Greater Cambridge Local Plan

Proposed Submission (Regulation 19) Consultation - Response Form

Please submit your comments (known as representations) by **5pm** on **Friday 25 September 2026**.

Data Protection and Freedom of Information

We will treat your data in accordance with our Privacy Notice. All personal information that you provide will be used solely in relation to the Greater Cambridge Local Plan.

Please note that each representation and the name of the person or organisation who made the representation, and the name and organisation of the agent (where used), will be published on our website - representations cannot be treated as confidential.

Additionally, respondent details and representation(s) will be made available to the Planning Inspectorate and to the Inspector appointed by the Secretary of State to conduct the examination.

By submitting this response form you are agreeing to these conditions.

About this Response Form

This response form has two parts:

- Part A – Your details. We cannot formally register your comments without your details.
- Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make. If you need more space to provide your answers, please expand the boxes or continue on an attached separate sheet.

We strongly encourage the submission of representations via our consultation platform at https://consultations.greatercambridgeplanning.org/proposed-submission-greater-cambridge-local-plan If you are unable to submit your representation using our online system, this response form is available to downloaded to complete electronically from www.greatercambridgeplanning.org/local-plan.

Your completed response form should be:

- emailed to localplan@greatercambridgeplanning.org, or
- posted to: Greater Cambridge Shared Planning Policy Team, South Cambridgeshire District Council, South Cambridgeshire Hall, Cambourne Business Park, Cambourne, Cambridge, CB23 6EA

If you are having difficulty submitting your comments, please contact localplan@greatercambridgeplanning.org or call 01954 713694.

Part A: Your Details

Information required	**Personal details ***	**Agent's details (if applicable)**
Name		Andrew Hodgson
Organisation (where relevant)	CEMEX UK Properties Ltd	Pegasus Group
Job Title (where relevant)		Senior Director
Address, including Post Code		Victory House Vision Park CB249ZR
Telephone		[redacted]
Email address		[redacted]

* If you have appointed an agent to represent you, you only need to complete the Name and Organisation (if applicable) under Personal Details, but you do need to complete the full details of the agent. All correspondence will be sent to the agent.

Part B: Your Representation

Please fill in a separate sheet for each representation.

Section 1: Which document, and section of that document, does your representation relate to?

Document	**Policy / Paragraph / Site / Map** (please identify)
Proposed Submission Greater Cambridge Local Plan	Appendix C
Proposed Submission Policies Map	
Sustainability Appraisal	
Habitats Regulations Assessment	

Section 2: Do you consider that the Greater Cambridge Local Plan is sound and legally compliant?

Test	**Yes / No**
Legally compliant	
Sound	No

Section 3: Your representation

Please set out and explain your comments. Please be as precise as possible, and please do not just refer to an attached supporting document(s). For your representation (comments) to be considered, your representation must be set out here. Wherever possible, set out precisely any changes you think should be made to the plan and its policies.

Appendix C of the Local Plan provides a schedule of housing requirements for each of the designated Neighbourhood Plans' in Greater Cambridgeshire. Paragraphs C.3 - C.6 also provides the methodology as to how the Council have set a requirement.

The methodology is predicated on planning for the residual amount of housing left over following the implementation of the Councils chose Development Strategy i.e. the number of dwellings that need to be delivered following deduction of existing supply and proposed site allocations. As set out in other Representations CEMEX objects to policy S/DS: Development Strategy on the basis that the identification of site allocations is too heavily focused on new settlements and strategic extensions to Cambridge.

Accordingly, CEMEX has a fundamental and automatic objection to the methodology used to define a housing requirement for Neighbourhood Plans; as the housing requirement at sustainable rural settlements, such as Orwell, has been artificially reduced by the Councils policy decisions regarding development strategy.

CEMEX have instructed housing need specialists, Marrons, to provide a housing needs assessment for the Parish of Orwell. This Assessment is submitted in support of these Representations.

The Assessment concludes that when following the 'policy off' methodology advised in Planning Practice Guidance and associated guidance, Orwell has an outstanding housing need of 98 dwellings to 2031, with an additional need this need rising to the 223 by the end of the proposed Plan period in 2045.

Appendix C of the Local Plan identifies a housing need in Orwell of 23 dwellings for the period 2025-2045. This equates to just 10% of the unconstrained 'policy off' housing need for the same period.

Putting aside the CEMEX's concerns regarding the Plan's overall Development Strategy, it is apparent that the approach to identifying housing requirements for Neighbourhood Development Areas is flawed and totally inadequate. Delivering just 23 dwellings in Orwell over a 20-year plan period will result in the stagnation of the local housing market, limited housing opportunities for young people and threaten the long-term viability of key services and infrastructure such as Petersfield Primary School and public transport links.

Please provide a 100 word summary of your representation.

Putting aside the CEMEX's concerns regarding the Plan's overall Development Strategy, it is apparent that the approach to identifying housing requirements for Neighbourhood Development Areas is flawed and totally inadequate. Delivering just 23 dwellings in Orwell over a 20-year plan period will result in the stagnation of the local housing market, limited housing opportunities for young people and threaten the long-term viability of key services and infrastructure such as Petersfield Primary School and public transport links.

Section 4: Supporting Documents

If you are submitting any supporting documents with your representation, such as maps or further evidence documents, please provide a list.

Orwell Housing Needs Assessment - Marrons

Section 5: Proposed Modifications

Please set out the modification(s) you consider necessary to make the Greater Cambridge Local Plan legally compliant and sound.

You will need to say why each modification will make the Greater Cambridge Local Plan legally compliant or sound. Please put forward your suggested revised wording of any policy or paragraph, being as precise as possible.

Orwell Neighbourhood Plan area should have a housing requirement well in excess of 23 dwellings. CEMEX's evidence indicates that the figure should be 223 dwellings.

In its current form the approach to identifying a housing requirement for Neighbourhood Plans is not considered to be positively prepared or effective as it jeopardises the Local Plan's ability to deliver its minimum housing need and support the sustainable growth and vibrancy of rural communities. Thus, it is contrary to NPPF paragraphs 36 a), b) and d).

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to justify your representation and any proposed modification(s), as there will not be a subsequent opportunity to make further representations other than at the invitation of the Inspector during the Examination process.

Section 6: Participation at the Examination

If you are proposing a modification to the Greater Cambridge Local Plan, do you consider it necessary to participate at the examination hearings?

Examination	**Yes / No**
Participate at the hearing sessions	Y

If you wish to participate at the hearing sessions, please outline why you consider this to be necessary.

This matter is of crucial importance in delivering sustainable levels of growth at established rural settlements. CEMEX has undertaken significant work to establish the true housing need in Orwell. This evidence warrants careful discussion and consideration at the hearing.

Please note: the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in Examination hearing sessions. You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Section 7: Being Kept Informed

Would you like to be kept informed of the progress of the Greater Cambridge Local Plan through to adoption?

