Gentian Developments Ltd

Trafalgar House

Trafalgar Street

Winchester

SO23 9DH

Planning Policy Team

Greater Cambridgeshire Shared Planning Team

24th September 2026

Online submission

Dear Planning Policy Team,

Local Plan Representations – Regulation 19 Version of Local Plan

Further to the consultation of the Regulation 19 version of the Greater Cambridge Local Plan closing on 25th September 2026, we consider that the Local Plan as consulted on, fails to meet the relevant statutory tests.

Overview

Section 19 of the Planning and Compulsory Purchase Act 2004 sets out specific matters to which the local planning authority must have regard when preparing a local plan which includes National Policy and guidance. The Council are utilising the transitional arrangements as set out by Government. Therefore, the plan making policies contained within the December 2024 National Planning Policy Framework are of relevance.

It does not meet the tests of soundness due to the:

- Failure to assess sites as part of the latest call for sites (not positively prepared) – contrary to Paragraph 10 of NPPF [1]

[1] This is assessed against the December 2024 NPPF, as the Council are using this as a result of the Local Plan transitional arrangements. It should be noted that reference to the NPPF will mean this iteration of the NPPF unless otherwise stated.

- Failure to assess sites against the Local Nature Recovery Strategy, which was published in December 2025 (not consistent with national policy; not positively prepared) contrary to Paragraph 192 of the NPPF.
- Failure to accommodate sufficient sites outside of those contained within new settlements/urban extensions (not justified or effective) contrary to paragraph 78 of the NPPF
- Failure to assess allocated sites in lieu of permissions already consented, thus reducing the amount of housing allowed for in allocated sites (not positively prepared).
- Failure to have a deliverable supply of housing over 5-year period (not consistent with national policy)
- Settlement Hierarchy as proposed creates conflict for future Neighbourhood Plan opportunities for Bassingbourn – cum Kneesworth Parish Council. (not positively prepared)

The purpose of the Proposed Submission Joint Local Plan is to show where new homes and workplaces could be built over the next 20 years in the Greater Cambridge Area (albeit this will only be for a period of less than 15 years given that the Council started preparation of the plan in 2020) and how essential community facilities and infrastructure would support this expected growth. Once adopted, the joint Local Plan will become the statutory Development Plan for Cambridge and South Cambridgeshire Councils.

This joint Local Plan is the version the Greater Cambridgeshire Shared Planning Service (herein 'the Council') intends to submit government for examination. As per para 2.14 of the Reg 19 plan – *Our objectively assessed needs have been calculated jointly for Cambridge and South Cambridgeshire, which together form Greater Cambridge, and therefore the objectively assessed need for homes will be applied jointly for the purposes of housing delivery, such as calculating housing land supply and the Housing Delivery Test.*

It is noted that a September 2026 addendum has been published which seems to run contrary to this agreed approach. It is considered this is unreasonable, and unjustified and

should either be ignored by the Inspector or result in serious repercussions for the Local Plan as drafted.

Our (Gentian Developments Ltd) comments focus on whether the Local Plan complies with relevant legislation and is 'sound', which is defined as justified, effective, positively prepared and consistent with national planning policies.

As the plan progresses, we reserve the right to comment further and to seek legal advice and Counsel support on the soundness of the plan. Counsel Opinion and representation maybe provided at the appropriate time. We would explicitly request that we are involved with the Examination of the plan and intend on sending these representations to the Appointed Inspector.

The Local Plan is being prepared under the 'legacy' system and as such, paragraph 36 of the December 2024 National Planning Policy Framework is of relevance, repeated below -

> *36. Local plans and spatial development strategies are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. Plans are '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.*

Background

Gentian Developments Ltd are promoting a site in Bassingbourn – cum – Kneesworth and submitted the site via the call for sites on 17th December 2025 and subsequent comments on Reg 18 Plan (appended to this submission). Reviewing the updated (2026) HEELA – the following response was given –

> ***JDi Number**: 201683*
>
> ***Placemaker Number:** 116408*
>
> ***Site name/ description**: Land west of Old North Road, Kneesworth*
>
> ***Reason site not assessed**: The site does not align with the wider Local Plan Strategy and therefore has not been assessed.*

Other comments were submitted regarding the settlement hierarchy, which have been summarised as –

> *Bassingbourn and Kneesworth should not be seen as 2x separate settlement types given they have coalesced long ago. The documents, settlement boundary and settlement hierarchy should be updated to reflect the position they are one settlement - Bassingbourn - cum - Kneesworth and be upgraded to a rural centre.*

During the process, it came to our attention that 2.2 hectares of our promotion site had been allocated in the Cambridgeshire and Peterborough Local Nature Recovery Strategy Document, which was published in December 2025 (whilst the last call for sites was on going). We emailed the Local Plan Policy Team to advise them of this update (appendix 2), which we feel they would be duty bound to consider as part of their requirements under Section 102 of the Environment Act 2021.

It is therefore extremely disappointing to see that the site was not considered as part of the call for sites or assessed as part of any wider review of sites, when new material, legislation and National Policy explicitly specifically require the Council to do so.

Wider Compliance with Paragraph 36 of December 2024 NPPF Assessment

Not Positively Prepared – Call for sites and Local Nature Recovery Strategy Ignored

Attention is drawn to the updated HEELA 2026. Paragraphs 2.11 to 2.13 outline the approach to the 2025 site submission update. Paragraph 2.13 is of note where the Council note -

The site assessment process was similar to the process undertaken for the sites assessed after the First Proposals consultation. However, there was not sufficient time to ask Parish Councils and Residents Associations to 'fact check' sites with a reliance, instead, on picking up their views through the normal consultation process. Also, sites that did not fit with the emerging strategy were not assessed. Hence, sites within or adjacent to Infill Villages and Group Villages without good public transport links and sites not within or adjacent to any settlement were not assessed.

Paragraphs 2.14 – 2.20 relates to the HEELA 2026 and discusses the Call for Sites Assessment which took place from 1st December 2025 to 30th January 2026. Paragraph 2.15 and 2.16 is important –

2.15 There were minimal changes to the assessment process from the approach used for the Site Submission Update 2025. HELAA 2026 continued the position of not (re-)assessing sites that do not align with the spatial development strategy and resulted in about 50 sites not being not being assessed or re-assessed beyond registration.

2.16 Again, there was not sufficient time to request Parish Councils and Residents Associations to 'fact check' sites. Instead, their views were considered where they commented on sites through the normal consultation process.

