing links or gaps in the routes. These could be improved, providing for direct, safe routes, to make walking and cycling attractive propositions for people of all ages’.	<p>Consider rephrasing:</p> <p>... quality and attractiveness of the walking and cycling network is only as good as the missing links or gaps in the routes. These missing links should be identified and then improved, to provide direct, safe routes, that make walking and cycling an attractive proposition for people of all ages.</p> <p>An explanation could be added of how these routes could be improved.</p>	No change - change implies that someone will be responsible for identifying the gaps. Who? The project aspirations already point to some suggestions as a start point for discussion with partners, including ESCC.
Paragraph 8.9	<p>‘Consideration will be given to the use of the Parish Council proportion of CIL monies.’</p> <p>Consideration for what use? We</p>		Sentence to be deleted

	recognise this is implied but it should be identified as to what the money is to be used for and how it is compliant with the current CIL Regulations.		
Policy HTM2: Active and healthy travel	(1a) '... Provide new walking and cycling routes that are direct, safe and convenient to use and designed for use by people of all ages and abilities and which promote permeability within and between new developments and to existing built-up areas. Where appropriate to the site, these should retain and provide connections to the existing public right of way network'.	Would recommend rephrasing: Provide new walking and cycling routes that are direct, safe and convenient to use by individuals of all ages and abilities, which promote permeability within and between new developments and to existing built-up areas. Where appropriate to the site, these should retain or provide connections to the existing public right of way network.	Noted. To update
	(2) There is a viability issue here, as well as whether this can be secured through a section 106 agreement as one of the tests is whether it is directly relevant to the development. This could come from the Parish Council CIL policy however.		There is no suggestion that these projects must be contributed towards. No change required
	(3) 'Proposals for residential development shall provide secure cycle storage assigned to the dwelling and located within or immediately adjacent to the property, fully enclosed and at ground-level'. Even for a single dwelling? Is this required? Perhaps a major development threshold should be used here, and we should refer to ESCC standards. Should consideration also be given to		If a change to healthy and active lifestyles is supported then the policy should apply to single dwellings. No change.

	the provision of secure storage and charging facilities for visitors to a development?		
Project H(v): Encouraging walking and cycling	<p>2g Reference is made to the replacement of stiles with gates to improve the accessibility of existing ROW. The enhancement of existing ROW does not appear to be covered within the policy HTM2 or the supporting text.</p> <p>This is national policy but should be gaps, then gates, then stiles in order of preference.</p>	<p>Add reference in the supporting text to the enhancement of existing ROW.</p> <p>Reword 2g.</p> <p>Paragraph 2 of the policy talks to helping deliver projects identified in Project H(iv) is this correct or should it actually be “deliver projects within H(v)” which would then cover the existing ROW enhancement.</p>	No need to change as it is a project. And there is no requirement for schemes to deliver these.
Paragraph 8.11	User Research undertaken	User research undertaken (no capital letter required on research)	The report uses a capital 'R' for research. No change
Paragraph 8.12	This is already underway using both base budgets and a “levelling up grant”.		Reference at end of first sentence to be added, stating ', some of which are already underway'
Paragraph 8.13	<i>‘will become an even greater natural, economic, tourism and health and wellbeing asset. It will continue to be accessible to everyone and a resource everyone is proud of’.</i>	Quote reference required	Noted
Paragraph 8.15	‘.... gateway between the Cuckoo Trail and Horam Village Centre’	Trail	Noted. To update
Paragraph 8.17	‘unable to drive: impacting in particular on the young and elderly’	<p>Consider rephrasing:</p> <p>unable to drive impacting particularly on the young and elderly</p>	Noted. To replace with a comma

Policy HTM4: Public transport	(2) '... Where development is designed to allow bus routing through these'	We would recommend rephrasing: Where development is designed to accommodate public transport, streets must be carefully designed to balance the needs of competing users and avoid conflicts between bus users, pedestrians and cyclists	Noted. To update
	(3) 'Any bus stops provided in areas of new development should be located so that all residents are, as far as possible, within walking distance of a bus stop (defined as 400m based on the walking network as opposed to an 'as the crow flies' distance)'	We would recommend: Where bus stops are provided within residential development these should be located within 400m walking distance of dwellings.	No change
Policy HCF1: Community facilities	(1) Perhaps the term within the development boundaries is needed here. Otherwise, we are supporting these uses in all locations?	Add clarification.	There are very limited, if any, opportunities with existing built-up areas for new community facilities; hence, it is not considered appropriate to limit them to being within development boundaries (which are out-of-date at present in any event and for which there are none at Vines Cross and Maynards Green). The inclusion of criteria relating to accessibility and local character provide sufficient controls.
	(1a) '... include provision of flexible space that can be used for a variety of community uses;'	It is recommended that the following amendment is made to ensure that appropriate community uses are identified for flexible space. For example, it would not be appropriate to have fitness classes within a	Noted. To update.

