Greater Cambridge Local Plan Regulation 19 Consultation - Response on behalf of Rainier Developments Limited

Land at North End, Bassingbourn

September 2026

Turley

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Our reference
RAIS3016

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1. Introduction

1.1 These representations have been prepared by Turley, on behalf of Rainier Developments Limited (hereafter referred to as 'The Client'), in response to the Regulation 19 Consultation on the Draft Greater Cambridge Local Plan (GCLP).

1.2 The Site at North End, Bassingbourn (the Site) has previously been promoted for residential development of up to 150 dwellings, as part of the Greater Cambridge Local Plan process, through the Call for Sites exercise in March 2025 (HELAA ID: 200809) as well as the Winter 2025 / 2026 Consultation.

1.3 These representations should be read alongside the Vision Documents (including Site Location Plan), set out in Appendix One.

1.4 We welcome the opportunity make representations to the final consultation on the proposed submission GCLP before it is submitted for independent examination.

1.5 Rainier are supportive of the Council in preparing an updated plan that provides clarity, certainty and sustainable development outcomes.

1.6 Having reviewed the Draft GCLP, it appears that the strategy taken towards allocation sites for residential development is disproportionately skewed in favour of major sites, with over approximately 12,670 dwellings proposed across just 6 sites; an approach considered to be inconsistent with national guidance and contradictory to past decisions by Planning Inspectors during examination where a more dispersed strategy, anchored by larger strategic allocations, was supported.

1.7 It is proposed that this approach should be re-evaluated and updated, to include a wider range of site sizes which are allocated and make up the overall housing land supply. This would be consistent with NPPF policy H06, which identifies the importance of planning for a diverse mix of sites" noting a requirement to "*Allocate sites which will support and enhance the vitality of rural communities and enable villages to grow and thrive, especially where this will support local services.*"

1.8 The publication of the new NPPF during this consultation has resulted in several of the policies now being inconsistent with national guidance, and it is therefore considered that the draft Local Plan should be updated to reflect the principles set out in the NPPF.

1.9 The urgency to progress a new Local Plan is understood due to the Government deadline of 31st December for local plans to be submitted under the current Regulations, such that if this deadline is missed the Council would likely have to 'start again' under the new Regulations. However, it is advised that the required updates to the draft Plan be made the priority as to be consistent with the NPPF and be found 'sound', rather than being submitted under the current regulations.

1.10 We question the sense in this Local Plan proceeding with any policies which are materially inconsistent with, or duplicate, matters addressed in the NPPF on the basis that they would immediately be afforded very limited weight.

1.11 It is in this spirit that these representations have been prepared on behalf of the Client, to seek a positive allocation for the Site.

Purpose and Structure

1.12 These representations are structured as follows:

- **Section 2:** Site Context & Proposed Development
- **Section 3:** National Planning Policy Framework 2026
- **Section 4:** Policy Assessment
- **Section 5:** Summary

2. Land at North End, Bassingbourn

The Site

2.1 The Site is located to the north of Bassingbourn and immediately west of North End.

2.2 Bassingbourn village is located 19 kilometres south west of Cambridge and 4 kilometres north west of Royston.

2.3 The Site comprises 8.6 hectares of a larger agricultural field under arable cultivation. The Site is bound to the east by North End Road along with a dry ditch, occasional trees, and remnant hedgerow. A further agricultural field lies beyond. To the north and west of the site lie further agricultural fields, with the western boundary defined by an overgrown hedgerow and tree line. To the south, the Site is bounded by the northern extent of Bassingbourn, with dwellings at The Fillance variously backing onto and fronting onto the site.



Figure One: Site Context Plan (Google Earth 2026)

2.4 Bassingbourn village centre and High Street provide access to a range of retail and service opportunities and is accessible from the site by a 12 minute walk using the footpath running alongside North End Road heading south.

2.5 Several local amenities are located in Bassingbourn including a Pre-School and Primary School, Church, Post Office, SPAR, Pharmacy, Community Centre, a Pub, Dentist, Village College, Sport centre and Recreation Ground. These facilities are all accessible from the site by a around 15 minute walk or 4 minute cycle or less. A further Pub and Retail facilities are located slightly further from the site around a 19 minute walk or 5 minute cycle away.