Paragraph 2.19 *also notes - It is important to note that the development strategy is informed by a number of evidence base(d) documents and material considerations, which include but are not limited to the HELAA.*

What it appears to have happened in the latest Call for Sites is that this was merely 'lip service' to the process as required, and the LPA apparently had no intention of reviewing any of the sites which were put forward, due to a conflict with an emerging plan and a process which was not adopted or scrutinised.

As set out above Para 36 of the NPPF (December 2024) requires that plans are prepared; a) Positively prepared; b) Justified c) Effective, and d) Consistent with National Policy. In this instance it would appear that the Council would have failed all of the above tests of soundness.

Section 102 of the Environment Act 2021 notes that Local Authorities must have regard to the Local Nature Recovery Strategy (LNRS) Documents when making planning policies and decisions. It is considered that the Council have failed on their duties to not even assess potential new sites in so far as they may be able to deliver on the statutory function of the Environment Act. Particularly as the Emerging Local Plan has such an ambitious 20% on site BNG policy.

It can be concluded that the Local Plan has failed in its statutory obligation to be positively prepared in so far as they have failed to have regard to the newly published LNRS. This is an opportunity missed, particularly as this document was only published at the time of the call for sites being issued which presented an opportunity for the Council to review sites which could have aligned with the LNRS.

Not Justified – sites remain allocated which have already been delivered, or which have no prospect of being delivered

As outlined above, it is clear from the HEELA that the Council have paid minimal consideration to their statutory roles and have not assessed any new sites beyond those which had been allocated in previous versions of the emerging Local Plan, even when new documents have been produced which they are statutorily required to comply with.

Notwithstanding this, attention is drawn to the Housing Trajectory Report 2026, which is a useful update on the status of the various allocated sites within the Local Plan.

A review of this document outlines that there are some allocations still within the Local Plan which the delivery of may be impacted by viability or other wider constraints. There are

others which need to be updated to reflect what has been consented and currently being built out. Examples include -

Policy HTR 137-143 Histon Road – Allocated for 100 dwellings – permitted 70 (minus 30)

Full Planning Application 24/01354/FUL permitted 70 (minus 30)

S/C/HRC: Horizon Resource Centre, 285 Coldham's Lane (40 dwellings)

The landowner (Cambridgeshire County Council) has advised that no progress has been made towards the delivery of dwellings on this site (see Response 10 in Appendix D). The landowner has also advised that the site will only be made available once declared surplus to operational requirements, and that the operational service delivery requirements for this site still need to be reviewed (see Response 10 in Appendix D). The landowner has advised that the delivery timetable for the redevelopment of this site for residential development is unknown at present (see Response 10 in Appendix D).

There are still issues to be resolved regarding the redevelopment of this site for residential uses, including confirming exactly when the site will become available. The Council has therefore taken a conservative approach to delivery on this site by making no allowance for housing on this site within the five year period; however, it is anticipated that the development will come forward by 2045.

S/C/GER: Former Garage Block, East Road (minus 40 dwellings)

Developer (Cambridge Investment Partnership) has advised Cambridge City Council's current thinking is to remove the site from the residential land portfolio and explore alternative uses (see Response 7 in Annex A). However, as the consideration of alternative residential uses is at an early stage the site continues to be proposed for allocation for residential uses.

The below extract is from the document which shows that the developer (Cambridge Investment Partnership – i.e. Cambridgeshire Councils social housing development arm) proposed to remove the site from its residential portfolio.

Response 7: Former Garage Block, East Road, Cambridge

From: Hill

Sent: 09/04/2026 11:50

The Council's current thinking is to remove the site from the residential land portfolio and explore alternative uses.

As such, I would assume no residential dwellings on this site for your planning.

Therefore minus 40 dwellings, however, remains allocated in the emerging plan.

S/C/BRN: Land at Barnwell Road and Newmarket Road *- Capacity for approximately 154 (Net additional homes) (172 homes gross)*

Planning permission granted for 120 flats November 2023 - net loss of 34 (23/04687/FUL)

(minus 52 dwellings from allocation)

636-656 Newmarket Road, Christ the Redeemer / Meadowlands Methodist Church / Holy Cross Church Hall, East Barnwell Community Centre and Cambridge Spiritualist Centre, Newmarket Road (adopted Cambridge Local Plan allocation R6): a reassessment of the site capacity for the remainder of the allocation results in an additional 2 dwellings. Therefore minus 52 dwellings.

In summary; notwithstanding the overly simplistic and ambitious assumptions that the strategic sites will be delivering housing within the plan period, you will note that the above examples of supposedly 'easier' sites and/or sites which would be classed as 'low hanging fruit' – those examples above show circa 122 houses which aren't deliverable or available but remained allocated.

It's also worth noting that a number of the allocations either have permission or are 'rolled over' allocations from previous Local Plans. Has this Local Plan really explored Reasonable Alternatives or looked at any other sites which could deliver housing within this plan period, as opposed to continuing with sites which clearly have issues coming forward?

We ask the Inspector to investigate these allocations further, as we consider that there are significant and fundamental issues that seem to arise from the allocation.

Not Effective – not deliverable over the plan period

As demonstrated above and below the question remains are these new settlements/urban extensions really deliverable in this plan period considering the amount of infrastructure works required on sites of this scale?

Does the local plan allocate sufficient sites to maintain a deliverable supply of housing whilst the strategic sites go through the planning process, and have enabling engineering and infrastructure works undertaken, along with a phased approach to delivery?

To the reasonable reader, the answer is **no**.

Not Consistent with National Policy Goals – not deliverable; not aligned with National Policies; not aligned with Environment Act; no deliverable 5-year housing land supply – over reliance on strategic site coming forward towards end of plan period

The Emerging Local Plan seeks to Deliver a significant amount of housing within the Local Plan Period; the majority of which will be delivered on sites of strategic importance. Particular focus would be on the following new settlement sites -

- Policy S/CBN - Cambourne North (13,000 dwellings)
- Policy S/CE - Cambridge East (8,000 dwellings)
- Policy S/GF: Land adjacent to A11 and A1307 at Grange Farm (4,500 dwellings)
- Policy S/NST: Northstowe New Town – 10,180 (10,180 dwellings)
- Policy S/WNT: Land north of Waterbeach – (11,000 dwellings)
- Policy S/BA: Bourn Airfield New Village – (3,500 Dwellings)

Whilst the Local Plan is clearly ambitious in its approach, it is considered that the delivery of such large new settlements and urban extensions within the Local Plan Period is ill

conceived at best. Moreover given that the plan period won't start from adoption but from when the plans stated this puts far greater pressure on the delivery of such strategic sites. Using Bourn Airfield as an example, the outline application was submitted in 2018 and permission was granted in July 2024. So circa 5 years to get **Outline Permission**. Given the amount of supporting infrastructure work required as part of these sites to be brought forward (new train stations, roads, bridges etc); it is considered that the general thrust of the Local Plan as proposed does not deliver on an immediate 5 year supply of housing, and as such **fails to comply with wider national policy goals**, and in fact could leave the Greater Cambridgeshire Area open to speculative development. Which the Government insists having an up-to-date local plan tries to avoid.