Notifications	**Yes / No**
Informed of submission of the Local Plan to the Secretary of State for independent Examination	Y
Informed of the publication of the Inspector's recommendations following the Examination of the Local Plan	Y
Informed of adoption of the Local Plan	Y

Marrons

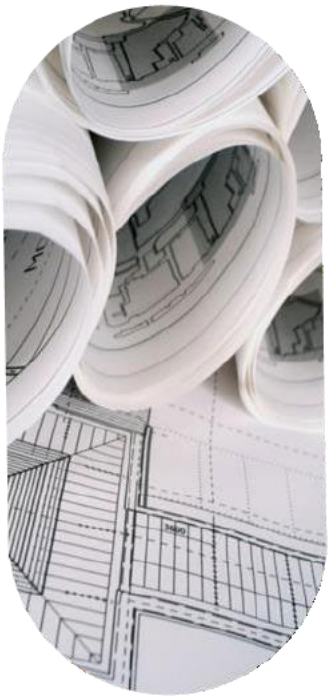
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ORWELL NEIGHBOURHOOD HOUSING NEED ASSESSMENT

Land west of Malton Road, Orwell

Prepared on behalf of Cemex UK Properties Ltd

August 2026



Level 19, The Shard, 32 London Bridge Street, London, United Kingdom SE1 9SG
www.marrons.co.uk

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Appendix 1: Freedom of Information Request

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1. INTRODUCTION AND CONTEXT

Introduction

1.1 This neighbourhood housing need assessment has been prepared by Marrons socio-economics team on behalf of Cemex UK Properties Ltd ('Cemex'). The assessment has been prepared to support Cemex's proposed residential development for up to 75 homes at Land West of Malton Road, Orwell ('the Site').

1.2 The purpose of the assessment prepared by Marrons here is to illustrate how there is a clear need for new housing in the Orwell Neighbourhood Plan area of South Cambridgeshire to ensure the objectives of the National Planning Policy Framework (NPPF, 2024) to create mixed and balanced communities, are achieved.

1.3 Furthermore, the evidence in this report also emphasises how new housing is needed to support the objectives for Orwell as set out in South Cambridgeshire District Council's (SCDC) Development Plan.

1.4 At the outset it should be noted how this mix provides for a variety of household age groups, household types and household sizes in line with the NPPF objective to create mixed and balanced communities.

1.5 This includes the provision of 40% of the residential development as affordable housing which is a significant benefit of the scheme.

1.6 The type of evidence set out in this report has been supported in section 78 appeals, the most notable of which was in Arun District. Marrons prepared a neighbourhood housing need assessment for Walberton parish and presented the findings at the appeal hearing. The decision notice is appended to this report.

1.7 Notwithstanding the presence of a made Neighbourhood Plan which was less than five years old, and paragraph 14 of the NPPF being engaged, the Inspector concluded *"this is a rare occasion where the adverse impacts of conflicting with a neighbourhood plan are unlikely to significantly and demonstrably outweigh the benefits. Indeed, the benefits of the scheme would outweigh the harm. This strongly indicates that the appeal should be allowed."*

1.8 Central to this was the assessment of housing need, the Inspector concluding *"the evidence before me suggests that there is an ongoing need in Walberton parish for perhaps 187 to 465 homes by 2041."*[1]

[1] Appeal Decision APP/C3810/W/24/3349836

National policy context

1.9 The 2024 NPPF's overarching objective in terms of housing is to 'significantly boost' housing supply as set out in paragraph 61, and in terms of the mix of housing create mixed and balanced communities.

1.10 Paragraph 61 also states how *"The overall aim should be to meet an area's identified housing need, including with an appropriate mix of housing types for the local community."*

1.11 In respect of neighbourhood areas, paragraph 70 states that where it is not possible to provide a requirement figure for a neighbourhood area, the local planning authority should provide an indicative figure, if requested to do so by the neighbourhood planning body.

1.12 The same paragraph then states how *"this figure should take into account factors such as the latest evidence of local housing need, the population of the neighbourhood area and the most recently available planning strategy of the local planning authority."* (our emphasis)

1.13 This approach is set out in more detail in the **'Neighbourhood Planning' Planning Practice Guidance (PPG**) which in terms of determining housing need states *"The National Planning Policy Framework expects most strategic policy-making authorities to set housing requirement figures for designated neighbourhood areas as part of their strategic policies."* However, it then goes to state that there is *"no set method"* for doing this (ID: 41-101-20190509).

1.14 The following paragraph is headed 'How should local planning authorities identify indicative housing requirement figures for designated neighbourhood areas, when these are needed? It states that *"where an indicative housing requirement figure is requested by a neighbourhood planning body, the local planning authority can follow a similar process to that for providing a housing requirement figure. They can use the authority's local housing need as a starting point, taking into consideration relevant policies such as an existing or emerging spatial strategy, alongside the characteristics of the neighbourhood plan area."* (ID: 42-101-20190509)

1.15 The PPG then moves on to discuss the evidence needed to support a neighbourhood plan. It states *"Neighbourhood plans are not obliged to contain policies addressing all types of development. However, where they do contain*

policies relevant to housing supply, these policies should take account of latest and up-to-date evidence of housing need" (ID: 41-040-20160211, our emphasis).

1.16 However, there are circumstances where a local planning authority has not provided a housing requirement figure for a neighbourhood area. The PPG addresses this in paragraph ID: 41-105-20190509 which is titled *"What happens if the local planning authority does not provide a housing requirement figure for a designated neighbourhood area that wishes to plan for housing?"*

1.17 The paragraph states *"Where strategic policies do not already set out a requirement figure, the National Planning Policy Framework expects an indicative figure to be provided to neighbourhood planning bodies on request. However, if a local planning authority is unable to do this, then the neighbourhood planning body may exceptionally need to determine a housing requirement figure themselves, taking account of relevant policies, the existing and emerging spatial strategy, and characteristics of the neighbourhood area. The neighbourhood planning toolkit on housing needs assessment may be used for this purpose."* In this report we use the recommended toolkit published by Locality to assess overall housing need for the Orwell neighbourhood planning area. We discuss the methodology later in this report.

1.18 More recently in March, April, and May 2026 the Government published a range of documents under the **'Neighbourhood Planning Toolkits'** heading. The government state how these documents set out *"the processes and activities required to produce a neighbourhood plan, as well as providing best practice guidance."*

1.19 However, in terms of the toolkit published to determine housing need there has been no update. The government web site states how it expects all updates to be completed by April 2027.

1.20 The government published **proposed revisions to the NPPF** in December 2025. The consultation ended on 10th March 2026 and a revised NPPF is expected imminently.

1.21 These revisions emphasise the importance of evidence showing a local need for development.

1.22 Proposed policy HO7 (Meeting the need for homes) states *"substantial weight should be given to the benefits of providing accommodation that will contribute towards meeting the evidenced needs of the local community, taking into account any up-to-date local housing need assessment, and other relevant evidence"* (our

emphasis).

1.23 Furthermore, proposed policy S5 (Principle of development outside settlements) states how certain forms of development should be approved outside settlements. Part j of the policy states *"Development which would address an evidenced unmet need (including, but not limited to, development proposals involving the provision of housing where the local planning authority cannot demonstrate a five year supply of deliverable housing sites or scores below 75% in the most recent Housing Delivery Test)"* (our emphasis).

1.24 We provide evidence of housing need in this report at the local level of geography mentioned in these draft policies.

Local policy context

Draft Greater Cambridge Local Plan

1.25 The Draft Greater Cambridge Local Plan covers the period 2024–2045, is currently at the Regulation 18 stage of preparation.

1.26 The plan sets out the housing requirement for individual neighbourhood areas, taking account of the overall housing requirement, the development strategy, existing supply and the proposed additional allocations, and the population of the neighbourhood area.

1.27 It is outlined that the housing requirement in Orwell between 2024-2045 is 23 dwellings. Limited weight can be afforded to the Greater Cambridge Plan, as it remains at an early stage of preparation, having only reached the Regulation 18 consultation stage.

1.28 Furthermore, the figure of 23 dwellings in Orwell has been arrived at by assuming that the majority of dwellings will be delivered on larger strategic sites, an approach which has not yet been endorsed and does not align with the methodology for determining neighbourhood housing need.

