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25 September 2026

Dear Planning Policy,

Re: Representations for Proposed Submission Greater Cambridge Local Plan (Regulation 19) on behalf of Guilden Morden Developments Ltd

Introduction

JMS Planning & Development ('JMS Planning') has been instructed by Guilden Morden Developments Ltd ('GMD') to submit representations on their behalf to the Greater Cambridge Shared Planning Service's ('GCSP') Proposed Submission Greater Cambridge Local Plan (Regulation 19) consultation closing 25 September 2026. GMD welcomes the opportunity to provide representations on the Regulation 19 Local Plan and the evidence base.

These representations are made drawing on the experience of both the team members of GMD and JMS Planning in engaging with the Greater Cambridge plan-making process. GMD and JMS Planning recognise the challenges faced by Greater Cambridge in preparing a Local Plan for a large and varied geographic area with significant development constraints combined with the need for housing now and in the future led by the prosperous local economy. The comments provided here are intended to be constructive and to assist the Council in ensuring that the Local Plan is ultimately capable of being found sound.

GMD and JMS Planning have previously participated in the Local Plan process for Greater Cambridge, including the submission of a HELAA entry for Land South of New Road, Guilden Morden (site reference 40563) during the consultations in 2021 and

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March 2025, as well as submitting comments at the Regulation 18 stage. The site is considered suitable, available and achievable for the preferred development type.

The Regulation 19 consultation represents the final stage before submission of the Local Plan to the Secretary of State under the Planning and Compulsory Purchase Act 2004 and the Town and Country Planning (Local Planning) (England) Regulations 2012. The Local Plan must be supported by a proportionate and robust evidence base capable of demonstrating soundness at Examination. It is understood that the Local Plan must be submitted by the end of December 2026.

The Statement of Representations Procedure identifies the following documents as part of the Regulation 19 consultation:

- Greater Cambridge Local Plan - Proposed Submission
- Proposed Submission Policies Map
- Sustainability Appraisal (incorporating the requirements of Strategic Environmental Assessment)
- Habitats Regulations Assessment

Whilst the Statement of Representations Procedure sets out the documents subject to consultation, it is also recognised that the Regulation 19 Local Plan must be assessed against the statutory framework contained within the Planning and Compulsory Purchase Act 2004 and the Town and Country Planning (Local Planning) (England) Regulations 2012. At Examination, the Planning Inspector will consider whether the Local Plan has been prepared in accordance with legal requirements and whether it is sound, having regard to the evidence base, national planning policy and other relevant material. GMD and JMS Planning note that the Regulation 19 document has been prepared in the context of the NPPF 2024, however, the publication of NPPF 2026 means that updates will be required to ensure full alignment with current national policy, particularly where changes in the Framework necessitate amendments to policy wording or approach.

This letter sets out GMD's representations in relation to the Regulation 19 Proposed Submission Greater Cambridge Local Plan. The structure of this representation is as follows:

- Part 1 – Compliance with Legislative and Policy Requirements for Plan-Making
- Part 2 – Commentary of Consultation Documents
- Part 3 – Site Promotion

Finally, JMS Planning wishes to take part in the Examination Process for the draft Local Plan on the grounds that alterations are required in order to the Local Plan to be found and to ensure that any queries in relation to site reference 40563 can be answered by a representative of the landowner.

Part 1 - Legislative and Policy Requirements for Plan-Making

Legislative Background

As alluded to above, the PCPA 2004 and TCP Regulations 2012 impose requirements on local-plan making. This includes the production and maintenance (where applicable of) **Local Development Scheme** (s15 PCPA 2004), **Statement of Community Involvement** (or Statement of Consultation) (s18 and s19 PCPA 2004, notwithstanding s15LE PCAP 2004, in addition to s22c TCP 2012), **Sustainability Appraisal** (Part 2 s19(5) PCPA 2004, s22a TCP 2012), **policies Map** (s22b TCP 2012). In so far as the NPPF is concerned, the Local Plan must not be inconsistent or repeat any national development management policy (s15C (9) PCPA 2004), and section 15CA(6) states that the **LPA must have regard to**:

a) Observations or advice received from a person appointed by the Secretary of State (such as a Planning Inspector)
b) **Any responses to a consultation**, provided for in regulations under Section 15LE, in connection with the Local Plan,
c) National development management policies
d) **Other national policies and advice** contained in guidance issued by the Secretary of State
…
g) Any other part of the development plan for the authority's area which has effect
h) any neighbourhood priorities statement (if i) has effect for part if the authorities area, and ii) the authority has not already had due regard in a previous iteration)
i) such other matters as the Secretary of State prescribes.

Furthermore, Part 2 s8 PCPA 2004 states that, the local plan must take account of an assessment of the amount, and type, of housing that is needed in the local planning authorities area, including the amount of affordable housing need.

Further to the above, the TCP Regulations 2012 state how Local Plans should be prepared. Section 18 places emphasis on the role the LPA has in consulting relevant bodies or persons, including specific consultation bodies (2a), general consultation bodies (2b), the public or others carrying on business in the LPA (2c). Section 18(3) requires that the LPA must take into account any representation made to them by a party detailed in s18(2). As per s15CA(6)(d), 004 of the PPG which asks LPAs, in consultation with the local community, to consider the most appropriate way to plan for the needs of their area.

Ultimately, as is enshrined within Part 2 s20 PCPA 2004 and also in national policy, the Planning Inspectorate must decide at examination that the Local Plan is 'sound' (with national policy setting out the tests of soundness). It is the view of JMS Planning that with minor alterations the Local Plan can pass the soundness tests.

