

REG.18 HEYDON NEIGHBOURHOOD PLAN CONSULTATION – DECEMBER 2025

LORD DEVONPORT

LAND IN HEYDON

FINAL REPRESENTATIONS

INTRODUCTION

The consultation on a Reg.16 Heydon Neighbourhood Plan (draft HNP) is taking place between 15th December 2025 and 9th February 2026. This document provides the final representations to the consultation. The final version of the representations will be uploaded to the online consultation system.

REPRESENTATIONS TO DRAFT HNP

General Comments

The Trustees of 3rd Viscount Devonport's Discretionary Trust (the Trust) owns land at Heydon. A plan showing the parcels of land owned by the Trust is enclosed with this representation. The land west of Fowlmere Road (Parcel 1), land east of Fowlmere Road (Parcel 2), land south of Heydon Lane (Parcel 3), and land west of Chishill Road (Parcel 4) would be directly affected by some of the proposed policy designations within draft Heydon Neighbourhood Plan (draft HNP).

The Trust submitted representations to the Reg.14 version of draft HNP in June 2025. The majority of the paragraphs and policies that the Trust previously commented on have not been amended for the Reg.16 version of draft HNP, or the changes are minor, and as such those previous comments are largely resubmitted with amendments where relevant. The Trust does support the decision in the Reg.16 version of draft HNP to delete the previously proposed Local Green Space designation from the land south of Heydon Lane.

In summary, the Trust's representations to draft HNP are as follows:

- There are parts of the Vision and some Objectives that would require additional development in order to be achieved, e.g. heritage enhancements, biodiversity net gain, housing needs, and community infrastructure. However, draft HNP does not allocate any land for development and includes policy designations that would prevent new development that could deliver some of the items identified in the Vision and Objectives.
- Object to Policy HEY1 because the proposed valued landscape designation of land at Chishill Down is not informed by robust evidence.
- Object to Policy HEY2 because the proposed important countryside frontage designations at land south of Heydon Lane and at land west of Chishill Road do not meet the criteria for this designation.
- Object to Policy HEY3 because the proposed locally important views of Holy Trinity Church across Church Field, at Church Field, at Chishill Down, and from High Close over Heydon Valley are not informed by robust evidence or selection criteria, and are general in nature rather than related to specific features.
- Policy HEY4 refers to an opportunity to restore the visually important walls along Heydon Lane, but there is no associated development in draft HNP to deliver those heritage related improvements.

- Object to Policy HEY6 because the proposed non-designated heritage assets of the site of Earles (or Earlsbury) 14th/17th Century manor house, and the visually important walls on the south side of Heydon Lane are not informed by robust evidence. The proposed extension to Heydon Conservation Area is also not informed by robust evidence.
- Object to Policy HEY10 because it is not positively prepared. It identifies a need for additional types of housing, but draft HNP does not allocate land for development that could address those needs and includes policy designations that would prevent new development at suitable sites.
- Object to Policy HEY11 because it is not positively prepared. It identifies a need for community facilities, community meeting space and children's play area for the village, but draft HNP does not allocate land for development that could support the delivery of additional community facilities, and includes policy designations that would prevent new development at suitable sites.

In due course draft HNP will be examined by an Independent Examiner who will determine whether the basic conditions for a neighbourhood plan have been met. As explained in this response, it is considered that some of the policies and designations in draft HNP do not meet Basic Condition (a) and are inconsistent with national policy.

Paragraph 4.1 Vision

COMMENT

Paragraph 4.1 outlines the vision for draft HNP. The vision refers to a variety of matters, including the landscape setting of the village, limited sustainable development for the village, and services and facilities to meet the needs of the village.

The Vision refers to the *"exceptional protected landscape setting"* of the village. It would be appropriate for the Vision to refer to landscape setting, and no changes are requested to this part of the Vision. As set out in the representations to Policy HEY1, the area for the proposed valued landscape designation should be amended to exclude land at Chiswell Down because it is not supported by evidence.

