

**Date:** 19/06/2025

The Trustees of 3rd Viscount Devonport's Discretionary Trust

By email only

**Subject: Technical review of the Heydon Neighbourhood Plan 2025-2041 - Landscape and Visual Considerations**

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### **Scope of Work**

This technical review has been prepared on behalf of The Trustees of 3rd Viscount Devonport's Discretionary Trust to assess the landscape and visual aspects of the draft Heydon Neighbourhood Plan 2025–2041 (Regulation 14 version, April 2025), with particular focus on the following elements:

- Policy HEY 1: Valued Landscapes
- Policy HEY 3: Identification and justification of Key Views (Appendix 1)
- Supporting evidence provided in the Heydon Landscape Appraisal (April 2022)

The purpose of this review is to evaluate the internal consistency, technical robustness, and evidential basis of the landscape-related elements of the plan, and to request further clarity or amendments as necessary.

### **Policy HEY 1 - Valued Landscape**

#### **Observations**

Policy HEY 1 Introductory text (Par 5.1.6) identifies the Heydon Northwest Slopes and the Heydon Valley as "valued landscapes." These areas are supported by qualitative descriptions within the Heydon Landscape Appraisal (pg. 11 and 12) and are generally consistent with recognised methodologies for identifying local landscape value (e.g., GLVIA3 Box 5.1).

However, there is a notable inconsistency in the treatment of the Chishill Down. While Figure 4 of the Landscape Appraisal includes the Chishill Down within the area highlighted as "valued landscape," the description in the Landscape Appraisal (pg.13) does not evidence that this should be considered a "valued landscape". Furthermore, the policy text (par 5.1.4) omits a detailed description of the Chishill Down landscape unit.

Policy HEY 1 also introduces a "sensitive breaks in slopes", which is a landscape feature identified in the Landscape Appraisal evidence. However, the policy wording on restricting development (point 4 pg.30) does not appear consistent with the Landscape Appraisal conclusions. On page 21 the Landscape Appraisal acknowledges that buildings down the slope or in close proximity to the break in the slope would be more visible, however under 'Future Change' it lists changes that should be avoided, omitting any mention of the



"sensitive beaks in slopes". Therefore, the Landscape Appraisal evidence does not appear to completely deny development due to this topography feature, rather consider appropriate design response.

### **Issues Identified**

Poly HEY 1 and Landscape Appraisal evidence don't support the designation of the Chishill Down as a "valued landscape". To avoid ambiguity and ensure the policy aligns with its evidence base, the plan should be revised to exclude the Chishill Down from the "valued landscape" as shown in Figure 4 of the Landscape Appraisal and Map 6 of the Neighbourhood Plan.

The Policy HEY 1 and Landscape Appraisal evidence consideration of "sensitive beaks in slopes" is inconsistent. The policy wording should be amended to align to the Landscape Appraisal and encourage good landscape and housing design but avoid unnecessary obstacles to development.

### **Policy HEY 3 - Locally Important Views**

#### **Methodological Concerns**

The Neighbourhood Plan identifies a series of "key views" in Map 9 and Appendix 1, intended to inform spatial planning and design guidance. However, several methodological and technical issues have been identified that weaken the robustness of these designations.

#### **General Issues**

Photographs supporting the key views are inconsistently presented in Appendix 1 of the Neighbourhood Plan and not clearly labelled. To enhance the credibility and legibility of the plan, each viewpoint should be accompanied by well-composed, representative photographs taken during multiple seasons where appropriate. These images should illustrate the core visual attributes that the plan aims to protect.

The photography should be undertaken and presented as per the Landscape Institute TGN 06/19 (or future updated version) otherwise it is not possible to verify that their description and analysis is accurate.

Most key views lack precise locational data such as GPS coordinates or directional indicators. This makes it difficult to independently verify the view's location or orientation. Including mapped coordinates and compass directions for each viewpoint would significantly improve transparency and usability.

