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FAO Greater Cambridge Shared Planning Service
South Cambridgeshire District Council
South Cambridgeshire Hall
Cambourne Business Park
Great Cambourne
Cambourne
Cambridge
CB23 6EA

07 March 2025

By online submission only

Dear Planning Policy,

Re: Further Site Information (Land South of New Road, Guilden Morden, Reference 40563) for the Greater Cambridge Local Plan

Introduction

JMS Planning welcomes the opportunity to provide further comments on submitted HELAA site 'Land South of New Road, Guilden Morden' (reference 40563) ('the site') on behalf of the landowner.

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 early stages and the below commentary is made to help the Planning Service assess the suitability, achievability and availability of the site for allocation within the Local Plan.

As the Greater Cambridge Local Plan progresses, JMS Planning & Development would like to be kept informed of any updates and consultations. It is understood that Greater Cambridge Shared Planning Service ('GCSP') does not wish for resubmission

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of previously submitted materials and so JMS Planning will only comment on the November 2021 HELAA Assessment (Appendix I).

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 the following:

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.

The development of the 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 analysis of the 'Amber' RAG score for Suitability below.

Site Suitability ('Amber')

For ease of reference to the site scoring for this aspect of the HELAA outcome, JMS Planning & Development present this section primarily in table format.

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-criteria. 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, that the site presents a logical extension to the

settlement with regards 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 lowest risk Flood Zone 1 and is not at risk of surface water flooding. JMS agrees with the 'green' RAG score.

Landscape and Townscape ('Amber')

JMS does not contend the site to be 'irregularly shaped', rather a logical extension that is contiguous with the development framework and built-up form of Guilden Morden. It should be noted that boundary vegetation does exist to the south of the site and 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 subsection should be scored as 'green' on a RAG rating.

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 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. It should also be noted that the landowner control land off-site, should in the unlikely event that off site provision be required. JMS agrees with the 'green' RAG score.

Open Space/Green Infrastructure ('Green')

The site is not within an outdoor sports facility or within designated local green space. Rather the site is adjacent, with the Guilden Morden Recreation Ground beyond the southern boundary of the site (and beyond 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.

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.

Archaeology ('Amber')

JMS Planning is not of the view that the site is adjacent to the historic village core. *Figure 1* illustrates the built-up extent of Guilden Morden in 1898. The site is clearly beyond the historic edge of the settlement. JMS Planning believes that the site should be scored as 'green' for archaeology.

