

# **South Cambridgeshire District Council response to Heydon Neighbourhood Plan Regulation 16 Submission Consultation (January 2026)**

## **South Cambridgeshire District Council comments on the submission draft Heydon Neighbourhood Plan**

1. South Cambridgeshire District Council (“the District Council”) is taking the opportunity to provide comments on the submission draft of the Heydon Neighbourhood Plan (“the Neighbourhood Plan”). This response represents our formal comments to the Regulation 16 Consultation.
2. The District Council has been working with the Neighbourhood Plan Steering Group during the preparation of the Neighbourhood Plan. We appreciate the hard work that has gone into getting the neighbourhood plan this far along in the process.
3. Our comments concentrate on the planning policies as, ultimately, they are the elements that will be used to determine planning applications and must meet the Basic Conditions. We also provide additional comments in relation to the supporting and informative content of the Plan which, subject to the consideration of the Neighbourhood Plan Examiner, could be updated in the Referendum version of the Plan without impacting on the Basic Conditions.

## **How has the Plan responded to previous comments?**

4. We previously made comments on the pre-submission draft of the Neighbourhood Plan in May 2025, followed by a meeting to discuss our suggestions. Comparing the two documents, it is clear that this version of the Neighbourhood Plan has positively responded to most of our suggestions, but some of our informal comments have not been addressed, and we have further highlighted these in our Regulation 16 response.

## **Comments relating to whether the Neighbourhood Plan’s policies meet the Basic Conditions**

5. The following comments are focussed on whether the Neighbourhood Plan’s policies pass the tests of the Basic Conditions.

## Policy HEY 1: Protecting and enhancing Heydon's landscape character and recognising its area of Valued Landscape

6. **General Policy Comment** – Our Regulation 14 consultation response highlighted the reference to “distinctive landscape” in Policy HEY1, as this term was not referred to in the Heydon Landscape Appraisal (2022). We note that this has now been amended and we are content with the updated wording.
7. **Policy HEY 1, Part 1** – As a minor amendment for clarity, we would suggest that the reference to HLA 2022 in paragraph 1 is amended to Heydon Landscape Appraisal, which can be carried out without impacting the Basic Conditions.

## Policy HEY 2: Important Countryside Frontages

8. **General Policy Comment** – The policy refers to Map 7, but it should refer to Map 8. Please ensure that all mapping references in the supporting text and policy wording for HEY 2 are correct.
9. **Map 8** – Our Regulation 14 consultation response noted that the Important Countryside Frontage (ICF) “Land north of Heydon Lane” was incorrectly indicated on Map 8. We are pleased to note that the map is now correct. The text also provides a clearer description of how the two Local Plan ICFs in the Village are already designated.
10. **Map 8** – Our concerns raised at the Regulation 14 consultation concerning the justification of the designation of ICF3 remain. ICF3 as shown on Map 8 is in an area of countryside character; the development framework for the village of Heydon does not extend beyond Holy Trinity Church and it is not a rural break between two nearby, detached parts of the development framework. Therefore, in our opinion, ICF3 should be removed as it does not meet either of the requirements to be considered for an ICF:
  - (i) penetrate or sweep into the defined built-up area of Heydon (as defined by the development framework) to provide a significant connection between the street scene and surrounding rural area, or
  - (ii) act as an important rural break between two nearby but detached parts of the development framework.

## Policy HEY 3: Locally Important Views

11. **General Policy Comment** – Our Regulation 14 consultation response suggested a review of Policy HEY 3 and Appendix 1 to focus on views that are

or could be under threat, or most likely to be affected by development. Our comments also suggested that the Neighbourhood Plan should clearly identify the significant feature(s) that are the focus of the Locally Important View (LIV), and that the landscape appraisal should also be used to support the distinctiveness of the views.