National Planning Policy Framework (2026)

The revised NPPF was released in August 2026, with iterations of the Local Plan to date formulated based on the December 2024 NPPF. The 2026 NPPF replaces the December 2024 version and introduces a revised approach to plan-making and development management, including Spatial Development Strategy, housing delivery, and Green Belt release to name but a few.

The 2026 NPPF places emphasis on a plan-led system and introduces a chapter of plan-making polices (**PM1-PM17**) plus relevant policies in additional chapters which cumulatively establish clearer expectations on local plan content, preparation, monitoring and review. It requires local plans to be supported by up-to-date evidence, to plan positively for identified development needs and to avoid unnecessary duplication of national decision making policies.

The following assessment identifies those areas where the Proposed Submission Greater Cambridge Local Plan requires amendments, replacement or review to demonstrate consistency with the revised NPPF 2026. Given that the Local Plan will be assessed against the NPPF 2026 since it does not benefit from the transitional arrangements in the NPPF 2024, JMS Planning will not comment on the specific policies within the Local Plan since they must be updated to clearly reflect the requirements of a new Framework that drastically differs from its preceding version. **JMS Planning recommends that the Greater Cambridge Local Plan is revised to refer to the NPPF 2026 and a consultation statement released on how the existing policies comply with its plan-making requirements. JMS Planning would expect that the Planning Inspectorate would request such a revision should the Greater Cambridge Local Plan be submitted without the necessary changes being made.**

Inspectors appointed under section 20 of the PCPA 2004 must assess whether the Local Plan satisfies both the legal requirements and the tests of soundness set out in **policy PM15** of the NPPF (2026). Plans are considered '*sound*' if they accord with the following criteria, which is to be applied in a proportionate manner:

a) ***Positive*** *– the plan sets out a positive approach to delivering growth to meet the development needs of the area in accordance with policy S1, and is based on effective joint working on cross-boundary strategic matters;*
b) ***Appropriate*** *– the plan sets out an appropriate strategy to enable the delivery of sustainable development, taking into account reasonable alternatives, and is based on proportionate evidence;*
c) ***Effective*** *– the plan sets out effective policies for development, and there is a reasonable prospect that its site allocations are capable of being deliverable at the time envisioned;*
d) ***Consistent with national policy*** *– the plan accords with the policies for plan-making in this Framework and other statements of national planning policy where relevant, and does not include policies which duplicate, substantively restate or are inconsistent with the content of national policies for decision-making; and*

e) ***Conformity*** *– the plan is in general conformity with any adopted spatial development strategy for the area.*

The Framework underlines that the planning system should contribute to the achievement of sustainable development and manage the use and development of land in the long-term public interest (**paragraph 15**). **Policy S1** sets out the expectations that the development plan should plan 'positively' for future grown and change, by meeting the development needs of the areas as a minimum, based on OANs inclusive of cross boundary unmet need unless assets of particular importance and the application of policies in the Framework to protect them would provide a strong reason for restricting overall scale, type or distribution of development in the plan area or the adverse impacts of would substantially outweigh the benefits.

Policy PM1 indicates that Spatial Development Strategies are central to the plan-making process, with development plans such as the Greater Cambridge Local Plan to evaluate and respond to strategic policies. For instance, in specifying the requirements for an SDS, **PM1(2)(a)** sets out they should fix a strategy for sustainable growth covering at least 25 years. PM1(1) finds that the content of SDSs 'should be genuinely strategy in nature and allow for more detailed issues to be considered and addressed through other parts of the development plan' (such as the BLP).

The Framework states at **Policy PM2** that Local Plans should set out a positive vision and spatial strategy which supports the delivery of the SDS for the area – meaning that the LP must be flexible to accommodate a forthcoming SDS. Further, the policy requires accommodation of development needs undertaken by:

a) Setting a vision of the plan area that articulates, supported by no more than 10 measurable outcomes, which:
    i. Articulates how the area should change over the plan period
    ii. Sets aspirational aims and objectives underpinned by a realistic appreciation of what the plan's policies can genuinely shape and deliver;
    iii. Reflects longer term expectations extending beyond the plan period where appropriate; and
    iv. Has particular regard to meeting the identified development needs of the area in a sustainable manner in accordance with policy S1.

b) Setting out a spatial strategy policies for the minimum amount of development to be provided, land allocations and broad locations of growth for a period no less than 10 years from the point of adoption;

c) Identifying the contributions expected from development towards meeting affordable housing requirements; and

d) Including other policies and explanatory text only where necessary to support allocation delivery or to address local issues.

Policy PM6 sets the general principles for plan making, with plan-makers 1a) only including relevant matters, 1b) only including policies that extend beyond location specific requirements where necessary and justifiable, 1c), not duplicate the Framework on national policies unless directed, 1d) engaged positively with stakeholders, ensure they are informed by environmental assessments 1f) make use of relevant online tools, 1g) publish plans in a search digital format.

Policy PM7 states planning authorities should design an approach to prepared and adopt a plan in 30 months. This is not applicable to those plans being made under the legacy system.

Policy PM8 further adds to this, stating that 1) all plans should be informed by a baseline understanding of the needs, opportunities, constraints and wider context of the area to which they related. Information and data should underpin the Local Plan, with data focused and drawn from suitable and reliable sources that are sufficiently up to date. 3) details that evidence should be up to date and with development needs only updated where there are strong reasons to do so.

Policy PM9 guides LPAs in identifying and assessing land for development, requiring 1) an assessment of land available, 2) a detailed assessment that is proportionate to the type of plan.