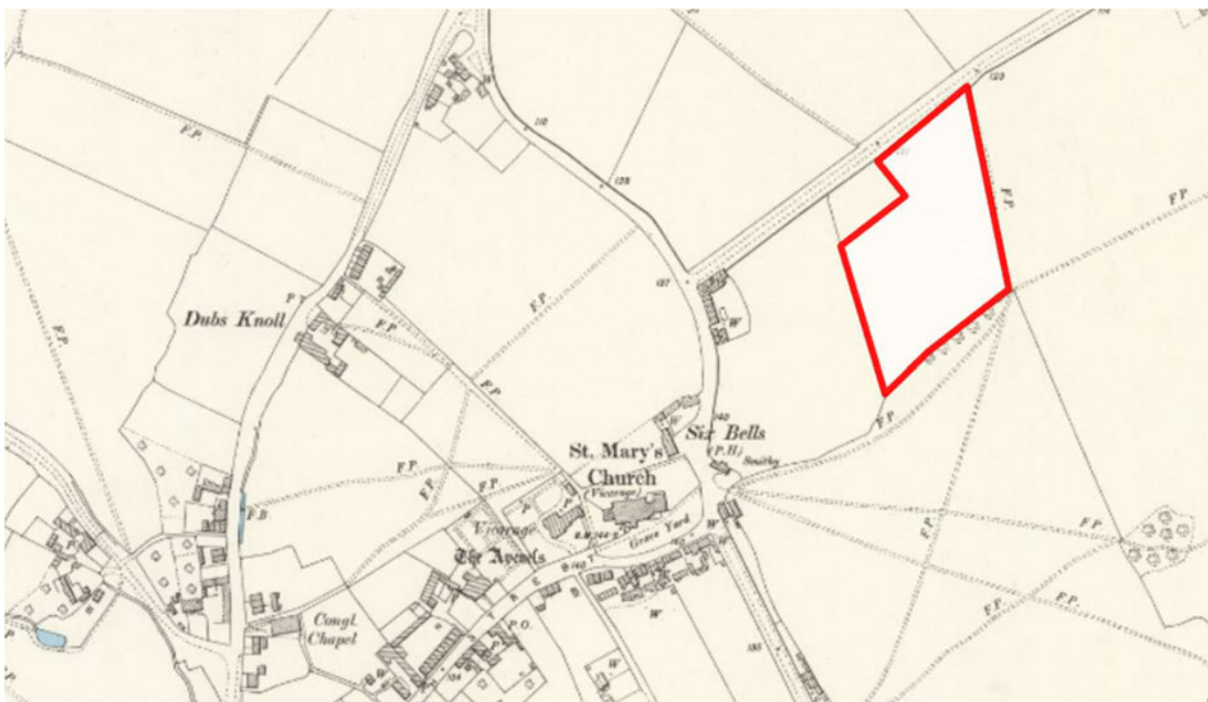


Figure 1. Hertfordshire II.13 1898 showing Guilden Morden (National Library of Scotland)¹.

Accessibility to Services and Facilities ('Amber')

GCSP assess the site from the site to facilities and services. JMS Planning refers GCSP to an Site and Settlement Sustainability Analysis (Appendix 2), which demonstrates transport links and nearby facilities. It should be noted that the site has potential to support the public transport links in the village, including bus services, connecting into the wider footpath network and also cycling routes. Furthermore, the landowner is

¹ National Library of Scotland. Available at:
<https://maps.nls.uk/view/104198926#zoom=4.1&lat=51.7477&lon=0.13989&layers=BT>

willing to further support the livelihood of village facilities. Overall, JMS Planning agrees that there is 'adequate accessibility to key local services, transport and employment opportunities', however, would expand this to 'very good'. We also agree that the 'proposed development would not require delivery of key accompanying services'.

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. The site access should be scored as 'green' in the RAG rating.

Transport and Road ('Amber')

As above, any development would be accompanied by the usual reports demonstrating suitability of impact on the road network. JMS agrees that any impact could be suitably mitigated. It is notably that there would be no negative impact 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.

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.

Air Quality ('Green')

JMS Planning agrees with the 'green' RAG score for this sub-section.

Contamination and Ground Stability ('Amber')

There is no indication that the site has been subject to historic contamination or ground instability. Due to C3 being a 'vulnerable' use class, JMS Planning agree that a condition to suitably investigate the land is necessary however should not impact on HELAA scoring. The site should be scored as 'green' with regarding to this sub-section.

Other Designations

It is understood at this stage that the ALC score is Grade 2 for the site however this is subject to further investigation via an ALC report at application stage. 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. 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.

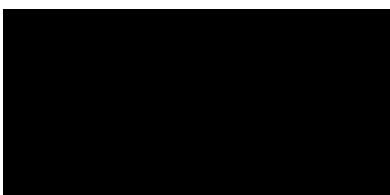
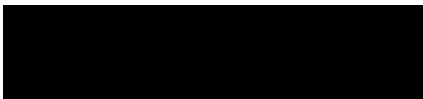
Conclusion

JMS Planning are in general support of the HELAA 2021 Assessment and provide this feedback as part of ongoing communication regarding the site and the consultation process.

The representation supports the allocation of site 40563 through the Greater Cambridge Local Plan, with the site presenting a suitable, available and achievable opportunity for growth in the settlement. It should be noted that the landowner is community-minded and would like to support the sustainable growth of Guilden Morden.

