

Greater Cambridge Local Plan - Response on behalf of Rainier Developments & Strategic Land

Land at North End, Bassingbourn (HELAA ID:
200809)

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Contents

1.	Introduction	3
2.	Land at West End, Bassingbourn.	5
3.	Site Sustainability	7
4.	Site History	9
5.	Proposed Development	11
6.	Response to the Proposed Policies	12
7.	Conclusion	15
	Appendix One: Vision Document	17



Our reference
RAIS3017

30 January 2026

1. Introduction

- 1.1 These representations have been prepared by Turley, on behalf of Rainier Developments & Strategic Land (hereafter referred to as 'The Client'), in response to the consultation on the Draft Greater Cambridge Local Plan (GCLP) (2024-2045).
- 1.2 The Site at Land west of North End, Bassingbourn (the Site) has previously been promoted for residential development as part of the Greater Cambridge Local Plan process, through the Call for Sites exercise in March 2025 (HELAA ID: 200809)
- 1.3 These representations should be read alongside the Vision Document (including Site Location Plan), as set out in Appendix One.
- 1.4 We welcome the opportunity to comment on the emerging Local Plan, which is intended to address the District's significant housing requirement and to set out a robust, deliverable spatial strategy for the area. We support the Council in preparing an updated plan that provides clarity, certainty and sustainable development outcomes.
- 1.5 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 6 sites; an approach considered to be inconsistent with national guidance and contradictory to past decisions by Planning Inspectors during examination.
- 1.6 It is proposed that this approach should be re-evaluated and updated, to include a higher percentage of small to medium sized sites, such as the Site at Bassingbourn, in line with paragraph 73 of the NPPF.

Duty to cooperate

- 1.7 Section 110 of the Localism Act and Section 33(A) of the Compulsory Purchase Act 2004 (as amended) requires Local Planning Authorities to cooperate with other Councils and other relevant bodies.
- 1.8 This 'Duty to Cooperate' is to be implemented in accordance with the principles set out in the Framework at paragraphs 24-28.
- 1.9 It is recognised that the Duty to Cooperate (DtC) is a process of ongoing engagement and collaboration. As set out in the PPG it is clear that the Duty is intended to produce effective policies on cross boundary strategic matters. In this regard, the Council must be able to demonstrate that it has engaged and worked with its neighbouring authorities, alongside their existing joint work arrangements, to satisfactorily address cross boundary strategic issues, and the requirement to meet any unmet needs (including housing need). This is not simply an issue of consultation but a question of effective cooperation to ensure that housing needs are met in full.

1.10 Whilst we raise no concerns at this stage and are generally supportive of the Plan, as the DtC is a process of continued cooperation, it is recommended that the Council continue to prepare a DtC statement to effectively demonstrate the steps that the Council has taken through each round of consultation. This is necessary in order to ensure that the plan has been subject to ongoing and effective cooperation with any interested parties to which a strategic cross boundary issue, such as unmet housing needs, may effect.

1.11 In summary, these representations seek a positive allocation for the Site.

Purpose and Structure

1.12 These representations are structured as follows:

- **Section 2:** Site Context.
- **Section 3:** Site Sustainability.
- **Section 4:** Site History.
- **Section 5:** Proposed Development.
- **Section 6:** Response to the Proposed Policies; and
- **Section 7:** Conclusion.

2. Land at West End, Bassingbourn.

The Site

- 2.1 The Site is located to the north of Bassingbourn, 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 There is a gentle fall across the Site, broadly from south to north. A high point of approximately 28m AOD lies in the middle of the southern boundary of the Site, dropping to approximately 27m AOD to the east and west, and 26m AOD on the northern boundary
- 2.4 The Site comprises part of a larger agricultural field under arable cultivation. The boundaries comprise North End road to the east, with a dry ditch, occasional trees and remnant hedgerow. A further agricultural field lies beyond. To the north and west 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)

- 2.5 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 corresponds to Flood Zone 1.
- 2.6 In the western region of the Site, a very small section of Flood Zone 2 and 3 has been identified along the western and south-west boundary of the site. However, the extents of the areas of Flood Zone 2 and 3 shown encroaching upon the Site are very minimal. It is proposed that the full extents of the development will be located within Flood Zone 1 and therefore be at low risk of fluvial flooding.
- 2.7 Areas ranging from low – high risk of surface water flooding have been identified along the north-east and south-west boundaries. However, these areas appear to be constrained to the existing watercourse on the south-west boundary.
- 2.8 Two Grade II Listed Buildings and one Scheduled Monument have been identified in the area surrounding the Site to the south, however none are within or immediately adjacent to the Site.
- 2.9 A single 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.
- 2.10 As set out in the Greater Cambridge Landscape Character Assessment (CBA 2021), the Site falls within Landscape Type (LT) 3: Lowland Farmlands and the Landscape Character Area (LCA) 3C: Rhee Tributaries Lowland Farmlands Landscape Character Area.

