

Subject: GCLP Regulation 18 Consultation
From: E W Pepper
Date: January 2026



E W PEPPER

POLICY S/RRA: OTHER SITE ALLOCATIONS IN THE REST OF THE RURAL AREA

Object

E W Pepper objects to Draft Policy S/RRA on the basis that there are insufficient site allocations in the Rest of the Rural Area. The following sites should be allocated for housing development, in the following settlements:

Guilden Morden – HELAA Refs. 40300 (Land south of Church Street, east of High Street) and 40304 (Land off Swan Lane)

The Vision document submitted proposes the sensitive development of Land at Church and High Streets, Guilden Morden (HELAA Ref. 40300) to include 40-45 dwellings along with the provision of a new community village green/meadow, play facilities and landscaping. It reflects the comments received from Urban Design Officers on the proposed layout during pre-application discussions held with Officers in 2018.

Residential development on the Site would bring a number of economic, social and environmental benefits:

- A policy compliant level of affordable housing units tailored to meet local housing local needs;
- Provide a biodiversity net gain on site through the creation of new habitats, including wildflower grassland and tree planting, on land which is currently of low ecological value;
- A new public open space in a well-connected and central location within the village;
- New community orchard and village green for the whole village community to enjoy;
- New footpaths to link into and enhance the PROW network and available safe, walking routes within the village; and
- New residents which will help to support the vitality of local infrastructure, including public transport, community public house and primary school.

There are no overriding technical constraints to the delivery of residential development on the Site. The Proposals would ensure that the setting of the Conservation Area is protected.

The northern boundary of the Site is currently designated as an Important Countryside Frontage under Policy NH/13 of the South Cambridgeshire Local Plan 2018 and Draft Policy GP/LC proposes to retain this designation. However, the Site does not have a strong countryside character and it is visually enclosed by significant vegetation screening; there are no views out to the countryside side to protect. Furthermore, the Vision document shows how a break in the built development could still be retained through providing new landscaping and open space along the northern boundary. As set out in our comments to Draft Policy GP/LC, the Councils should remove the Important Countryside Frontage designation from this Site.

As shown in the Vision document, the proposals include for wider amenity contribution to the village at the linked Site, Land off Swan Lane (HELAA Ref. 40304).

As set out in the below HELAA Response, the Sites are suitable, available and achievable for development during the next 5 years.

HELAA REF. 40300:			
LAND SOUTH OF CHURCH STREET, EAST OF HIGH STREET	HELAA ADDENDUM (2025) RANKING	JANUARY 2026 REPRESENTATION RESPONSE	PROPOSED RAG RATING
Suitable			
Adopted Development Plan Policies	Amber	Any policy constraint could be overcome via a Site Allocation.	Green
Flood Risk Assessment	Amber	Site entirely in Flood Zone 1 with no areas at risk of surface water flooding.	Green
Landscape Assessment	Amber	With careful mitigation development could be accommodated without material harm to the surrounding countryside's landscape character and views. See Vision document.	Green
Biodiversity and Geodiversity	Green	Any proposals would provide ecological enhancement.	Green
Open Space/ Green Infrastructure	Green	The Site will promote access to open space and green infrastructure.	Green
Historic Environment Assessment	Amber	Impact on Conservation Area could be mitigated through design considerations.	Green
Archaeology Assessment	Amber	Archaeological investigation prior to development can be secured via an appropriately worded Condition.	Green
Accessibility Assessment	Amber	Accessibility provisions can be made through the appropriate design.	Green
Site Access	Amber	There are no constraints that cannot be dealt with through appropriate design.	Green
Transport and Road	Amber	Any impact could be mitigated through appropriate measures secured as part of any future application.	Green

Noise, Vibration, Odour and Light Pollution Assessment	Amber	HELAA notes acceptable in principle subject to detailed design and mitigation. Specific assessments would accompany a future application.	Green
Contaminated Land Assessment	Amber	Potential for contamination due to historic agricultural uses. Contamination Reports and subsequent remediation scheme would accompany any future application and appropriate remediation scheme secured via Condition.	Green
Overall Suitability Score	Amber	Demonstrated above there are no technical considerations that could not be mitigated or should preclude the allocation and development of the Site.	Green
Available			
	Green	Site remains under agreement with the landowner. Single ownership with intention to develop.	Green
Achievable			
	Green	Viable for residential development	Green

HELAA REF. 40304: LAND OFF SWAN LANE	HELAA ADDENDUM (2025) RANKING	JANUARY 2026 REPRESENTATION RESPONSE	PROPOSED RAG RATING
Suitable			
Adopted Development Plan Policies	Amber	Any policy constraint could be overcome via a Site Allocation associated with Land south of Church Street.	Green
Flood Risk Assessment	Amber	The Vision for this Site secures it as recreational amenity space rather than for development.	Green
Landscape Assessment	Amber	The Vision retains this Site as open space.	Green
Biodiversity and Geodiversity	Green	~	Green