1.29 The PPG sets out the methodology for calculating housing requirements. Applying this methodology indicates that the housing need in Orwell is significantly higher than that identified in the Greater Cambridge Plan, as detailed later in this report.

South Cambridgeshire Local Plan

1.30 The South Cambridgeshire Local Plan was adopted in September 2018 and sets out the Council's planning framework for the 2011-2031 period.

1.31 Orwell is one of 32 group villages within South Cambridgeshire. The 'Vision' for South Cambridgeshire in 2031 states, *"South Cambridgeshire will continue to be the best place to live, work and study in the country. Our district will demonstrate impressive and sustainable economic growth. Our residents will have a superb quality of life in an exceptionally beautiful, rural and green environment."*[2]

1.32 The vision will be achieved through the implementation of 6 objectives, with the following objective specifically addressing housing, *"To provide land for housing in sustainable locations that meets local needs and aspirations, and gives choice about type, size, tenure and cost."* [3] (our emphasis)

1.33 Policy S/5: 'Provision of New Jobs and Homes' sets out how "*Development will meet the objectively assessed needs in the district over the period 2011-2031 for: (a) 22,000 additional jobs to support the Cambridge Cluster and provide a diverse range of local jobs; (b) 19,500 new homes, including affordable housing."*[4]

1.34 Supporting text to Policy S/10: 'Group Villages' confirms that "*All Group Villages have at least a primary school and limited development will help maintain remaining services and facilities and provide for affordable housing to meet local needs."*[5] (our emphasis)

1.35 In context of the supporting text above, Orwell Parish Council Website details the following facilities within Orwell:

- Orwell Village Hall.
- Pavilion and Recreation Ground.
- Petersfield Church of England (Aided) Primary School.
- Orwell Village Store & Post Office.
- Niche Hair & Beauty.
- The Chequers Pub & Restaurant.
- Parish Church of St Andrew.
- Orwell Methodist Church & Schoolroom.
- Orwell Telephone Box Library; and
- Allotments.

1.36 The Village Hall hosts several organisations, many of which are regular users of

[2] Page 22, South Cambridgeshire Local Plan 2018
[3] Page 22, South Cambridgeshire Local Plan 2018
[4] Page 26, South Cambridgeshire Local Plan 2018
[5] Page 36, South Cambridgeshire Local Plan 2018

the hall. These include:

- Pannier Market- The biggest village market in South Cambs, hosting circa 30 stalls, with a mix of local produce, artisan foods, local crafts, skincare and horticultural.
- Orwell Parish Council- Monthly meeting of the Parish Council.
- Orwell Table Tenis- Friendly table tennis, open to all abilities, and tuition is available for beginners.
- Orwell Film Club - The club has been screening films in the village hall and enjoying a social catch up beforehand since 2007. A mixture of film ages and genres are selected to try to cater to everyone's tastes, showing 10 films a year.
- Hillsliders Line Dancers- Weekly line dancing sessions.
- Women of Orwell- A local independent social group, based in the village, with 11 club meetings a year. Hosting talks, events, tastings, arts and crafts and much more. Also organise ad-hoc litter picks, guerrilla gardening sessions, coffee mornings and major village events. They have a yearly membership of around 50 people, and a mailing list of nearly 100; and
- Orwell Carpet Bowls- They have two mats and each may accommodate eight players, meeting every Friday.

1.37 It is important to note that Petersfield CofE Aided Primary School has a capacity of 210 pupils aged 4-11 years, but as of 29th June 2026 was only 60% full (125 pupils).

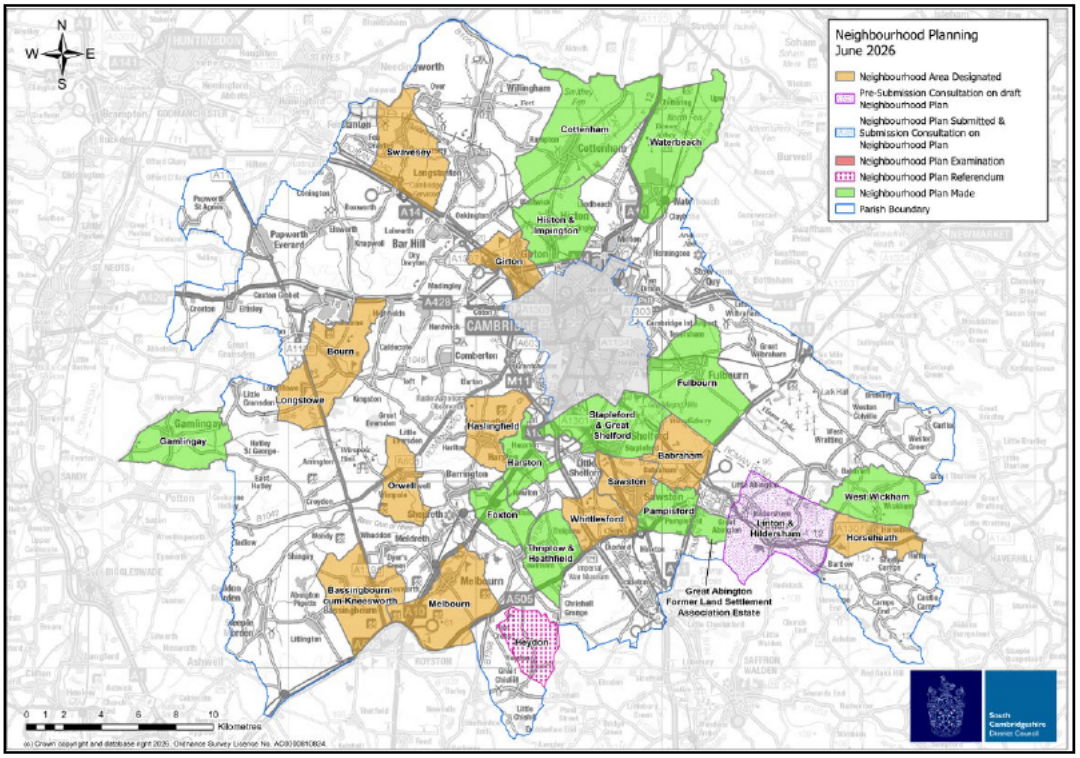
1.38 In the context of the above it is important to ensure enough housing, particularly family housing, is provided to ensure the viability and vitality of community services including Petersfield Primary School is retained, in line with supporting text to Policy S/10.

Orwell Neighbourhood Plan

1.39 The Orwell area in South Cambridgeshire is where our analysis in this report focusses, and the **Orwell Neighbourhood Plan Community Steering Group Website** provides a record of the Neighbourhood Plan's progress.