12. **Map 9 and Map 10a** – In the pre-submission version of the Plan, Map 8 identified 12 LIVs. Map 9 of the submission version of the Plan covers the whole of the parish and appears to have increased the number of LIVs identified to 28, albeit some of these views appear to have been grouped and five of the LIVs from the pre-submission version of the Plan appear to have been deleted. Given the quantity of local views identified, we would query whether all views identified are important enough to warrant designation.
13. The key features identified for many views include locally ubiquitous features, such as an appreciation of the rural village setting. However, Policy NH/2 of the adopted Local Plan and Policy HEY 1 of the Neighbourhood Plan already seek to ensure that local landscape character is respected, retained and enhanced. Only a small number of views identify specific key features, such as within Views 1A/1B where it states, '[view] of the church looking west across Church Field' and within Views 6A/6B where it states, '[views] of Down Plantation [...]. Down Plantation is a significant landmark on a promontory of Chishill Down, [...]. The wooded and undeveloped ridgeline is visually sensitive.' Additionally, Views 11A/11B and 17 are already protected by the Important Countryside Frontage designation for land east of Fowlmere Road (ICF1).
14. The relatively low threshold for designation has resulted in effectively all land to the North, South, West and East of the village's built-up area being included within the frame of a proposed LIV, and we therefore question whether this policy meets the basic conditions of having regard to national policies and contributing to the achievement of sustainable development.
15. The nomenclature used for the LIVs is also confusing and there is a particular lack of clarity as to whether different iterations of the same view (those labelled A, B, or C) are intended to be different views or provided for purely contextual purposes. For example, LIV 6A and 6B are taken from very different areas in the Neighbourhood Plan area, whilst 5A and 5B appear to be the same view, but in different seasons of the year according to the description in Appendix 1.
16. **Policy HEY 3, Part 1a** – As worded, the policy seeks to protect everything within the view, which is perhaps unreasonable. Appendix 1 generally identifies the key features of each described view. Therefore, in order to provide a level

of certainty, we consider that it would be appropriate for Policy HEY 3, Part 1a to be amended to read as:

‘a) ensuring that the proposed development does not detract from the key features of these Locally Important Views (as identified in Appendix 1); and’

17. **Policy HEY 3, Part 1b** – Our Regulation 14 comments also suggested that Part 1b of Policy HEY 3 be amended to remove the wording “for example opening up views of key features such as the Church” from the policy. Appendix 1 already identifies the key features of views to justify their identification, and part 1b, as currently written, is, in our opinion, repetitive of the opening part of the policy. To make the policy more succinct, we would suggest Part 1b is reworded to:

‘b) wherever feasible and practicable, enhancing the key features or visibility of the key features (as identified in Appendix 1) that are the focus of the Locally Important Views.’

18. **Map 10a** – It is unclear why this is referred to as Map 10a given there does not appear to be a Map 10b in the Plan. Therefore, we would suggest renaming this to Map 10.

19. **Appendix 1** – Paragraph 5 of Appendix 1 makes reference to a view being “breathtaking”. We would suggest the use of more objective language, for example “notable” or “distinctive”.

#### **Policy HEY 4: Preserving and enhancing the special character of Heydon’s built environment**

20. **General Policy Comment** – There is an error in the policy in that it refers to Map 10 whereas it should be Map 11.

21. **Policy HEY 4, Part 1b** – Our Regulation 14 comments suggested deleting “(see supportive text)” from Part 1b of Policy HEY 4. We remain of the opinion that this is not necessary in the policy as all supportive text in a Plan is of relevance in determining planning applications.

22. **Policy HEY 4, Part 3** – This part of the policy references the “Heydon Lane village gateway”, but reviewing Map 11, none of the gateways share this exact name. If it is the intention to reference the “Heydon Land inner village gateway” here, the wording of the paragraph should be amended for factual correctness.

## Policy HEY 5: Local Green Spaces

23. **General Policy Comment** – Our Regulation 14 comments stated: “The supporting paragraphs to this policy (5.5.5 – 5.5.11) briefly describe the proposed Local Green Spaces (LGSs). However, there is no other apparent evidence to demonstrate how these spaces meet the criteria of Paragraph 107 of the NPPF.” On review of the proposed LGSs against NPPF criteria, the sites appear to be reasonable designations, but the evidence presented in the supporting text would benefit from further justification and detail. The NPPF sets a high bar for the designation of LGSs, so it would be advisable for the Neighbourhood Plan to elaborate on why the identified LGSs are important to the village and the important features within these LGSs that add to the justification for their protection.
24. **Map 12** – The accuracy of the delineation of the boundaries of LGS2 and LGS3 on Map 12 needs checking. For example, LGS2 appears to include part of the highway.
25. **Policy HEY 5, Part 1** – The policy refers to Map 11, but it should refer to Map 12.

## Policy HEY 6: Conserving and Enhancing Heritage Assets in Heydon Parish.

26. **Policy HEY 6, Part 2** – The reference to the Cambridgeshire Local Heritage List and the changes made to the policy wording are welcomed. Further comments on the NDHAs listed under Policy HEY 6 and the maps used to identify these assets in Appendix 2 can be found later in this document (under our comments on Appendix 2 of the Neighbourhood Plan).
27. **General Policy Comment** – We note that a map is now included in Appendix 2 to illustrate the location of the Non-Designated Heritage Assets (NDHAs), which is welcomed. However, we do consider that, given the significance of NDHAs in planning terms, they should be illustrated on a map in the main body of the Plan, as opposed to just being identified in a separately published appendix.

