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30 January 2026

Dear Planning Policy,

**Re: Representations for Draft Greater Cambridge Local Plan (Regulation 18) 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') Regulation 18 Draft Local Plan consultation closing 30 January 2026. GMD welcomes the opportunity to provide representations on the Regulation 18 Draft Local Plan and its evidence base, and, via JMS Planning, wishes to be included in future consultations as the Local Plan progresses.

JMS Planning & Development has significant experience responding to local plan consultations across the country, and it is based on this experience that these representations are made. It is recognised that the Greater Cambridge Local Plan remains at an early stage, with the soundness of the Local Plan to be tested by the Planning Inspectorate from its submission, including consideration of Regulation 19 material. JMS Planning provide commentary on the soundness of the Regulation 18 Draft Local Plan and evidence base in this representation.

It is with this experience that these representations are made. Both GMD and JMS Planning recognise the challenge that Greater Cambridge faces in undertaking plan-making across a large geographic area with varying development constraints. Both parties understand that this is a first draft of the Local Plan, and would expect to see

policies developed and refined throughout the plan-making process. It is with this in mind that GMD and JMS Planning wish to underline that comments made as part of these representations should be inferred by the Council to be constructive, in order to assist in the development of policies for a sound Local Plan.

JMS and GMD have previously been involved in the Local Plan-making process for Greater Cambridge, with a HELAA submission for Land South of New Road, Guilden Morden (site reference 40563), made as part of the consultations in March 2025 and in 2021. We also take this opportunity to comment on the updated, albeit incomplete, 2025 GCSP for the site. The site should be deemed suitable, available and achievable for the preferred development type.

While GMD and JMS Planning acknowledge that GCSP will be aware of its responsibilities set out in Statute and planning policy with respect to plan-making, we nevertheless outline these below for completeness. Following this, the representation will comment on Part 1 – Development Management, Part 6 – Themes, and the Evidence Base.

## Compliance with Legislation: Plan-making

### *Duty to Cooperate*

The Planning and Compulsory Purchase Act 2004 (as amended by s110 of the Localism Act 2011) at Part 2 section 33A, insofar as the ‘*duty to cooperate in relation to planning of sustainable development*’ is concerned, requires that,

*(1) Each person who is –*

- (a) A local planning authority*
- (b) A county council in England that is not a local planning authority, or*
- (c) A body or other person, that is prescribed or of a prescribed description*

*Must co-operate with every other person who is within paragraph (a), (b), or (c) ... in maximising the effectiveness with which activities within subsection (3) are undertaken’.*

The Act establishes that the duty requires any person identified by (1) above (and with our emphasis).

- (a) ‘To engage constructively, actively and on an ongoing basis in any process by means of which activities within subsection (3) are undertaken, and*
- (b) To have regard to activities of a person within subsection (9) so far as they are relevant to activities within subsection (3).’*

Accordingly, subsection 3 sets out that the activities include:

- (a) ‘The preparation of development plan documents*
- (b) The preparation of other local development documents*

- (c) *The preparation of marine plans under the Marine and Coastal Access Act 2009 for the English inshore region, the English offshore region or any part of either of those regions,*
- (d) *Activities that can reasonably be considered to prepare the way for activities within any of a to c that are, or could be contemplated, and*
- (e) *Activities that support activities within any of paragraphs (a) to (c),*

*so far as relating to a strategic matter.'*

For the purposes of establishing the definition of a strategic matter, this is set out at subsection 4 as

*'sustainable development or use of land that has or would have a significant impact on at least two planning areas, including (in particular) sustainable development or use of land for or in connection with infrastructure that is strategic and had or would have a significant impact on at least two planning areas'.*

Failure to demonstrate Duty to Cooperate from an early stage will not be satisfactory to an Inspector at the Examination-in-Public stage and will lead to a recommendation of non-adoption (for instance, R. (on the application of St Albans City and District Council) v SSCLG [2017] EWHC 1751 (Admin)). JMS Planning strongly recommends that the engagement referred to on page 5 of the Spatial Strategy is recorded via a Statement of Common Ground ('SoCG') to evidence effective joint working on cross-boundary strategic matters (as per the NPPF at paragraph 36(c)). The SoCG does not require agreement between the parties, but does require evidence of constructive, active, and ongoing engagement.