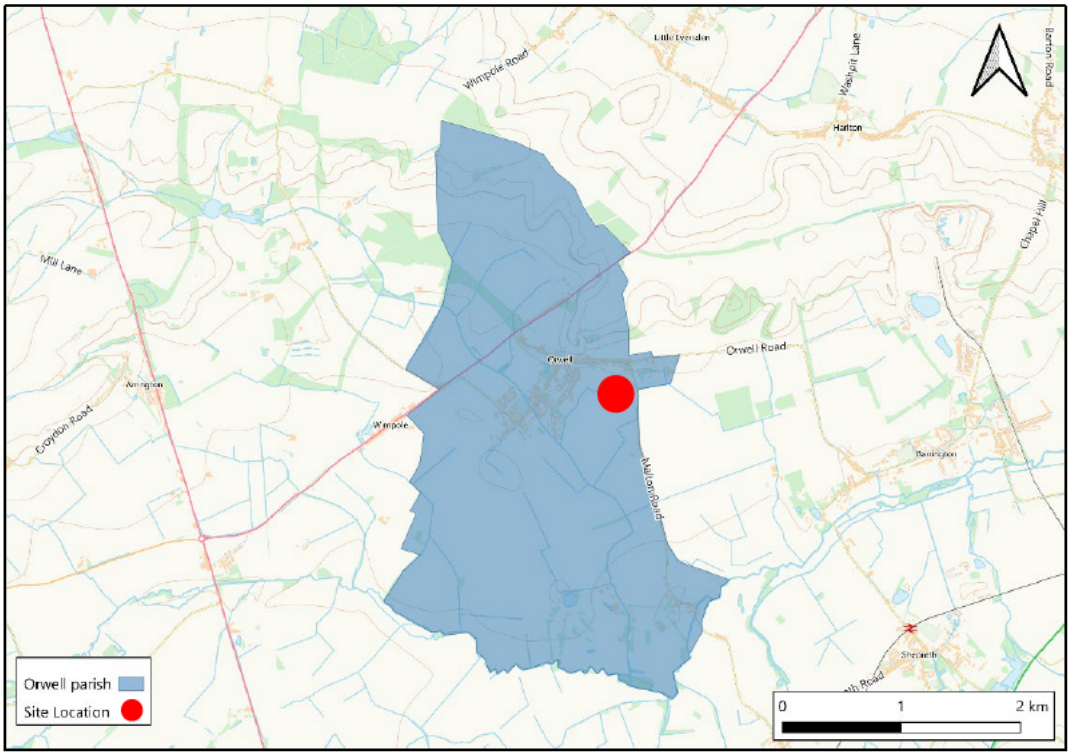
1.40 The area that Orwell Neighbourhood Plan covers is illustrated in Figure 1.1 alongside all other Neighbourhood Plan areas in Greater Cambridge as published by South Cambridgeshire Council. Figure 1.2 specifically shows the Orwell Parish boundary and the Site.

Figure 1.1: Neighbourhood Plan Areas in Greater Cambridge



Source: neighbourhood-plans-district-_june_2026_a3version.pdf

Figure 1.2: Orwell Parish



Source: Marrons

1.41 The May 2026 Progress Report confirms that the first draft of the Neighbourhood Plan is nearing completion. At the time of writing the website has details of the Orwell Neighbourhood Plan Consultation which was held in July 2022. A second consultation took place in February 2025.

1.42 There are several visions presented on the website which seek input and comments.

1.43 The final version of Orwell's Housing Needs Assessment (HNA) (June 2024) has been published, and states *"It is outside of the scope of this HNA to provide an overall housing need figure or housing requirement for Orwell for the Neighbourhood Plan period. Orwell was provided with a requirement of 8 dwellings up to 2031 by South Cambridgeshire District Council. This requirement reflects the adopted Local Plan strategy. Completions of new homes in the parish have exceeded this requirement."*[6] (our emphasis)

1.44 In the context of the HNA not being required to undertake an up-to-date assessment of overall housing need, we provide that in this report.

1.45 The HNA outlines the affordability levels within Orwell. It is noted that "*there is a clear issue with affordability of housing in Orwell, with a very apparent gap between the spending power of the average income household relative to average cost of buying or renting. Exceptionally high incomes, existing capital assets or very large deposits are required to access market housing in Orwell. This is likely to have an impact on demographic change over time as younger and newly forming households may move elsewhere to access cheaper housing and conversely, prices and rents limit the type of household who can afford to move in to market housing in Orwell."*[7] (our emphasis)

1.46 With regards to market housing, the HNA confirms *"Market housing, even with the benefit of a higher than average income, is likely to remain out of reach to most. The median house price would require an annual income approximately two and a half times higher than the current average."* Specifically referring to market housing for rent, the HNA states *"Average market rents are out of reach for average income households, but entry level rents would be affordable."*[8] (our emphasis)

1.47 The above highlights clear issues with the affordability of market housing within Orwell. Increasing the supply of housing within Orwell will help to alleviate financial

[6] Page 6, Orwell Housing Needs Assessment, 2024
[7] Page 25, Orwell Housing Needs Assessment 2024
[8] Page 26, Orwell Housing Needs Assessment 2024

barriers to housing market home ownership and renting within Orwell.

1.48 A Housing Needs of Specific Groups study was undertaken for Cambridgeshire and West Suffolk planning authorities in 2021 which considered the housing needs of the district and can be used to give an indication of the scale of affordable housing need in Orwell. It is estimated that Orwell will require 54 social/affordable rental homes, and 11 affordable home ownership over the neighbourhood plan period (2022-2040)[9].

1.49 This is important as the requirement solely for affordable housing is over double the proposed requirement set out in Appendix D of the emerging Greater Cambridge Plan as set out above and the 8 dwellings suggested in the HNA.

Summary

1.50 In summary the NPPF is clear that housing need should be determined for a neighbourhood area based on the latest evidence of local housing need, the population of the neighbourhood area and the most recently available planning strategy of the local planning authority.

1.51 This is reiterated in the Neighbourhood Planning section of the Planning Practice Guidance, and more recent publications by the Government under the umbrella of 'Neighbourhood Planning Toolkits'.

1.52 PPG recommends the use of Locality's 'Neighbourhood Planning Toolkit' to determine the housing need for a neighbourhood area has not been provided by the local planning authority. An indicative figure has not been made public for the Orwell area illustrated in Figure 1.2.

1.53 The proposed revisions to the NPPF are also important. Draft Policy HO7 is clear that substantial weight should be given to the benefits of providing accommodation that will contribute towards meeting the evidenced needs of the local community.

1.54 The South Cambridgeshire Local Plan (2011–2031) establishes Orwell as a Group Village, where limited housing growth is supported to maintain services and meet local needs.

1.55 Evidence from the Housing Needs Assessment highlights significant affordability challenges, indicating a need for additional housing to support community vitality and ensure access for a wider range of households.

[9] Page 33, Orwell Housing Needs Assessment 2024

1.56 In this context the remainder of this report considers the characteristics of the Orwell area in respect of population, affordability, and affordable housing amongst other factors before calculating housing need for Orwell based on the Locality toolkit.

2. DEMOGRAPHIC ANALYSIS

Introduction

2.1 This section of the assessment sets out relevant ONS data relating to the demographic profile of the Orwell neighbourhood plan area. This reflects the area illustrated in Figure 1.2.

2.2 This analysis provides an understanding of how the area has changed demographically between the 2011 and 2021 Censuses, whether these trends align with the objectives of the Local Plan set out earlier in this report, and whether new housing development is needed to meet these objectives.

Overall Population Change

2.3 The following table establishes the proportional change in the population of broad age groups in Orwell between 2011 and 2024 compared with other geographies. We can look further than 2021 for this measure owing to the presence of mid-year population estimates which are available for sub district areas up to 2024.

Table 2.1: Population change by age groups, 2011-2024

Age Group	Orwell	South Cambridgeshire	East	England
0-18	28% (61 people)	17%	10%	7%
19-24	12% (6 people)	-7%	-6%	-2%
25-39	56% (62 people)	10%	16%	13%
40-64	1% (6 people)	12%	7%	6%
65+	41% (98 people)	38%	27%	26%

Source: ONS

2.4 As Table 2.1 illustrates, 25-39 ages have seen the greatest percentage increase within Orwell (56%). Despite this, the greatest value increase within Orwell is the 65+ age group (98 people). Both the 19-24 and 40-64 age groups have seen the lowest increase in population, both at 6 people.