## Policy HEY 7: Delivering sustainable climate adapted and resilient design in the Parish.

28. **General Comment** – Amendments to Policy HEY 7 have been made that accord with our comments made as part of the Regulation 14 consultation.
29. **Policy HEY 7, Part 1** – Part 1 of the policy requires residential extensions to adopt design and construction approaches that demonstrate sustainable use of resources and high energy efficiency levels. We suggest that this is unduly

onerous and that proposals for extensions should be “encouraged” to adopt this approach.

30. **Policy HEY 7, Part 3** – Part 3, bullet point 1 states, “[where] new build is involved, materials should be prioritised which are reused, reclaimed or natural from the local area or from sustainable sources and that are durable”. We would suggest that it would be clearer if it were worded as follows:

“Where new build is involved, the use of materials which are reused, reclaimed or natural from the local area or from sustainable sources and that are durable is encouraged.”

31. **Policy HEY 7, Part 4** – As part of our Regulation 14 comments, we highlighted that the policy will only be applied if planning permission is required. Therefore, we maintain our suggestions that “and requiring planning permission” is deleted from this part of the policy to improve the succinctness of the policy wording.
32. **Policy HEY 7, Part 7** – Comparing the submission version of the Neighbourhood Plan against the pre-submission version of the Neighbourhood Plan, this appears to be a new addition to Policy HEY 7. We recognise that this addition appears to have been made in response to advice received from the Environment Agency during the pre-submission consultation, but we question whether this is a necessary inclusion as it effectively repeats the requirements of the adopted Local Plan and national planning policy. Therefore, we would suggest this part of the policy is unnecessary and could be deleted.

#### **Policy HEY 8: Protecting and enhancing Heydon’s natural features and sites of biodiversity value**

33. **Policy HEY 8, Part 2** – In part 2 of the policy, it is unclear what “partial removal” of a veteran tree would entail and whether it would be reasonable to always oppose partial works to a veteran tree. There may be occasions where works are required to a veteran tree for public safety or to support the health of the tree, but the policy would not currently support this. Instead, we would recommend wording akin to the following:

‘2. Proposals that would result in the harm to or involve the removal of veteran trees will not be supported, unless special circumstances are demonstrated.’

34. **Policy HEY 8, Part 3** – In what is now part 3 of Policy HEY 8, the identified features should be identified, through clear and detailed mapping. This element of the policy is difficult to use in that some features are identified on maps in the Plan and others referenced in Appendix 3. We consider that it would be clearer

if all features in Part 3 were identified on a single map specifically for this purpose and within the Plan. It is also unclear as to the status of these features in the policy context. For example, the policy does not state that these features should be protected, which might be addressed through alterations to Policy HEY 8, Part 4 (see below).

35. **Policy HEY 8, Part 4** – We previously commented that it is unclear if the provisions relate to those sites and features listed in Part 3 or to the whole of the Plan Area. This matter of concern remains in the submission version of the Plan. This element of the policy also repeats the requirements of Local Plan Policy NH/4: Biodiversity. If it is intended to reference only those sites of biodiversity value identified, wording along the following lines may help to refine the policy's focus:

'Proposed development that is likely to have a direct or indirect ecological impact on sites and features of biodiversity value identified in the Plan Area should demonstrate through an ecological assessment that: ...'

36. **Policy HEY 8, Part 5** – It should be recognised that opportunities may not be provided by all development proposals as many of them will be outside development sites and outside the control of the applicant. Therefore, we maintain our comments made during the Regulation 14 consultation and would recommend removing the introductory clause – "When development occurs" – from this part of the policy.

37. **Policy HEY 8, Part 5b** – We note that a new element b) has been added. We would recommend that the requirement "for planting of new trees of appropriate species and size" is amended to "native species of a local provenance and appropriate size" to ensure that planting reflects the local and historic character of the area.

### **Policy HEY 9: Protecting the darks skies in Heydon**

38. **Policy HEY 9, Part 1a** – As part of our Regulation 14 consultation comments, we suggested deleting the example given 'for example turned off when not needed' as this is not enforceable. We maintain our position on this amendment and would recommend the policy wording is changed.

39. **Policy HEY 9, Part 2** – As part of our Regulation 14 consultation comments, we also noted that, for most proposals, the requirement for planning applications to be accompanied by a Lighting Plan is not required to validate an application. Conditions can, however, be added to ensure that light pollution is minimised. We would suggest altering the wording of Part 2 so Lighting Plans

are not read as a validation requirement. We maintain our position on this amendment and would recommend the policy wording is changed to:

‘Where external lighting is proposed, details of the luminaire type, mounting height, aiming angles and lumen unit levels will need to be provided as part of a Lighting Plan.’