Policy PM10 requires cooperation between plan-making authorities, requiring proactive engagement to identify and address cross boundary matters, including infrastructure, development needs and optimal locations for growth. PM11 states the requirement for SoCGs to evidence cooperation.

Policy HO1, in line with s20 PCPA 2004, requires the preparation of SDSs, and Local Plans where a SDS is not in place (as per the BLP 2026), to be based upon:

a. A Housing needs assessment that establishes the overall number of homes needed in the areas as a minimum over the plan period, using the standard method in Annex D
b. The same with needs for travellers;
c. Understand any accommodation needs that cannot be met within neighbouring areas.

The NPPF at **Policy HO1(2)** requires local planning authorities to consider the housing needs of different groups within the community, including those requiring affordable housing with children, older people, people with disabilities, students, service families, travellers and those wishing to commission their own homes.

Policy HO2(2) requires that where an SDS is not in place, local plans should establish a housing requirement figure. The figure should HO2(3a) should reflect the extent to which identified needs can be accommodation over the plan period as a minimum, and HO2(3b) be higher that the LHNA where appropriate (including scenarios where it is necessary to meet the needs of neighbouring areas or reflect growth ambitions linked to economic development or infrastructure development).

The NPPF requires strategic policy-making authorities to maintain a clear understanding of the land available for development through the preparation of housing and economic land availability assessments and other proportionate evidence. Planning policies should identify a sufficient supply and mix of sites, takin account of their availability, suitability, achievability and viability. Plans should identify specific deliverable sites to provide at least five years' worth of housing against their housing requirement, together with developable sites or broad locations for growth for later phases of the plan period.

Specifically, local planning authorities are expected to identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement or, where relevant, their local housing need figure. The NPPF continues to require an appropriate buffer to be applied to housing land supply position where necessary to ensure choice and competition in the market for land and to improve delivery where there has been a record of under-provision.

Habitats Regulation Assessment

Should a Local Plan be likely to have significant effects on European habitats or species, the LPA should undertake a Habitats Regulation Assessment as per the Conservation of Habitats and Species Regulations 2010 (as amended). The Sustainability Appraisal should also take the findings of the HRA into account (as per the PPG, paragraph 11, ID11-011-20140306).

Sustainability Appraisal

With this in mind, JMS Planning would like to underline the importance of the Council considering 'reasonable alternatives' at all consultation stages in order to comply with Article 5(1) of the Directive, which states that:

'Reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme. Are identified, described and evaluated.'

Annex I(h) requires that GCSP must set out,

'an outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken, including any difficulties … encountered in compiling the required information.'

Cross-Boundary Collaboration

JMS Planning note that while legislation on Duty to Cooperate has been revoked, a SoCG ensures a record of collaboration on cross-boundary matters. While the Regulation 19 evidence base includes a Duty to Cooperate statement, it remains important for GCSP to maintain and update a Statement of Common Ground ('SoCG') to demonstrate constructive, active and ongoing engagement with neighbouring authorities. The SoCG does not require agreement between the parties, but does require evidence of constructive, active, and ongoing engagement. This reflects the

approach taken within the Greater Cambridge Draft SoCG (July 2026), which identifies the relevant authorities and strategic matters requiring continued cooperation.

The Government abolished Duty to Cooperate within legislation (The Planning and Compulsory Purchase Act 2004 (as amended by s110 of the Localism Act 2011), Part 2, section 33A on 25 March 2026. It remains a requirement for local authorities to collaborate closely in respect of strategic matters and to provide for unmet need. LPAs will be expected to 'maintain effective cooperation' between one another as per Ministerial direction[1], and policies PM10 and PM11 of the Framework (2026).

For the benefit of the Council, the PPG sets out that such SoCGs are expected to contain (paragraph 11, ID 61-011-20190315):

a. *'a short written description and map showing the location and administrative areas covered by the statement, and a brief justification for these area(s);*

b. *the key strategic matters being addressed by the statement, for example meeting the housing need for the area, air quality etc.;*

c. *the plan-making authorities responsible for joint working detailed in the statement, and list of any additional signatories (including cross-referencing the matters to which each is a signatory);*

d. *governance arrangements for the cooperation process, including how the statement will be maintained and kept up to date;*

e. *if applicable, the housing requirements in any adopted and (if known) emerging strategic policies relevant to housing within the area covered by the statement;*

f. *distribution of needs in the area as agreed through the plan-making process, or the process for agreeing the distribution of need (including unmet need) across the area;*

g. *a record of where agreements have (or have not) been reached on key strategic matters, including the process for reaching agreements on these; and*

h. *any additional strategic matters to be addressed by the statement which have not already been addressed, including a brief description how the statement relates to any other statement of common ground covering all or part of the same area.'*

The Greater Cambridge Draft SoCG (July 2026) identifies housing need, employment land, transport, environmental designations and infrastructure planning as the key strategic matters requiring continued cooperation. As the Local Plan progresses towards submission, it will be necessary for GCSP to update the SoCG to reflect the

[1] Matthew Pennycook MP (Minister of State for Housing and Planning) (2025). Available at: https://assets.publishing.service.gov.uk/media/692864153345e31ab14ecf67d/Local_Plans_letter_to_PINS.pdf

publication of the NPPF 2026 and any changes in strategic alignment with neighbouring authorities. This will assist the Planning Inspector in determining whether the Local Plan meets the requirement for effective cooperation under the current national policy framework.