		<p>doctor's surgery flexible space.</p> <p>"include provision of flexible space that can be used for a variety of appropriate community uses;"</p>	
	(1c) '... maximise, as far as possible the provision of charging points and cabling for electric vehicles;'	<p>Consider rewording:</p> <p>Include the provision of EV charging points for electric vehicles and secure bike and mobility scooter charging points.</p>	Noted. To update
	(2) 'The loss of community facilities will only be supported where a new, equivalent replacement is made for that use or is met by an existing facility within the Neighbourhood Plan Area, and where evidence is provided that demonstrates that the facility is no longer required or viable.'	<p>We would recommend the following:</p> <p>The loss of a community facility will only be supported where a replacement is provided, equivalent to or better than exists currently or where the need can be met by an existing facility within or adjacent to the Neighbourhood Plan Area, and where evidence is provided that demonstrates that the current facility is no longer required or viable.</p>	Noted. Change to be made - Except for reference to being 'adjacent' to the Plan area, as this could result in the facility being remote from the area which goes against the point of the policy.
Policy HCF3: Infrastructure	(1) 'Proposals for major development that...'	What is classed as major development? This will need to be clarified and should accord with the current planning definitions.	Major development is a common term. To be added to glossary
Policy HCF4: Allotments and Food Growing Opportunities	(1) 'Proposals for major residential development that.....'	What is classed as major residential development? This will need to be clarified and should accord with the current national planning definitions.	As above
	(1) '... the location shall be informed by an overarching green infrastructure strategy for the site'	Clarification should be given as to whose Green Infrastructure Strategy this relates to, Wealden District Council's or Horam's own? If you are referring to one to be submitted with an application, then this would be a matter for the Council's validation criteria to determine when it is required.	Noted. <i>'prepared by the applicant'</i> to be added to end of sentence

Paragraph 10.4	'Since December 2020, CIL Charging Authorities have to publish Annual Infrastructure Funding Statements (IFS)'	Consider rephrasing: Since December 2020, CIL Charging Authorities are required to publish Annual Infrastructure Funding Statements (IFS)	Noted. To update
Paragraph 10.6 (Table)	It should be noted that not all of these projects are suitable for funding via CIL (i.e. wildflower verges are not considered as infrastructure, and it would also be difficult to show that it will address the demands that that development places on the area.	Consider removing that project.	Disagree. No change. These could be funded through various sources.

Wealden District Council Officers' comments on the Draft Design Guidelines and Codes, October 2022 (AECOM) that formed Appendix 1 to the Draft (Regulation 14) Horam Neighbourhood Plan, and Horam Parish Council responses

September 2023

WDC Comments - General	HPC Response
<ul style="list-style-type: none"> The photos you have used with ticks and crosses e.g. on page 67 and page 83 are far more akin to a Design Guide than Code. 	<p>Noted. The photographs provide local examples to help a general appreciation of some of the issues being addressed by the guidelines in the respective sections.</p> <p>The general point about the document being more akin to a set of guidelines, rather than codes, is accepted and it is amended accordingly.</p>
<ul style="list-style-type: none"> There are certain elements missing which are key components of design codes. For example, there are no Area Types which we would expect to see in a Design Code. This would then lead to the creation of coding specific to each Area Type as well as area wide coding. As an example, you could look at the Peacehaven and Telscombe Design Code here. 	<p>Noted. It is believed that the approach AECOM has taken for Horam appropriately responds to the local context and local issues. However, it is acknowledged that the document uses the expression "guidelines and codes" to cover the range of design parameters set out and that this may be confusing to the reader, aside from perhaps lacking the specificity expected of design codes.</p> <p>Therefore, as the scope of the report is parish wide and does not include any site-specific development parameters, all references to codes have been updated to guidance/guidelines as appropriate.</p>
<ul style="list-style-type: none"> It could be clearer what public involvement there has been in the creation of the document. This is a key part of creating a code. A key paragraph of the NMDC is paragraph 30 which states that the code making body will 'need to have an understanding of their area informed by up-to-date evidence such as characterisation studies or site analysis, with input from the community, to support design coding'. 	<p>Noted. Text is added in the introductory section on '<i>Steps towards the completion of this document</i>', explaining the initial call for residents to take photographs of what they liked and didn't like in the parish, a "walk-about" and various discussions with members of the Steering Group, as well as the preparation of a draft Study published for comments prior to the preparation of the version to accompany the Regulation 14 HNP.</p>
Sections 1-4	
WDC Comment	
<ul style="list-style-type: none"> Section 1 would benefit from an explanation of what a Design Code is. 	<p>Noted, but this is no longer needed due to restricting the document to guidelines, and not codes.</p>