It would be appropriate for the Vision to refer to sustainable development, which would in principle be consistent with national policy. However, draft HNP does not allocate any land for development and includes policy designations that seek to prevent new development outside of settlement boundaries. Any infill developments in Heydon would be small i.e. not more than 2 dwellings, to be in accordance with Policy S/11: Infill Villages of the adopted South Cambridgeshire Local Plan 2018 (SCLP). As set out in Policy H/9: Housing Mix of SCLP, small infill developments are not required to provide a mix of dwellings or any affordable housing. In addition, small infill developments would not provide additional land or sufficient funding through planning obligations to support the delivery of community infrastructure or facilities.

It would be appropriate for the Vision to ensure that the local community has the services and facilities to meet needs, which would in principle be consistent with national policy relating to healthy communities. It is noted that Policy HEY11 of draft HNP seeks to improve the community infrastructure in Heydon, and refers to support for the delivery of a community meeting space and play spaces. However, draft HNP does not allocate any land for development that could support the delivery of these additional facilities, either through land or planning obligations. Draft HNP also includes policy designations that seek to prevent new development at suitable edge of village sites, which could deliver community facilities.

No changes are requested to the Vision for draft HNP. However, changes are required to policies in draft HNP in order to deliver that Vision, particularly in terms of sustainable development and community needs.

Paragraph 4.1.1 Objectives

COMMENT

Paragraph 4.1.1 identifies the themes and objectives for draft HNP.

Theme 1 relates to landscape and settlement character. It is appropriate to seek to protect the landscape character and the setting of the village. There are development plan policies and national policies that already require the landscape to be protected. It is considered that the evidence used to support the valued landscape, important countryside frontages, and locally important views is not robust, and as such these proposed designations should be deleted from draft HNP in some locations.

Theme 2 relates to the built environment character, heritage and sustainability. These are all matters that are consistent with development plan policies and national policies. However, draft HNP does not allocate any land for development and includes policy designations that would prevent new development, which means that some of the heritage and sustainability objectives would not be delivered.

Theme 3 relates to biodiversity. The protection of designated nature conservation sites is consistent with development plan policies and national policies. The delivery of biodiversity enhancement and biodiversity net gain through the planning system is related to the delivery of development. However, draft HNP does not allocate any land for development and includes policy designations that would prevent new development from being delivered, which means that biodiversity net gain would not be delivered in the village without development.

Theme 4 relates to housing and refers to meeting housing needs. However, draft HNP does not allocate any land for development, which means that the housing and housing needs of the village would not be met.

Theme 5 seeks to deliver a new community meeting space in the village and to address existing deficiencies in community infrastructure. However, draft HNP does not allocate any land for development that might support the delivery of new community infrastructure through land or planning obligations, and includes policy designations that would prevent the delivery of community infrastructure on some suitable sites on the edge of the village.

Theme 6 seeks to protect and improve the network of rural routes around the village. It is appropriate to protect the existing routes. It is considered that there is an opportunity through draft HNP to provide connections between existing routes and provide new circular routes, in conjunction with development.

No changes are requested to the Themes/Objectives for draft HNP. However, changes are required to policies in draft HNP in order to deliver on those Themes and Objectives, particularly in terms of the stated aspirations for heritage, sustainability, biodiversity, housing needs, community infrastructure, and rural routes.

HEY1: Protecting and enhancing Heydon's landscape character and recognising its area of Valued Landscape

Policy HEY1 seeks to protect and enhance the landscape character of the village. Policy HEY1 refers to a proposed valued landscape designation on northern part of village, which is identified on Map 6. The Trust's land at east of Fowlmere Road (Parcel 2) and west of Chishill Road (Parcel 4) is included within the proposed valued landscape designation.

The Trust appointed Planscape Consultants Ltd to review the justification for the proposed valued landscape designation. The Landscape and Visual Technical Review was submitted with representations to the Reg.14 version of draft HNP and is resubmitted with these representations.