2.6 There are two bus services in Bassingbourn, the No. 15 Haslingfield – Royston; and No. 17 Royston- Bassingbourn – Guilden Morden. The nearest bus stop to the Site is located just south of the site on North End Road providing a weekly service via Haslingfield, Royston and Bassingbourn. The No. 17 also stops just south of the site on North End Road and provides a Monday to Saturday service between Guilden Morden, Bassingbourn and Royston. Both services also provide a connection between the site and Bassingbourn High Street.

2.7 Royston Railway Station lies to the south of Bassingbourn and is within a 5km cycling distance and is accessible via the existing bus service.

2.8 The vast majority of the proposed Site is identified as lying outside of the fluvial and tidal flood risk zone according to the Environment Agency's (EA) published flood map for planning. The EA flood map indicates that the level of flood risk to this part of the Site is in Flood Zone 1.

2.9 The Site is not located within a conservation area and there are no heritage assets within the Site.

2.10 There are three Grade II Listed Buildings (Mill, 31, Mill Lane, Mill House, 33 Mill Lane, and Rolling Mill, Mill Lane) lie to the south west of the Site, and a further three Grade II Listed Buildings (106 North End, 98 North End and Pump to the West of Number 98), located on the opposite side of North End, diagonal to the Site.

2.11 Scheduled monument (John o'Gaunt's House: a motte castle and moated site 300m NE of Haygate Farm) is located to the north, and Bury Yard moated site adjacent to Milldyke is located 150m south west of the Site's southern boundary, although neither are located within the or immediately adjacent to the Site.

2.12 The Bassingbourn Conservation Area also adjoins the site south western corner.

2.13 A Special Area of Conservation (SAC) is located approximately 7km north of the Site. Designated for barbastelle bats, it is not considered a constraint to development of the Site.

	Distance m / km	Walking Time (mins)	Cycle Time (mins)
Pre-School	0.8	7	2
Primary School	0.8	12	3
Post Office	0.6	13	3
SPAR	0.6	7	2
Pharmacy	0.6	15	4
Dentist	0.6	16	4
Village College	0.9	16	4
Recreation Ground	0.7	10	2.5
The Belle Freehouse	0.2	1	1
The Parish Church	0.4	5	1
The Hops Pub	0.8	7	2

Table One: Site Sustainability Summary

Proposed Development

2.14 To summarise, the allocation of this site has the capacity to deliver the following:

- Up to 150 new dwellings;
- A mix of market and affordable homes;
- Vehicular access from North End Road via a priority junction, with a footpath connection to the existing network (with access into the site proposed in detail);
- public open space, including new areas for children to play;
- New and enhanced green infrastructure to the western boundary;
- Areas of modified grassland and scrub planting to enhance biodiversity.

2.15 The Site is considered to be located sustainably adjoining Bassingbourn, with convenient access to local services and facilities.

Availability and Deliverability

2.16 The Site is available and deliverable early within the plan period, with no issues being identified that would preclude its development, including no known legal or ownership constraints.

2.17 There are no identified impediments to delivery that cannot be appropriately mitigated.

3. National Planning Policy Framework (2026)

3.1 This Submission Local Plan is intended to be submitted to the Planning Inspectorate by the 31 December 2026, thus it will be considered against the 2024 NPPF in terms of the plan making policies.

3.2 A revised version on the National Planning Policy Framework (2026) was published in August 2026, with considerable changes from the previous version which are already affecting the plan making and development management process across Local Planning Authorities.

3.3 Chapter 2 of the NPPF illustrates the objective of creating a system that is genuinely plan led, primarily though the preparation of development plans, which influence development in their area.

3.4 PM2 states that 'Local plans should set out a positive vision and spatial strategy which supports the delivery of the spatial development strategy for their area, and should set out specific proposals for accommodating development needs and conserving and improving the environment at a local level.'