#### **Policy HEY 10: Delivering homes that meet the village’s needs**

40. **Policy HEY 10, Part 2** – We are pleased to note that our Regulation 14 comments regarding Policy HEY 10, Part 2 have been addressed. The original wording has now been split into two parts (Part 2 and Part 3) to make it clear that all new dwellings should be designed to meet the Building Regulations accessible and adaptable dwellings M4 (2) standard or the Building Regulations wheelchair user M4(3) standards.

#### **Policy HEY 11: Delivering improved community infrastructure for the Parish community**

41. **Policy HEY 11, Part 2 and Part 3** – As part of our Regulation 14 consultation response, we previously commented that parts 2 and 3 of Policy HEY 11 repeat the content of policies in the adopted South Cambridgeshire Local Plan (2018) and, as such, could be deleted. We reiterate that comment.

#### **Policy HEY 12: Public house safeguarded site**

42. **Policy Comment** – As part of our Regulation 14 consultation response, we requested clarity as to whether the community meeting space referenced in the second part of the policy was to be provided on-site, off-site, or allowances were to be made for either provision. This has now been clarified in the first bullet of Part 2 of the policy.
43. **Policy HEY 12, Part 2** – Our Regulation 14 consultation response also questioned whether there is evidence to suggest that this policy would be viable or reasonable in its approach. As currently worded, the policy sets a requirement for the provision of a community meeting space on site alongside other proposed uses, if the use as a public house is not to be retained having been demonstrated to no longer be a viable use through a marketing exercise. However, there is no option to demonstrate that there is no requirement for such a facility, and it makes no allowances for alternative community uses of the site, even if evidence is submitted to demonstrate that delivery of either a public house or a community meeting space on the site would be unviable or unfeasible. Without evidence from a Community Needs Assessment, the approach taken seems unjustifiable and the retention of Policy HEY 12 Part 2 in

its current form risks the whole site being sterilised if a buyer for the public house cannot be found. Rewording Part 2, bullet point one to allow alternative mitigation where onsite provision really cannot work and / or and to request that applicants explore other community uses as part of their marketing exercise / viability assessment work to support an application would likely make the policy more realistic whilst still protecting community interests.

44. **General Comment** – The Parish Council may wish to consider nominating the public house as an Asset of Community Value (ACV). Following changes made by [The Assets of Community Value \(England\) Regulations 2012](#) to the [Localism Act 2011](#), certain planning uses, including public houses, can be nominated as ACVs by community interest groups and included on an ACV list managed by the Local Planning Authorities. ACV status is a material consideration during the determination of a planning application and can offer additional protection for important community spaces or assets.

#### **Policy HEY 13: Protecting and improving our network of rural routes suitable for safe use by walkers and other non-motorised users**

45. **Policy Comment** – Our pre-submission consultation comments suggested splitting this policy into two separate policies: one to cover public rights of way and another that focuses on delivering safe and accessible active transport infrastructure as part of development. We remain of the opinion that this would help to add clarity to the intent and direction of these Neighbourhood Plan requirements.
46. **Policy HEY 13, Part 1** – The policy refers to Map 14, but it should refer to Map 15. Please ensure that all mapping references in the supporting text and policy wording for HEY 13 are correct.

#### **Comments on the remainder of the plan**

#### **Appendix 1: Locally Important Views and Their Key Features**

47. **General Comment** – In the event that changes are made to the number or nomenclature of LIVs included in the Neighbourhood Plan, please ensure that the details in Appendix 1 are consistent with the updates in policy and mapping.

#### **Appendix 2: Heydon's Non-designated Heritage Assets**

48. The submission version of the Plan has not fully addressed some of the comments we previously made about NDHAs as part of our Regulation 14 comments. For the avoidance of doubt, the inclusion of a map or maps linked to Policy HEY 6 of the Plan and/or within Appendix 2 that identifies the extent or

boundary of all the NDHAs listed in Policy HEY 6 would help to ensure that there is no misinterpretation of the policy when planning applications are being considered. At present, not all of the assets listed under Policy HEY 6 or described in Appendix 2 have been mapped. For example, it remains difficult to identify the extent of three proposed NDHA (assets 1, 2 and 3) as the boundaries have not been clearly annotated on maps within the appendix or the main-body of the Plan.