3. Site Sustainability

- 3.1 As set out in the table below, the Site is sustainably location within Bassingbourn, with safe and convenient access to a range of local amenities, sufficient to meet day to day needs of the local community.

Facilities	Distance m	Walking Time (mins)	Cycle Time (mins)
The Belle Freehouse (Public House)	200	3	2
Parish Church of S Peter & St Paul	750	10	2.5
Pre-School	750	10	2.5
Post Office	1125	15	4
SPAR	1125	15	4
Pharmacy	1125	15	4
Garage	1125	15	4
Community Centre	1125	15	4
Retail	1400	19	5
The Hoops (Public House)	1400	19	5
Dentist	750	10	2.5
Village College	1100	15	4
Sport Centre	1100	15	4
Primary School	1100	15	4
Recreation Ground	1050	14	3.5

- 3.2 Residents will be able to walk easily into the nearby village centre using the footpath running alongside North End road heading south. An easy walk of 12 minutes would also lead to High Street providing access to a range of retail and service opportunities for residents.

- 3.3 There are two bus services in Bassingbourn. No 15 Haslingfield - Royston; and No 17 Royston – Bassingbourn – Guilden Morden. The No 15 stops just south of the site on North End road and provides a weekly service via Haslingfield, Royston and Bassingbourn.

- 3.4 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 provide a connection between the site and Bassingbourn High Street.
- 3.5 Royston Railway Station lies to the south of Bassingbourn and is within a 5km cycling distance and accessible via the existing bus service.
- 3.6 The Site is therefore considered to be well connected to facilities within the village, as well as in regards to the wider area, benefiting from convenient public transport links.

4. Site History

- 4.1 The Site was previously submitted to the Call for Sites exercise in March 2025 (HELAA Site ID: 200809), for the erection of between 150 and 175 dwellings, to be delivered within 5 years.
- 4.2 The HELAA shows that as part of the Site assessment, concerns were raised regarding the proximity of several Heritage Assets. It was however acknowledged that the potential harm to the identified heritage assets could be mitigated against by landscape buffering.