<ul style="list-style-type: none"> Section 1.2 provides a list of local development/ design issues. It is not clear where these have come from, are they from the public, from a character appraisal? 	<p>This is a similar point as that above regarding public involvement in the preparation of the document. For brevity, the first sentence under 1.2 is amended to read:</p> <p><u>“There are currently a number of development/design issues related to the parish, that have been identified through character assessment and consultation responses (see section 1.3).”</u></p>
<ul style="list-style-type: none"> Section 2-The NPPG on design should be mentioned. Historic England studies and guidance on contextual design in the historic environment may be relevant. See - Good Practice for Design in the Historic Environment: Principles and Case Studies Historic England https://historicengland.org.uk/advice/planning/design-in-the-historic-environment/ and Promoting a Contextual Approach to New Housing in Historic Places https://historicengland.org.uk/content/docs/planning/design-in-the-historic-environment-report/ 	<p>It is agreed that the planning practice guidance (PPG) supporting the NPPF in respect of ‘Design: process and tools’ should be mentioned. This is done on page 13.</p> <p>The respective Historic England (HE) reports are noted, but are not regarded as being necessary to highlight in the report, given their broad nature and reference back to the NMDC.</p>
<ul style="list-style-type: none"> Please see our comments on the Landscape Character Assessment regarding the Council's landscape evidence base. When talking about the Council's landscape evidence base, the document should start with the most recent / strategic document first i.e., the Landscape Character Assessment 2022, then the site-specific studies and then the 2014 Landscape Character Assessment. Once the remaining landscape assessments are completed, the 2014 Assessment and the site-specific studies will be superseded. We would argue that the 2014 LCA is actually irrelevant as it has effectively been superseded by the 2022 assessment already. We would recommend deleting reference to the 2014 assessment, or at least making it crystal clear that the 2022 assessment supersedes the 2014 assessment and should be the one to set the character context for Horam, including landscape guidelines. This will then ensure that the HNP is in line with the most up-to-date evidence that will support the emerging Local Plan. 	<p>Noted, but see the response in relation to a similar comment on the Landscape Character Background Paper.</p> <p>In essence, the level of spatial refinement of the later LCAs is less than the 2014 one, so are less insightful.</p> <p>Landscape character has not really changed in the recent times, so it is appropriate to refer to all LCAs.</p>

<ul style="list-style-type: none"> Baseline studies - The landscape section could be expanded to include topography, geology, ecology, open spaces? Is a map showing topography and land use possible? 	<p>This is not considered necessary here, but text is added at the end of the review of Landscape Character Assessments to note that the HNP Steering Group has prepared a separate Background Paper on 'Landscape Character', which covers the main influences on it (which refers to geology and terrain, hydrology and evolution of the landscape).</p> <p>Figure 11, showing the Parish in its wider setting, has a satellite base mapping. An "inset map" just of the Parish is added.</p>
<ul style="list-style-type: none"> Heritage is considered only very fleetingly in the baseline studies. The heritage section is very short. We would like to see greater explanation of how the settlement pattern has evolved for each of the different settlements and why i.e. what have the influences been? e.g. geology, available materials, railways, economy, agriculture. 	<p>Noted, but we believe that the evolution of the settlement pattern is comprehensively set out in a supporting report entitled "Horam parish- Historic Overview, Character and issues Statement, which is referenced on page 18.</p> <p>Furthermore, the HNP Steering Group has also prepared a separate Background Paper relating to heritage, which covers all the influences mentioned. For completeness, text will be added to also refer to this Background Paper.</p>
<ul style="list-style-type: none"> Are there any non-designated heritage assets? notable parks and gardens? 	<p>There is no local heritage list, nor are there any historic parks and gardens in the parish. However, the above-mentioned supporting documents would be useful in providing background material for identifying "non-designated heritage assets".</p>
<ul style="list-style-type: none"> If there are no Conservation Areas this could be stated. 	<p>Noted, but it seems unnecessary to highlight the absence of a designation.</p>
<ul style="list-style-type: none"> We note the reference to 'Historic Overview, Character and Issues Statement' (2021 Murphy Associates) but could a summary of the historic development of the village be included that then is cross-referenced back to the more detailed document? (This relates to all the settlements). 	<p>Noted. This point will be covered by the proposed cross-reference to the background paper relating to heritage on page 18 without further repetition here.</p>
<ul style="list-style-type: none"> Are any of the streets/PROW, particularly in the northern part of the parish corresponding with the AONB, historic routeways: 	<p>Yes, there are a number of historic routeways, the significance of which in the evolution of the Parish is mentioned in the Design Study, as well as in the Landscape Character Background Paper, although the routeways themselves, which are available on the High Weald AONB website, are not shown.</p>

<p>https://www.highweald.org/downloads/publications/land-management-guidance/routeways.html?</p>	<p>It is agreed that inclusion of the 'historic routeways' plan would be useful. These are added to Figure 16.</p>
<ul style="list-style-type: none"> Fig 05 could be used to convey the strength of the historic environment generally rather than just identify designated assets. 	<p>Figure 5 already identifies recognised heritage, while further information would make it harder to read.</p>
<ul style="list-style-type: none"> Given the highly dispersed development pattern, historic farmsteads might be identified (available on Heritage Gateway: https://www.heritagegateway.org.uk/Gateway/ . Historic gardens at Horeham Manor and Stilliands Tower, possibly others seen on the 6" OS maps (south of Maynards Green at The Gables/Coxlow/The Hurst/Horeham Hurst/The Grange). Heritage Gateway also shows the presence of a number of other features such as fingerposts, ironworks/furnace and bloomery sites, WWII 'nodal point', barns, railway features, etc. HER enquiries could reveal others as well. This all builds up a picture of the heritage resource of the area, and strongly informs the vernacular character and appearance within the parish. 	<p>Noted, but historic farmsteads are not clearly or comprehensively identified, while gardens relate to identified Listed Buildings, and other records, such as fingerposts, are identified within the Heritage Background Paper. HER information has already been obtained and reflected in reports.</p> <p>On balance, further elaboration in the Design Guidelines is not considered necessary.</p>
<ul style="list-style-type: none"> Figure 20-It is not clear from this labelling if the 3-storey flats are part of the Merrydown site. Assuming they are, this will need to be reworded. 	<p>It will be understood locally, but is rewritten to be clearer.</p> <p>(It is noted that the design of this element of the scheme has also been found wanting as part of WDC's own review of completed developments.)</p>
<ul style="list-style-type: none"> Is it possible to show on a map where the Merrydown site is in the village as it is referred to quite a lot throughout the document. 	<p>Noted, but this is such a well-known landmark site locally, now called "Merrydown Village", that its mapping is not necessary.</p>
<ul style="list-style-type: none"> Page 40 Local Vernacular Section (and the corresponding sections under Maynards Green and Vines Cross)-Whilst under the heading 'local vernacular' this seems to refer to the general material palettes/textures within the village – do 'concrete roof tiles, mostly on post-ward developments' really belong 	<p>Noted. The text on page 40 is descriptive, but attention is drawn to the subsequent design guideline in relation to built form, which promotes the clear local vernacular of "plain clay roof tiles".</p> <p>It is agreed that "concrete roof tiles" do not really fit under the heading of "Local vernacular", and may be better expressed as less</p>