Part 2 – Commentary of Consultation Documents

The comments below are intended to assist GCSP in producing a sound Local Plan, with the context of legislation, the Framework, and the PPG in mind.

National Context

It is noted that as the UK economy as a whole is the second largest exporter of Digital Goods in the world (Source: The World Trade Organisation 2024 data) and Cambridgeshire is the focus for Businesses in this sector – the Authority should not be diverted from being a key – component in the UK economy by providing homes for those employed or expecting to be employed in this sector. Without homes, any restrictions on the employment of labour will have a detrimental effect both nationally and locally.

GMD and JMS note that in order to calculate the five year housing land supply, the Liverpool methodology with a 5% buffer has been used. The Liverpool methodology has been used due to the circumstances that exist in Greater Cambridge, which mean that a sustained increased level of annual completions at or above the annual housing requirement is not anticipated until the second half of the plan period. A 5% buffer has been applied as this is the likely buffer required taking account of anticipated Housing Delivery Test results. JMS Planning supports the identification of a target of 2,289 dwellings per annum or circa 48,069 homes.

It should be noted that the commuting assumptions show a need for 2,422 dwellings per annum, and clarification as to why this figure has not been adopted is required (as per the Housing Needs Assessment in the evidence base). JMS Planning & Development would suggest that Policy S/JH be altered to accommodate the increased figure.

Local Plan Vision

JMS Planning generally supports the Local Plan Vision; however, we question why the Vision does not rely on the mix of development strategies outlined in the Spatial Strategy as a whole. There is no specific reference to the type of development or its location. GMD and JMS Planning recommend that the Local Plan Vision be updated to explicitly clarify the range of development locations to be utilised to meet demand for housing and other types of development.

Local Plan Spatial Strategy

JMS Planning wholly supports the identification of the four strategies set out under Policy S/DS. However, there is also an inherent weakness in not including increased development at the Group Village scale, given the sustainability of the settlements within this tier is referenced throughout the evidence base and is not dependent on the presence of a train station (as per the SA).

While JMS Planning understand that the size of the settlement and 'very good' public transport links given as justification by GCSP, this approach contradicts the spatial flexibility encouraged by NPPF paragraph 18, which calls for development to be guided by taking *'local circumstances into account, to reflect the character, needs and opportunities of each area.'* The rigid application of tiers could result in missed opportunities for supporting sustainable development in rural areas.

JMS Planning would recommend that Policy S/DS be revised at part 3, insofar as development in the wider rural area should be inclusive of all sustainable locations, regardless of being beyond the 'Rural Centre' or 'Minor Rural Centre' Tiers. This is revisited by JMS Planning at the 'Sustainability Appraisal' section.

Furthermore, the policy should have regard to the flexibility afforded by the NPPF, including Policies HO10 and HO11, which recognise that certain forms of housing development, including affordable housing and isolated homes in the countryside, may be appropriate in rural locations beyond defined settlement boundaries. Whilst the majority of development should be directed towards the most sustainable settlements, the spatial strategy should retain sufficient flexibility to support sustainable development opportunities that contribute towards meeting identified housing needs and maintaining the vitality of rural communities.

Policy S/SH: Settlement hierarchy and Strategy Paper

JMS Planning agrees with the settlement hierarchy as set out by the aforementioned policy. JMS Planning suggests, however, that the sustainability credentials of the Group Villages should not be undermined by the imposition of arbitrary development quantums, specifically 8 dwellings within the development extents and 15 where it would make best use of a brownfield site. JMS Planning would argue that the quantum that is acceptable is dependent on the characteristics of a specific site in question, and would also raise that the limit to 8 dwellings also results in the Council not bringing forward much-needed affordable housing. There should also be a reference to Policy S/DE (Defined Development Extents) and the circumstances in which development is justified beyond the boundary of a settlement.

Policy S/DE: Defined development extents

This policy is not sufficiently flexible to allow for unallocated development that is located beyond the settlement boundary when there is a specific need for the development type. In terms of reference to development types (such as rural exception sites), a cross-reference should be made to the specific governing policy (e.g. H/ES). There should be further flexibility included to underline how this policy will be interpreted by the LPA in times of no housing land supply or shortfall in other development.

Policy J/RE: Supporting the Rural Economy

It is noted that Policy J/RE expresses a positive approach towards rural diversification through support for the re-use and replacement of rural buildings and proposals related to land-based enterprises. However, the policy should also recognise that rural businesses may support enterprises with a strategic role in the wider regional and national economy. A positive approach should therefore be taken towards such proposals where they can demonstrate acceptable impacts in relation to highway

safety, environmental sustainability and landscape character, whilst continuing to recognise the significant role of agricultural and other land-based enterprises within the rural area.

Policy H/AH: Affordable housing

The policy does not include any wording on how the delivery of affordable housing can be altered should there be material viability considerations; therefore, GMD and JMS Planning encourage its inclusion, or as a standalone policy as per many other Authorities. JMS Planning recommends that explanatory text be provided to explain why the affordable housing tenures change depending on whether the quanta are 10-14 or 15+ units.

More generally, the policy should be reviewed to ensure consistency with the NPPF including Policy HO10, which supports the delivery of affordable housing to meet identified needs. The Local Plan should therefore maintain sufficient flexibility to maximise affordable housing delivery across a range of sustainable locations, including rural settlements where local need can be demonstrated.

Policy H/ES: Exception sites for affordable housing

JMS Planning is in general support of the inclusion of a policy for rural exception sites for local housing need and first homes. This approach is consistent with the objectives of the NPPF, including Policy HO10, which supports the delivery of affordable housing to meet identified local needs, including within rural communities. JMS Planning would, however, recommend that these two development types form two policies to allow for more convenient interpretation by applicants in order to meet the overall needs for housing and other development types such as community.