3.5 Moreover, paragraph 1(d) of section PM6, identifies the necessity of positive and early engagement with communities and key stakeholders during the preparation of a local plan, as a key principle of the plan making process.

3.6 Annex 1, paragraph 2 of the NPPF states the following, regarding the assessment of Development Management (DM) policies and consistency with the Framework.

"Development plan policies (or parts of those policies) which are materially inconsistent with national decision-making policies in this Framework should be given very limited weight. The only exception to this is where they have been examined and adopted or made against this Framework. Other development plan policies should not be given reduced weight simply because they were adopted prior to the publication of this Framework.".

3.7 Considering this, a number of policies from the draft Local Plan have been assessed against guidance in the NPPF for consistency, with some considered to be materially inconsistent and attributed only very limited weight.

3.8 On that basis, we urge the Council to consider whether such policies should be retained in the Draft Local Plan or amended to achieve the necessary consistency.

4. Representations to the Local Plan Policies

4.1 We have reviewed the proposed policies within the Draft Local Plan. Our comments primarily relate to draft policies that are most relevant to our client's Site on land at North End, Bassingbourn.

4.2 We consider that given the emphasis on growth being driven by the Development Corporation, it is considered that the plan could be more ambitious, with an increased housing target, supported by the inclusion of smaller sites, which would ensure a steady planned trajectory of delivery across the plan period. These themes are further explored below, through commentary on specific policies. We trust these comments are helpful to Council officers.

4.3 The GCLP identifies a high level vision for the growth and future land use of the area; timeframes for this growth; and planning policies which set the parameters for this. It identifies the need for new homes and jobs, and the services and infrastructure to support them, and guides where this development should happen.

Development Strategy

Policy S/JH: New Jobs and Homes

4.4 The identification of Greater Cambridge as a Development Corporation with priority for sustainable economic growth has resulted in the creation of an ambitious plan, which seeks to deliver the homes and infrastructure needed to achieve this growth. The Government has recently announced a £400 million investment in Cambridge to overcome barriers to growth, such as housing supply and affordability, as part of the Cambridge Development Corporation. The main premise for the Development Corporation is to set out and deliver an ambitious plan for long-term sustainable and infrastructure-led economic growth across Greater Cambridge; the GCLP is the first step towards this, and as such, it is considered that the Local Plan should be more ambitious in terms of its housing and jobs targets.

4.5 Previous assessments of housing need based on the proposed employment growth required a higher number of dwellings than is now being forecast. The reduction in unit numbers is based on an assumption of larger household sizes, mainly brought about as a result of poor affordability. This should be addressed through the delivery of more homes, rather than perpetuating the problem. On this basis, it is considered that a higher growth ratio should be applied to inform the housing need in accordance with para. 88 of the 2024 NPPF. The ability to identify a higher housing requirement than the identified housing need, on the basis of growth ambitions linked to economic development or infrastructure investment is a point that is specifically referred at para.69 of the 2024 NPPF.

4.6 Further, the Council's evidence base has not considered alternatives for much higher growth in order to support the aspirations for region (through Sustainability Appraisal). The absence of a robust consideration of these reasonable alternatives, including the role that smaller sites with sustainable settlement could play in enabling villages to grow and thrive, especially where this will support local services, is an oversight of this plan.

Policy S/DS Development Strategy

4.7 The draft plan identifies a minimum housing need of 48,069 over the plan period (2024-2045), equating to an annual need of 2,289. According to the draft Plan, there is an existing supply (adopted allocations, sites with planning permission or a resolution to grant planning permission, and windfall allowance) of 38,378, meaning additional homes of just 9,691 are considered to be needed to meet the identified need.

4.8 Table Two below identifies land for the delivery of 13,654 new dwellings, which equates to an over provision of 3,963 dwellings (a headroom in supply of 8%). Whilst Rainier welcomes this oversupply, they are of the view that greater headroom between need and supply would be beneficial, particularly considering the ambitious growth plans for Greater Cambridge and the reliance on a relatively small amount of large strategic sites to deliver the majority of the identified need.

