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/MO: Houses in Multiple Occupation (HMOs)
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 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.

Please provide a 100 word summary of your representation.

H/MO is improved but requires clearer justification for the "sandwiching" test and careful framing of management plan requirements. 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.

Clarify the justification for the “sandwiching” test to ensure it is proportionate and does not duplicate amenity considerations already addressed in part 1.a. Ensure management plan requirements do not duplicate licensing controls and remain focused on planning-related impacts. Provide clearer guidance on how over-concentration will be assessed to ensure consistency.

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