under the heading 'local vernacular'? This seems descriptive rather than clearly informing what is considered to add positively to the character of the area. Were there any local or nearby industries (brick making or similar) that informed the local vernacular? If branching out to 'texture', this could also address public realm elements more generally – paving materials, services and utilities, post boxes, public spaces, etc.	sympathetic alternatives, with added reference to sources of bricks, mentioned in the previous paragraph:
<ul style="list-style-type: none"> Trees on village maps- Are they just protected ones shown? 	<p>No, it covers evident areas of tree cover. <i>NB. We have not been able to find a WDC map of protected (TPO) trees on its 'online mapping'. Such information would be useful.</i></p>
<ul style="list-style-type: none"> This doesn't represent all trees – any street trees and those in garden areas not shown for example – so does that undermine the amount and contribution of them to the rural character? 	<p>It is appreciated that not all trees are shown, but it is intended to highlight where groups, or corridors, of trees are evident.</p> <p>It is agreed that trees generally make a significant contribution to rural character, which is drawn out in the Landscape Character Background Paper and, in particular, by Policy HCE2 of the HNP.</p>
<ul style="list-style-type: none"> We wonder whether Ancient woodland should be shown also? And also non-designated woodland blocks? Maybe worth some consideration. 	Ancient Woodland will be shown on the overall base map of the Parish which also identifies the extent of spatial policies.
<ul style="list-style-type: none"> Hamlets, Farmsteads and Rural Areas- This discusses the three hamlets briefly, but seems to miss out the farmsteads and rural areas? Also a bit more limited on the character/ local vernacular perhaps. 	Noted. However, while the historic significance of farmsteads is appreciated, the focus of the HNP is on the villages and hamlets, as this is where there is particular interest and concern by local people.
Section 5	
WDC Comment	HPC Response
<ul style="list-style-type: none"> DC.01.1- Guideline 2-Could give more guidance on what development within the AONB will need to demonstrate- see policy EN6 of the 1998 Local Plan 'development in the AONB will only be permitted if it conserves or enhances the natural beauty and character of the landscape. Particular care will be paid to the siting, scale, layout and design of development'. 	<p>Noted, but the guideline does not seek to duplicate or replace either national or local planning policy protection for AONBs, while HND Policy HCD1 sets out the broader regard to the AONB.</p> <p>Notwithstanding this, the existing reference to the High Weald Housing Design Guide is supplemented by reference to the High Weald Management Plan, which contains an overarching description of its character components and management priorities.</p>

<ul style="list-style-type: none"> Guideline 5- Setting of heritage assets need to be referred to. More could be made of the use of heritage assets/ features both designated and non- designated and historic landscapes to inform development as referred to in the High Weald AONB Design Guide DG1 'Historic patterns of growth offer the best precedent for adding new development that is in character'. 	<p>Noted. The current wording is interpreted as covering the setting of heritage assets, but it is agreed that this could usefully be spelt out by making explicit reference to the setting of heritage assets.</p>
<ul style="list-style-type: none"> DC.01.2- Guideline 3- Second point - There are some circumstances where an abrupt edge is required, for example for road safety. Also, this reads quite negatively 'clash' maybe turn this round to sound more positive – i.e. you would like to see more green. Need to remember that this document will (if adopted by WDC, as part of the NDP) form part of the WDC development plan, therefore it should not be derogatory. This also needs to be addressed in other places where new development and its design is criticised. 	<p>Noted. Tweaked wording slightly.</p> <p>On the general point regarding positivity/negativity, the Design Study is regarded as taking a balanced approach.</p> <p>Some indication of what constitutes inappropriate design, including by reference to examples, is regarded as helpful, while the guidelines themselves are generally expressed in the positive.</p> <p>Notwithstanding this, the guideline may be rephrased to refer more appropriately to 'harsh', rather than 'abrupt' edges:</p>
<ul style="list-style-type: none"> DC.01.3- Guideline 1-Opportunity to add something here about farmstead developments or more rural sites where there may be different considerations. 	<p>This has been carefully considered, but DC.01.3 is essentially concerned with settlements. Also, farmsteads are very individual and difficult to set guidelines, or codes, for.</p>
<ul style="list-style-type: none"> Some of the guidance/ coding would have the effect of preventing any major development e.g. on page 71 where it states that 'any extensive development that will alter the existing development form will not be accepted'. At times the document aims to direct where new development should be located e.g. on page 72 where it states that new development should be contained within the core of the settlement, along the three rural lanes that form the triangle. Wealden District Council will allocate sites as part of the forthcoming Local Plan. 	<p>It is a legitimate conclusion of the analysis that "extensive" development would not be appropriate with the local landscape character of Vines Cross.</p> <p>If the Local Plan were to promote new developments, then these would need to be justified, having due regard to the HNP and its design guidelines.</p> <p>In any event, it is noted that WDC policy is that Vines Cross should not have a development boundary, as it not regarded as a sustainable settlement for growth.</p>
<ul style="list-style-type: none"> The Important views and landmarks section from page 72 overlaps with the main Neighbourhood Plan document which also covers views. Also the views shown on the map here are different to those listed in 	<p>Noted.</p>