Should GCSP have any queries about the above, please contact us using the details provided below. JMS Planning wishes to be informed as the Local Plan progresses.

Yours sincerely,

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JMS Planning & Development

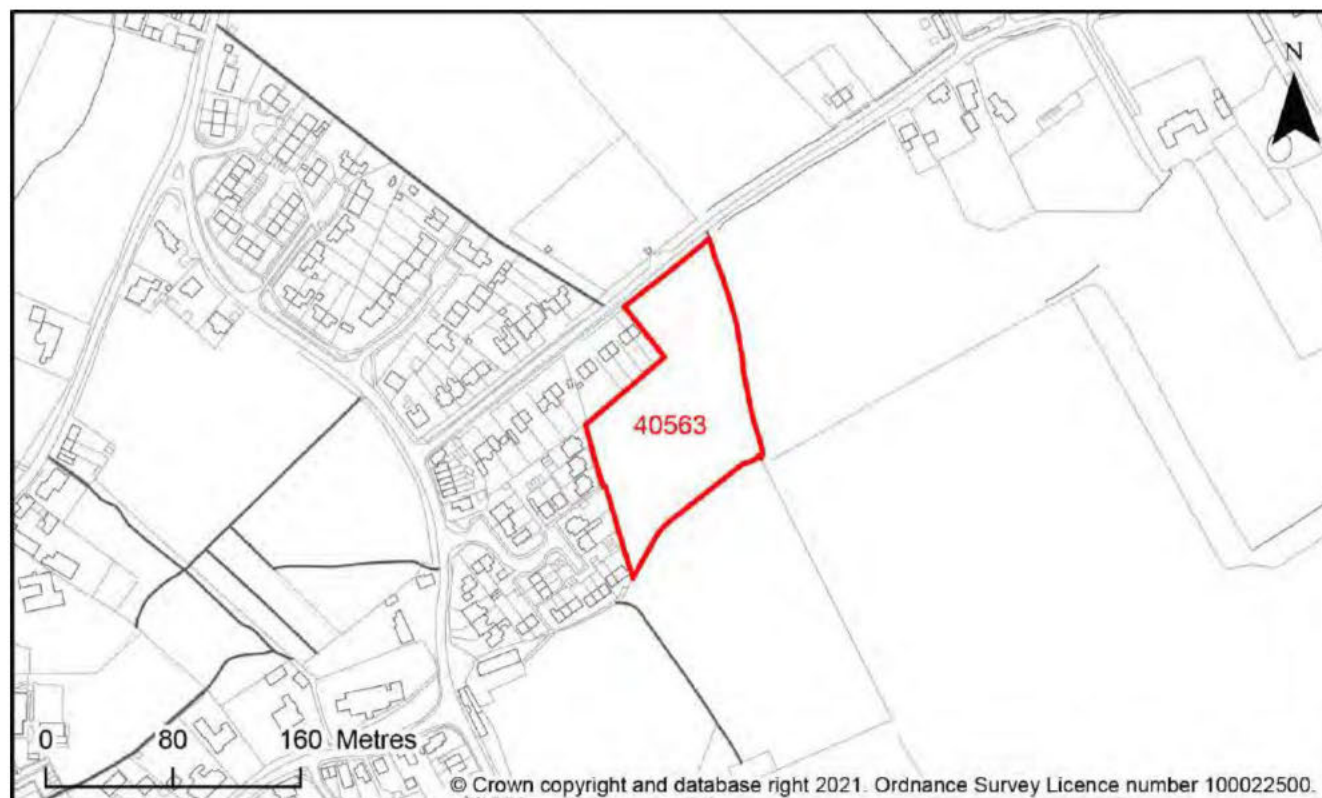
Encl.