Further it would be naive to assume that any allocation of over 200 units would be delivered in anything other than a phased approach. It is certainly not realistic to assume that an allocated site would simply release 3,500 units at the same time, or even within a 4 or 5 year period. Have the Council any correspondence from the site promoters setting out their phasing and delivery?

Adding to this the New Town Taskforce commissioned by the Government notes

> *The present local planning system combined with the speculative development model appears generally incapable of bringing forward the largest scale forms of development. Even the exceptions fall short of what would be achieved by a new town and rely on joint ventures with the public sector, or are underpinned by large landowners and other organisations that have specific long-term legacy or stewardship goals, in locations that can take advantage of existing infrastructure. Local plans also typically look ahead only 15 years, while new towns require a planning horizon well beyond this*.[2] *Lichfields, Start to Finish, Third Edition, 2024*

The whole crux of the report is that the local plan period is simply not capable of delivering such volume within a plan period.

[2] https://www.gov.uk/government/publications/new-towns-taskforce-report-to-government

The Call for Sites exercise undertaken in December 2025 and 2026 did not assess any new sites. This is particularly disappointing as we had submitted a site which consists of an area which was allocated within the Local Nature Recovery Area as one of the *"Areas that could become of particular Importance for Biodiversity".*

Given the site was not assessed in any detail, this means that the Local Plan fails to comply with section 2A of Section 102 of the Environment Act 2021 which outlines that Local Authorities must have regard to any relevant Local Nature Recovery Strategy for planning policies and decisions.

Whilst, the Council may say they have had regard, given they have an ambition to adopt a planning policy which seeks 20% on site BNG on all development sites. The NPPG states the following;

> *Plan-makers should not seek a higher percentage than the statutory objective of 10% biodiversity net gain, either on an area-wide basis or for specific allocations for development unless justified. To justify such policies they will need to be evidenced including as to local need for a higher percentage, local opportunities for a higher percentage and any impacts on viability for development. Consideration will also need to be given to how the policy will be implemented.*
> *Paragraph: 006 Reference ID: 74-006-20240214*

As such it would have been reasonably expected for the Council to assess potential sites being proposed as part of the LNRS to see if there were any potential synergies between these documents, which after applying the uplift multiplier may be able to deliver an ambitious target.

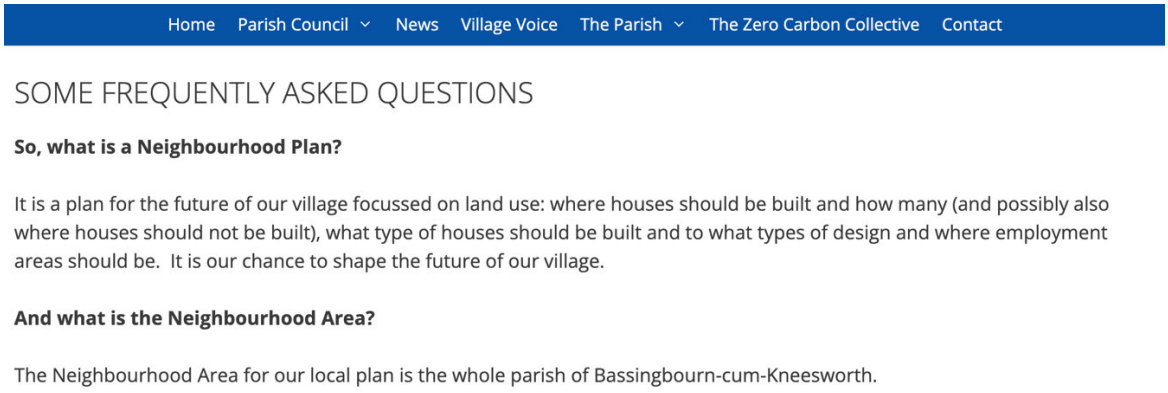
Settlement Hierarchy Limiting Neighbourhood Plan Potential – Not Postively Prepared

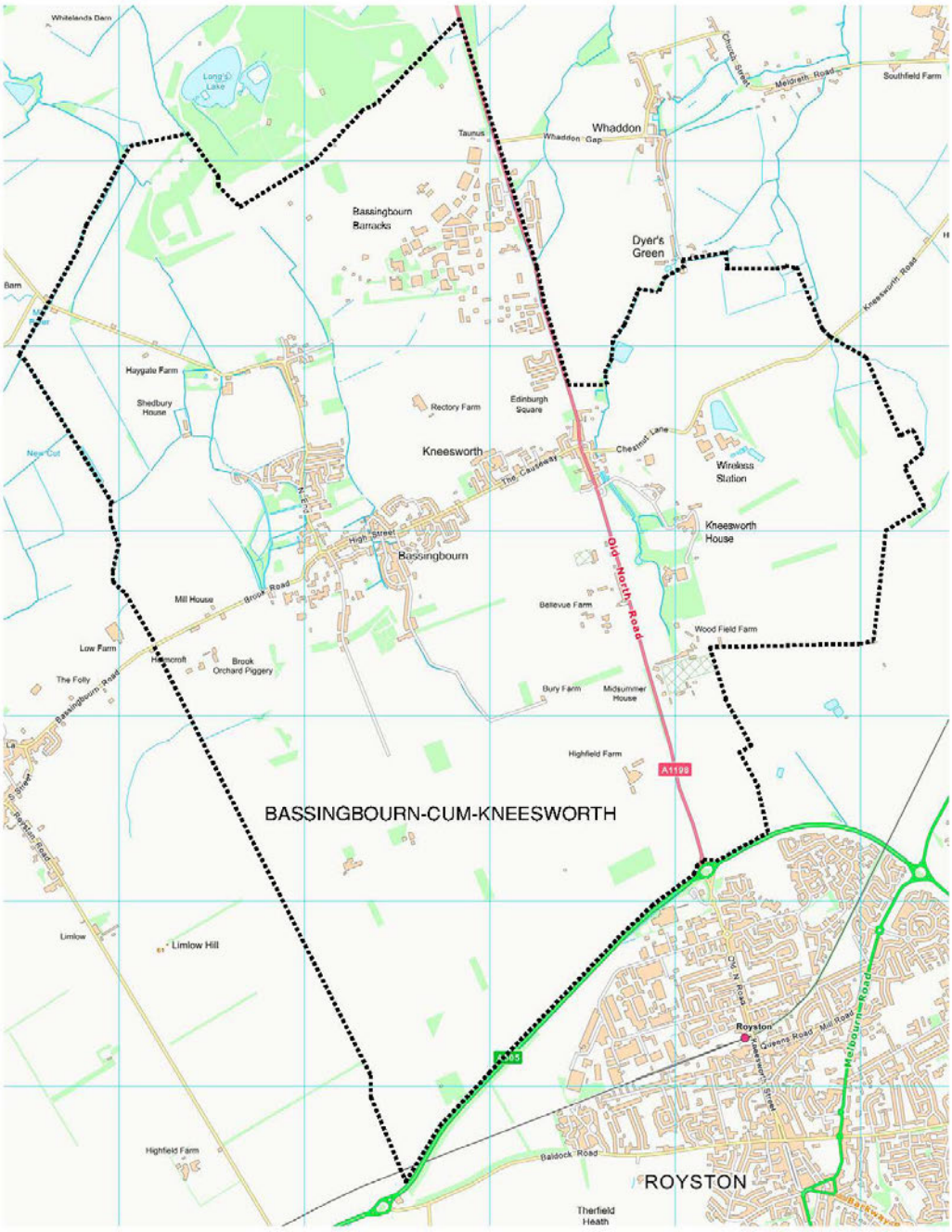
As outlined above, previous representations were submitted to the LPA regarding the settlement hierarchy and how as worded could potentially create issues for any future