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.'*

### *Sustainability Appraisal*

GMD and JMS Planning also note that s19 of the PCPA 2004 requires a Sustainability Appraisal to be undertaken. The PCPA incorporates the requirements of the Environmental Assessments of Plans and Programmes Regulations 2004, in turn giving effect to the EU Directive (2001/42/EC) or 'the Strategic Environmental Assessment Directive'.

JMS Planning notes that production of a Sustainability Appraisal is a live and ongoing process throughout the production of an emerging Local Plan. 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.'*

The SA should therefore clearly identify the reasons for policy choices, including an exploration of reasonable alternatives and an explanation for their rejection. The SA should be robust and fair in its assessment, considering positive and negative effects. For instance, Commission Guidance and UK Guidance Section 5 state that it is not legitimate to select alternatives that have obviously more significant adverse effects than the plan as proposed.

JMS Planning reserves comment on the Sustainability Appraisal to the relevant section of this representation. JMS Planning recommends that further information be provided to substantiate the consultation draft SA regarding the assessment of reasonable alternatives, and specifically the role that the rural areas surrounding Group Village settlements and above can have in enabling sustainable development.

### *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).

### Plan-Making Policy: National Planning Policy Framework and Planning Practice Guidance

#### *National Planning Policy Framework (2024)*

The Framework underlines that the planning system should be 'genuinely plan led (paragraph 15), with paragraph 16 setting out the expectations of MHCLG for Local Plans. These include Local Plans being:

- a) be prepared with the objective of contributing to the achievement of sustainable development (and as per legislation);
- b) be prepared positively, in a way that is aspirational but deliverable;
- c) be shaped by early, proportionate and effective engagement between planmakers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees;
- d) contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;
- e) be accessible through the use of digital tools to assist public involvement and policy presentation; and
- f) serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant).

Local Plans must contain strategic policies (paragraph 17) which are explicitly referenced (paragraph 21) and should also include non-strategic policies (paragraph 18). The identification of strategic issues and the inclusion of policies to address them are also set out in legislation (Sections 19(1B)-(1E) of the Planning and Compulsory Purchase Act 2004).

Paragraph 20 sets out that strategic policies set the overall strategy for the pattern, scale and design quality of places and make sufficient provision (in line with the presumption in favour of sustainable development) for:

- d) homes (including affordable housing), employment, retail, leisure and other commercial development;
- d) infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);

- d) community facilities (such as health, education and cultural infrastructure); and
- d) conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation.

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 paragraph 36 of the NPPF (2024). Under paragraph 36 of the Framework, Plans are considered ‘*sound*’ if they are:

- a) ***Positively prepared*** – *providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;*
- b) ***Justified*** – *an appropriate strategy, taking into account the reasonable alternatives and based on proportionate evidence;*
- c) ***Effective*** – *deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and*
- d) ***Consistent with national policy*** – *enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.*

### *Housing Need*

To support the Government’s continued objective of significantly boosting the supply of homes, it is important that the Local Plan provides a sufficient amount and variety of land that can be brought forward, without delay, to meet housing needs (paragraph 61). In determining the minimum number of homes needed, strategic plans should be based upon a local housing needs assessment defined using the standard method (paragraph 62). Paragraph 63 sets out specific groups that local planning authorities should take into account when identifying and meeting their housing needs, including, but not limited to, affordable housing and housing for older people (retirement homes, housing with care, care homes).

Paragraph 72 sets out that strategic policy-making authorities should have a clear understanding of the land available in their area by preparing a strategic housing land availability assessment. From this, planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. Planning policies should identify a supply of a) specific, deliverable sites for five years following the intended date of adoption; and b) specific, developable sites

or broad locations for growth, for the subsequent years 6-10 and, where possible, for years 11-15 of the remaining plan period.

