

Subject: GCLP Regulation 18 Consultation  
From: [REDACTED]  
Date: January 2026

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

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### **Object**

[REDACTED] 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
<b>Suitable</b>			
<b>Adopted Development Plan Policies</b>	Amber	Any policy constraint could be overcome via a Site Allocation.	Green
<b>Flood Risk Assessment</b>	Amber	Site entirely in Flood Zone 1 with no areas at risk of surface water flooding.	Green
<b>Landscape Assessment</b>	Amber	With careful mitigation development could be accommodated without material harm to the surrounding countryside's landscape character and views. See Vision document.	Green
<b>Biodiversity and Geodiversity</b>	Green	Any proposals would provide ecological enhancement.	Green
<b>Open Space/ Green Infrastructure</b>	Green	The Site will promote access to open space and green infrastructure.	Green
<b>Historic Environment Assessment</b>	Amber	Impact on Conservation Area could be mitigated through design considerations.	Green
<b>Archaeology Assessment</b>	Amber	Archaeological investigation prior to development can be secured via an appropriately worded Condition.	Green
<b>Accessibility Assessment</b>	Amber	Accessibility provisions can be made through the appropriate design.	Green
<b>Site Access</b>	Amber	There are no constraints that cannot be dealt with through appropriate design.	Green
<b>Transport and Road</b>	Amber	Any impact could be mitigated through appropriate measures secured as part of any future application.	Green

<b>Noise, Vibration, Odour and Light Pollution Assessment</b>	Amber	HELAA notes acceptable in principle subject to detailed design and mitigation. Specific assessments would accompany a future application.	Green
<b>Contaminated Land Assessment</b>	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
<b>Overall Suitability Score</b>	Amber	Demonstrated above there are no technical considerations that could not be mitigated or should preclude the allocation and development of the Site.	Green
<b>Available</b>			
	Green	Site remains under agreement with the landowner. Single ownership with intention to develop.	Green
<b>Achievable</b>			
	Green	Viable for residential development	Green

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

<b>Open Space/ Green Infrastructure</b>	Green	~	Green
<b>Historic Environment Assessment</b>	Amber	The Site is partly in the Guilden Morden Conservation Area, but under the Vision is retained as open space.	Green
<b>Archaeology Assessment</b>	Amber	Archaeological investigation prior to development can be secured via an appropriately worded Condition.	Green
<b>Accessibility Assessment</b>	Amber	Adequate accessibility to key local services, transport, and employment opportunities.	Green
<b>Site Access</b>	Red	Walking access will be improved to facilitate the use of the site for informal recreation.	Green
<b>Transport and Road</b>	Amber	No highways access is required.	Green
<b>Noise, Vibration, Odour and Light Pollution Assessment</b>	Green	Site capable of being developed with regards to environmental health considerations.	Green
<b>Contaminated Land Assessment</b>	Amber	No significant groundworks would be needed for the proposed open space use.	Green
<b>Overall Suitability Score</b>	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
<b>Available</b>			
	Green	Site remains under agreement with the landowner. Single ownership with intention to develop.	Green
<b>Achievable</b>			
	Green	Viable for residential development	Green

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

<b>Noise, Vibration, Odour and Light Pollution Assessment</b>	Green	Site capable of being developed with regards to environmental health considerations.	Green
<b>Contaminated Land Assessment</b>	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
<b>Overall Suitability Score</b>	Red	Demonstrated above there are no technical considerations that could not be mitigated within any future application.	Green
<b>Available</b>			
	Green	Site remains under agreement with the landowner. Single ownership with intention to develop.	Green
<b>Achievable</b>			
	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
<b>Suitable</b>			
<b>Adopted Development Plan Policies</b>	Amber	Any policy constraint could be overcome via a Site Allocation.	Green
<b>Flood Risk Assessment</b>	Green	Site entirely Flood Zone 1. No surface water flooding.	Green
<b>Landscape Assessment</b>	Red	Appropriate quantum of residential development and effective layout could be effectively mitigated through landscaping scheme.	Green
<b>Biodiversity and Geodiversity</b>	Amber	Appropriate mitigation could be included within any future application.	Green
<b>Open Space/ Green Infrastructure</b>	Green	~	Green
<b>Historic Environment Assessment</b>	Green	~	Green
<b>Archaeology Assessment</b>	Amber	Archaeological investigation prior to development can be secured via an appropriately worded Condition.	Green
<b>Accessibility Assessment</b>	Amber	Accessibility provisions can be made through the appropriate design.	Green
<b>Site Access</b>	Red	Safe and suitable access to the public highway to be reviewed.	Amber
<b>Transport and Road</b>	Amber	Any impact could be mitigated through appropriate measures secured as part of any future application.	Amber