Neighbourhood Plan to achieving its core function under Paragraph 8 Schedule 4B of the Town and Country Planning Act 1990 (As amended) – namely:

- *Have regard to national policies and advice, such as the National Planning Policy Framework*
- *Contribute to the achievement of sustainable development*
- *Be in general conformity with the strategic policies in the development plan for the area (our Core Strategy and our other development plan documents)*
- *Be compatible with European obligations and human rights requirements*

Bassingbourn cum Kneesworth was designated a neighbourhood plan area on 11th December 2017 and covers the whole Parish.
https://bassingbournparishcouncil.gov.uk/bassingbourn-cum-kneesworth-parish-council-neighbourhood-plan/





Parish Boundary

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SCALE 1:25,000 at A4

The Regulation 19 plan does not update the Settlement Hierarchy from the 2018 Local Plan which defines the Parish as two settlement conurbations with significantly different development frameworks, even though table 7 of the Settlement Hierarchy Study Topic Plan (Appendix 18 of the Reg 19 submission) includes the Population of Kneesworth within the Minor Rural Centre assessment.

It's also noteworthy that the 'up to date' evidence has not been updated since 2021 – which misses out on a number of key new goods and services such as new shops which has opened in Bassingbourn cum Kneesworth.

Minor Rural Centres

Table 7: Points awarded to existing Minor Rural Centres under each assessment category and total

Village	Parish Population (as at 2022)	Primary School and GP surgery	Shops and services (retained from 2021)	Secondary School	Job density	Transport	Total
Bar Hill	3,870	2	8	0	2	2	14
Bassingbourn	3,350*	2	3	4	1	0	10

* Including Kneesworth Population. The ONS data available is for the whole parish, not split per settlement as in previous study.

Bassingbourn – defined as a minor rural centre which the Local Plan defines as - *Minor rural centres have a lower level of services, facilities and employment than rural centres, but a greater level than most other settlements in Greater Cambridge and often perform a role in terms of providing services and facilities for a small rural hinterland.*

Policy Limits development at 30 dwellings.

Kneesworth – defined as an infill village - *Infill villages are generally amongst the smallest settlements within Greater Cambridge. These settlements have a poor range of services and facilities, and it is often necessary for local residents to travel outside the settlement for most of their daily needs. These settlements generally lack any food shops, have no primary school and may not have a permanent post office or a village hall or meeting place. Development on any scale would be unsustainable in these settlements, as it will generate a*

disproportionate number of additional journeys outside the settlement. In Infill villages, development will not be permitted on sites capable of accommodating scheme sizes significantly larger than 2 dwellings, or exceptionally up to 8.

However, logically when taken together and assessed against the definition of the Rural centres – the fact Bassingbourn cum Kneesworth benefits from a range of services and its own primary and secondary school, the Local Plan should redefine the settlement as a Rural Centre –

Rural centres are the largest, most sustainable villages within Greater Cambridge. They have good access to a secondary school (either within the settlement or accessible by good public transport), employment opportunities, a variety of services and facilities and have high quality public transport in the form of a segregated public transport route services (such as the Greater Cambridge Partnership schemes or the Cambridgeshire Guided Busway) to Cambridge or a market town.

The settlement hierarchy creating a distinction between the two settlements needs to be addressed in this Local Plan. Particularly given that the Parish Council would like to progress with a Neighbourhood Plan – this will impact on the delivery of housing opportunities and could limit the potential for development being brought forward, given the dichotomy between the two settlements as defined in the strategic policy of the Local Plan.

Conclusions

It is clear that there are fundamental issues with the emerging Local Plan as proposed and it fails to comply with the requirements of Para 36 of the 2024 NPPF. It does not comply with the Legal and Procedural requirements and is therefore could not be considered as ever being sound.

We wish to set out clearly that we reserve the right to consult with and obtain Counsel Opinion on the plan and its compliance with National policy and legislation. We would also request that we are included within the Examination in Public process to expand upon our representations as necessary.

