Greater Cambridge Local Plan

Proposed Submission (Regulation 19) Consultation - Response Form

Please submit your comments (known as representations) by **5pm** on **Friday 25 September 2026**.

Data Protection and Freedom of Information

We will treat your data in accordance with our Privacy Notice. All personal information that you provide will be used solely in relation to the Greater Cambridge Local Plan.

Please note that each representation and the name of the person or organisation who made the representation, and the name and organisation of the agent (where used), will be published on our website - representations cannot be treated as confidential.

Additionally, respondent details and representation(s) will be made available to the Planning Inspectorate and to the Inspector appointed by the Secretary of State to conduct the examination.

By submitting this response form you are agreeing to these conditions.

About this Response Form

This response form has two parts:

- Part A – Your details. We cannot formally register your comments without your details.
- Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make. If you need more space to provide your answers, please expand the boxes or continue on an attached separate sheet.

We strongly encourage the submission of representations via our consultation platform at https://consultations.greatercambridgeplanning.org/proposed-submission-greater-cambridge-local-plan If you are unable to submit your representation using our online system, this response form is available to downloaded to complete electronically from www.greatercambridgeplanning.org/local-plan.

Your completed response form should be:

- emailed to localplan@greatercambridgeplanning.org, or
- posted to: Greater Cambridge Shared Planning Policy Team, South Cambridgeshire District Council, South Cambridgeshire Hall, Cambourne Business Park, Cambourne, Cambridge, CB23 6EA

If you are having difficulty submitting your comments, please contact localplan@greatercambridgeplanning.org or call 01954 713694.

Part A: Your Details

Information required	Personal details *	Agent's details (if applicable)
Name	Guilden Morden Developments Ltd	Ollie Lloyd
Organisation (where relevant)		JMS Planning & Development Ltd
Job Title (where relevant)		Associate Director
Address, including Post Code		Build Studios, 203 Westminster Bridge Rd, London, SE1 7FR
Telephone		[redacted]
Email address		[redacted]

* If you have appointed an agent to represent you, you only need to complete the Name and Organisation (if applicable) under Personal Details, but you do need to complete the full details of the agent. All correspondence will be sent to the agent.

Part B: Your Representation

Please fill in a separate sheet for each representation.

Section 1: Which document, and section of that document, does your representation relate to?

Document	**Policy / Paragraph / Site / Map** (please identify)
Proposed Submission Greater Cambridge Local Plan	Policy H/ES (Exception Sites)
Proposed Submission Policies Map	
Sustainability Appraisal	
Habitats Regulations Assessment	

Section 2: Do you consider that the Greater Cambridge Local Plan is sound and legally compliant?

Test	**Yes / No**
Legally compliant	No

Sound	No

Section 3: Your representation

Please set out and explain your comments. Please be as precise as possible, and please do not just refer to an attached supporting document(s). For your representation (comments) to be considered, your representation must be set out here. Wherever possible, set out precisely any changes you think should be made to the plan and its policies.

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.

Please provide a 100 word summary of your representation.

The policy combines rural exception sites and First Homes, which should be separated for clarity. Both development types require distinct criteria. Full details in attached representation.

Section 4: Supporting Documents

If you are submitting any supporting documents with your representation, such as maps or further evidence documents, please provide a list.

GCSP Regulation 19 Local Plan Representations – JMS Planning obo GMD – Final.pdf

Section 5: Proposed Modifications

Please set out the modification(s) you consider necessary to make the Greater Cambridge Local Plan legally compliant and sound.

You will need to say why each modification will make the Greater Cambridge Local Plan legally compliant or sound. Please put forward your suggested revised wording of any policy or paragraph, being as precise as possible.

Split H/ES into two separate policies: one for rural exception sites and one for First Homes exception sites. Each development type requires distinct criteria and justification. Provide clearer guidance on local need, site suitability and design expectations. This modification will improve clarity and ensure the policy is easier for applicants and decision-makers to interpret.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to justify your representation and any proposed modification(s), as there will not be a subsequent opportunity to make further representations other than at the invitation of the Inspector during the Examination process.

Section 6: Participation at the Examination

If you are proposing a modification to the Greater Cambridge Local Plan, do you consider it necessary to participate at the examination hearings?

Examination	**Yes / No**
Participate at the hearing sessions	Yes

If you wish to participate at the hearing sessions, please outline why you consider this to be necessary.

Yes — for all reasons set out in GCSP Regulation 19 Local Plan Representations – JMS Planning obo GMD – Final.pdf

Please note: the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in Examination hearing sessions. You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Section 7: Being Kept Informed

Would you like to be kept informed of the progress of the Greater Cambridge Local Plan through to adoption?

Notifications	**Yes / No**
Informed of submission of the Local Plan to the Secretary of State for independent Examination	Yes
Informed of the publication of the Inspector's recommendations following the Examination of the Local Plan	Yes
Informed of adoption of the Local Plan	Yes