<b>Noise, Vibration, Odour and Light Pollution Assessment</b>	Green	Site capable of being developed with regards to environmental health considerations. Specific assessments would accompany a future application.	Green
<b>Contaminated Land Assessment</b>	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
<b>Overall Suitability Score</b>	Red	Demonstrated above there are no technical considerations that could not be mitigated within any future application.	Green
<b>Available</b>			
	Green	Site remains under agreement with the landowner. Single ownership with intention to develop.	Green
<b>Achievable</b>			
	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
<b>Suitable</b>			
<b>Adopted Development Plan Policies</b>	Amber	Any policy constraint could be overcome via a Site Allocation.	Green
<b>Flood Risk Assessment</b>	Amber	Wholly in Flood Zone 1. A sensitive approach to layout and drainage strategy could mitigate any flood risk.	Green
<b>Landscape Assessment</b>	Amber	Design and layout to respond to site context. Mitigatory landscaping scheme also to be included.	Green
<b>Biodiversity and Geodiversity</b>	Amber	Appropriate mitigation could be included within any future application.	Green
<b>Open Space/ Green Infrastructure</b>	Green	~	Green
<b>Historic Environment Assessment</b>	Amber	Landscaping and effective layout to mitigate any potential impact on nearby Listed Assets.	Green
<b>Archaeology Assessment</b>	Amber	Archaeological investigation prior to development can be secured via an appropriately worded Condition.	Green
<b>Accessibility Assessment</b>	Red	Accessibility provisions can be made through the appropriate design.	Green
<b>Site Access</b>	Amber	Safe and suitable access to be demonstrated as part of any future application.	Green
<b>Transport and Road</b>	Green	~	Green

<b>Noise, Vibration, Odour and Light Pollution Assessment</b>	Green	Site capable of being developed with regards to environmental health considerations. Specific assessments would accompany a future application.	Green
<b>Contaminated Land Assessment</b>	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
<b>Overall Suitability Score</b>	Red	Demonstrated above there are no technical considerations that could not be mitigated within any future application.	Green
<b>Available</b>			
	Green	Site remains under agreement with the landowner. Single ownership with intention to develop.	Green
<b>Achievable</b>			
	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
<b>Suitable</b>			
<b>Adopted Development Plan Policies</b>	Amber	Any policy constraint could be overcome via a Site Allocation.	Green
<b>Flood Risk Assessment</b>	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
<b>Landscape Assessment</b>	Red	Appropriate development quantum alongside considerate design and layout to respond to site context. Mitigatory landscaping scheme also to be included.	Green
<b>Biodiversity and Geodiversity</b>	Amber	Appropriate mitigation could be included within any future application.	Green
<b>Open Space/ Green Infrastructure</b>	Green	~	Green
<b>Historic Environment Assessment</b>	Amber	Landscaping and effective layout to mitigate any potential impact on nearby heritage assets.	Green
<b>Archaeology Assessment</b>	Amber	Archaeological investigation prior to development can be secured via an appropriately worded Condition.	Green
<b>Accessibility Assessment</b>	Amber	Accessibility provisions can be made through the appropriate design.	Green
<b>Site Access</b>	Amber	HELAA notes acceptable in principle. Safe and suitable access to be demonstrated as part of any future application.	Green

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