Appendix 1 –

Call for sites

Reg 18 Policy Representations

Gentian Developments Ltd

Trafalgar House

Trafalgar Street

Winchester

SO23 9DH

Local Plan Team

Greater Cambridge Shared Planning Service

Cambridgeshire

By email only

17th December 2025

Dear Local Plan Team,

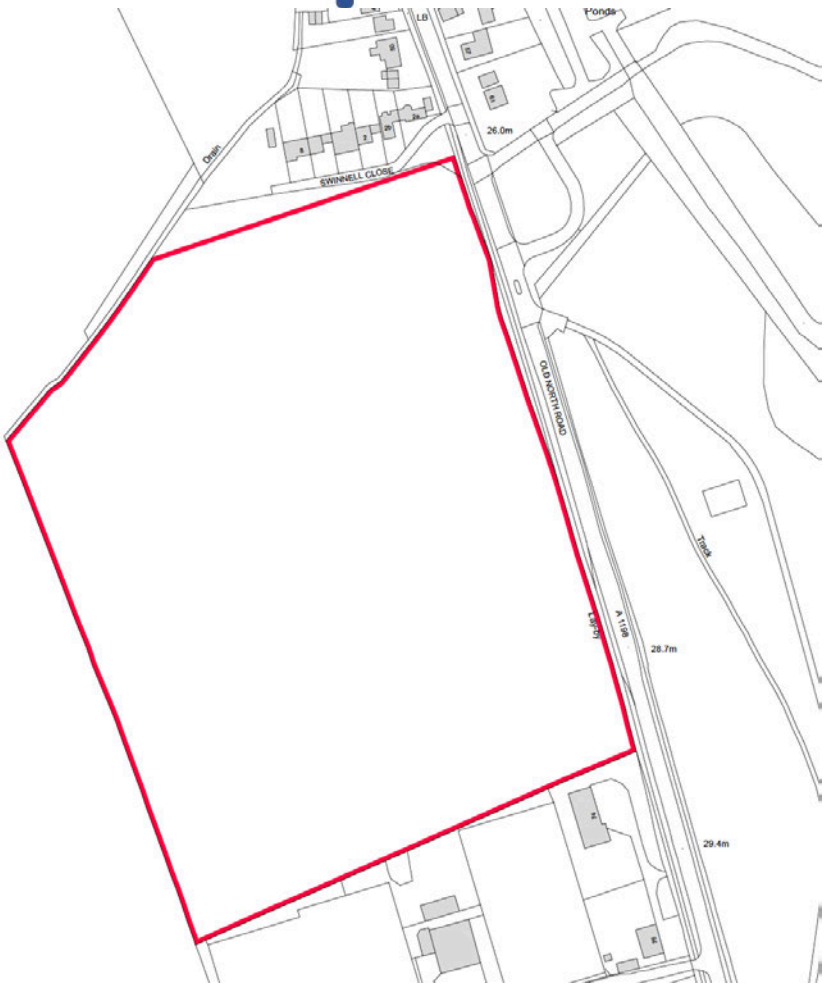
Call for sites submission – land west of Old North Road, Bassingbourn-cum-Kneesworth, South Cambridgeshire

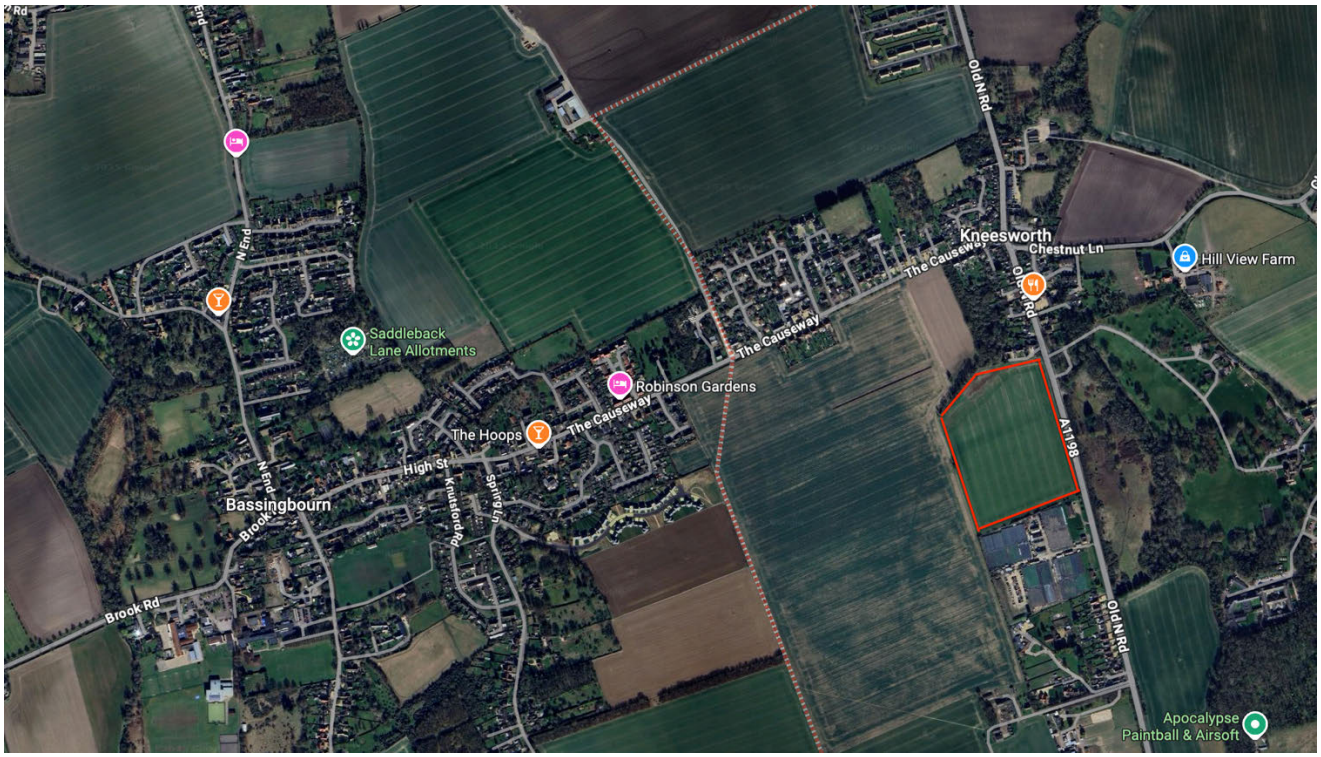
I am pleased to enclose details pursuant to the latest call for sites for the Greater Cambridge Local Plan which ends on the 30th January 2026. This submission is made by Gentian Developments Ltd – the land promoter for the site and has full consent from the landowner to submit these representations.

Gentian Developments have entered into a Promotion Agreement with the landowner, and we intend to submit a planning application for circa 140 dwellings on the site.

The site is question is a 6.6 hectare parcel of land located to west of Old North Road, Bassingbourn – cum Kneesworth, as illustrated below.