The Technical Review highlights that the Heydon Parish Landscape Appraisal (April 2022), prepared for draft HNP, does not provide the evidence to support the decision to include land at Chishill Down within the proposed valued landscape designation. Pg.13 of the Heydon Parish Landscape Appraisal provides a description of Chishill Down, but it is noted that this description does not provide evidence or a conclusion that Chishill Down is a valued landscape. Bullet Point No.2 in Paragraph 5.1.4 of draft HNP repeats the description of Chishill Down, but does not explain or justify the inclusion of this area within a valued landscape. Paragraph 041 (Ref ID: 41) of the PPG states that "*It [neighbourhood plan policies] should be concise, precise and supported by appropriate evidence*". There is no evidence to include the Chishill Down local landscape character area within the proposed valued landscape area designation. If there is no evidence to include Chishill Down in this designation then it would be inconsistent with Paragraph 041 of the PPG and would not meet Basic Condition (a).

Requested Change

The requested changes are as follows:

Remove land in the Chishill Down local landscape character area from the proposed valued landscape area designation, as shown on Map 6 of draft HNP.

HEY2: Important Countryside Frontages

OBJECT

Policy HEY2 seeks to identify two additional important countryside frontages on the edge of the village; at land south of Heydon Lane (ICF3) and at land west of Chishill Road (ICF4).

The supporting text and justification for the proposed two additional important countryside frontages in Policy HEY2 refers to Policy NH/13 in SCLP. It is noted that Policy HEY2 is worded slightly differently to Policy NH/13. It is considered that if the policy intentions are identical then the policy wording and criteria should be the same. The criteria in Policy NH/13 are "*a. Penetrates or sweeps into the built-up area providing a significant connection between the street scene and the surrounding rural area; or b. Provides an important rural break between two nearby but detached parts of a development framework*".

Proposed ICF3 (land south of Heydon Lane) does not meet the criteria for an important countryside frontage. It is not adjacent to the defined development framework boundary of the village. This part of Heydon Lane has limited physical or visual relationship with built-up area of the village. Holy Trinity Church is visible from Heydon Lane, but it is separated by a cemetery and mature trees. There

is no relationship with any other buildings or the village from this part of Heydon Lane. This part of Heydon Lane does not sweep into the built-up area of the village, and there is no connection between it and the street scene of the village. Therefore, proposed ICF3 does not meet the criteria for an important countryside frontage and should be deleted from Policy HEY2 and Map 8.

Proposed ICF4 (land west of Chishill Road) also does not meet the criteria for an important countryside frontage. It should be noted that proposed ICF4 is approximately 350m in length. This part of Chishill Road is an edge of village location only. It does not penetrate or sweep into the built-up area of the village, and it has no visual relationship with the centre of the village. Therefore, proposed ICF4 does not meet the criteria for an important countryside frontage and should be deleted from Policy HEY2 and Map 8.

It is considered that the proposed important countryside frontage designations ICF3 and ICF4 are clearly intended to prevent any type of development from coming forward in these two locations in the future. Paragraph 16 of the NPPF sets out requirements for those preparing plans, including neighbourhood plans. Criteria (a) states that plans *"be prepared with the objective of contributing to the achievement of sustainable development"*. Criteria (b) states that plans *"be prepared positively, in a way that is aspirational but deliverable"*. As set out in these representations, draft HNP includes policy requirements to address housing needs and community infrastructure provision, which both relate to the future sustainability of the village. The proposed important countryside frontage designations would prevent the delivery of development that could meet identified needs, which would not be a positive outcome for the village.

Therefore, it is concluded that the proposed important countryside frontage designations at land south of Heydon Lane (ICF3) and at land west of Chishill Road (ICF4) in Policy HEY2 do not meet Basic Condition (a) because they are inconsistent with national policy.

Requested Change

The requested changes are as follows:

Delete the proposed important countryside frontage designations at land south of Heydon Lane (ICF3) and land west of Chishill Road (ICF4) from Policy HEY2 and Map 8.

HEY3: Locally Important Views

OBJECT

Policy HEY3 seeks to identify locally important views on the edge of the village. The list of proposed locally important views include views of Holy Trinity Church across Church Field (View No.1), at Church Field (View No.2), at Chishill Down (View No. 7), and from High Close over Heydon Valley (View No.17).