Appendix 1 2021 HELAA Assessment

Land south of New Road, Guilden Morden, SG8 0JN

Site Reference: 40563

Map 356: Site description - Land south of New Road, Guilden Morden



Site Details

Criteria	Response
Site area (hectares)	1.20
Parish or Ward	Guilden Morden CP
Greenfield or previously developed land	Greenfield
Category of site	Dispersal: Villages
Category of settlement	Within or adjacent to Group Village
Current or last use	Agricultural land/building
Proposed development	Residential, Market and affordable housing, Key worker housing, Older persons housing, Specialist/other forms of housing, Retail
Proposed employment floorspace (m ²)	-
Proposed housing units	25-30

Site Assessment Summary

Criteria	Outcome
Suitable	Amber
Available	Green
Achievable	Green

Site Assessment

Suitable (Outcome = Amber)

Issue	Assessment	Comments
Adopted Development Plan Policies	Amber	Outside Development Framework
Flood Risk	Green	Flood zone: Wholly in Flood Zone 1 Surface water flooding: None
Landscape and Townscape	Amber	NCA 88 Bedfordshire and Cambridgeshire Claylands District Area The Chalklands The site is typical of the settlement character. Landscape Character Assessment (2021) Landscape Character Area - 8B: Morden to Duxford Lowland Chalklands An irregular shaped agricultural field located to the east of the village of Guilden Morden in a rural location outside and abutting the settlement framework. Wide and local views are high due to lack of boundary vegetation. Development upon this site would have a limited impact to the settlement character subject to a sympathetic approach with landscape mitigation measures.
Biodiversity and Geodiversity	Green	Application unlikely to require Natural England consultation. There are no apparent priority habitats within the site; however, there are grasslands, hedges, and wooded boundaries on site that are likely to have ecological value. Applications may find provision of a 10% net gain in biodiversity difficult within their red line boundaries and may need to find off-site compensation

Issue	Assessment	Comments
		to comply with up-coming National legislation and developing local policies. Development of the site would not have a detrimental impact on any designated site, or those with a regional or local protection.
Open Space / Green Infrastructure	Green	Within or Partially within an Outdoor Sports Facility Within Designated Local Green Space Site is not on a protected open space designation, however there are some protected open space designations on periphery of the site including a Local Green Space designation. Development of the site may have a detrimental impact on the peripheral open space designation, but the impact could be reasonably mitigated or compensated.
Historic Environment	Green	Development of the site would have either a neutral or positive impact, but importantly not have a detrimental impact on any designated or non-designated heritage assets.
Archaeology	Amber	Located on edge of historic village core
Accessibility to Services and Facilities	Amber	Distance to Primary School: Greater than 450m and Less than or Equal to 1,000m Distance to Secondary School: Greater than 2,000m Distance to Healthcare Service: Greater than 2,000m Distance to City, District or Rural Centre: Greater than 2,000m Distance to Local, Neighbourhood or Minor Rural Centre: Greater than 2,000m Distance to Employment Opportunities: Greater than 1,800m Distance to Public Transport: Less than or Equal to 450m Distance to Rapid Public Transport: Greater than 1,800m Distance to proposed Rapid Public Transport: Greater than 1,800m Distance to Cycle Network: Greater than 1,600m

Issue	Assessment	Comments
		Adequate accessibility to key local services, transport, and employment opportunities Proposed development would not require delivery of accompanying key services
Site Access	Amber	The proposed site is acceptable in principle subject to detailed design. There are potential access constraints, but these could be overcome through development.
Transport and Roads	Amber	Potentially part of a cluster and, therefore, may require a cumulative assessment. Any potential impact on the functioning of trunk roads and/or local roads could be reasonably mitigated.
Noise, Vibration, Odour and Light Pollution	Amber	The site is capable of being developed to provide healthy internal and external environments in regard to noise / vibration/ odour/ Light Pollution after careful site layout, design and mitigation.
Air Quality	Green	Site does not lie within an AQMA. Minimal traffic impact on AQMA.
Contamination and Ground Stability	Amber	Potential for historic contamination, conditions required.