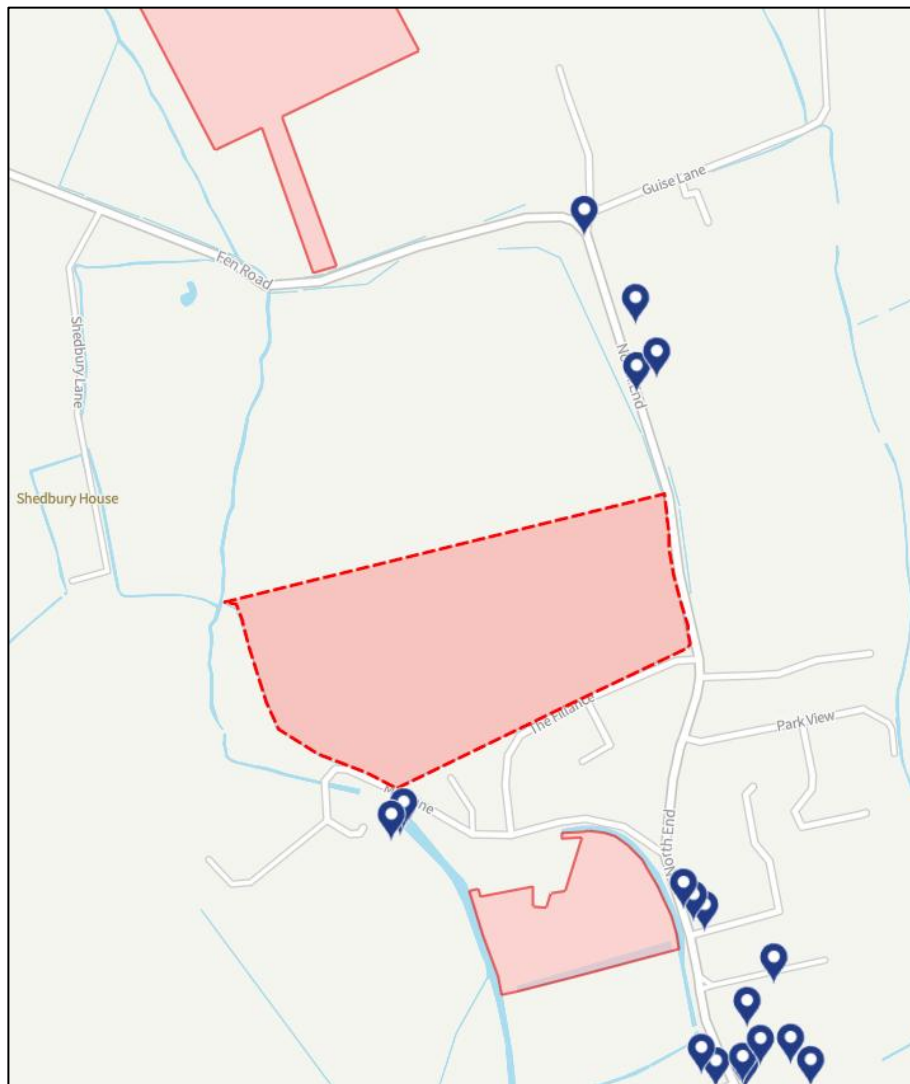


Figure Two: Heritage Assets Map (Historic England 2026)

- 4.3 The location of archaeological remains of a medieval village in the vicinity of the Site was also identified as an area of concern.

- 4.4 As shown in Figure Two above, none of the identified assets are located within, or immediately adjacent to the Site. Both the listed buildings and archaeological remains are physically separated from the Site, and it is considered that any impacts on the setting or views to these assets can be mitigated against through master planning and landscape buffering.
- 4.5 Although the Site is considered to be relatively unconstrained, located sustainably, and able to be built out in a short to medium time period, it has not been included as an allocation in the Draft Greater Cambridge Local Plan.
- 4.6 It appears that Draft Policy S/SH Settlement Hierarchy uses blanket approach to allocation residential development, setting out limits to dwelling numbers of up to 30 dwellings for sites within Minor Rural Centres, one of which is Bassingbourn.

5. Proposed Development

5.1 The proposals provide up to 150 dwellings (including affordable), comprising a range of 1 bed to 4 bed houses, at a density of approximately 30 dwellings per hectare. Retention of existing vegetation and provision of substantial new planting integrating informal open space, areas of play and attenuation provide a green context for the proposals and provide an appropriate relationship with the landscape beyond.

5.2 Key elements of the proposal are identified below.

- Potential formal village green.
- Proposed hedgerow and planting to northern boundary.
- Tree lined streets.
- Potential drainage basin.
- Access from north end road via a priority junction, with a footpath connection to the existing network.
- Positive interface with dwellings at The Fillance with potential pedestrian connections.
- Buffer to listed buildings and conservation area.
- New and enhanced green infrastructure to western boundary.
- Potential informal pathways through multifunctional green space.
- Green wedges linking green space through development.
- Opportunity for locally equipped area of play (leap).
- Areas of modified grassland and scrub planting to enhance biodiversity; and

Availability and Deliverability

5.3 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.

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

6. Response to the Proposed Policies

- 6.1 We have reviewed the proposed policies within the Draft Local Plan in full. Our comments primarily relate to draft policies that are most relevant to our client's site on North End, Bassingbourn. We trust these comments are helpful to Council officers.
- 6.2 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 growth. It identifies the need for new homes and jobs, and the services and infrastructure to support them, and guides where this development should happen.
- 6.3 The identification of Greater Cambridge as a priority for sustainable economic growth by the government has resulted in the creation of an ambitious plan, which seeks to deliver the homes and infrastructure needed to achieve this growth.
- 6.4 Sites have been identified that will deliver around 13,460 further homes by 2045 to meet the needs and provide a buffer to ensure the target is met.