49. It is recognised that attempts have been made to use the criteria used to identify assets for inclusion on the Cambridgeshire Local Heritage List. However, it appears the method in which these criteria have been applied to the proposed NDHAs is different to our understanding of the methodology used to select assets for inclusion on the Cambridgeshire Local Heritage List. In particular, we would like to raise the following:

- **Asset 7: Visually and historically important walls.** Identifying the boundary treatments individually would be preferable to grouping by type as the walls throughout the village vary in type and age. The walls to Heydonbury would be considered curtilage listed (grade II) if they were in the same ownership at the time of listing (1980) – this includes at least a long stretch on Heydon Lane. They will not be mentioned in the list description. Bury House appears to date to 1972 and therefore the walls in their ownership would not be curtilage listed, and would merit inclusion.
- **Asset 8: Spring Pond boundary treatment.** The age and significance of this asset is questioned, and the asset is not considered to meet the criteria. The historic images (page 5 of Appendix 1 and page 14 of Appendix 2) appear to show a different type of post with pyramid tops. The current posts are apparently concrete with a different profile and mid/late-20th century type. The lower rail is also clearly a different height. Therefore, we question whether this particular asset merits inclusion as an NDHA in the Plan.
- **Asset 11: The Sarsen Stone.** Whilst locally interesting, it is questioned whether this meets the criteria to be recognised as a NDHA as its origins and history are only hearsay.

### **Appendix 3: Important Trees in the Parish**

50. The tree preservation order (TPO) mechanism, as established as part of the Town and Country Planning Act 1990, allows local planning authorities to protect trees if it is expedient in the interest of amenity value. TPO requests from the Parish Council and the local community are welcomed, particularly for trees that were protected by a TPO, but it has since lapsed.

51. **Appendix 3 Map** – The map of trees currently identifies single trees and groups of trees with only points. If technically possible, it may be better if avenues of trees or large groups of trees could be made more distinguishable from single trees.

#### **Appendix 4: Community Actions**

52. **Community Action 9** – The community action should reflect an understanding of how TPOs are considered and established in line with legislation. As such, it may be beneficial for the wording of Community Action 9 to be amended to something along the lines of:

“The Parish Council will support and facilitate, where appropriate, a process for trees of public amenity value that are under threat to be considered for protection through a Tree Preservation Order via the local planning authority.”

#### **Other Matters**

53. **Corrections to Map and Figure References** – At various points throughout the submission version of the Plan, we have noticed that map or figure references stated within policy wording or supporting text do not match the actual maps or figures being referenced. This is likely due to new additions or changes altering the order of maps and figures within the Plan. Therefore, we would recommend that all in-text map and figure references are checked when creating the referendum version of the Neighbourhood Plan and once all changes to mapping have been made to ensure that any factual errors can be corrected. These changes can be carried out without impacting the Basic Conditions.
54. **Corrections to NPPF References** – In the Glossary of the Neighbourhood Plan, we note there are references to the NPPF 2023, but reference should be made to the NPPF 2024. We would recommend that all in-text references to the NPPF are checked when creating the referendum version of the Neighbourhood Plan.
55. **Figure 4** – Given the small figures for household sizes of 6 or more people, you might want to consider merging data for households of 5 or more so that a better comparison can be made with other data.
56. **Figure 7** – It is considered that the axis labels for this bar chart could be amended to help clarify the meaning of the graph to those not familiar with the data. For example, “2 less rooms than required”. Alternatively, the title could be amended to reflect that the chart shows the difference between the number of

bedrooms in a dwelling compared with the number of bedrooms needed by the household.

57. **Paragraph 3.2.2** – We previously highlighted that the long list of policies in the Local Plan that are relevant to the Neighbourhood Plan is not necessary as they are referred to in each policy under the heading “applicable policies from South Cambridgeshire’s 2018 Local Plan”. It is therefore suggested that they are deleted from the Neighbourhood Plan.
58. In some instances, emotive language, rather than objective language, is used in the supporting paragraphs of the Plan to describe features in the village. For example, paragraphs 5.4.1 and 5.4.12 refer to ‘physical appeal’ of the village, which we would suggest is amended to ‘character’.
59. In paragraph 5.4.1, it is stated that “virtually the whole village is designated a Conservation Area”. It would perhaps be clearer for Plan users if it were worded to state, “virtually the whole of the village’s built-up area is included within the designated Heydon Conservation Area.”
60. In the policy context following HAR 7, reference should also include Local Plan policies CC/1, CC/2 and CC/3.
61. There will be a need for some general updating of the supporting paragraphs of the Plan. For example, the reference to the emerging Local Plan. These matters can be addressed ahead of the Referendum without impacting on whether the Plan meets the Basic Conditions.