Open Space/ Green Infrastructure	Green	~	Green
Historic Environment Assessment	Amber	The Site is partly in the Guilden Morden Conservation Area, but under the Vision is retained as open space.	Green
Archaeology Assessment	Amber	Archaeological investigation prior to development can be secured via an appropriately worded Condition.	Green
Accessibility Assessment	Amber	Adequate accessibility to key local services, transport, and employment opportunities.	Green
Site Access	Red	Walking access will be improved to facilitate the use of the site for informal recreation.	Green
Transport and Road	Amber	No highways access is required.	Green
Noise, Vibration, Odour and Light Pollution Assessment	Green	Site capable of being developed with regards to environmental health considerations.	Green
Contaminated Land Assessment	Amber	No significant groundworks would be needed for the proposed open space use.	Green
Overall Suitability Score	Red	Demonstrated above there are no technical considerations that could not be mitigated or should preclude the proposed use of the Site as a linked recreational amenity space.	Green
Available			
	Green	Site remains under agreement with the landowner. Single ownership with intention to develop.	Green
Achievable			
	Green	Viable for residential development	Green

Guiden Morden – HELAA Ref. 40315 (Land at Town Farm)

This Site has been promoted by E W Pepper Ltd throughout the local plan process. It is submitted hereby submitted as an amendment to the Call for Sites, with a revised area of 4 hectares (see Site Location Plan). This smaller-scale development would be focused on the previously developed land at Town Farm. A sensitive development will include careful consideration of all matters including appropriate access.

HELAA REF. 40315: LAND AT TOWN FARM	HELAA ADDENDUM (2025) RANKING	JANUARY 2026 REPRESENTATION RESPONSE	PROPOSED RAG RATING
Suitable			
Adopted Development Plan Policies	Amber	Any policy constraint could be overcome via a Site Allocation.	Green
Flood Risk Assessment	Amber	Revised Site is within Flood Zone 1. A sensitive approach to layout and drainage strategy could mitigate flood risk.	Green
Landscape Assessment	Amber	Layout would respect existing development pattern. Smaller development than previously proposed, focused on the brownfield land.	Green
Biodiversity and Geodiversity	Green	Any proposals would provide ecological enhancement.	Green
Open Space/ Green Infrastructure	Green	The Site will promote access to open space and green infrastructure.	Green
Historic Environment Assessment	Amber	The northeastern edge of the Site lies within the Conservation Area. However, layout and sensitive design would mitigate any impacts on heritage.	Green
Archaeology Assessment	Amber	Archaeological investigation prior to development can be secured via an appropriately worded Condition.	Green
Accessibility Assessment	Amber	Adequate accessibility to key local services, transport, and employment opportunities.	Green
Site Access	Red	Safe and suitable access to the public highway would be delivered as part of any development.	Amber
Transport and Road	Amber	Any impact could be mitigated through appropriate measures.	Green

Noise, Vibration, Odour and Light Pollution Assessment	Green	Site capable of being developed with regards to environmental health considerations.	Green
Contaminated Land Assessment	Amber	Potential for contamination due to historic agricultural uses. Contamination Reports and subsequent remediation scheme would accompany any future application and appropriate remediation scheme secured via condition.	Green
Overall Suitability Score	Red	Demonstrated above there are no technical considerations that could not be mitigated within any future application.	Green
Available			
	Green	Site remains under agreement with the landowner. Single ownership with intention to develop.	Green
Achievable			
	Green	Viable for residential development	Green

Steeple Morden – HELAA Ref. 40294 (Land to the west of Brook End)

The development of up to around 25 dwellings is based on a consideration of the capacity of the existing public highway and the rural context of the Site. The development would offer a number of affordable housing units and market housing units which would contribute towards meeting local housing local needs.

The development would also bring new residents into the village which will help to support the vitality of local infrastructure, including shops, public transport, schools etc. This will ensure the ongoing sustainability of the village.

HELAA REF. 40294: LAND TO THE WEST OF BROOK END	HELAA ADDENDUM (2025) RANKING	JANUARY 2026 REPRESENTATION RESPONSE	PROPOSED RAG RATING
Suitable			
Adopted Development Plan Policies	Amber	Any policy constraint could be overcome via a Site Allocation.	Green
Flood Risk Assessment	Green	Site entirely Flood Zone 1. No surface water flooding.	Green
Landscape Assessment	Red	Appropriate quantum of residential development and effective layout could be effectively mitigated through landscaping scheme.	Green
Biodiversity and Geodiversity	Amber	Appropriate mitigation could be included within any future application.	Green
Open Space/ Green Infrastructure	Green	~	Green
Historic Environment Assessment	Green	~	Green
Archaeology Assessment	Amber	Archaeological investigation prior to development can be secured via an appropriately worded Condition.	Green
Accessibility Assessment	Amber	Accessibility provisions can be made through the appropriate design.	Green
Site Access	Red	Safe and suitable access to the public highway to be reviewed.	Amber
Transport and Road	Amber	Any impact could be mitigated through appropriate measures secured as part of any future application.	Amber