Development Strategy for Greater Cambridge

- 6.5 The Draft Plan identifies the following order of preference for land to accommodate development.
- *Within the Cambridge urban area;*
 - *On the edge of Cambridge whilst considering the impact on Green Belt purposes;*
 - *At Cambourne and new settlements; and*
 - *In the rural area at Rural Centres and Minor Rural Centres.*
- 6.6 The preference of land identification set out in the development strategy is reflected in draft policy S/SH, Settlement hierarchy. There is a clear and significant trend towards the selection of major sites in the allocation process, with a considerable proportion of housing land supply coming from urban extensions and new settlement.
- 6.7 This approach has repeatedly been shown to be problematic, particularly regarding delivery timeframes, and is inconsistent with key principles of the NPPF. Paragraph 72 of the Framework acknowledges the importance of strategic housing land supply comprising a sufficient mix of sites, regarding availability, suitability and economic viability.
- 6.8 Furthermore, paragraph 73 identifies the importance that small and medium sized sites can make to meeting the housing requirements of an area, especially for small and medium enterprise housebuilders. The primary benefit of allocating small and medium sized sites is the often quick build out rate, compared to major sites, particularly new settlements.

6.9 Paragraph 73a states that *'land to accommodate at least 10% of their housing requirement on sites no larger than one hectare; unless it can be shown, through the preparation of relevant plan policies, that there are strong reasons why this 10% target cannot be achieved'*.

	Homes 2024 - 2045	Site Numbers	Percent
Cambridge Urban Area	413	7	3%
Edge of Cambridge	7,450	3	55%
New Settlements	5,220	3	39%
Rural Southern Cluster	180	2	1.3%
Rest of the Rural Area	205	3	1.5%
TOTAL	13,463		

Table One: Draft GCLP (2025)

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

6.11 According to this data, 94% of all new dwellings proposed between 2024 and 2045 are allocated across only 6 sites, 3 of which are new settlements. The Council will need to provide further evidence that demonstrates that those are deliverable. Clearly trajectories and Statements of common Ground with landowners/promoters are required.

6.12 The 'Res of the Rural Area' comprises rural centres and group villages, a total of 48 settlements, have only 3 sties allocated for a total of 205 new homes.

6.13 The proportion of development attributed to major, strategic sites not only carries a huge risk to deliverability, but is also inconsistent with the Framework.

6.14 Regarding draft allocations, a 'blanket approach' has been taken, with maximum dwelling numbers given too all settlements below Rural centres; as set out below.

- Minor rural centres – maximum of 30 dwellings.
- Group villages – maximum 8 dwellings; and
- Infill villages – maximum of 2 dwellings.

6.15 A one size fits all approach to site allocation is inappropriate and does not allow individual characteristics and benefits of a site to be considered on merit. The

Framework is clear that sufficient allocations should be included in Local Plans, and at this stage the Plan fails to facilitate sufficient allocations in a range of sustainable settlement.

- 6.16 The importance of ensuring a Plan meets the needs of an area is also stressed through the ‘tests of soundness’ (paragraph 36) which require that if a Plan is to be justified, it is

*“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”.*

- 6.17 A range of scenarios should therefore be assessed, including a higher housing requirement that aligns with the government aspirations for this geography. A range of site locations and site sizes should be identified.

7. Conclusion

7.1 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 allocation of growth is not supported given its very narrow focus on just a few proposed allocations.

7.2 The considerable tilt of residential allocation on large, strategic sites is recognised as unfair, prejudiced and inconsistent with national policy and guidance. The slow delivery (if at all) of the existing new allocated settlements in South Cambs exemplifies the problems with such an approach, and is being felt through the absence of a five year housing land supply.

7.3 Furthermore, if any issues such as viability, access or infrastructure are encountered on one of the six sites which make up 94% of new housing planned up to 2045, the delivery a significant proportion of housing land supply required to meet housing need will be at risk.

7.4 At present, the approach fails to demonstrate how the Local Plan meets the criteria set out within Paragraph 36 of the Framework in ensuring Plans are 'sound':

"36a 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"

7.5 A more balanced approach to residential site allocation is encouraged, both for delivery purposes and to adhere to national guidance. The importance that small and medium sized sites in ensuring a more resilient, viable and deliverable approach to housing should not be overlooked, as it appears to be in the draft Plan.

7.6 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.

Appendix One: Vision Document

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