The supporting evidence for key views in Appendix 1 is largely descriptive and lacks structured visual analysis. Incorporating a more systematic evaluation, such as visual envelope mapping, skyline analysis, or scenic quality scoring would ensure that the plan's landscape policies are underpinned by rigorous assessment methods, consistent with best practice in landscape and visual impact assessment.

It is also noted that the Landscape Appraisal does not include a detail analysis of its views, it is therefore unclear what professional evidence supports Appendix 1. Consequentially, the reliability of its content is weak.

#### **Viewpoint-Specific Observations**

##### **View 2 and View 8 – Location and Seasonal Visibility Constraints**

Due to the general issues mentioned above, it was not possible to find their precise location of views 2 and 8 during a site survey undertaken the 12 June 2025.

The views along Chishill Road (View 2) and Fowlmere Road (View 8) are significantly restricted by hedgerows along roadside verges, particularly in summer when foliage is dense. There is no seasonal photographic evidence to confirm their year-round availability, however it is likely that even in winter, the visibility remains filtered due to residual vegetation.

Given this seasonal limitation, the plan should either remove these views from the list of key viewpoints or supplement them with clear photographic evidence demonstrating their value across different seasons.

##### **View 3 – Access and Functional Value**

View 3 is not situated on a Public Right of Way, and its legal status as a publicly accessible location is unclear.



Since long-term accessibility is a fundamental criterion for key view designation, the plan should clarify whether this view is on permissive land or privately owned and inaccessible. Further, the rationale for its inclusion should be substantiated by linking it to community use or notable visual interest.

At present, the view does not form part of a circular or destination-led route, reducing its contribution to recreational visual amenity and challenging the definition of the sensitivity of the associated visual receptors.

#### View 4 – Insufficient Justification

The importance of View 4 is not clearly explained in the Landscape Appraisal, nor Appendix 1. Without details on what makes the view significant, such as its composition, focal features, or contribution to landscape character, the designation lacks transparency. The plan should provide a detailed description highlighting specific elements that justify the view's inclusion as a key viewpoint or such it would need to be removed.

#### **Recommendations for Improvement**

Based on the matters raised above, we would advise the recommendations are taken into consideration:

| <b>Issue</b>                         | <b>Recommendation</b>                                                                                                                                                                                                                                                      |
|--------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Inconsistent valued landscape areas  | Revise Policy HEY 1 to reflect the value description of Chishill Down                                                                                                                                                                                                      |
| Sensitive breaks in slopes           | Amend policy wording to clarify that development should be mindful of visual implications where located down the "sensitive break in slopes" or in close proximity to the identified line, considering appropriate density, landscape and housing design, but not avoided. |
| Limited view visibility (2 & 8)      | Reconsider inclusion or provide seasonal photographs and clear fieldwork records                                                                                                                                                                                           |
| Ambiguous access (View 3)            | Clarify legal accessibility and explain its selection within recreational context                                                                                                                                                                                          |
| Viewpoint rationale unclear (View 4) | Provide descriptive analysis: focal points, spatial composition, cultural context                                                                                                                                                                                          |
| Missing view photographs             | Include representative imagery in both summer and winter where visibility varies                                                                                                                                                                                           |
| Lack of spatial metadata             | Map all viewpoints with coordinates and directional arrows                                                                                                                                                                                                                 |
| Weak analytical basis                | Strengthen visual assessments using established landscape and visual criteria                                                                                                                                                                                              |

#### **Conclusion**

The Heydon Neighbourhood Plan demonstrates a commendable effort to reflect local landscape character and visual amenity. However, the current treatment of valued landscapes and key views presents several inconsistencies and technical deficiencies that may reduce the plan's robustness and could hinder sustainable development in the future.

By addressing the identified issues and integrating clearer evidence-based reasoning, the plan can offer stronger protection for the parish's landscape character while guiding high-quality development proposals.

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Please note: This letter is advisory and should only be considered as the opinion formed by specialist staff in relation to this particular matter.