Noise, Vibration, Odour and Light Pollution Assessment	Green	Site capable of being developed with regards to environmental health considerations. Specific assessments would accompany a future application.	Green
Contaminated Land Assessment	Amber	Potential for contamination due to historic agricultural uses. Contamination Reports and subsequent remediation scheme would accompany any future application and appropriate remediation scheme secured via condition.	Green
Overall Suitability Score	Red	Demonstrated above there are no technical considerations that could not be mitigated within any future application.	Green
Available			
	Green	Site remains under agreement with the landowner. Single ownership with intention to develop.	Green
Achievable			
	Green	Viable for residential development	Green

Arrington – HELAA Ref. 40292 (Land to the southwest of Ermine Way)

The residential development of around 21 dwellings and associated infrastructure could be accommodated on the Site. The design and layout of the development would respect the surrounding character of the area with regards to appearance and scale.

HELAA REF. 40292:			
LAND TO THE SOUTHWEST OF ERMINE WAY	HELAA ADDENDUM (2025) RANKING	JANUARY 2026 REPRESENTATION RESPONSE	PROPOSED RAG RATING
Suitable			
Adopted Development Plan Policies	Amber	Any policy constraint could be overcome via a Site Allocation.	Green
Flood Risk Assessment	Amber	Wholly in Flood Zone 1. A sensitive approach to layout and drainage strategy could mitigate any flood risk.	Green
Landscape Assessment	Amber	Design and layout to respond to site context. Mitigatory landscaping scheme also to be included.	Green
Biodiversity and Geodiversity	Amber	Appropriate mitigation could be included within any future application.	Green
Open Space/ Green Infrastructure	Green	~	Green
Historic Environment Assessment	Amber	Landscaping and effective layout to mitigate any potential impact on nearby Listed Assets.	Green
Archaeology Assessment	Amber	Archaeological investigation prior to development can be secured via an appropriately worded Condition.	Green
Accessibility Assessment	Red	Accessibility provisions can be made through the appropriate design.	Green
Site Access	Amber	Safe and suitable access to be demonstrated as part of any future application.	Green
Transport and Road	Green	~	Green

Noise, Vibration, Odour and Light Pollution Assessment	Green	Site capable of being developed with regards to environmental health considerations. Specific assessments would accompany a future application.	Green
Contaminated Land Assessment	Amber	Potential for contamination due to historic agricultural uses. Contamination Reports and subsequent remediation scheme would accompany any future application and appropriate remediation scheme secured via condition.	Green
Overall Suitability Score	Red	Demonstrated above there are no technical considerations that could not be mitigated within any future application.	Green
Available			
	Green	Site remains under agreement with the landowner. Single ownership with intention to develop.	Green
Achievable			
	Green	Viable for residential development	Green

Kneesworth – HELAA Ref. 40299 (Land to the east of Old North Road)

The Site could accommodate a development of circa 142 dwellings and associated infrastructure (based on 75% of the 6.318ha site being developable area and at a standard quantum basis of 30 dph). The design and layout of the development would respect the surrounding character of the area with regards to appearance and scale.

HELAA REF. 40299: LAND TO THE EAST OF OLD ROAD	HELAA ADDENDUM (2025) RANKING	JANUARY 2026 REPRESENTATION RESPONSE	PROPOSED RAG RATING
Suitable			
Adopted Development Plan Policies	Amber	Any policy constraint could be overcome via a Site Allocation.	Green
Flood Risk Assessment	Amber	Site partly in Flood Zone 2 (1%) and partly in Flood Zone 3 (6%). A sensitive approach to layout and drainage strategy could mitigate any flood risk.	Green
Landscape Assessment	Red	Appropriate development quantum alongside considerate design and layout to respond to site context. Mitigatory landscaping scheme also to be included.	Green
Biodiversity and Geodiversity	Amber	Appropriate mitigation could be included within any future application.	Green
Open Space/ Green Infrastructure	Green	~	Green
Historic Environment Assessment	Amber	Landscaping and effective layout to mitigate any potential impact on nearby heritage assets.	Green
Archaeology Assessment	Amber	Archaeological investigation prior to development can be secured via an appropriately worded Condition.	Green
Accessibility Assessment	Amber	Accessibility provisions can be made through the appropriate design.	Green
Site Access	Amber	HELAA notes acceptable in principle. Safe and suitable access to be demonstrated as part of any future application.	Green

Transport and Road	Amber	Any potential impact could be reasonably mitigated through application proposals.	Green
Noise, Vibration, Odour and Light Pollution Assessment	Amber	Site capable of being developed with regards to environmental health considerations with appropriate mitigation. Specific assessments would accompany a future application.	Green
Contaminated Land Assessment	Amber	Potential for contamination due to historic agricultural uses. Contamination Reports and subsequent remediation scheme would accompany any future application and appropriate remediation scheme secured via condition.	Green
Overall Suitability Score	Red	Demonstrated above there are no technical considerations that could not be mitigated within any future application.	Green
Available			
	Green	Site remains under agreement with the landowner. Single ownership with intention to develop.	Green
Achievable			
	Green	Viable for residential development	Green