<p>the views policy. We would suggest removing this section as it is covered elsewhere, or at the very least removing the map and photos and relating the resulting code back to the views as listed in the policy.</p>	<p>Figure 51 and its accompanying listing of views was drafted following initial consultation, whereas the HNP list of important views followed a further round of consultation.</p> <p>Therefore, it is agreed that the anomaly should be removed. This will be done by simply providing a cross-reference to the 'Important Views' Background Paper.</p>
<ul style="list-style-type: none"> DC.01.5 Needs to make reference to the setting of heritage assets by name. Would be useful to include a list of the Listed Buildings in the parish in an appendix. 	<p>Regard to the setting of heritage assets has been addressed by the proposed amendment to DC.01.1 above.</p> <p>The 'Approach to identifying and protecting local heritage assets' Background Paper contains a list of Listed Buildings.</p>
<ul style="list-style-type: none"> This section could be much broader. It seems to be treating development only as larger new housing developments within the setting of heritage assets, but could also address smaller changes to historic buildings themselves, and emphasize retention of historic features, including on non-designated heritage assets, such as timber windows, etc. Generally could be much more emphasis on non-designated heritage assets and protecting their character for the contribution they make to local vernacular and overall character. Also, it could be used to promote use of historic materials and construction techniques which contribute to local vernacular character and sustainability. 	<p>This section relates to heritage assets in the context of landscape character and settlement pattern, while materials and construction techniques are dealt with elsewhere. It duly covers both designated and non-designated heritage assets.</p> <p>However, the first guideline (a) of DC.01.5 is elaborated upon to specifically embrace some of the aspects suggested.</p>
<ul style="list-style-type: none"> Guideline 4- There is some confusion in this statement-existing open spaces, vegetation and trees may not form part of historic development. Consider changing to 'new development should respond to/ be informed by the historic form'... 	<p>It is agreed that the guideline DC.01.5c may be rephrased, although open spaces, vegetation and trees can be important to the setting of a heritage asset. It is proposed to read:</p> <p><i>"New development should retain the existing open spaces, vegetation and trees <u>where these are important to the setting of a heritage</u> to preserve the historic form and pattern of development close to the asset;"</i></p>
<ul style="list-style-type: none"> Guideline 6- Does this relate to all new development or just that which may impact on the historic environment? This should promote good design without being overly 	<p>It is intended to relate to development that impacts on the historic environment. It is agreed that the phrasing may be improved – see DC.01.5 e.</p>

prescriptive. This doesn't seem to allow for contemporary approaches or innovative modern design.	
<ul style="list-style-type: none"> DC.02.2- Guideline 2- This sounds like a policy rather than guidelines. Maybe say 'should ideally' or alter wording to make it a guideline. 	<p>The scope of the subject is appropriate as a guideline, although the phrasing is negative and may be improved, as follows:</p> <p><i>"Within the development boundaries, New streets should not be built commensurate with their function, location and the safe movement for all road users, rather than to maximise vehicle speed or capacity, and should discourage rat-running which is an issue within the parish. For that reason, Traffic calming measures, like speed cushions and bumps, speed tables or raised pedestrian crossings could be implemented at places, to manage traffic speeds, but non-engineered approaches will be favoured that maintain rural character;"</i></p>
<ul style="list-style-type: none"> Cycle parking- some of these guidelines are too prescriptive e.g the size of the door on cycle sheds, minimum garage sizes. Maybe you could state what you would like to achieve instead. 	Agreed. This level of prescription is removed.
<ul style="list-style-type: none"> DC.03.2- Guideline 6- This needs further explanation, what is meant by green assets? Access to where? DC.03.3 Guideline 1- please see our comments on the Water Management Background Paper. 	<p>This is clarified to relate to front gardens – see DC.03.2f.</p> <p>Re DC03.3, this comment has been addressed in the response to comments on the Water Management Background Paper.</p>
<ul style="list-style-type: none"> Permeable Paving- Could clarify that permeable paving does not work on certain soils eg clay. 	<p>Guideline 3 at DC03.3 is intended to cover this situation but it could be spelt out, as follows:</p> <p><i>"Permeable paving is generally supported where it provides effective means to maintain soil permeability, notably unbound gravel, clay pavers, or stone setts, <u>although is not effective on clay soils,</u>"</i></p>
<ul style="list-style-type: none"> Guideline 6- Would be good to identify any locally distinctive patterns or examples where historic features exist. 	Agreed, but not necessary.
<ul style="list-style-type: none"> DC.04.1 Guideline 1- 'In addition, the new development should be suitable to successfully sustain agriculture 	Agree that this is unclear and is deleted