Further constraints

Issue		Comments
Constraints to development	-	Agricultural Land Classification: 100% Grade 2 Public Right of Way is on or crosses the site
Strategic Highways Impact	Green	Within Highways England Zone 10 - South West <2,000 dwellings / 5,000m2 employment - Capacity for growth
Employment	-	
Green Belt – Assessment of	-	Parcel ID:

Harm of Green Belt Release		
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Available (Outcome = Green)

Question	Response
Is the site controlled by a developer or landowner who has expressed an intention to develop?	The site was submitted by the landowner and/or site promoter who has confirmed that the site is available for development in the timescales indicated.
Are there known legal or ownership impediments to development?	No
Is there planning permission to develop the site?	No relevant recent planning history
When will the site be available for development?	0-5 Years

Achievable (Outcome = Green)

Question	Response
Is there a reasonable prospect that the site will be developed?	The land has been promoted by the landowner and or developer and is known to be available for development. The site has a low existing use value and residential development is likely to be economically viable at an appropriate density.

Development Potential

Capacity and Delivery	Response
Estimated dwellings per hectare	25
Estimated dwelling units	30
Estimated employment space (m ²)	-
Estimated start date	0-5 Years
Estimated annual build-out rate (pa)	40-75
Development completion timescales (years)	0-5 Years

Appendix 2 - Site and Settlement Sustainability Analysis

02 SITE ANALYSIS

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WIDER TRANSPORT LINKS

Guilmen Morden is located less than 25km south west of Cambridge and less than 10km west from Royston, Hertfordshire.

Bus Links

Guilmen Morden has a local bus service, the number 17 which links to Steeple Morden, Litlington, Bassingbourn, Kneesworth and Royston.

Train Links

Ashwell and Morden Railway Station is the closest train station at 4 miles from site and within 10 minutes via road. This station provides direct access to London King's Cross Station in 45 minutes and Cambridge in 20 minutes.

Royston Railway Station is located 9 miles from site, can be reached in 15 minutes via road and is also reached on the no. 17 bus route. The train line is just one stop up from Ashwell and Morden and also links to London Kings Cross and Cambridge.

Road Links

The nearest main roads are the A1 to the west and the A10 to the east, which links to the M11 north of Cambridge.