2.5 This suggests that the housing provision in Orwell parish has not been of a quantum which has been able to support the older working age population (40-64 years of age). These people have therefore had to move elsewhere within the district to find the type of housing they need.

2.6 The comparative areas show a slightly different pattern with a decline in the 19–

24-year age group with the district at -7%, region at -6% and country at -2%.

2.7 The growth in the 65+ age group both in Orwell Parish and South Cambridgeshire has been significantly higher (41% in Orwell and 38% in South Cambridgeshire) than the wider district and country (East at 27% and England at 26%).

2.8 The contrasting population change in Orwell and South Cambridgeshire compared with the district and country averages, specifically with the 25-39 and 65+ age groups means the areas local to the development site have become less balanced in terms of demographics between 2011 and 2021.

2.9 This trend needs to be addressed in order to ensure the NPPF objective of creating mixed and balanced communities is achieved in Orwell parish and South Cambridgeshire.

Population proportion in 2024

2.10 Table 2.2 sets out the population proportions of each age group as of 2024.

Table 2.2: Population proportion in 2024

Age Group	Orwell	South Cams	East	England
0-18	22%	24%	22%	22%
19-24	5%	5%	6%	7%
25-39	14%	18%	20%	21%
40-64	33%	34%	32%	32%
65+	26%	20%	20%	19%

Source: ONS

2.11 Table 2.2 illustrates how the 25-39 population of Orwell remains *lower* than the district, region, and national figures despite significantly higher growth between 2011 and 2021 shown in Table 2.1.

2.12 The proportion of 0-18-year-olds, 19–24-year-olds and 40–64-year-olds are broadly the same as wider geographies, despite 40-64-year-olds displaying much lower growth since 2011. However, the population of 65+ year olds is noticeably higher than the district, regional, and national figures, in line with growth figures from 2011.

Household Reference Persons (HRP)

2.13 Notwithstanding the population change data which records all people irrespective of where they reside, the change in the age of households by the HRP is another important measure.

2.14 The HRP is the householder, who is the household member who owns the accommodation; is legally responsible for the rent; or occupies the accommodation as reward of their employment, or through some relationship to its owner who is not a member of the household. If householders, the one with the highest income is the HRP. If their income is the same, then the eldest one is the HRP.

2.15 This data is set out in Table 2.3 for the 2011-2021 change. This data is not available for the same age groups as the population data; however, it is broadly comparable.

Table 2.3: Household Reference Person (HRP) change (2011-2021)

Age Group	Orwell	South Cambridgeshire	East	England
Under 24	75% (6 people)	-8%	-20%	-23%
25-34	121% (23 people)	4%	6%	1%
35-49	4% (4 people)	1%	-4%	-6%
50-64	0% (0 people)	14%	16%	16%
65+	20% (32 people)	25%	19%	18%

Source: ONS

2.16 Table 2.3 shows Orwell to have experienced a significantly higher proportional increase in HRPs aged under 24 and 25-34. There has been a large increase in HRPs aged under 24 (75%) compared to the regional and national averages (ranging between -20% to -23%), which is also similar for the 25-35 age group (121%) than the regional (6%) and national averages (1%).

2.17 Despite the high percentage changes to under 24s and 25-34 year age group, this only equates to 6 people for under 24 age group and 23 people for 24-34 age group in Orwell. This is in line with population growth in Orwell for the 25-39 age group. Both age groups have increased significantly more than the South Cambridgeshire District average.

2.18 Although the population growth in Orwell for the 65+ age group has been high, the comparative HRP growth hasn't been as high, with the 65+ age group experiencing only a 20% growth, lower than district averages (25%).

2.19 In the context of this change between 2011 and 2021, it is useful to consider the proportion of households in each age group recorded by the 2021 Census. Table 2.4 sets out this data.

Table 2.4: Proportion of households by age of HRP in 2021 Census

Age Group	Orwell	South Cambridgeshire	East	England
Under 24	3%	1%	2%	3%
25-34	8%	11%	13%	14%
35-49	21%	28%	26%	26%
50-64	29%	29%	29%	29%
65+	38%	30%	30%	29%

2.20 Table 2.4 shows that despite the under 24 and 25-34 age groups showing large percentage increase in HRP compared to the comparator areas, the proportion of the under 24 age group of HRP is in line with the country average (3%), and marginally higher than the district (1%) and region (2%).

2.21 The proportion of the 25-34 age group that are HRP is *lower* than the district (11%), region (13%) and country (14%) despite growth, 2011-2021. This indicates a lower-than-average proportion of younger families and couples.

2.22 Furthermore, despite lower growth of HRP for 65+ in Orwell compared to South Cambridgeshire shown in Table 2.2, 65+ have the greatest proportion of HRP in Orwell (38%) compared to South Cambridgeshire (30%), East (30%) and England (29%).

2.23 This indicates how Orwell remains more unbalanced towards the older population in 2021 than the district, region, and country, despite growth between 2011 and 2021.

Households with Dependent Children

2.24 A further indicator of demand for housing can be drawn from the number of households with dependent children. Table 2.5 sets out the increase in the number of households with and without dependent children between 2011 and 2021.

Table 2.5: Households with and without dependent children, 2011-2021

Area	No dependent children	Dependent children
Orwell	2%	10%
South Cambridgeshire	11%	4%
East	9%	7%
England	7%	4%

Source: ONS

2.25 As Table 2.5 emphasises, the Orwell area has experienced an increase in households with dependent children which has been over double that of the District and England, and just over that of the Eastern region.

2.26 In the context of this change between 2011 and 2021, it is again useful to consider the proportion of households with and without dependent children recorded by the 2021 Census. Table 2.6 sets out this data.

Table 2.6: Proportion of households with and without dependent children, 2021

Area	No dependent children	Dependent children
Orwell	9%	26%
South Cambridgeshire	9%	31%
East	11%	29%
England	11%	28%

Source: ONS

2.27 Table 2.6 shows that despite Orwell area having experienced the highest increase in households with dependent children (10%) compared with the other areas, as of 2021 the Orwell area had the lowest proportion of households with dependent children; 26% compared with the South Cambridgeshire district average of 31%, 29% across the East region and 28% across England. This aligns with the previous demographic evidence and explains the low number of pupils compared with capacity at the primary school.

Occupancy Rates

2.28 The occupancy rates of properties in the study area can reveal important characteristics and link to the population analysis set out above. The data from the 2021 Census reveals several issues related to under-occupancy, i.e., where one or more bedrooms are not being used, and the property is under-occupied. A value of +1 means there is one bedroom unoccupied, and +2 or more means there are 2 or more bedrooms unoccupied. The home is therefore under-occupied. A minus rating means the property is overcrowded.

2.29 Table 2.7 shows occupancy ratings in Orwell and across the wider geographies in terms of the percentage increase of under-occupied properties between the 2011 and 2021 Censuses.

Table 2.7: Occupancy Rating (Bedrooms)

Area	% increase in properties with under-occupied bedrooms 2011-2021	Proportion of properties with under-occupied bedrooms 2021	Proportion of properties with 2+ beds under-occupied 2021
Orwell	8%	81%	56%
South Cambridgeshire	11%	80%	49%
East	14%	71%	39%
England	13%	69%	36%

Source: ONS

2.30 The data in Table 2.7 reveals a much higher proportion of homes in both Orwell Parish (81%) and South Cambridgeshire (80%) are under-occupied compared to that of the region (71%) and England (69%).

2.31 Table 2.7 also indicates that all areas have experienced an increase in under-occupied homes, 2011-2021. Orwell Parish has experienced the lowest increase, but it still has the highest proportion of under-occupied homes in 2021 of the comparator areas.