Paragraph 78 requires that strategic policies within the Local Plan include a trajectory illustrating the expected rate of housing delivery over the plan period, and that all plans consider whether it is appropriate to set out the anticipated rate of development for specific sites. Local planning authorities should 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 set out in adopted strategic policies, or against their local housing need where the strategic policies are more than five years old. The supply of specific deliverable sites should, in addition, include a buffer (moved forward from later in the plan period) of a) 5% to ensure choice and competition in the market for land; or b) 20% where there has been significant underdelivery of housing over the previous three years, to improve the prospect of achieving the planned supply.

Paragraph 82 highlights the role of rural areas in delivering housing – planning policies should be responsive to local circumstances and support housing developments that reflect local needs, including proposals for community-led housing development. Local planning authorities should support opportunities to bring forward rural exception sites that will provide affordable housing to meet identified local needs, and consider whether allowing some market housing on these sites would help to facilitate this.

Notably, paragraph 83 states that to promote sustainable development in rural areas, housing should be located to enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby.

### *Planning Practice Guidance*

The Government's Planning Practice Guidance (PPG) on Plan-Making reinforces these statutory duties and the NPPF's requirements. It confirms that Local Plans must '*set out a vision and a framework for the future development of the area, addressing needs and opportunities in relation to housing, the economy, community facilities and infrastructure*' and that they must be underpinned by '*relevant and up-to-date evidence*' gathered in a proportionate and transparent manner.

### **Comments on Part I: Development Strategy**

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 Planning note that the LPA states, from the outset, the local housing need figure for Greater Cambridge, based on the application of the standard method formula as prescribed by MHCLG for South Cambridgeshire and Cambridge. JMS Planning supports the identification of a target of 2,295 dwellings per annum or circa 48,195 homes with a 5% buffer over the plan period. 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 on page 16; however, we ask that the feasibility of the strategies, as demonstrated in the SA, be tested after the assessment of all sites in both Call for Sites consultations. 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 9, which calls for development to be guided by ‘*local circumstances, 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 e, 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.

#### *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 quantum, 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 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.

*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. 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.

### *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*

The policy, as worded, is vague at part 1.a. JMS Planning recommends that the term 'dominate' be specifically identified so as to ensure consistent application of the policy to development proposals. Similarly, wording to encourage flexibility if there is a demand for the development type (i.e. C3) exists.

### *Policy H/CO: Co-living*

JMS Planning and GMD welcome the inclusion of a policy specific to co-living. The respondents wish to raise the contradiction presented at part 1.a.; '*where the development does not contribute to car dependency*' and '*parking can be minimised reflecting the high level of accessibility*'. JMS Planning also seeks justification as to the scale of between 50 and 200 units that GCSP requires under this policy. However, this Policy needs to recognise that many parts of the rural areas of the Plan area would be suitable for such development and that sufficient Car Parking is required to allow the occupiers beneficial occupation. Car parking as a whole should not be seen as detrimental due to the shift to electric vehicles.

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

The policy, as worded, is vague. JMS Planning recommends that the term ‘over-concentration’ be specifically identified. JMS Planning suggests that the ‘over-concentration’ definition is applied to Tiers within the Settlement Hierarchy in order for a proportionate approach to be taken. Similarly, 1.b. should be justified: the policy places an inherent negative stance on the ‘sandwiching’ of a C3 property by C4/Sui Generis HMO; however, compliance amenity matters in 1.a. would negate the need for 1.b. Part 2 of the policy is also presumptive, with the prevention of antisocial behaviour a requirement for retention of an HMO license; this is not a planning policy matter.

*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. While this Local Plan will be tested against the December 2024 NPPF, JMS Planning would recommend that the Council consider making reference to the Department for Transport’s Connectivity Tool in order to future-proof the Local Plan. Part 3 of the policy states that ‘development will only be permitted where they do not have an unacceptable transport and highways safety impact’. This should be updated to reflect the 2024 NPPF’s requirement to avoid severe highway safety impacts.

**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 paragraph 61, is clear: *'To support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed.'* 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 paragraph 77 of the NPPF, which promotes *'the needs of different groups in the community'*. 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. This would better meet the requirements of NPPF paragraph 33, which expects ‘*Local plans and spatial development strategies should be informed throughout their preparation by a sustainability appraisal... [which] should demonstrate how the plan has addressed relevant economic, social and environmental objectives*’. In our opinion, this requires a flexibility of review rather than solely focusing on commuting by train only.