JMS Planning would recommend that the wording for 1. a. be altered from 'demonstrable social or economic need for affordable housing for local residents which cannot be met in any other way, which can reasonably be expected to persist in the long term' to 'demonstrable need for affordable housing for those with a connection to the settlement and which is evidenced by a local housing needs assessment'. It is not necessary that the LHNA be 'independent' as this will be scrutinised by the decision-taker. It is also not reasonable to demand that the need for affordable housing be met via a different mechanism since rural exception sites are entirely for this purpose. It is also not reasonable to include as a policy requirement that the need should persist in the long term; this is ambiguous and overly stringent.

It should also be noted that requiring Registered Providers to be named in S106 agreements, while understandable, hampers the delivery of the site. This prevents the applicant from engaging with multiple RPs throughout a planning application process or the sale of the site post planning in order to meet both parties' needs for adaptation to circumstances at the time of land disposal. . A more flexible approach would better support the delivery of affordable homes in accordance with national policy objectives.

Policy H/HM: Housing mix

GMD and JMS Planning ask for clarification on how applicants should have regards to 'location and character of the area, the built form of the new development, the nature

or type of development being proposed, the viability of delivery given site-specific constraints or requirements, changes in affordable and market housing demand in the local area, and the existing housing mix in the surrounding area', when justifying deviations.

Policy H/SS: Residential space standards and accessible homes

Policies should not repeat existing legislation or regulations. The requirement in part 2 is inappropriate given its inapplicability to all applications; for instance, compliance with the Building Regulations cannot be demonstrated for applications at the outline planning stage. Compliance with the Building Regulations is for the Building Control process rather than planning applications. Instead, it is recommended that signposting to the Building Regulations in supporting text would be more appropriate.

Policy H/SH: Specialist housing

JMS Planning and GMD are supportive of the provision of specialist housing; however, we seek clarity on the application of the policy to minor development. Cross-referencing with Policy S/DE is welcome; however, JMS refers GCSP to comments made with respect to this policy.

Policy H/CB: Self and Custom Build homes

JMS Planning and GMD are supportive of this policy; however, we seek clarity on the application of the policy to minor development, i.e. less than 10 units (albeit noting South Cambridgeshire's current sub-11 unit definition). Cross-referencing with Policy S/DE is welcome; however, JMS refers GCSP to comments made with respect to this policy.

Policy H/BR: Build to Rent homes

Part 1.a of the Regulation 19 version now requires that schemes *'will not be supported where they result in a harmful concentration of this type of development within the local area',* JMS Planning recommends that the term *'harmful concentration'* be clearly defined or supported by measurable criteria to ensure consistent interpretation across applications. Similarly, the Regulation 19 wording replaces the previous reference to Build to Rent schemes 'dominating' an area, and therefore our earlier recommendation is updated to request clarity on how *'harmful concentration'* will be assessed in practice. JMS Planning also recommends that the policy include flexibility where there is demonstrable demand for alternative residential development types (i.e. C3), particularly in sustainable rural locations.

Policy H/CO: Co-living

JMS Planning and GMD welcome the inclusion of a policy specific to co-living. However, part 1.b of the Regulation 19 version now requires developments to deliver active travel facilities and *'minimal car parking'*, which conflicts with the practical need for occupiers to have beneficial occupation, particularly in areas where public transport accessibility varies. JMS Planning also seeks justification for the requirement that schemes be of a *'moderate scale of between 50 and 200 units'*, noting that the Regulation 19 version retains this threshold and restricts larger schemes unless it is demonstrated that they will not result in a *'harmful concentration of Co-living units'* or

place undue pressure on local infrastructure. JMS Planning recommends that the term *'harmful concentration'* be clearly defined to ensure consistent interpretation across applications. The policy should also recognise that sufficient car parking may be necessary in certain rural or semi-rural locations, particularly given the shift to electric vehicles, and that car parking should not be viewed as inherently detrimental.

Policy H/MO: Houses in Multiple Occupation (HMOs)

JMS Planning and GMD welcome the improved clarity in the Regulation 19 version of this policy. Part 1.b now specifies that proposals will not be supported where they result in a C3 dwelling being *'sandwiched'* by HMOs or create *'three or more adjacent properties as HMOs'*, which provides a clearer and more proportionate approach than the previous Regulation 18 wording. JMS Planning notes that the introduction of exceptional circumstances in part 2, where existing breaches of *'sandwiched'* HMOs or continuous frontages may be considered acceptable if no harm is caused, represents a positive refinement that addresses earlier concerns regarding over-concentration. We also welcome the strengthened requirements in parts 1.c–1.e relating to amenity, suitability, and accessibility. However, we continue to recommend that the justification for the *'sandwiching'* test be clearly articulated, given that compliance with amenity criteria in part 1.a may already mitigate the concerns the test seeks to address. Finally, part 3's requirement for management plans to minimise antisocial behaviour should be carefully framed to avoid duplicating licensing controls, ensuring the policy remains focused on planning-related impacts.

Policy H/SA: Student accommodation

JMS Planning welcomes this policy; however, we seek further information on 1.d. The Council is invited to accommodate the role of contributions to affordable housing in lieu of, and how this is taken into account in determining whether development would lead to permanent net loss of C3.