The Trust appointed Planscape Consultants Ltd to review the justification for the proposed locally important views in the Reg.14 version of draft HNP. The names and numbers of some views have changed, some views have been added, and other views have been deleted in the Reg.16 version of draft HNP. For example, the previous View No.3 is now View No.7, the former View No.4 is now View No.1, and the former View No.8 is now View No.17. View No.2 (at Church Field) is a new identified view. The former View No.2 (from Chishill Road north toward Down Plantation) has been deleted as a locally important view. The Landscape and Visual Technical Review is resubmitted with these representations, but the view references in the document have changed.

The Technical Review provided some general comments on the proposed locally important views, including the lack of location data for the photographs of the views, and the lack of a detailed analysis of the views and their visual attributes. Those previous comments remain relevant. For these reasons the evidence that has informed the proposed locally important views is not robust.

The precise location of the photographs provided in Appendix 1 of draft HNP for View No.1 is unclear. The views of Holy Trinity Church across Church Field from most parts of Heydon Lane are restricted by trees. It appears that the photographs of View No.1 have been enlarged, which inaccurately overemphasises the view of the church. The evidence to inform the decision to identify View No.1 is not robust.

A new View No.2 (at Church Field) has been added from the land south of Heydon Lane. The precise location of the photographs provided in Appendix 1 of draft HNP for View No.2 is unclear. It appears that the photographs have been taken from the south side of Heydon Lane. However, there is no footway on the southern side of Heydon Lane, which means it is not a publicly accessible location. Accessibility is one of the key criteria for designation as a key view. View No.2 is a primarily a view of an agricultural field with mature trees. It is not clear what is important about this view to justify special protection in draft HNP. The evidence to inform the decision to identify View No.2 is not robust.

View No.7 is not in a publicly accessible location, and there is no public right of way from this viewpoint. Accessibility is one of the key criteria for designation as a key view. There is no evidence of the landscape and visual features in this viewpoint to justify designation as an important view. The evidence to inform the decision to identify View No.7 is not robust, and it should be deleted. View No.7 is not a publicly accessible location, there is no public right of way from this viewpoint, and it is an agricultural field. Accessibility is one of the key criteria for designation as a key view. There is no evidence to identify the importance of View No.7, including detailed analysis of landscape character and key features. If there is no evidence to inform the decision to identify View No.7 then it should be deleted.

The precise location of the photographs provided in Appendix 1 of draft HNP for View No.17 is unclear. The view from View No.17 is significantly restricted by hedgerows along the roadside verge. The evidence to inform the decision to identify View No.17 is not robust. In addition, View No.17 is already designated as an Important Countryside Frontage in SCLP, and as such it is not necessary to add an additional policy designation.

Paragraph 041 (Ref ID: 41) of the Planning Practice Guidance states that *"It [neighbourhood plan policies] should be concise, precise and supported by appropriate evidence"*. The evidence put forward to explain and justify the proposed locally views at No.1, No.2, No.7, No.17 are not robust, and as such these proposed designations do not have regard to national policy and would not meet Basic Condition (a).

Policy NH/2 of SCLP seeks to protect landscape character and the landscape of the National Character Areas. Policy HQ1 identifies the design principles for development, which includes preserve and enhancing the character of the area and responding to the site context in the wider landscape (criteria a) and providing high quality landscape (criteria m). Paragraph 16(f) of the NPPF states that plans, including neighbourhood plans, should *"serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant)"*. The landscape character around Heydon, and the views at No.1, No.2,

No.7, and No.17, are already protected by Policy NH/2, and high quality landscaping is required by Policy HQ1 of SCLP. It is not necessary to duplicate development plan policies related to protecting landscape character, and to do so would be inconsistent with Paragraph 16(f) of the NPPF and would not meet Basic Condition (a).

It might be helpful for the Neighbourhood Plan Group to review the Examiner's Reports for the Fulbourn Neighbourhood Plan (published April 2022) and the Stapleford & Great Shelford Neighbourhood Plan (published May 2025). These two neighbourhood plans also sought to identify locally important views around those villages. In summary, the Examiner's raised concerns about the site selection process for the views, the nature and importance of those views, and the relationship of those views to the settlements. In both cases, the Examiner's deleted all of the proposed views from the neighbourhood plans.