and woodland management' What does this mean, needs further clarification.	
<ul style="list-style-type: none"> DC.04.3 A large proportion of the guidelines under building heights actually relate to roofs and rooflines- consider a separate heading. Building height also has a relationship to profile of the buildings and their architectural treatment – slightly taller building may be advantageous over squatter building which is encumbered by dormers or rooflights. Traditional steeper pitches sometimes leads to 'taller' buildings but would be more appropriate. Hierarchy of built form with higher status buildings potentially being taller, etc. 	<p>Agree. The title is amended to clarify that the guidelines relate to building heights, roofs and rooflines.</p> <p>There is a strong local feeling about taller building and steep pitches being out of keeping with local, rural character, so the existing codes are regarded as appropriate.</p>
<ul style="list-style-type: none"> Pedestrian and cycle movement should be a priority and taken into account in larger development schemes' This is repeated elsewhere in the document. Consider removing. 	<p>Agreed. These are the subject of DC.02.3, so this sentence can be deleted from DC.04.</p>
<ul style="list-style-type: none"> Infill sites within historic curtilage and setting of heritage assets may not always be appropriate – should include some reference to understanding significance of heritage assets and contribution that setting makes in proposing any infill development within their settings. Perhaps this needs to suggest that 'infill' should generally follow the main building lines unless there are other circumstances dictating (for instance, reuse of outbuildings behind the main building line, etc). 	<p>Noted. The fourth code in relation to small scale and infill development under DC.04.3 on page 107 refers to important views "towards ... heritage assets and buildings", while the fifth code relates to building lines.</p> <p>However, the specific point raised regard the setting of heritage assets is not highlighted, although this is elsewhere (as set out in response to earlier responses). Similarly, the existing code only relates to new building lines.</p> <p>Therefore, these guidelines can be amended to read:</p> <p><i>"Small infill developments need to be considered in relation to topography, views, vistas and landmarks. In particular, any important views towards the countryside or heritage assets and buildings should not be blocked by any new development, <u>while such developments should also be compatible with maintaining the significance of any heritage assets, including views towards them.</u>"</i></p> <p><i><u>"Infill" developments should generally follow existing building lines, unless there are overriding reasons why this would not be</u></i></p>

	<i>appropriate and would still maintain the integrity of the street scene. New building lines should be reasonably consistent along a street with existing buildings and offer subtle variations to enhance the rural context.”</i>
<ul style="list-style-type: none"> DC.04.4 What is the value of differentiating between side/rear extensions rather than just referring to extensions? Presumably the principles would apply to porch extensions which might be to the front? 	<p>Side extensions generally have a more important visual relationship to the main building from the public realm, so have somewhat different parameters than rear extensions.</p> <p>Porches are not subject to the quite the same requirements as front extensions. They could be separately addressed, but it is regarded that the general codes in relation to extensions provide an adequate framework.</p>
<ul style="list-style-type: none"> Buildings should front onto streets. The building line should have subtle variations in the form of recesses and protrusions to enhance the rural context’. The building line should be informed by / respond to historic development pattern – not always necessary for this to be varied and this doesn’t clearly state whether it means in relation to the elevational treatments of the buildings themselves or the relationships of buildings to one another. 	<p>This comment relates to the second code in relation to building lines under DC.04.4.</p> <p>A similar point has been made, and response given, in relation to infill sites, as set out above.</p> <p>The point has been agreed and, although covered elsewhere, could usefully be incorporated into this code, as follows:</p> <p><i>“Buildings should front onto streets <u>and be informed by / respond to historic development pattern</u>. The building line should <u>may</u> have subtle variations in the form of recesses and protrusions to enhance the rural context;”</i></p>
<ul style="list-style-type: none"> DC.04.7- It is very unclear in this section what is guidelines and what is supporting text. 	<p>Agreed. All guidance is now highlighted in a green box to ensure there is a distinction between supporting text and guidance points.</p>
<ul style="list-style-type: none"> We are pleased to see that there is some distinction made here between ‘existing’ and new build homes, but this section needs to be very careful with regard to retrofit and upgrades to any existing building of traditional solid wall construction – Commonly ‘recommended’ measures may not always be appropriate on a listed building or any building of traditional construction. Historic England advocate a ‘whole house approach’ when considering 	<p>The points are well made and in line with the “life cycle thinking” set out.</p> <p>As is evident from earlier comments and responses, the HNP already gives due regard to historic buildings. However, a requirement for listed building consent re. solar panels is added, as is reference to HE Guidance, to ensure that an applicant considers the appropriateness of individual measures on the respective heritage building.</p>