Policy H/DC: Dwellings in the countryside

JMS Planning and GMD support the inclusion of a policy controlling the reuse of buildings in the countryside. We would, however, suggest that it is an unreasonable requirement to have to market a property for 12 months and not take the existing state of the property into account. JMS Planning would suggest restricting the requirement for marketing information to properties that are vacant but capable of accommodating employment uses, and which are not in poor condition. A market assessment report by a suitably professionally qualified firm or firms should be sufficient to identify the potential re-use in its existing Use Class.

Policy I/ST: Sustainable transport and connectivity

JMS Planning welcomes the inclusion of a policy for sustainable transport and connectivity. The Regulation 19 version now sets out a more detailed, vision-led approach requiring development to be designed around walkable neighbourhoods, active travel networks and high-quality public and community transport, which strengthens the expectations compared to the Regulation 18 draft. Given this expanded emphasis, JMS Planning recommends that the Council consider referencing the Department for Transport's Connectivity Tool to support consistent assessment of accessibility across different settlement types, and to ensure the policy can be readily

reviewed once national policy is updated. Part 3 of the policy states that developments will only be permitted where they do not have an *'unacceptable transport and highways safety impact'*, and we note that this wording should be revisited when the Local Plan is examined to ensure alignment with the new NPPF. JMS Planning supports the strengthened requirement for earl -phase sustainable travel provision, but recommends that the policy clarify how *'unacceptable'* impacts will be assessed in practice, particularly where proportionate mitigation is proposed through Transport Assessments, Travel Plans or Transport Statements.

Comments on the Evidence Base

This section reviews the key evidence base documents informing the emerging Local Plan. While these documents demonstrate general alignment with national policy, aspects of their interpretation risk narrowing the spatial strategy, underplaying the potential of sustainable rural growth and dispersed housing delivery.

Housing Needs Update (September 2025)

The Housing Needs Assessment (HNA) provides the starting point for determining housing need in accordance with national policy, identifying a requirement for 2,295 dwellings per annum. It should be noted that the commuting assumptions show a need for 2,422 dwellings per annum, and clarification as to why this figure has not been adopted is required. See earlier statement on Page 8 about the housing requirement for Greater Cambridge.

The NPPF, at the start of Chapter 6, is clear: *'The objective of the policies in this chapter is to support the delivery of a substantial increase in the supply of homes and traveller sites, by ensuring that a sufficient amount and variety of land can come forward where needed. This includes planning for an appropriate mix of accommodation for the local community and ensuring that land with permission is developed without unnecessary delay.'* The LHNA's findings support a diverse land supply strategy. However, over-reliance on large urban extensions risks delaying delivery. JMS Planning also recognises that the emerging spatial strategy advocates a mix of development options, which JMS supports. This includes smaller sites across a range of settlements, which would further improve the plan's flexibility and resilience, in line with Policy HO5 of the NPPF, which promotes '*the housing needs of different groups'.* Again, the division of growth across the Tiers is vital to achieve the housing requirement target and align the Plan with planning policy.

The Authorities' own surveys illustrate the increasing ability of workers in the Digital sector to not necessarily commute daily by working from home, reducing the carbon footprint, which is an aim we support.

Sustainability Appraisal and Spatial Balance

The Sustainability Appraisal (October 2025) evaluates spatial options against several objectives, referring to Appendix E for the full assessment and justification of the strategy adopted.

The Appendix states that,

'E.41 All sites tested in the HELAA and identified as potential development options in the better served villages have been subject to site-specific consideration for allocation, and for sustainability appraisal.

E.42 This was identified as sites at Rural Centres, Minor Rural Centres, and Group villages on transport corridors providing very good access to public transport. Sites at other villages were not considered reasonable options, as they would not provide sustainable locations to allocate development. Note that the Councils have reviewed representations to the First Proposals consultation regarding the S/SH: Settlement Hierarchy policy to confirm our understanding of which settlements sit in which settlement hierarchy category

E.43 Residential proposals which would be detached from villages were rejected through the HELAA process as they would not provide a suitable location for development. Where sites were identified in the HELAA as either not suitable, not available or not achievable these sites have not been subject to site specific consideration for allocation, and for sustainability appraisal, as they are not considered reasonable options.'

JMS Planning disagrees with the proposition in the Development Strategy Topic that if Group Villages do not have a train station then they should be removed from the Development Strategy (paragraph 5.220) The approach of curtailing growth in the rural area to those that are designated as neighbourhood plan areas or those settlements with 'very good' public transport links is a potential unnecessary narrowing of locations suitable for sustainable development. See earlier comment on page 12 about how the pattern of work is reducing the need for commuting by train, along with not all work opportunities at the other end of the commute being close to train stations. Spatial strategies involving smaller settlements can positively contribute to the plan's resilience and implementation. It is questionable as to why settlements with good access to public transport are removed from the development strategy for the area. Introducing this level of transport accessibility would allow for a more proportionate assessment of rural growth and ensure that reasonable alternatives are meaningfully tested. Furthermore, consideration should be given to the changing ways of working given the ongoing changes enable by technology, reducing the need for commuting for many, enabling a wider range of locations.

Part 3 – Site Promotion: Land South of New Road, Guilden Morden (Site 40563)

JMS Planning on behalf of GMD submitted Land South of New Road for consideration to the March 2025 HELAA process, building on information submitted to GCSP in 2021. The proposed residential capacity was 25-30. The 2025 Assessment includes 2021 commentary. As established above, the site was not assessed further as it did not align with the Development Strategy for GCSP, which focuses on Minor Rural Centres and above.