Requested Change

The requested changes are as follows:

Delete references to the proposed locally important views at Holy Trinity Church across Church Field (View No.1), at Church Field (View No.2), at Chishill Down (View No. 7), and from High Close over Heydon Valley (View No.17) from Policy HEY3, Appendix 1, and Map 9.

HEY4: Preserving and enhancing the special character of Heydon's built environment

COMMENT

Policy HEY4 identifies the key design principles for development in the village. These principles are appropriate and relate to the character of the village. However, draft HNP does not allocate any land for development and includes policy designations that would prevent new development from being delivered, which means that these design principles might never be applied.

The Trust owns land to the south of Heydon Lane. Policy HEY4 refers to an aspiration to restore the visually important walls along both sides of Heydon Lane. The walls on the southern side of Heydon Lane could be restored and reinstated, but is not required at the moment and is only likely to be delivered in conjunction with development in the village. It is noted that other policies in draft HNP – HEY2, HEY3, and HEY5 – have proposed designations that would prevent any type of development at land south of Heydon Lane, which would be inconsistent with the aspiration to restore the walls in this location.

No changes are requested to Policy HEY4.

HEY6: Conserving and Enhancing Heritage Assets in Heydon Parish

OBJECT

Policy HEY6 identifies non-designated heritage assets, including the following:

- Asset No.6: site of Earles (or Earlsbury) 14th/17th Century manor house; and
- Asset No.7: visually important walls.

Paragraph 5.6.10 provides supporting text to Policy HEY6 and refers to Community Action 3, which relates to a proposed extension to Heydon Conservation Area. The proposed extension to the Conservation Area would include land south of Heydon Lane and to the east of Holy Trinity Church.

The Trust appointed JB Heritage to assess the evidence to inform the decision to identify the proposed non-designated heritage assets and the proposed extension to Heydon Conservation Area for the Reg.14 version of draft HNP. The numbers of the non-designated heritage assets have changed e.g. former No.7 is now No.6, and former No.8 is now No.7. The valued landscape (former No.1) has been deleted as a non-designated heritage asset. The Heritage Technical Assessment is resubmitted with these representations, but the reference numbers for the non-designated heritage assets have changed.

There is limited evidence provided in Appendix 2 of draft HNP to explain or justify that the site of Earles (Asset No.6) as a non-designated heritage asset. Paragraph 039 (Ref ID: 18a) of the PPG requires details of the heritage significance to be provided in order for sites to be identified as non-designated heritage assets. There is no assessment of the heritage significance of the site of Earles provided in Appendix 2 of draft HNP. For this reason, the site of Earles (Asset No.6) should not be identified as a non-designated heritage asset.

The brick walls on the south side of Heydon Lane are included within the proposed designation of visually important walls (Asset No.7) as a non-designated heritage asset. It is concluded in the Heritage Technical Assessment that the walls included within this designation are of different materials, dates and construction, and should not be grouped together as a single non-designated heritage asset. The brick walls on the south side of Heydon Lane are not of sufficient quality to justify designation as a non-designated heritage asset. For this reason, the brick walls on the south side of Heydon Lane (included as part of Asset No.7) should not be identified as a non-designated heritage asset.

The land south of Heydon Lane and to the east of Holy Trinity Church is included in a proposed extension to the Heydon Conservation Area. There is no evidence provided with draft HNP to explain the heritage significance of this land that would justify it being included within the Conservation Area. The lack of heritage evidence means that the land south of Heydon Lane and to the east of Holy Trinity Church should not be included within Heydon Conservation Area, and Community Action 3 should be deleted.

Paragraph 041 (Ref ID: 41) of the PPG states that *"It [neighbourhood plan policies] should be concise, precise and supported by appropriate evidence"*. As set out above, there is no robust evidence provided with draft HNP to justify Assets No.6 and No.7 as non-designated heritage assets. There is also no robust evidence provided with draft HNP for the land south of Heydon Lane and to the east of Holy Trinity Church to be included within the proposed extension to Heydon Conservation Area. For all these reasons, these proposed heritage designations should be deleted. Therefore, the proposed non-designated heritage assets at Assets No.6 and No.7, and the reference to including land south of Heydon Lane and to the east of Holy Trinity Church within Heydon Conservation Area, do not meet Basic Condition (a) because they are inconsistent with national policy.