GENTIAN


Pond
LB
26.0m
Drain
SWINNELL CLOSE
OLD NORTH ROAD
Trees
A 1198
28.7m
29.4m


Old N Rd
Kneesworth
Chestnut Ln
Hill View Farm
The Causeway
Saddleback
Lane Allotments
Robinson Gardens
The Causeway
The Hoops
The Causeway
High St
N End
Bassingbourn
Brook Rd
Knutsford Rd
Spring Ln
A1198
Old N Rd
Brook Rd
Apocalypse
Paintball & Airsoft

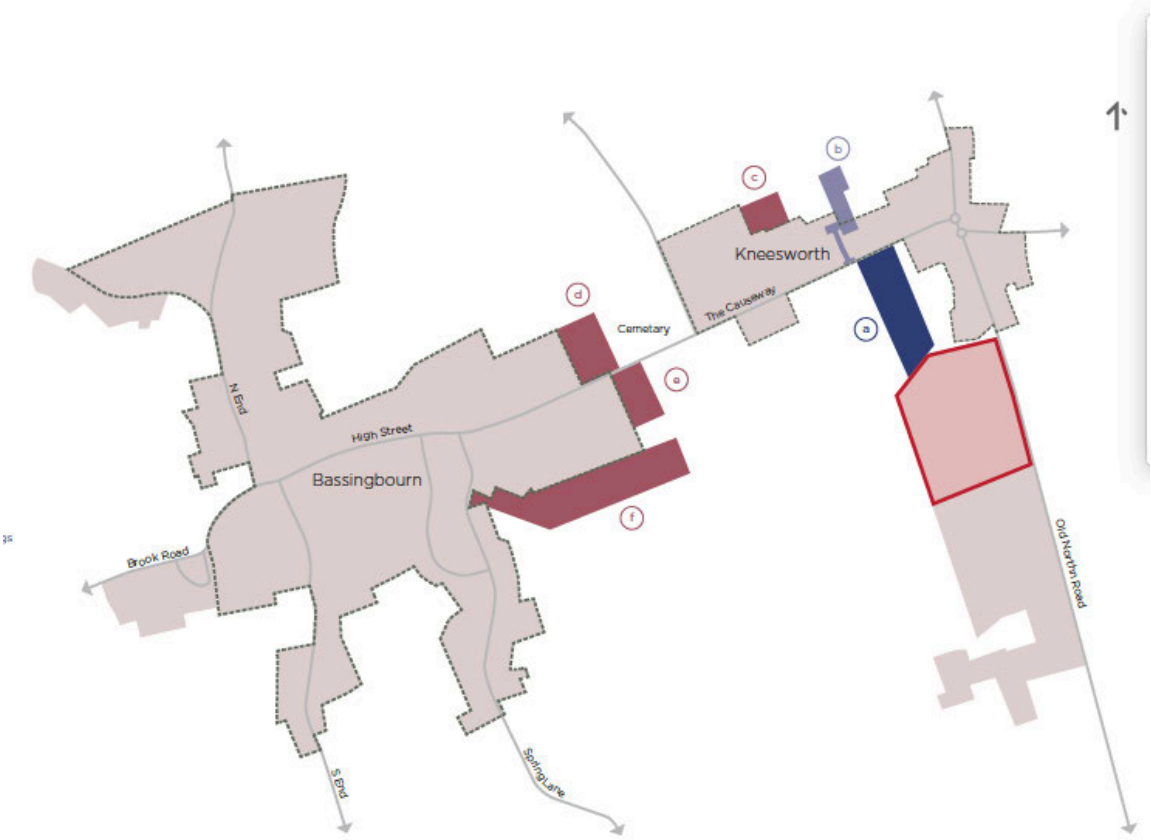
This submission is supported by the following suite of documents –

- this covering letter
- Old North Road pre-application document (September 2025), including high level Health Impact Assessment
- Illustrative Layout
- Illustrative accommodation schedule
- Call for sites summary

Site Details

The site is located adjacent to the settlement boundary of Bassingbourn -cum – Kneesworth; a minor rural centre which benefits from number of amenities including a retail, food and beverage provisions, a primary school and village college.

Residential properties of Swinnell Close are located to the north of the site. A recent planning application for 9 self-build dwellings was approved under application 22/04153/OUT, further adding to the settlement boundary as illustrated below. To the south of the site, commercial glass houses and residential properties are located. It is considered the site makes a logical infill site whilst respecting the surrounding built development boundaries.



The site benefits from an existing footpath to the front of the development, which connects into the village and surrounding area. The topography of the site and the surrounding village is relatively flat, and the village centre is a 15-minute walk from the site.

The total site measures 6.4 hectares and consists of arable fields. A review of historic maps suggests that the site has remained undeveloped from the earliest available map (1885) to the present day (2025).

The majority of the site (4.2ha) is located in flood zone 1. The remaining of the northern part of the site is located in 2.2ha is located in FZ3.

A site investigation has been undertaken. Ground conditions at the site comprise Topsoil over a discontinuous layer of Head Deposits in turn overlying undifferentiated units of the Grey Chalk Group (formerly the Lower Chalk). No significant sources of contamination have been identified with regard to the proposed development, no significant contaminations risks are considered to be present.

Access/Sustainable Location

The site will be off Old North Road. It is envisaged that a T junction access should be sufficient to service the development. Old North Road being a straight road, adequate viz splays are expected to be achieved. Separate discussions will be had with the Highways Authority.

As outlined above, the site is located in a sustainable location being so close to the village and benefiting from an existing footpath to the front of the site. The relatively flat topography of the site and its surrounds is considered to be advantageous for encouraging trips by foot and cycle for local goods and services in the village.

Development Proposals

A residential development of up to 140 dwellings, on-site public open space, biodiversity improvements, community orchard and play space is being proposed to be considered as part of this call for sites. An indicative layout has been prepared as part of this submission.

As part of initial due diligence, we have undertaken a high-level market review and development appraisals in line with an indicative accommodation schedule based on discussions with local estate agents. Within this we envisage the development being able to deliver a policy compliant 40% affordable housing provision with a certain cost allocated for development contributions as necessary. A necessary caveat here is that this has not been tested with various consultees and other regulatory requirements.

A high-level review has also been undertaken in line with the Health Impact Assessment checklist. A full suite of supporting information has been prepared and supports this submission.

Suitability of the site

As outlined above, the site is in a very sustainable location being on the edge of the settlement boundary. The site benefits from an existing footway to the front which provides both pedestrian and cycle connectivity into the village centre. Built development is located both to the north and south of the site, with other new developments permitted in and around the conurbation, making it a natural infill site.

Bassingbourn -cum- Kneesworth as a rural centre, benefits from a number of local amenities including retail, Food and Beverage offerings, goods and services, community and educational facilities. The nature of the topography of the site and its surrounds allows for a relatively flat walk/cycle, which should not discourage active travel options.

In the wider context, the site is well serviced by other retail provisions towards Royston which is close to the site, thus not requiring long car-based journeys for other goods and services not provided for in the village.

