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	40563 – Land South of New Road, Guilden Morden
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.

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.

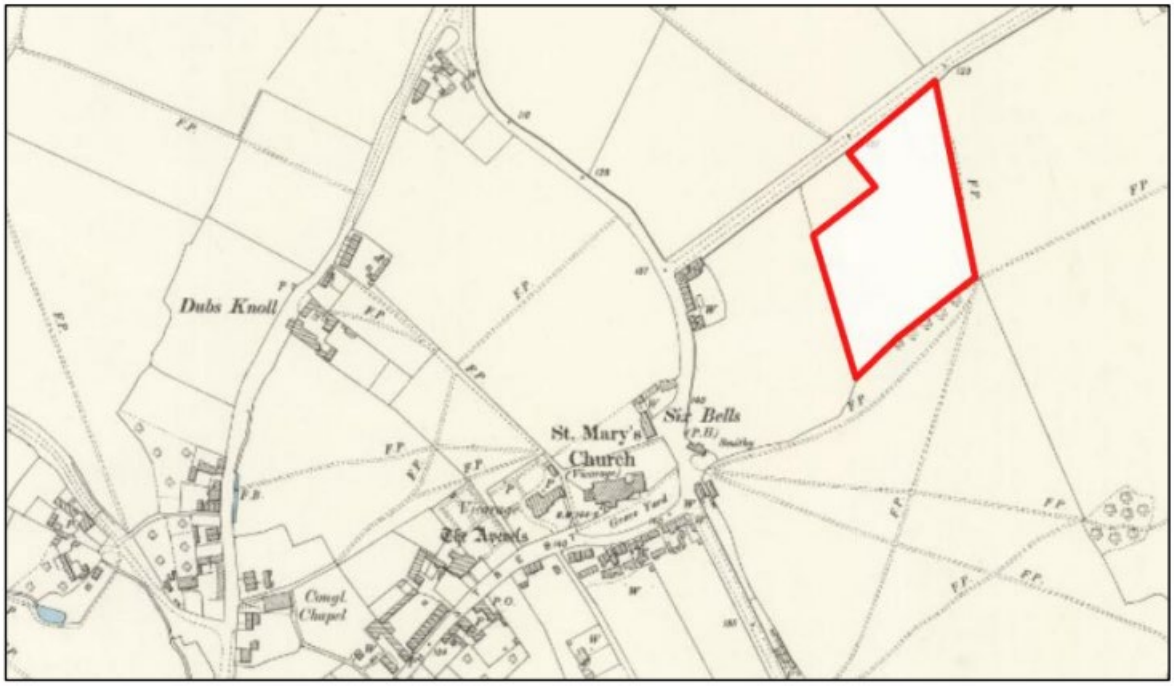


Figure 1. Hertfordshire II.13 1898 showing Guilden Morden (National Library of Scotland).More recent developments have expanded the village curtilage.

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, 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.

Please provide a 100 word summary of your representation.

Site 40563 is suitable, available, and achievable. Its exclusion is unjustified and undermines rural housing delivery. 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.

Allocate site 40563 for residential development. The site is suitable, available and achievable, as demonstrated through HELAA submissions and previous consultation stages. Its inclusion would support rural housing delivery, align with a more flexible spatial strategy, and contribute to meeting identified local need. The Plan should be updated to reflect the site's sustainability credentials and development potential.

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