2.32 The data also shows that Orwell has a significantly higher proportion of homes with two or more bedrooms under-occupied (56%), compared with both the region (39%) and the nation (36%).

2.33 This data indicates a significant number of larger family sized homes which are under-occupied by older people whose children have left home. This is reflected by the higher-than-average proportion in the 65+ population summarised in Table 2.2, and the higher-than-average proportion in the 65+ HRP set out in Table 2.4.

2.34 This larger stock could be better utilised by families with children, but the likelihood of it coming back onto the market quickly is reduced in more affluent areas such as Orwell parish if residents are not under any financial pressure to sell or downsize. New stock is therefore needed to fill this void.

2.35 Overall Table 2.7 illustrates how the existing stock in Orwell Parish and South Cambridgeshire is under-occupied at a greater rate than across the East region,

and England, and the number of homes under-occupied continues to increase.

Retirees

2.36 The number of retirees in the study area is also of use in building a demographic picture of the area. Table 2.8 sets out the increase 2011-2021, compared with wider geographies.

Table 2.8: Retirees

Area	% increase 2011-2021	Proportion 2021
Orwell	26%	31%
South Cambridgeshire	20%	23%
East	12%	23%
England	9%	21%

Source: ONS

2.37 Table 2.8 illustrates how Orwell parish has a high number of retirees (31% of the population) which exceeds the district (23%), region (23%) and national average (21%).

2.38 The change in retirees between the 2011 and 2021 Censuses is also of use in understanding how the local area has developed. Table 2.8 highlights how there have been significant increases in retirees, with Orwell parish (26%) experiencing over double the growth of retirees of that of the wider region (12%) and country (9%).

2.39 Together this data illustrates how Orwell parish has a comparatively higher proportion of retirees than the larger geographies.

2.40 This indicates a population which is becoming more unbalanced with an older, retired population.

Accommodation type

2.41 The final indicator we have analysed is the *type* of accommodation in Orwell and how this has changed between the 2011 and 2021 Censuses. This is set out in Table 2.9.

Table 2.9: Change in accommodation type 2011-2021

	Whole house or bungalow: Detached	Whole house or bungalow: Semi-detached	Whole house or bungalow: Terraced	Flat, maisonette or apartment
Orwell	13%	26%	-9%	25%
South Cambridgeshire	11%	12%	6%	34%
East	8%	9%	1%	19%
England	8%	7%	0%	12%

Source: ONS

2.42 This indicator provides a good indication of the type of development there has been over the recent past in Orwell. It shows a significant increase in semi-detached dwellings (26%) which has been over double that of the district, region, and country.

2.43 Orwell has also seen an increase in detached dwellings (13%), which is higher than that of the district (11%), region (8%) and country (8%).

2.44 Table 2.9 shows a significant decline in terraced dwellings in Orwell (-9%), whilst the district, region and country have all seen increases.

2.45 Flats, maisonette or apartments in Orwell (25%) have seen substantial amount of growth compared to regional (19%) and national (12%) averages, although significantly less than the growth experience in South Cambridgeshire (34%).

2.46 In the context of this change between 2011 and 2021, it is useful to consider the proportion of accommodation types recorded by the 2021 Census. Table 2.10 sets out this data.

Table 2.10: Accommodation type proportion 2021

	Whole house or bungalow: Detached	Whole house or bungalow: Semi-detached	Whole house or bungalow: Terraced	Flat, maisonette or apartment
Orwell	59%	29%	10%	2%
South Cambridgeshire	41%	34%	17%	7%
East	30%	31%	21%	18%
England	23%	31%	23%	22%

2.47 Table 2.10 indicates that despite there being the largest growth of flats, maisonette or apartments and semi-detached dwellings, the proportion of these

accommodation types in Orwell are still significantly lower than that of the wider geographies.

2.48 The decline in terraced dwellings leaves the proportion of terraced dwellings in Orwell at 10%, significantly less than South Cambridgeshire (17%), East (21%) and England (23%). This type of dwelling in most associated with couples or younger families.

2.49 The proportion of detached dwellings in Orwell (59%) is over double that of the country (23%) and almost double that of the region (30%).

2.50 As we have shown earlier in this section the proportion of first-time buyer and dependent children age groups in Orwell parish is significantly lower which indicates a lack of available family housing and first homes.

2.51 One of the main reasons for this will be the high level of under-occupancy of family sized dwellings in Orwell. So, despite there being a high proportional level of stock, a limited amount is coming back onto the market. This is further indicated through the high proportion of the 65+ age group and 65+ age group HRP in Orwell.

2.52 This will be placing continued pressure on the need for family housing, which indicates a need for dwellings to meet the needs of families.

2.53 Additionally, the low proportion of terraced housing and apartments in Orwell highlights a need for these types of accommodation to better meet the needs of first-time buyers. This is reflected in the relatively low proportion of HRPs in younger age groups compared with wider geographies.

2.54 At the same time, the relatively high number of 19–24-year-olds in Orwell, compared with the district, region and country, suggests that many households comprise more than two adults. This points to a higher prevalence of concealed households (i.e. adult children remaining in the parental home), likely driven by a shortage of smaller and more affordable first-home options.

Demographic summary

2.55 The analysis in this section has provided the following key headlines for Orwell parish.

- Orwell parish has experienced strong population growth in both the 25–39 age group and the 65+ population between 2011 and 2024, with particularly

high increases compared to district, regional and national trends.

- Despite growth in younger adults, the overall demographic balance in Orwell remains unbalanced towards an older population, with the 65+ cohort increasing the most in absolute terms and forming a higher proportion of residents than wider geographies as of 2024.
- The 19–24 and 40–64 age groups have seen minimal growth in Orwell, suggesting limited housing provision for families with older children and some out-migration of these groups.
- Although there has been growth in households with dependent children, Orwell still has a lower proportion of such households than the district, region and England, indicating fewer families than average.
- HRP data shows significant percentage increases in younger householders (under 34), but these remain small in absolute numbers and underrepresented proportionally, while 65+ households dominate (38%).
- There is a high and increasing level of under-occupancy (81% of homes in 2021), as well as high proportion of 2 or more beds being under-occupied within Orwell (56%), both significantly above regional and national levels, indicating many larger homes are occupied by fewer (often older) residents.
- This under-occupancy reflects the ageing population and high proportion of retirees, with Orwell having both higher growth and a higher share of retired residents than comparator areas.
- Housing stock is heavily skewed towards detached homes (59%), with relatively low proportions of terraced housing and flats, despite some recent growth in these types.
- The combination of large, under-occupied homes and an ageing population reduces the availability of family housing, limiting opportunities for younger households and contributing to concealed households (i.e. adult children remaining at home).
- The relatively low provision of smaller and more affordable homes (e.g. terraces and apartments) suggests a constraint on first-time buyers and younger age groups entering the housing market.

2.56 These demographic and housing trends indicate that Orwell parish is becoming increasingly unbalanced, with an ageing population, high under-occupancy, and limited access to suitable housing for younger households and families.

2.57 To support the NPPF objective of creating mixed and balanced communities, there is a clear need for:

- More family housing, including homes capable of accommodating households with children; and
- Smaller, more affordable homes (e.g. terraces and apartments) to support first-time buyers and reduce concealed households.

2.58 Without doing so the trends experienced over the 2011-2021 period will continue, creating an increasing lack of balance in the communities and therefore failing to align with the NPPF objective of creating mixed and balanced communities.