Requested Change

The requested changes are as follows:

Delete site of Earles (or Earlsbury) 14th/17th Century manor house (Asset No.6) as a non-designated heritage asset from Policy HEY6 and Appendix 2.

Delete visually important walls (Asset No.7), and in particular the walls on the south side of Heydon Lane, as a non-designated heritage asset from Policy HEY6 and Appendix 2.

Delete reference in Paragraph 5.6.10 and Community Action 3 to a proposed extension to Heydon Conservation Area that includes the land south of Heydon Lane and to the east of Holy Trinity Church.

HEY10: Delivering homes that meet the village's needs

OBJECT

Policy HEY10 relates to the delivery of housing. The policy refers to an aspiration for a mix of dwelling sizes and smaller 1 and 2 bed dwellings in particular, and for the delivery of accessible and adaptable dwellings and wheelchair accessible dwellings.

It should be noted that Heydon is classified as an Infill Village in Policy S/11 of SCLP, with a development site size limit of up to 2 dwellings. The site size limit is below the threshold where affordable housing would be required. Policy H/9 of SCLP outlines the housing mix requirements for development, but this applies to developments of 10 or more dwellings, and above the development site size limit for the village. Policy H/9 also refers to a requirement that 5% of homes in a development should be built to the accessible and adaptable dwellings M4(2) standard, but this standard would not be triggered by a site size limit of up to 2 dwellings that applies to the village. The housing mix aspirations contained in Policy HEY10 are incompatible with the policies in SCLP, and are unlikely to be delivered. Paragraph 16(b) of the NPPF sets out requirements for those preparing plans, and states that plans, including neighbourhood plans, *"be prepared positively, in a way that is aspirational but deliverable"*. It is considered that the housing mix requirements of Policy HEY10 are not deliverable.

Policy HEY10 identifies a preference for smaller homes with one or two bedrooms. Paragraph 5.10.6, which provides the supporting text to Policy HEY10, highlights that the existing housing stock in the village is mostly large and expensive, and refers to the difficulty of younger people accessing housing and of older people seeking to downsize to a smaller property. There is an identified need for different types of housing in the village, but draft HNP does not allocate any land for development that could address those needs. As set out above, Policy HEY10 would be ineffective at delivering a mix of house sizes and tenures, or accessible and adaptable dwellings. In addition, draft HNP includes policy designations that would prevent new development at suitable sites on the edge of the village from being delivered. Paragraph 16(b) of the NPPF sets out requirements for those preparing plans, and states that plans, including neighbourhood plans, *"be prepared positively, in a way that is aspirational but deliverable"*. It is considered that Policy HEY10 and draft HNP are not positively prepared because it identifies a need for different types of housing, but does not seek to meet those needs through policies. Therefore, Policy HEY10 does not meet Basic Condition (a), in that it is inconsistent with national policy.

The draft HNP does not state the current need for affordable housing in the village, and the most recent information on housing needs for villages published by South Cambridgeshire District Council is from September 2022 so is unlikely to provide the latest housing needs of the village. The draft Greater Cambridge Local Plan published for consultation between December 2025 and January 2026, identified a housing requirement for neighbourhood plan areas; the requirement for Heydon between 2024 and 2045 is 4 dwellings. It is acknowledged that draft HNP needs to be in general conformity with the strategic policies in SCLP, and as such does not need to take into account emerging policies in the draft Greater Cambridge Local Plan. However, the draft housing requirement figure for Heydon does identify some need for additional housing in the village. There

are general concerns with the approach towards the housing requirement for neighbourhood plan areas, relating to how the figure takes into account affordable housing needs, and what happens if a neighbourhood plan does not include allocations or is not reviewed. It is very unlikely that any housing requirement figure for Heydon would be implemented through draft HNP or any future review.