Site investigations confirm there are no abnormal ground conditions which should hinder the site being brought forward.

Highways access is considered to be relatively straightforward, with adequate viz splays being provided. Discussions will need to be had with the Highways Authority and appropriate access arrangements agreed.

The proposals seek to delivery all residential development within flood zone 1. The area within flood zone 3 is to be designated to on-site public open space, biodiversity improvements, community orchards and play space. It is considered this is an acceptable use of this area which helps with the placemaking principles.

Availability/Deliverability

The landowner has entered into a promotion agreement with the developer to bring the site forward for residential development. The site is wholly owned by the landowner, therefore there are no ownership issues that would hinder the site being brought forward once planning permission has been granted.

The proposed number of units would appeal to both SME and National House Builders. The straightforward access arrangements and associated infrastructure works is a major benefit to the delivery of any scheme. It is envisaged that a scheme of 140 units would be built out over a period of 3 years, which would bring immediate and long-term benefits to the local community.

Conclusions

The site is both suitable and available for development. Bassingbourn-cum-Kneesworth benefits from a range of goods and services. It is also well serviced with existing pedestrian connectivity to the village. The sites edge of settlement location makes it a sustainable location. The site being bounded by development to the north and south makes it a natural infill site. The site therefore has the potential to deliver a sustainable development that will help meet the housing need of the area for the local plan period and beyond.

Thank you for taking the time to read this covering letter, the supporting information of this submission outlines in more detail the sites suitability for development and can be used to justify the site being allocated for development in the next local plan.

Yours sincerely,

Aiden Murray

Planning Director

Gentian Developments Ltd

Gentian Developments Ltd

Trafalgar House

Trafalgar Street

Winchester

SO23 9DH

Local Plan Team

Greater Cambridge Shared Planning Service

Cambridgeshire

Uploaded via Consultation website

15th January 2026

Dear Local Plan Team,

Regulation 18 - Local Plan Comments – Policy:

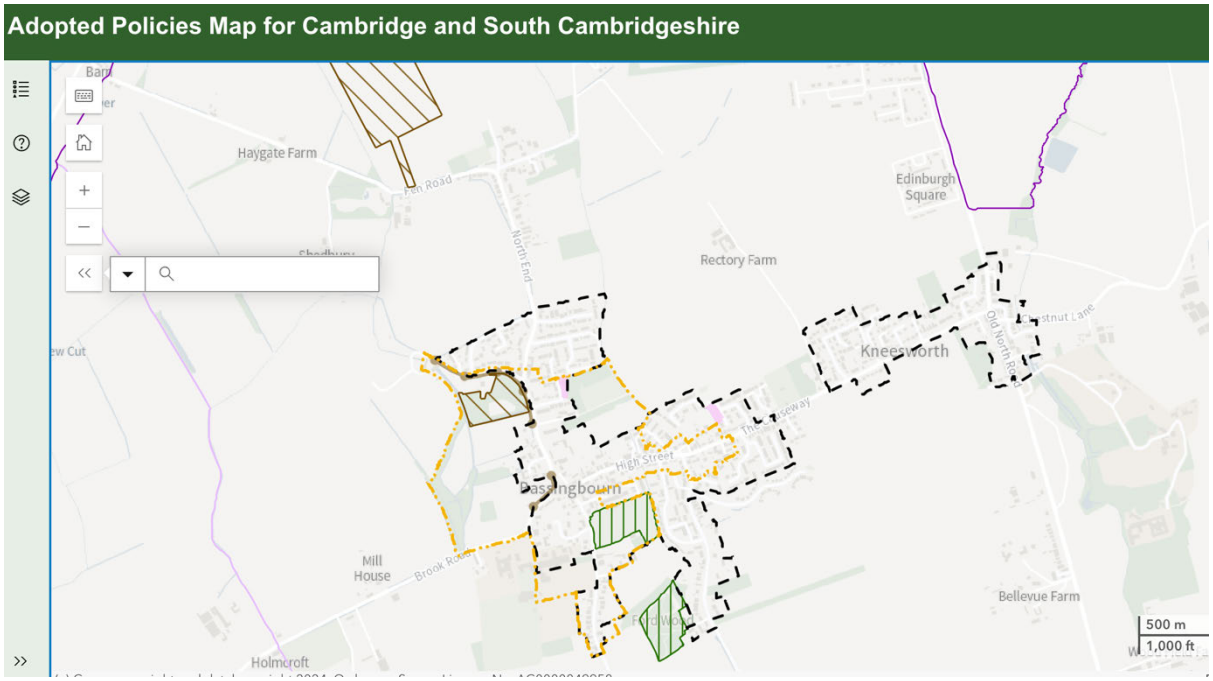
S/DE Defined Development Extents

S/SH: Settlement Hierarchy

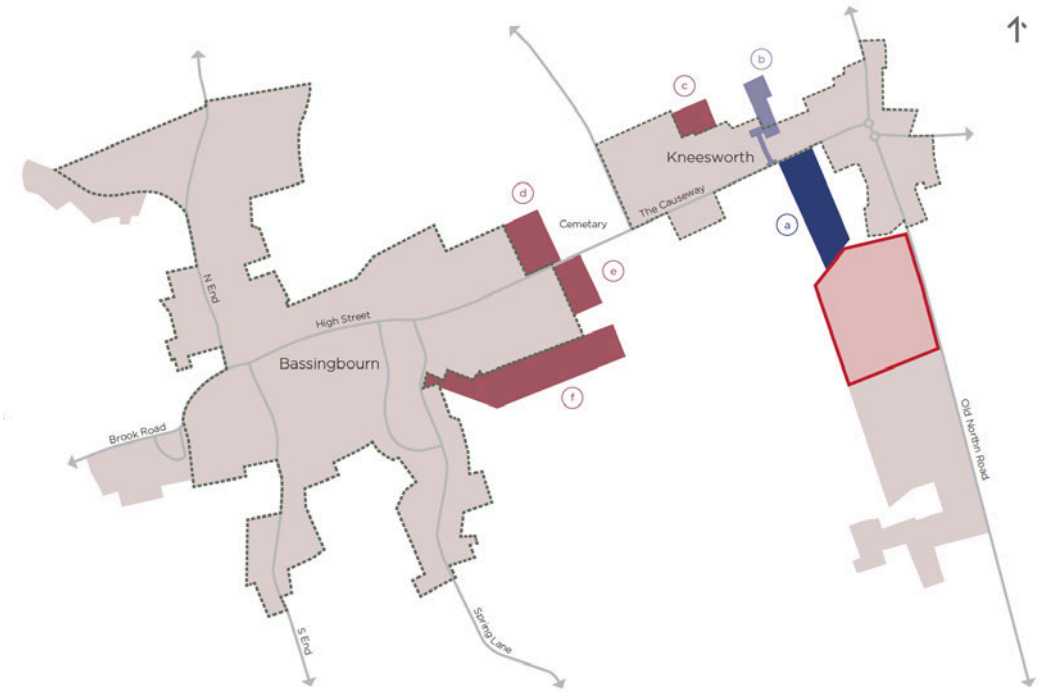
This submission is made by Gentian Developments Ltd who have entered into a Promotion Agreement with the landowner for a 6.6 hectare parcel of land located to west of Old North Road, Bassingbourn cum Kneesworth. The site has been submitted via the call for site under reference – b7ebaf, which discusses the merits of the site being allocated in the new Local Plan. A initial PPA scoping meeting with a Planning Officer at South Cambridgeshire Council has taken place, with a pre-application discussion due to be submitted with the LPA and relevant County Council departments.