An application has been made on the site for self-build plots under 25/05060/OUT. This does not prejudice the site coming forward for the development of an increased quantum or density. The responses from Statutory consultees, together with Utility providers, confirm no objections subject to standard conditions with respect to:

- Access and Highways
- Archaeology
- Biodiversity
- Contamination
- Definitive Maps
- Drainage
- Ecology
- Environmental Health.

As a result, all site assessment criteria with respect to the above should now be scored as 'green' on a RAG scoring scale.

General Commentary on the Site Assessment

It is notable that the site performs best compared to the other sites in Guilden Morden. GCSPS scores the site as follows (in both versions of the HELAA):

Criteria	Outcome
Suitable	Amber
Available	Green
Achievable	Green

JMS Planning & Development reiterates that the site is available, and JMS Planning & Development is actively working on the site promotion. The site is available for development within 0-5 years, and towards the front half of this five-year period to meet the need for homes as stated in numerous in the standard method and evidence base.

The development of this site remains achievable, with the land being actively promoted. The site is economically viable for a range of development types, with JMS Planning agreeing with GCSP's assessment of a low current land value. JMS Planning & Development agrees with the estimated dwelling number of 30 units, at a dwellings per hectare density of 25. The landowner is actively working with a developer and believes that the assumptions made by the Council are correct.

The site therefore remains available and achievable, with a RAG score of 'Green' still appropriate.
JMS Planning & Development sets out an analysis of the 'Amber' RAG score for Suitability below.

Site Suitability ('Amber')

Adopted Development Plan Policies ('Amber')

The outcome correctly identifies that the site is beyond the development framework for Guilden Morden, awarding an amber score for this sub-criterion. The assessment does not, in this section, recognise that the site is immediately adjacent to the development framework or settlement boundary. It should be recognised that by being contiguous with the development framework, the site presents a logical extension to the settlement with regard to existing adopted policies. On the whole,

being outside but adjacent to the settlement boundary should not prevent a positive assessment of the site.

Furthermore, the plans submitted show 8 new dwellings immediately adjacent (subject to the designed amenity land) to the existing houses in both Bells Meadows and New Road.

Flood Risk ('Green')

The site is within the lowest risk Flood Zone 1 and is not at risk of surface water flooding. JMS agrees with the 'green' RAG score from 2021 and comments confirming the same score in 2025.

Landscape and Townscape ('Amber')

JMS does not contend the site to be 'irregularly shaped', but rather a logical extension that is contiguous with the development framework and built-up form of Guilden Morden with urban development on 2 sides, together with the Village's Recreation ground on the 3rd side. It should be noted that boundary vegetation does exist to the south of the site and is subject to planting along the eastern boundary (thereby also enhancing the Public Right of Way to the east of the site); that landscape and character impact will be limited. Subject to such a mitigation scheme, the Landscape and Townscape sub-section should be scored as 'green' on a RAG rating. No comments were made in the 2025 Assessment.

Given the enhanced wildlife areas for BNG purposes, the areas of flora and for fauna, there is an actual improvement in the net quantum of the wildlife for the area.

Biodiversity and Geodiversity ('Green')

JMS Planning agrees with the assessment that there are no priority habitats on site, or other relevant protections such as Tree Protection Orders (which are focused to the south and west of Guilden Morden, not this site). There are boundary features that will have ecological value, and these will be protected as part of any development on the site. JMS confirms that there will be no need to provide off-site compensation to provide for any biodiversity net gain. The introduction of landscaping features on the eastern boundary and also areas of planting on site will readily achieve in excess of the 10% net gain, and a score of c.23% has been achieved in the currently submitted plans. It should also be noted that the landowner controls land off-site, should, in the unlikely event that off-site provision be required. JMS agrees with the 2021 'green' RAG score. No comments were made in the 2025 Assessment.

Open Space/Green Infrastructure ('Green')

The site is not within an outdoor sports facility nor within a designated local green space. Rather, the site is adjacent, with the Guilden Morden Recreation Ground beyond the southern boundary of the site (and beyond its tree/hedgerow buffer). The Recreation Ground is readily accessible via the Public Right of Way to the east of the

site. JMS agrees with the 'green' RAG score made by GCSP in 2021. No comments were made by GCSP in 2025.

Historic Environment ('Green')

JMS agrees that development of the site would have a neutral or positive impact on the historic environment and would not have any detrimental impact on designated or non-designated heritage assets. JMS agrees with the 'green' RAG score made in 2021; no comments were made by GCSP in 2025.

Archaeology ('Amber')

JMS Planning is not of the view that the site is adjacent to the historic village core, but is adjacent to the more recent expansion of the Village. *Figure 1* illustrates the built-up extent of Guilden Morden in 1898. The site is clearly beyond the historic edge of the settlement (but clearly part of more recent developments), with little to no risk of Archaeological discoveries for which suitable monitoring and mitigation actions will be undertaken. JMS Planning believes that the site should be scored as 'green' for archaeology rather than amber as per the 2021 HELAA score. No score was provided in 2025.