2.59 The following section provides analysis of housing affordability to complement this demographic analysis.

3. AFFORDABILITY ANALYSIS

Introduction

3.1 This section assesses housing affordability across South Cambridgeshire, with a particular focus on the Orwell neighbourhood plan area. Drawing on the latest available data, it examines the relationship between house prices and both individual earnings and household incomes to provide a comprehensive picture of local affordability pressures.

3.2 The analysis begins by setting out district-wide indicators, including median and lower quartile affordability ratios, and comparing these with regional and national benchmarks. It then explores affordability at a more localised level using neighbourhood data for Orwell, highlighting how conditions vary within the district. Consideration is also given to affordability thresholds, deposit requirements, and the income levels needed for home ownership.

3.3 Finally, the section reviews changes in house prices over time, including both long-term trends and more recent post-pandemic shifts, to understand how affordability pressures are evolving. Together, this evidence demonstrates the extent to which housing costs in South Cambridgeshire, and particularly within Orwell, continue to outpace local incomes, reinforcing the challenges faced by households seeking to access the housing market.

District-wide affordability

3.4 South Cambridgeshire District had a median affordability ratio of 9.31 as of March 2025. This means a median priced home cost just over 9 times the median salary of an individual working in the district.

3.5 This places South Cambridgeshire as the 23rd least affordable local authority in the eastern region (out of 45 local authorities) and the ratio is higher than the regional (9.02) and national (7.63) averages.

3.6 Lower quartile affordability ratios are also available. The lower quartile affordability ratio is a key metric used in housing and planning to assess how affordable housing is for lower-income households.

3.7 South Cambridgeshire's lower quartile ratio is *higher* than the median ratio at 10.18 and higher than the regional (8.76) and national (6.98) averages, meaning the less affordable homes are actually less accessible than median priced

properties.

3.8 These district-wide indicators highlight how unaffordable the district is when compared to the eastern and national averages.

Sub-district affordability – Orwell

3.9 The ONS tool, *'How affordable are homes in your neighbourhood?'* provides affordability data at neighbourhood level of geography incorporating the Orwell neighbourhood plan area for 2025 (known as Barrington, Orwell & Gamlingay).

3.10 The development site is located within the 'Barrington, Orwell & Gamlingay (BOG)' area, which incorporates the Orwell neighbourhood plan area, and the ONS toolkit states that the most recent evidence shows an average house price of £430,000, while the average individual earnings for workers in BOG is £46,007 as of 2026.

3.11 This means the house price to earnings ratio in Orwell was 9.3 in 2026. This is higher than the eastern average of 9.0.

3.12 The ratio in Orwell is therefore nearly double the maximum ratio (5.0) which the ONS considers can be affordable for nearby workers.

3.13 Furthermore, the ONS calculate how workers would need to earn £86,000 per year and have savings of £54,500 to afford a 10% deposit (£43,000) and £11,500 stamp duty.

3.14 It is also possible to assess affordability based on household income rather than individual workers income for the year ending March 2023.

3.15 This data shows that the total average gross household income for Barrington, Orwell & Gamlingay (rather than the worker income for the District) was £61,830.

3.16 The median price paid for a house in Barrington, Orwell & Gamlingay was £450,000 in the year ending March 2023.

3.17 This means that the affordability ratio (house price divided by household income) for the local area was 7.3.

3.18 This means that even based on gross household income, the affordability ratio is higher than the maximum (5.0) suggested by ONS.

3.19 Figures 3.1 and 3.2 illustrate the change in median and lower quartile house prices in Barrington, Orwell & Gamlingay, compared against South Cambridgeshire

district, the Eastern region, and England.

3.20 This data shows a 6% increase in median house prices in Barrington, Orwell & Gamlingay (from £404,998 to £430,000) over the decade between September 2016 and September 2025.

3.21 This 6% increase compares with a much larger increase of 27% across the wider South Cambridgeshire District. Although neither are as high a proportional increase as the Eastern region and England averages.

3.22 However, following a drop in median house price between 2016 and 2017, the increase since 2017 has been 38% which exceeds the district, regional, and national averages over 9 years.

3.23 It is important to note that the average median house prices across the decade in BOG was £145,612 greater than England, £101,008 greater than East of England, and £15,549 greater than South Cambridgeshire.

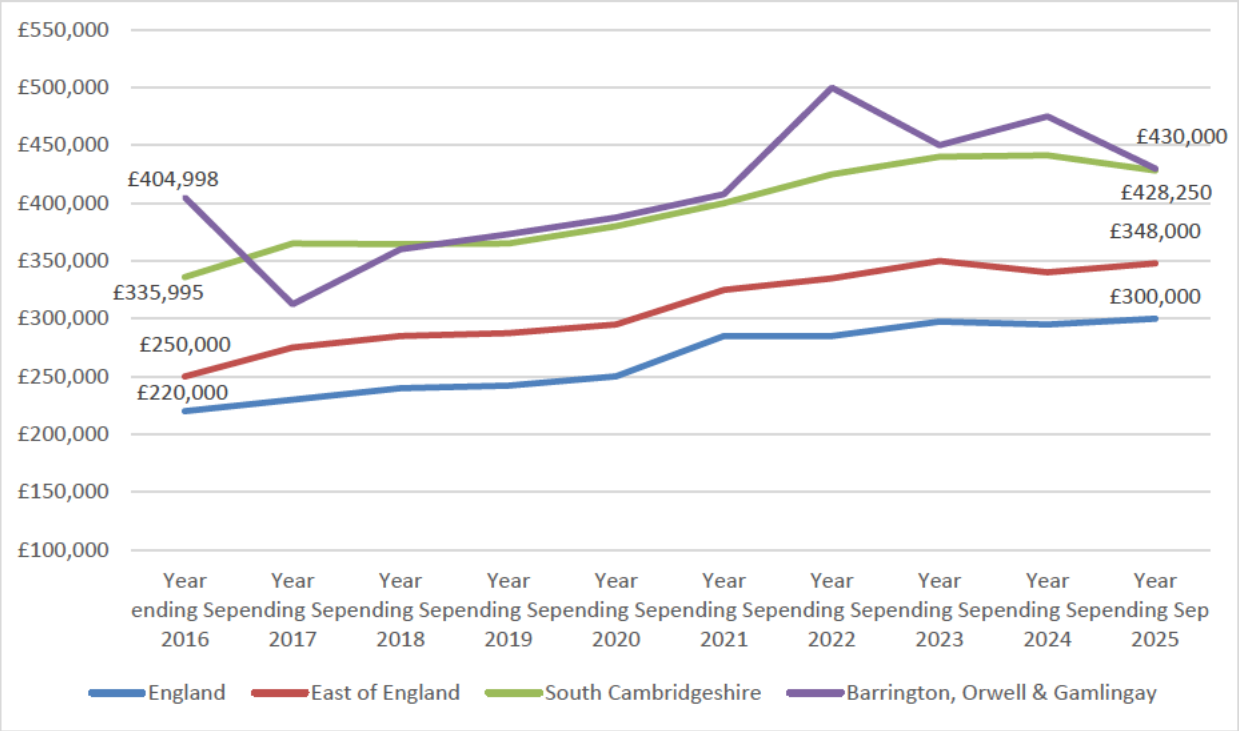
3.24 Over the shorter post-Covid period since September 2021, Barrington, Orwell & Gamlingay has experienced proportional (5%) and absolute (22,300) increases in line with all four areas, suggesting similar demand since the end of Covid.

3.25 Lower quartile house prices have experienced a more pronounced increase since September 2016 than median prices, with an increase of 12% in Barrington, Orwell & Gamlingay, and 25% across South Cambridgeshire. The increase across the East and England has been over 40%.