4.9 The Draft Plan the following locations for development.

a. Within the Cambridge urban area;

b. On the edge of Cambridge;

c. At an expanded Cambourne;

d. At other new settlements; and

e. In the rural southern cluster and wider rural area at Rural Centres and Minor Rural Centres.

	Dwelling Numbers	**Site Numbers**
Cambridge Urban Area	321	7
Edge of Cambridge	7800	4
New Settlements	5220	3
Rural Southern Cluster	103	2

Rest of the Rural Area	210	3
Total		**13,654**

Table Two: Draft GCLP

4.10 The data taken from Table Two of the Draft Plan (summarised above), presents the breakdown of housing delivery through allocation for new homes between 2024 and 2045.

4.11 Figure 9 of the Local Plan shows the distribution of growth compared to previous plans, demonstrating a steady increase in the percentage of development allocated as part of 'New Settlements', alongside a reduction by 50% in development allocated in the 'Rural Area'.

4.12 Delving further into the above figures, it is notable that over 80% of the homes to be delivered are on sites of over 1,000 or more units, and in terms of new sites that have been allocated to meet identified need, over 90% will be on sites of 1,000 or more homes. This indicates a significant reliance on large scale sites to deliver the identified need. Major strategic sites have a history of failing to meet delivery targets, due to: often multiple landowners, phasing and strategic infrastructure delivery, resulting in an inability to deliver housing in line with the intended trajectory and certainly not in the early years of the plan.

4.13 Para.61 of the 2024 NPPF states that as part of the 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. By relying so heavily on large strategic sites, and with a large proportion of small sites being windfall sites (addressed further below), it is not considered that the plan accords with this objective sufficiently. Notably, the existing strategic sites in South Cambs have failed to deliver at the pace envisaged in the adopted local plan. These evidence of slow delivery must influence the siter selection process.

<u>Small and Medium Sites</u>

4.14 Whilst it is noted that Greater Cambridge has made an allowance for 10% of overall housing delivery to be on small sites of less than 1ha, in line with para.73 of the 2024 NPPF, less than half of this amount (4.3%) is made up of specifically identified sites. The 2024 NPPF is clear that, in meeting the requirements of para.73, homes must be on allocated sites. Historically, there has been some flexibility applied to this by Planning Inspectors, on the basis of historic evidence, however, such a high reliance on windfalls within the 10% of small sites provides less certainty and relies on speculative applications that have not been properly planned or accounted for in the growth strategy.

4.15 Paragraph 2.67 of the Draft Local Plan notes that villages should only play a limited role in meeting future development needs to support delivery based on their poor sustainability credentials. It has been demonstrated through the various representations made by Rainier, and through the HELAA Assessment, that the Site

being promoted by Rainier *Land at North End, Bassingbourn* is in a sustainable location, where future residents will benefit from, and continue to support a number of local facilities, ensuring the long term sustainability of Bassingbourn as a settlement.

4.16 The approach to development in Rural Centres is at odds with the approach to sustainable development set out in the 2024 NPPF, but also within Policy HO6(1)(b) of the new 2026 NPPF, which states that local plans should provide for a diverse mix of sites, including those which will "*support and enhance the vitality of rural communities and enable villages to grow and thrive, especially where this will support local services"*. The allocation of smaller sites in a number of villages within the Plan area would therefore be in accordance with the clear sustainability objectives, and meet an identified need that is set out within the current plan. If the plan does not identify sufficient homes within rural settlements, when the plan is adopted, Policy S/SH, which sets out the settlement hierarchy, and limits development in rural centres, will be inconsistent with the 2026 NPPF, and afforded limited weight. It is therefore considered important to plan positively for this change in approach.

4.17 The importance and need to allocate a mix of site sizes is identified in policy HO6(1)(a), where it is stated that at least 10% of housing on sites no more than 1 hectare, but also requires a further 10% to be allocated on sites between 1 and 2.5ha. Whilst the Plan is not required to accord with this requirement, given the earlier concerns raised regarding the overall growth strategy, and the reliance on a few very large sites, it would result in a more positively prepared plan, if further smaller sites were allocated.