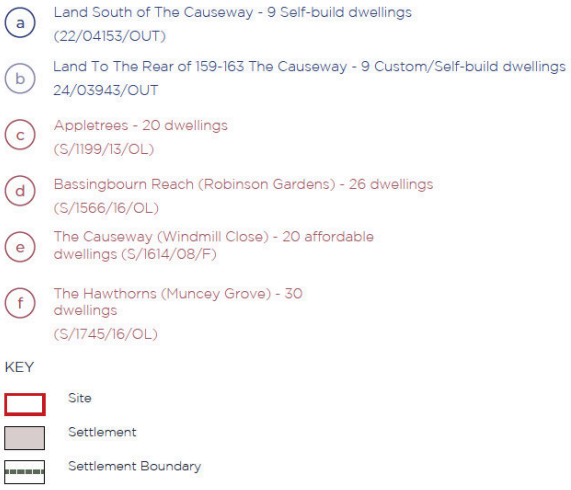
This Local Plan Representation submission seeks to comment on the above Policies; starting with the defined development extents as set out the draft planning policy **S/DE**.

The below extract is from the Adopted Local Plan (2018) and shows the development extents



Since the adoption of the local plan in 2018, there have been planning approvals outside of the defined boundary which alters the boundary around both settlements. The Settlement Boundary map should be amended to reflect these approvals.





With regards to policy S/SH**, Bassingbourn and Kneesworth being classes as two separate settlement hierarchies in Policy S/SH should be reviewed**.

The two conurbations merged in 1960's and as illustrated above, are spatially separated by the cemetery. **The two settlements have therefore coalesced**. The Parish Council which serves the area is Bassingbourn – cum – Kneesworth as outlined below.





It is understood that the Parish Council have intentions of producing a Neighbourhood Plan, which covers Bassingbourn – cum - Kneesworth.

National Planning Policy Guidance notes - *A neighbourhood plan should support the delivery of strategic policies set out in the local plan or spatial development strategy and should shape and direct development that is outside of those strategic policies Paragraph: 004 Reference ID: 41-004-20190509*

As currently drafted the spatial development strategy allows Bassingbourn to be developed with a maximum of 30 dwellings, and Kneesworth a maximum of 8 (in exceptional circumstances).

It is therefore considered that Bassingbourn and Kneesworth should be combined to align with the name of the area and the area re-defined within the settlement hierarchy to a Rural Centre and the settlement boundary map updated to reflect this.

By doing so it not only corrects the administrative boundary of the two settlements but also creates the environment where a Neighbourhood Plan can meaningfully allocate development beyond the restrictive limits of those set out within the Local Plan.

As outlined above and reiterated below, the site submitted as part of the Call for Sites is a natural addition to the settlement of Bassingbourn – cum – Kneesworth and will deliver sufficient homes in a sustainable location for the area for years to come. The direction of travel in the Draft NPPF (December 2025) is that development well related to an existing settlement any settlement boundary may be acceptable where an unmet need (including housing) can be met.

I trust that this letter sets out the justification and when read alongside the Call for Sites Representation, it makes an even stronger case for the site being allocated, the settlement hierarchy being updated and the settlement boundary maps being amended to allow for the development to come forward.

Should you require anything further, please do not hesitate to contact me directly.

Yours sincerely,

Aiden Murray

Planning Director

Gentian Developments Ltd

Appendix 2

Correspondence with Policy Team

Nature Recovery Strategy

Subject: RE: Greater Cambridge Local Plan: Site submission for Land west of Old North Road
Date: Wednesday, 11 March 2026 at 15:55:22 Greenwich Mean Time
From: Terry De Sousa
To: Aiden Murray
CC: LocalPlan (GC), Alex King
Attachments: image001.png, image002.jpg, image003.png

Dear Aiden,

Thank you for flagging this. These sorts of matters would typically be picked up by our ecology officers as part of any site assessments.

Kind regards

Terry

Terry de Sousa | Planning Policy and Strategy Team Leader

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When you contact us, we will do our very best to help you. Please note our colleagues have the right to be treated with respect while they try to help you, threatening behaviour or verbal abuse will not be tolerated. We reserve the right to terminate contact if these guidelines are not followed.

My working days are: **Tuesday – Friday.** On my non-working day (Monday), you can contact the Planning Policy, Strategy and Economy Team on localplan@greatercambridgeplanning.org or 07514 922444 if your email is urgent.

Tell us how we are doing by completing this survey: Project: How are we doing? | South Cambridgeshire District Council

From: Aiden Murray <[redacted]>
Sent: 11 March 2026 09:47

To: Terry De Sousa <[redacted]>
Cc: LocalPlan (GC) <[redacted]>; Alex King <[redacted]>
Subject: Re: Greater Cambridge Local Plan: Site submission for Land west of Old North Road

Morning Terry,

Since our call for sites submission I've come across that the area we have allocated for on-site landscaping is also allocated within the Cambridgeshire and Peterborough Local Nature Recovery Strategy – see attached screenshots.

You are no doubt cross referencing, but thought I best put on record.

Kind Regards,
Aiden

Aiden Murray MRTPI
Planning Director

[redacted]
01962 460 150
[redacted]

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From: Terry De Sousa <[redacted]>
Date: Friday, 23 January 2026 at 13:32
To: Aiden Murray <[redacted]>
Cc: LocalPlan (GC) <[redacted]>
Subject: RE: Greater Cambridge Local Plan: Site submission for Land west of Old North