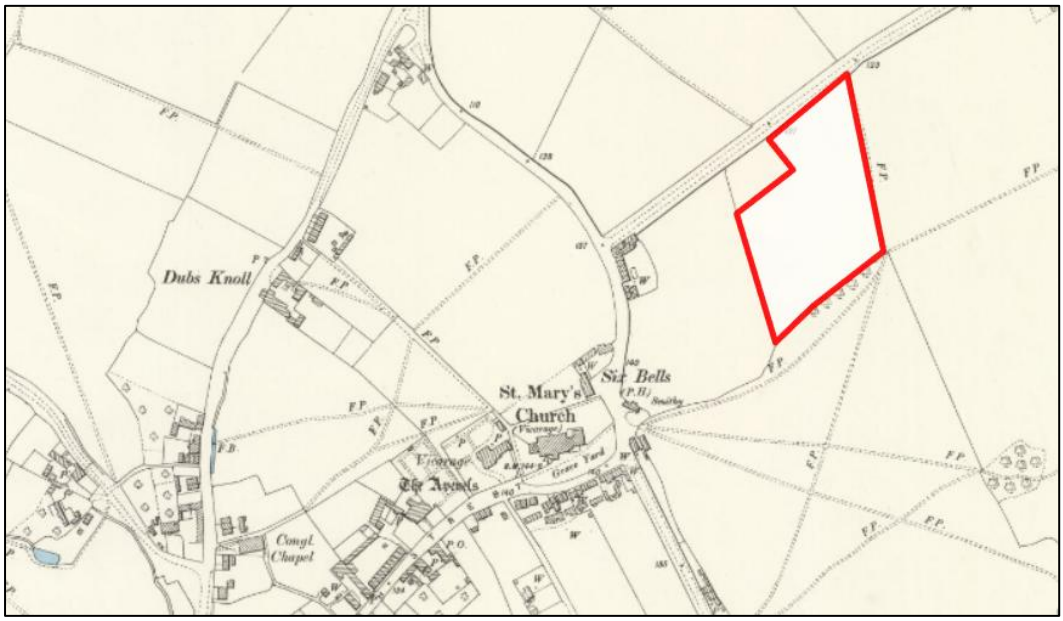


Figure 1. Hertfordshire II.13 1898 showing Guilden Morden (National Library of Scotland)[2]. More recent developments have expanded the village curtilage.

Accessibility to Services and Facilities ('Amber')

GCSP assess the site from the site to facilities and services. It should be noted that the site has the potential to support the public transport links in the village, including bus services, connecting into the wider footpath network and also cycling routes. Overall,

[2] National Library of Scotland. Available at: https://maps.nls.uk/view/104198926#zoom=4.1&lat=7477&lon=13989&layers=BT

JMS Planning agrees with the 2021 assessment that there is 'adequate accessibility to key local services, transport and employment opportunities'; however, it would expand this to 'very good'. We also agree that the 'proposed development would not require delivery of key accompanying services'. An automatic amber score was attributed to the site in 2025, which JMS contests based on the aforementioned 2021 assessment.

Site Access ('Amber')

The recent Traffic Counts have identified that the traffic along New Road has an average speed of between 30 and 31 mph. There are no access constraints, and the developer/applicant for any application would also apply for a s278 agreement to extend the existing 30 mph speed limit east and also extend the public footpath on the southern side of New Road, with no apparent risks to the delivery of this wholly supportable principle by all stakeholders. The site access should be scored as 'green' in the RAG rating rather than amber as per the 2021 scoring. No score was given in 2025.

Transport and Road ('Amber')

As above, any development would be accompanied by the usual reports demonstrating the suitability of the impact on the road network. JMS agrees that any impact could be suitably mitigated. It is notable that there would be no negative impact on the Strategic Road Network arising from development in this location, according to Highways England. JMS believes that this should be scored as 'green' in the RAG rating rather than 'amber' as per the 2021 scoring. No score was provided in 2025.

Noise, Vibration, Odour and Light Pollution ('Amber')

JMS Planning agrees with GCSP that the site is capable of providing healthy internal and external environments with respect to the above. As such, the site should be scored as 'green' in the RAG rating rather than amber as per the 2021 scoring. It is wholly supported that conditions requiring control of Street Lighting should be imposed upon any scheme. No score was provided in 2025.

Air Quality ('Green')

JMS Planning agrees with the 'green' RAG score for this sub-section as per the 2021 scoring. No score was provided in 2025.

Contamination and Ground Stability ('Amber')

There is no indication that the site has been subject to historic contamination or ground instability. An assessment was provided for development with respect to application 25/05060/OUT, which resulted in a statutory consultee response positively agreeing with no risks of contamination and no conditions. The site should be scored as 'green' rather than 'amber' as per 2021 scoring; no score was provided in 2025.

Other Designations

It is understood at this stage that the ALC score is Grade 2 for the site. It is notable that much of South Cambridgeshire is BMV Agricultural Land, and so such a score should not prevent allocation of the site.

There is a Public Right of Way to the east of the site, and any development would seek to protect and enhance this Public Right of Way as stated in the current Planning Application. The ability to link into the wider footpath network for Guilden Morden and beyond should be seen as a significant benefit for development at the site location. The inclusion of a portion of the whole site for BNG purposes will provide a formal increase in the footpath network as opposed to the trespass which is currently occurring across the filed from Bells Meadows eastwards

Conclusions

Overall, GMD and JMS Planning support the breadth of strategies presented for growth in the Regulation 19 Local Plan. It is noted that to find a sound Local Plan, the document requires further information or justification either as part of its principal documents or the evidence base. For instance, this representation suggests that further information is provided on the growth potential of rural settlements with reasonable to good access to public transport and facilities rather than focusing solely upon commutation via train stations. Given that the Local Plan was prepared prior to the publication of the NPPF 2026, certain elements of the strategy should be reviewed at Examination to ensure alignment with updated national policy requirements.

GMD and JMS Planning welcome the opportunity to provide representations and would appreciate being involved in relevant examination matters as the Local Plan progresses, via the contact details at the header of this letter.

Yours faithfully

[redacted]

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