4.18 Bassingbourn is identified as a Small Rural Centre, which is in turn identified as a Neighbourhood Area for the assessment of housing need. Appendix C of the Plan identifies housing need for individual neighbourhood areas including Bassingbourn, where 66 units have been identified. Whilst is it appreciated that the Local Plan does not specifically have to account for this need, it is clear that there is a need within Bassingbourn for additional homes, and the lack of any sites allocated in Bassingbourn is insufficient to meet the identified need. It is therefore considered that Rainier's Site would make an important contribution to local housing need, supporting the current community infrastructure that is available in the settlement, and allowing development within the settlement to come forward in a planned managed way.

4.19 In conclusion, it is considered that the significant reliance of windfall sites to deliver any significant housing provision outside of the large strategic sites is inconsistent with the 2024 NPPF. The approach does not positively plan for sustainable, identified need in a number of minor rural centres, which are recognised as performing a valuable role in terms of providing services and facilities to the local community, preventing unnecessary trips. It is accepted that development proposals should be in keeping with the overall scale of the settlement, but that a 'blanket limit' on the scale of new development does not allow for assessment of site specific and settlement characteristics.

4.20 The allocation of a greater range of site sizes is needed to contribute to the overall land supply. In turn, this will ensure a consistent supply across the plan period, and particularly within the first 5 years, given the growth strategy of this Plan, which relies so heavily on a few very large sites, which often take a longer time to mobilise.

4.21 Whilst not required, the Plan should also be positively prepared in light of the now published 2026 NPPF, which will become a material consideration of critical importance when determining development that will be brought forward in accordance with the Greater Cambridge Local Plan once adopted. Currently, the approach to rural settlement housing provision is not consistent with the approach being taken within the 2026 NPPF, and the plan should be future proofed to take account of this shifting approach, particularly as the Council's own evidence demonstrates need within rural centres that is not being properly planned for.

4.22 The allocation of Land at North End, Bassingbourn provides an opportunity to meet all of these objectives.

Policy H/AH Affordable Housing

4.23 It is stated that *'all major developments for housing will provide at least 40% of the new homes on site as affordable housing'*. The policy continues, with somewhat stringent requirements limiting *'the off-site provision of affordable housing or a financial contribution (commuted a. sum) for affordable housing will only be considered on developments of self contained dwellings'.*

4.24 The way this policy is worded is considered to be relatively inflexible ad inconsistent with national guidance. Policy H08 of the NPPF states the following.

Development proposals should meet or exceed up-to-date development plan requirements for the proportion and mix of affordable housing tenures relevant to the location, including the minimum proportion of Social Rent. This should be provided on-site unless:

> *a. Off-site delivery on an alternative nearby site would optimise the quality or quantity of affordable homes built; or*
>
> *b. A cash payment in lieu of on or off-site provision can be justified robustly, and the agreed approach contributes towards the objective of creating mixed and balanced communities.*

4.25 In order to be consistent with national guidance, it is suggested that the policy allow for some flexibility regarding either off site delivery or financial contributions, particularly factoring in viability issues and the potential for viability assessments.

Policy H/SS Residential Space Standards and accessible homes

4.26 Part 6, 7 and 8 set out requirements for accessible homes, as per the below.

> *6. All new build residential units (including residential annexes) must be designed to be accessible and adaptable in accordance with the Building Regulations M4(2) standard.*
>
> *7. For development proposals providing 20 or more new build dwellings, 10% of the affordable units (the majority being within the social/affordable rented units) and 5% of the market units must be 'wheelchair user' dwellings in accordance with*

the Building Regulations M4(3) standard. These homes should be delivered as Building Regulations M4(3)(a) 'wheelchair adaptable' dwellings unless the Council has identified a need for Building Regulations M4(3)(b) 'wheelchair accessible' dwellings.

8. Exceptions to meeting the Building Regulations M4(2) and M4(3) standards as set out above will only apply where robust justification is provided that sets out how site specific circumstances, in addition to the other requirements for the development, make the proposed development impractical, unachievable or unviable.

4.27 The requirements in this policy for the provision off 100% M4(2) housing and 'at least' 5% of homes to be M4(3)b compliant is considered to be excessive, inconsistent with the NPPF, and inconsiderate of viability constraints.