**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.

#### *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 3<sup>rd</sup> 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.

#### *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). 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 for biodiversity net gain. The introduction of landscaping features on the eastern boundary and also areas of planting on site will readily achieve 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.

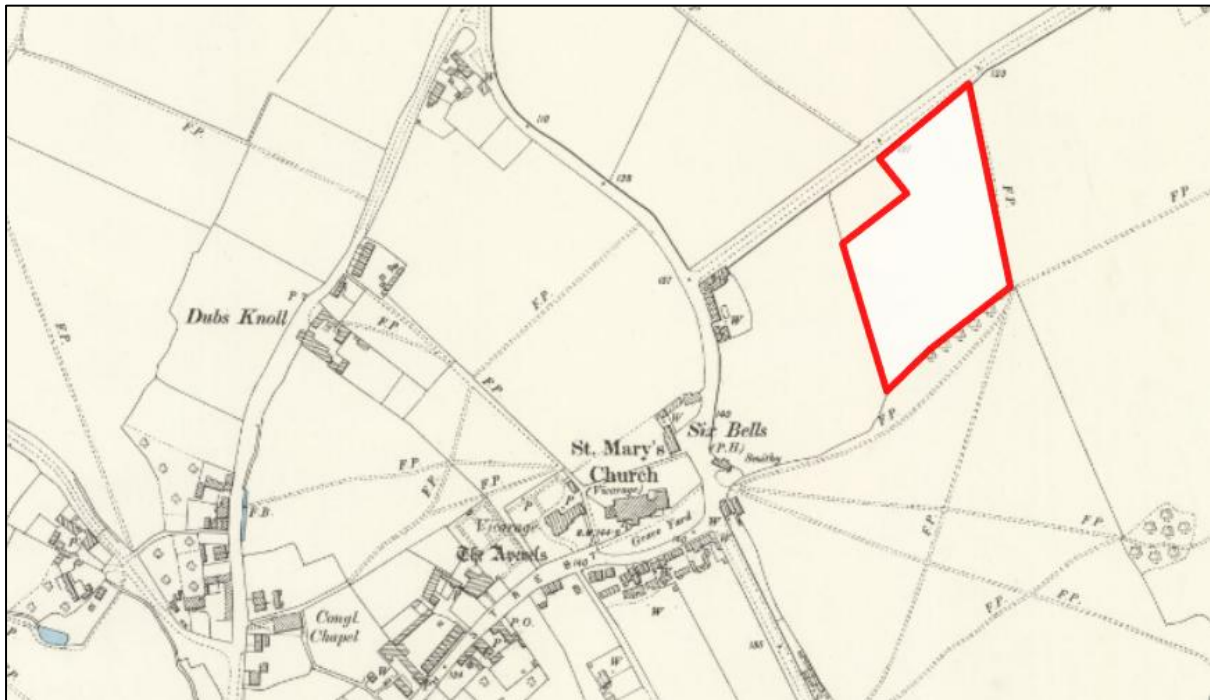


Figure 1. Hertfordshire II.13 1898 showing Guilden Morden (National Library of Scotland)<sup>1</sup>. More recent developments have expanded the village curtilage.

#### *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')*

There are no access constraints, and the developer/applicant for any application would 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.

<sup>1</sup> National Library of Scotland. Available at:  
<https://maps.nls.uk/view/104198926#zoom=4.1&lat=7477&lon=13989&layers=BT>

### *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.

## **Conclusions**

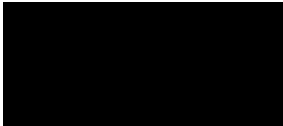
Overall, GMD and JMS Planning support the breadth of strategies presented for growth in the Draft Local Plan. It is noted that to find a sound Local Plan, the Local Plan requires further information or justification either as part of its principal documents or the evidence base. For instance, this representation suggests that further information



is provided on the growth potential of rural settlements with good access to public transport and facilities rather than focusing solely upon commutation via train stations.

GMD and JMS Planning welcome the opportunity to provide representations and wish to be kept up to date as the Local Plan progresses, via the contact details at the header of this letter.

Yours faithfully



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