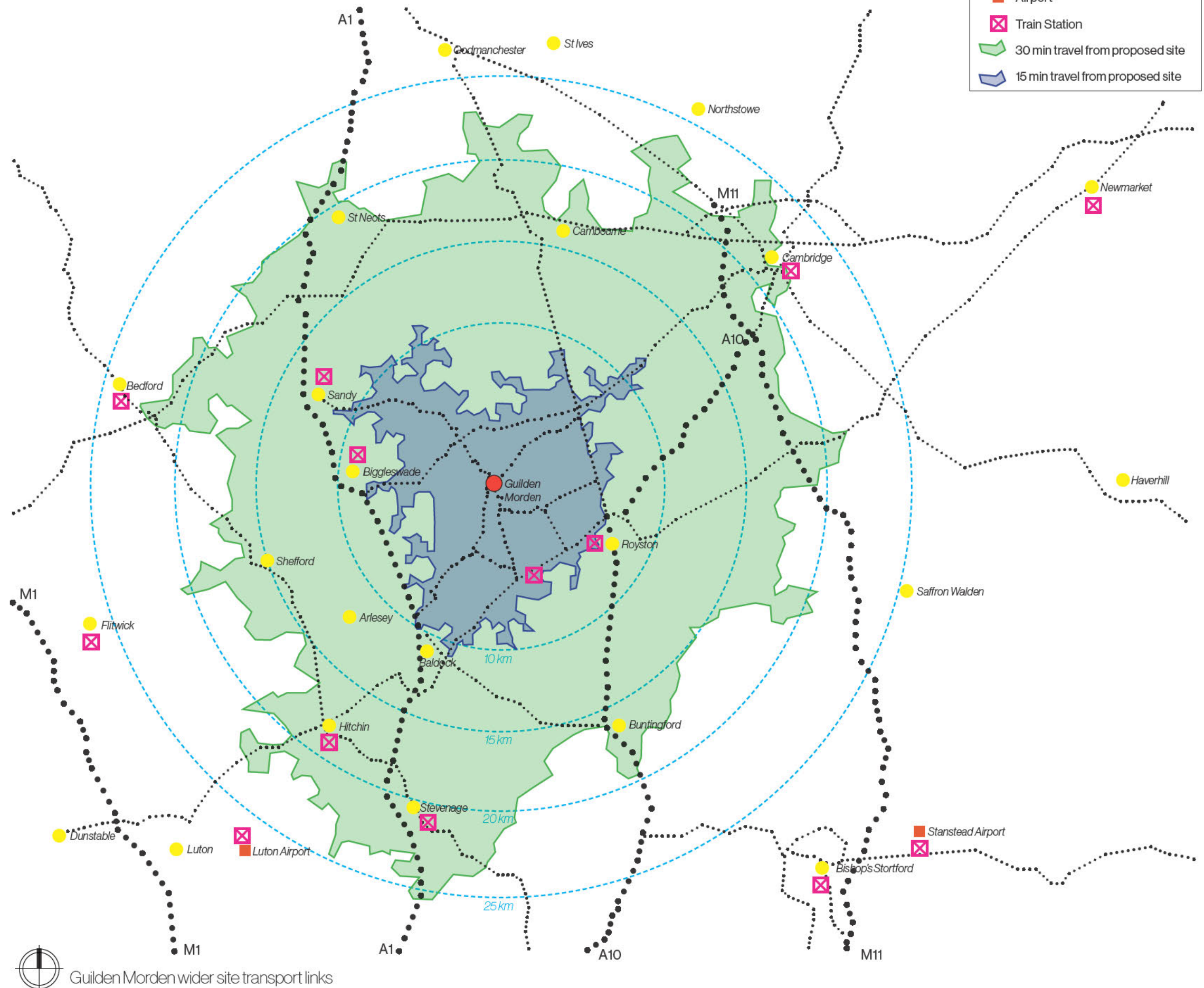
The **15 minute** journey time can be seen on the adjacent map to reach the edge of Royston, Baldock and Biggleswade.

The **30 minute** journey time can be seen to capture the Western side of Cambridge which includes the Park and Ride into the City Centre. Includes Stevenage, Bedford and Buntingford and Cambourne.

Airport Links

Stansted Airport is located 37km to the south east and can be reached in under an hour via road and train from Royston via Cambridge.

Luton Airport is located 25km to the south west and can be reached in under 40 minutes via road and under 2hrs via train and airport bus.



02 SITE ANALYSIS

AMENITIES AND RECENT DEVELOPMENTS

KEY:

Local Facilities:

- 1 St Mary's Church
0.2 mile / 5 min walk from site
- 2 Allotment
0.2 mile / 5 min walk from site
- 3 CofE Primary Academy School
0.5 mile / 11 min walk from site)
- 4 Quaker Meeting Space
0.5 mile / 12 min walk from site
- 5 Edward VII Pub
0.2 mile / 5 min walk from site
- 6 The Three Tuns Community Pub
0.5 mile / 12 min walk from site
- 7 Cemetery
0.1 mile / 2 min walk from site
- 8 Stables
0.5 mile / 17 min walk from site
- 9 Village Hall
0.2 mile / 5 min walk from site
- 10 Recreation Ground
0.1 mile / 2 min walk from site

Local Settlements:

- 11 Great Green
0.2 mile / 5 min walk from site
- 12 Steeple Morden
1.4 miles / 32 min walk from site or 10 minute bus

Recent Developments:

- 13 Moor Park
0.3 mile / 7 min walk from site
- 14 Thompsons Meadow
0.3 mile / 8 min walk from site

Transport Links:

-  Bus Stop
-  Bus Route



Guilden Morden Site Context