<p>improvements to ensure that energy efficiency works are suitable, robust, well-integrated, properly coordinated and sustainable: see https://historicengland.org.uk/images-books/publications/eehb-how-to-improve-energy-efficiency/ and https://responsible-retrofit.org/. They also provide a range of technical advice for energy efficiency improvements to Historic Buildings: https://historicengland.org.uk/advice/technical-advice/energy-efficiency-and-historic-buildings/. Please also be aware that Listed Building Consent is very likely to be required for many of these enhancements.</p> <ul style="list-style-type: none"> • There is also an opportunity to more broadly reinforce reuse of existing buildings and locating sensitive new uses within heritage assets where possible – as both an inherently sustainable approach to carbon lifecycle and conservation of heritage assets. 	
<ul style="list-style-type: none"> • Roof solar panels should respond to character of the host building and will not be appropriate in all instances, particularly on heritage assets. Favour less exposed locations (within roof valleys, rear roof slopes, possibly on outbuildings rather than the main building) – need to account for aesthetic impacts. 	<p>Noted. The sixth code covers the impact on Listed Buildings, as well as the need for Listed Building consent.</p> <p>However, the first, introductory paragraph is amended to read:</p> <p><i>“Solar panels over a rooftop can have a positive environmental impact, however their <u>siting</u>, design and installation should be handled sensitively, particularly on heritage assets, and may not always be appropriate within conservations areas. Preserving the character of the <u>host building and wider setting/village</u> should be a priority. It is also important to note that solar panels on listed buildings require consent.”</i></p>
<ul style="list-style-type: none"> • The minimising construction waste and recycling materials and buildings sections are more akin to policy than design guidelines. 	<p>All guidance is now highlighted in a green box to ensure there is a distinction between supporting text and guidance points.</p>
<ul style="list-style-type: none"> • Designing out crime and designing for people with disabilities is given little specific mention. 	<p>Noted. The design guidelines are compatible with these issues, which are also covered by district-wide policies. No action necessary.</p>
<ul style="list-style-type: none"> • There is duplication between the coding/ guidance and some of the actual policies in the Neighbourhood Plan 	<p>Noted, but the guidelines and polices are regarded as consistent and complementary, and not incompatible. For example, the guideline</p>

<p>e.g. housing mix, the Cuckoo Trail, Suds, Street Lighting. Do you need them in both? At times some of the guidance/ coding verges on being actual policy. For example where it states that affordable housing should be provided in medium and larger developments or where housing mix is discussed on page 102. Also, on page 101 it states that 'Business areas should be retained to meet employment needs and remain compatible with local amenities' this sounds more akin to a policy.</p>	<p>promotes smaller units, which the relevant HND policy develops, with the benefit of the Housing Needs Assessment, to be more specific. The same is true in relation to respective policy and code for affordable housing, and in relation to business uses.</p>
<ul style="list-style-type: none"> There is some duplication within the design guide/ code. For example charging points are discussed both on page 124 and on page 88. Also DC.02.2 and DC.02.3 contain some very similar points. DC.04.8 overlaps with quite a few of the other chapters. 	<p>It is agreed that there is duplication in respect of charging points. They will be consolidated under DC.02 and that the points and duplicated photographs on page 124 be deleted.</p>
<ul style="list-style-type: none"> Note that weatherboarding doesn't seem to feature very much at all in examples of existing vernacular material use, but you are proposing its use as acceptable? May need double checking. 	<p>Noted. Multiple references to weatherboarding are amended to make it clear that it is less common than bricks and tiles.</p>
<ul style="list-style-type: none"> Some of the design guidance/coding relates to issues other than design guidance e.g.: <ul style="list-style-type: none"> On page 70 where it states that speed limit signs should be placed along roads- this is out of the control of applicants. On page 76 it states 'an opportunity should be sought for the parish of Horam to identify buildings of local importance following the published Historic England Guidance'. Another example is on page 78 where it states that 'traffic on the A267 should be monitored and managed to maintain free flows'. 	<p>P.70: Wording amended to relate specifically to pedestrian safety, as this is more within the control of the applicant.</p> <p>P.76: Agree that this does not shape/inform the design of developments. This point has been removed.</p> <p>P78: Wording amended to focus on traffic monitoring as a means of establishing where future interventions/improvements might be most needed.</p>

<ul style="list-style-type: none"> o On page 80 it states that the Cuckoo Trail shall be maintained and enhanced, by whom? o On page 95 where it states 'Develop a flood risk management plan for the upper sections of the River Cuckmere impacting on the parish'. o On page 98 it states that small recreation spaces should be investigated, but by whom? 	<p>P80: Wording amended. Emphasis changed from the maintenance of the Trail to improved connectivity to the Trail from new developments.</p> <p>P95: Reference to flood risk management plan removed, as this is not a design matter. However, it is still relevant to the HNP, but pursued outside of the Plan.</p> <p>P98: reference to 'investigation' removed as this does not inform the design of new developments. This is indeed a policy matter.</p>
<p>At times the document becomes overly prescriptive, for example on page 91 where it defines the size of the door on a cycle shed. Yet at other times it becomes too vague, for example on page 98 where it states that substantial recreational space should be provided.</p>	<p>Agree that cycle shed dimensions should be omitted as they are too prescriptive.</p> <p>The guidelines provide a degree of flexibility to allow for inventive designs that align with the existing built form.</p>
Minor Issues that need correcting	
WDC Comment	HPC Response
<ul style="list-style-type: none"> • All reference to it being a Design Code needs to be removed. • You will need to address the concerns raised above, for example duplication and contradiction with the policies in the neighbourhood plan, being overly prescriptive, covering issues other than design guidance. • Address the terminology. If it is guidance the language should reflect this. • The objectives on page 8 do not match the groupings of objectives in the neighbourhood plan. 	<p>Noted. The objectives are as the HNP. The heading changed, following advice from WDC, hence, the groupings have been subsequently amended.</p> <p>The groupings are updated to reflect the HNP.</p>
<ul style="list-style-type: none"> • P14-The Direction of Travel Consultation Document was produced in 2020, the consultation took place from 23rd November 2020 to 18th January 2021 	<p>Noted</p>