As set out in the General Comments to draft HNP, the Trust owns a number of parcels of land on the edge of Heydon, which are identified on the plan submitted with those representations. It is considered that some of those parcels of land are suitable for a small-scale development to address the identified housing needs of the village. A small-scale development could deliver a mix of house types, sizes and tenures, including affordable housing to meet local needs, smaller dwellings and bungalows suitable for older people, smaller dwellings suitable for first time buyers and young families, accessible/adaptable/wheelchair accessible housing, and self and custom build housing plots.

Any small-scale development allocated on the edge of the village would need to be in accordance with the design and landscape policy requirements of Policy HQ/1 and NH/2 of SCLP, and with the proposed key design principles identified in Policy HEY4 of draft HNP.

The multiple land parcels owned by the Trust also provides scope for a small scale development to deliver open space, children's play area, village meeting space, other community facilities, and biodiversity net gain, either on the same site or on other land in the village within the same ownership.

Requested Change

It is requested that the Heydon Neighbourhood Plan Group considers allocating land for development on the edge of the village, to meet the identified needs for housing and community infrastructure.

HEY11: Delivering improved community infrastructure for the parish community

OBJECT

Policy HEY11 seeks to deliver improvements to community infrastructure. It is expected that new community facilities would be located within the development framework boundary or immediately adjacent to it, meet parking standards, and be of a suitable scale and type for the proposed location. Policy HEY11 and the supporting text refers to a lack of community facilities, an aspiration for more community facilities including playing fields, village hall/meeting space, and children's play area. There is a clear need for additional community facilities in Heydon.

The NPPF refers to the delivery of community facilities. Paragraph 8 of the NPPF identifies the three objectives of sustainable development, and the social objective refers to accessible services and open spaces to meet needs and to support community well-being. Paragraph 29 outlines the potential role of non-strategic policies, including those within neighbourhood plans, which can include allocating sites and the provision of community facilities. Paragraph 88 expects planning policies, including those within neighbourhood plans, to enable the development of local services and community facilities including meeting places and open space. Paragraph 89 highlights that sites to meet community needs in rural areas might have to be located adjacent to existing settlements. Paragraph 98 expects planning policies, including those in neighbourhood plans, to plan positively for the provision of community facilities including meeting places and open space in order to

enhance the sustainability of communities. Paragraph 103 highlights the importance of access to open spaces for the health and well-being of communities, and expects plan policies to meet identified needs for open space.

The principle of seeking to deliver additional community facilities for the village is consistent with national policy. There is an identified need for community facilities, a community meeting space and children's play area for the village. There is support for those community facilities to be located within or adjacent to the village. However, draft HNP does not allocate land for development that could support the delivery of additional community facilities at the village. In addition, draft HNP includes proposed policy designations for land adjacent to the development framework boundary of the village, which would prevent the delivery of new development including community facilities from coming forward on suitable sites on the edge of the village. The lack of an effective policy mechanism and a lack of suitable sites make it very unlikely additional community facilities would be delivered for the village.

It is concluded that Policy HEY11 is not consistent with national policy contained in Paragraphs 88, 98 and 103 in terms of meeting the needs for community facilities and open space. Paragraph 16(b) of the NPPF expects plans, including neighbourhood plans, to be "*prepared positively*". Policy HEY11 is not positively prepared because it would not deliver community facilities to meet identified needs. Therefore, Policy HEY 11 does not meet Basic Condition (a), in that it is inconsistent with national policy.

As set out in the General Comments to draft HNP, the Trust owns a number of parcels of land on the edge of Heydon, as identified in the enclosed plan. It is considered that some of those parcels of land are suitable for a small-scale housing development, which could also deliver open space, children's play area, village meeting space, or other community facilities needed by the village. As an alternative, those community facilities could be provided on other land in the village owned by the Trust, as part of delivering a development strategy for the village.

Requested Change

It is requested that the Heydon Neighbourhood Plan Group considers allocating land for development on the edge of the village, to meet the identified needs for housing and community infrastructure.

Carter Jonas – 9th February 2026