4.28 Section H05 of the NPPF identifies the importance of development proposals delivering dwellings that meet the needs of different groups, specifically regarding affordability and accessibility. H05 part b states *'that the proportion of housing on major developments to be delivered to requirements M4(2) and M4(3) of the Building Regulations. Requirements should meet or exceed local levels of need, and should ensure that no less than 40% of homes on major developments are delivered to M4(2) standards.'*

4.29 The national guidance is far less explicit and far more flexible regarding the delivery of accessible dwellings, recognising that a 'blanket approach' which does not allow for viability constraints to be considered is not appropriate.

4.30 Not only is the requirement materially at odds with the expectations in national policy, but it is not founded on any evidential basis.

4.31 It is therefore acknowledge the inconsistency between draft policy H/SS and policy H05 of the NPPF and advise the draft policy is amended in line with the national guidance.

Housing Economic Land Availability Assessment (HELAA) 2026

4.32 An updated HELAA was published in July 2026. This provided a further assessment of potential allocations against a number of planning criteria. Land at North End, Bassingbourn has been assessed within the 2023, 2025 and 2026 HELAA. Against all but one of the criteria that the site was assessed against, the site received an Amber or Green rating. Despite being assessed relatively positively within the HELAA, the Site was not included as a draft allocation in the emerging Local Plan.

4.33 The site received all green and amber ratings apart from the archaeology officer, where the Site was rated as red. The comments stated that the Site *'is located to the north of the nationally important moated site Bury Yard and shrunken medieval village remains are recorded in the vicinity. Artefacts of Roman, Saxon and medieval date are also recorded in the vicinity'.*

4.34 By itself, this is not considered to be such a significant and unresolvable obstacle for potential development which could not be addressed.

4.35 Rainier do not consider this archaeological response should be given a Red rating, as further archaeological assessments can be undertaken to ensure that any below ground heritage assets can be satisfactorily protected, so as not to result in a significant adverse impacts.

4.36 Aside from these comments, the Site was assessed as being suitable, achievable and available for residential development.

5. Summary

5.1 Although the introduction of a joint approach to strategic growth between Cambridge City and South Cambridgeshire through the creation of the Greater Cambridge Local Plan is supported in principle, the strategy taken to the spatial allocation of growth is not supported, given its very narrow focus on just a few proposed allocations.

5.2 The Site is considered to be sustainably located, and of appropriate scale for the character of Bassingbourn. It is also acknowledged that a site of this size, as well as others of a similar size, are able to offer quicker build out and delivery rates than larger, strategic sites. This representation confirms that in accordance with the NPPF the Site is deliverable, being suitable, available and achievable for allocation in the emerging Local Plan Update. In summary:

- **Available** – our client controls the Site and the land is immediately available for development, being actively promoted to the Local Plan update.
- **Suitable** - the Site is suitable for residential-led development because it:
  - *Is located in a sustainable location;*
  - *Can be developed immediately;*
  - *Has no identified environmental constraints that, subject to appropriate mitigation, would prevent or otherwise restrict development;*
  - *Will deliver high-quality market housing and much need affordable housing;*
  - *Offers the opportunity to provide a wide range of public benefits including supporting infrastructure, public open space, and net gains in biodiversity; and*
  - *Can facilitate sustainable transport links and wider pedestrian and cycle connectivity.*
- **Achievable** - the Site would make a positive contribution towards meeting the housing needs of the area, supporting the rural economy, and fostering healthy and vibrant communities.

5.3 Fundamental inconsistencies regarding the spatial approach to identifying and allocating land for residential development have been identified between the draft policies and NPPF.

5.4 A more balanced approach to residential site allocation is encouraged, both for delivery purposes and to adhere to national guidance. The importance allocating a range of site

sizes and scales for development has been set out, and creates a more resilient, viable and deliverable approach to residential development.

5.5 It is for these reasons that we suggest some of the policies within the Draft Plan be revised prior to submission for examination, as in the present form, these policies will be materially inconsistent with the NPPF 2026.