<ul style="list-style-type: none"> The Wealden Core Strategy was adopted in 2013 and covers the period 2013-2027 	The typo is corrected. (2017 should read 2027)
<ul style="list-style-type: none"> I have checked the Historic England website and there only appears to be 20 Listed Buildings in Horam- I can't find a reference to Furnace Farmhouse on the website. 	Noted. One site has been counted twice. The text will be corrected to refer to 20 Listed Buildings. These are listed in the 'Approach to identifying and protecting local heritage assets' Background Paper.
<ul style="list-style-type: none"> In Chapter 2 where you have policy and design guidance there are some errors in the sections some documents have been placed in e.g. The High Weald Housing Design Guide has been placed in the National level and the RTP1 document has been placed at a district level. The East Sussex Character Assessment has been placed at the District Level. <p>A large proportion of the guidelines under building heights actually relate to roofs and rooflines- consider a different heading.</p>	<p>The ordering is amended</p> <p>This comment is addressed above. The headings will be amended.</p>
Formatting Issues	
WDC Comment	HPC Response
<ul style="list-style-type: none"> Consider the use of paragraph numbers, particularly for the section on codes, and/ or numbering each guideline under each code e.g. I, ii, iii, iv. This will make it much easier later on to reference the guide. 	Agreed. Bullet lettering added to each guidance box. Coloured boxes added to distinguish the guidance from the supporting text.
<ul style="list-style-type: none"> At times it is hard to differentiate between the supporting text and the actual guideline or code, numbering would help or you could consider putting the actual guideline/code in a coloured box- see the Tenterden Design Code. 	Noted. All guidance is now highlighted in a green box to ensure there is a distinction between supporting text and guidance points.
<ul style="list-style-type: none"> The hyperlinks do not work. 	Noted. This is being addressed.
<ul style="list-style-type: none"> The footnotes are all labelled 1 rather than following sequentially. 	Numbering of footnotes is addressed.

<ul style="list-style-type: none"> • Maps need to be properly referenced if taken from other sources. 	Noted. This is done.
<ul style="list-style-type: none"> • Numberplates need to be redacted in photos. 	Noted. This is done.
<ul style="list-style-type: none"> • The document should be accessible. 	Noted. The document has been reviewed and a number of improvements made for accessibility. It has been agreed as fit for purpose by Locality.
If you are aiming for a Design Code	
<ul style="list-style-type: none"> • Then the document from Section 5 onwards needs to be shortened and amended to reflect better what is in the NMDC. More coding work needs to take place and illustrations added. Flexibility needs to be applied to something so far reaching. Area types/ character areas should be used. • As explained in the RIBA article 'A solution can be a set of district-wide design principles in an overarching chapter, which is then followed by specific design codes which address local priority design issues. By the end of the process local stakeholders must be able to clearly see the thread running between local character, current issues, and design code solutions'. The first part of the document does explain the local character and does briefly explain what the design issues are in section 1.2. (although we would question whether the second point, the prospect of further substantial housing growth, is a design issue per se). The coding should then attempt to resolve these issues but at the moment the coding/ guidance extends far beyond these issues. 	As stated in response to earlier comments, the document has been redrafted to provide 'guidelines' only, and not codes.
If you are aiming for a Design Guide	
<ul style="list-style-type: none"> • All reference to it being a Design Code need to be removed. • You will need to address the concerns raised above, for example duplication and contradiction with the policies in the neighbourhood plan, being overly prescriptive, covering issues other than design guidance. 	<p>Noted. As the document has been redrafted to provide 'guidelines' only, all these points are addresses – see individual responses above.</p> <p>The referencing of the guidelines have all been duly changed from "DC" to "DG" accordingly.</p>

<ul style="list-style-type: none"> Address the terminology. If it is guidance the language should reflect this. 	
<p>There may be a way of combining both a design guide and design code, for example using coding for streets, building lines, heights, car-parking, materials etc., and having separate guidance for the basics of good design but they would need to be clearly distinguishable. The Peacehaven and Telscombe Design Code referred to above, has coding for each area type/ character area but also General Design Principles which will apply across the whole plan area.</p>	<p>Noted. The guidance is now numbered and highlighted to distinguish it from the supporting text. This provides greater clarity on what is applicable.</p>



Horam Parish Neighbourhood Plan

Consultation Summary: Regulation 14

Appendix H: WDC Comments and HPC Response

August 2023

Horam Parish Council

Horam Neighbourhood Plan: 2023 - 2040

Consultation Statement

Volume 5b: Appendix to Regulation 14 Consultation Report
(WDC Comments and Response)

September 2023



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