3.26 However as with the median prices there was a sharp decline between 2016 and 2017 meaning the increase over the past nine years has been 30%.

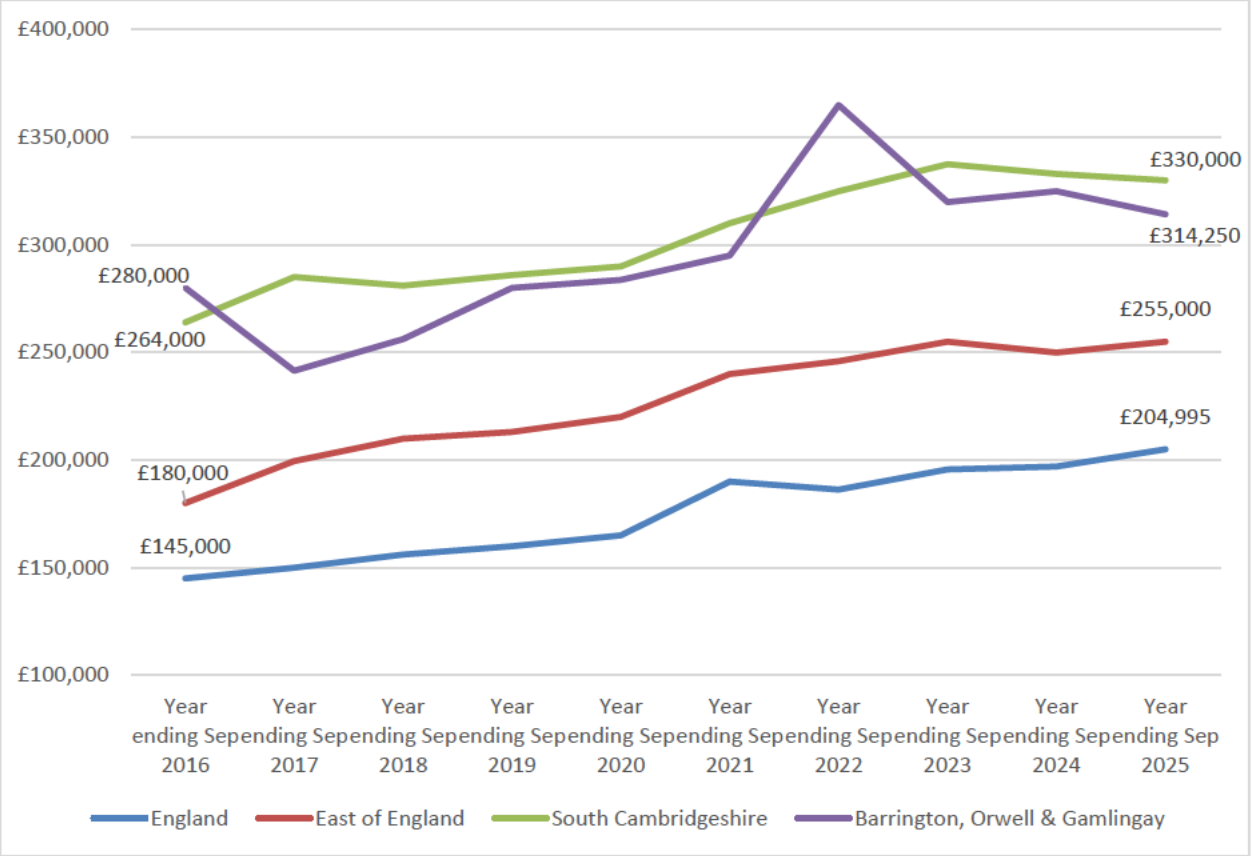
3.27 Lower quartile prices have increased at a faster rate post-Covid in Barrington, Orwell & Gamlingay (7%) compared to only 6% across South Cambridgeshire, and 6% across the East. This suggests a more recent increase in demand than the comparator areas.

Figure 3.1: Median House Price change



Source: ONS

Figure 3.2: Lower Quartile House Price change



Summary

3.28 In summary the key points from this section of analysis are as follows:

- **High overall unaffordability:** South Cambridgeshire has a median house price-to-earnings ratio of **9.31**, above both the East of England (**9.02**) and England (**7.63**) averages, demonstrating significant affordability pressures across the district.
- **Particular pressure on lower-income households:** The district's lower quartile affordability ratio of **10.18** exceeds the median ratio and is higher than both regional and national benchmarks, indicating that entry-level housing is even less accessible to households on lower incomes.
- **Consistent evidence of affordability constraints:** Both median and lower quartile affordability indicators show that South Cambridgeshire remains one of the less affordable areas within the region, with housing costs substantially outpacing local earnings.
- **Localised pressures in Barrington, Orwell & Gamlingay:** The neighbourhood-level affordability ratio is **9.3**, higher than the eastern average (**9.0**) and almost double the ONS affordability benchmark of **5.0**, highlighting the difficulties facing local workers seeking to purchase a home.
- **High income and savings requirements:** To afford a typical home in Barrington, Orwell & Gamlingay, workers would need annual earnings of around **£86,000** and savings of approximately **£54,500** to cover a deposit and stamp duty costs, creating a substantial barrier to home ownership.
- **Affordability remains stretched at household level:** Based on average household incomes, the affordability ratio is **7.3**, which remains well above the ONS affordability threshold, indicating that even households with multiple incomes face significant challenges accessing the local housing market.
- **House prices remain high despite slower long-term growth:** Median and lower quartile house prices have increased at a greater rate since 2017 than comparator areas. Absolute house prices have consistently remained above district, regional and national averages throughout the period.
- **Recent price trends suggest continuing demand pressures:** Since 2021, median house prices have increased by **5%**, broadly in line with comparator areas, indicating that demand has remained strong in the post-pandemic period.
- **Lower quartile prices increasing more rapidly in recent years:** Lower quartile house prices have risen by **7%** since 2021, outpacing the district and regional averages over the shorter period and further worsening affordability for those seeking more affordable housing options.

3.29 Overall, the evidence demonstrates that both district-wide and localised housing affordability pressures are severe and persistent; the following section will therefore consider the role and provision of affordable housing in addressing these challenges.

4. AFFORDABLE HOUSING NEED AND DELIVERY

Introduction

4.1 This section reviews the scale of affordable housing need within South Cambridgeshire and assesses the extent to which this need has been met over time. It draws on the Council's most recent evidence base, including the Greater Cambridge Local Plan Homes Topic Paper (2025), alongside earlier strategic evidence, to establish the overall level of need.

4.2 The section goes on to compare identified need with actual delivery, considering both gross and net completions to provide a comprehensive picture of affordable housing supply. It also examines wider indicators of housing pressure, including levels of stock loss, trends in the Council's Housing Register, and patterns of homelessness.

4.3 Taken together, these datasets provide a robust understanding of the ongoing imbalance between affordable housing need and delivery, and the implications this has for households across the district.

Affordable housing need

4.4 The most recent assessment of affordable housing needs for South Cambridgeshire (SC) is set out in the Greater Cambridge Local Plan Homes Topic Paper (2025). This determined net affordable need of 469 dwellings per annum, 2025-2045.[10]

4.5 Prior to the May 2022 report the Cambridge sub-region Strategic Housing Market Needs Assessment (SHMA), was published in May 2013. This report assessed affordable need to be 9,011 households, 2011-2031, equating to 451 affordable dwellings per annum.[11]

4.6 In this context Table 4.1 sets out the affordable delivery against the need of the Council's evidence base from 2011/12 until 2024/25.

[10] Greater Cambridge Local Plan Homes Topic Paper, December 2025
[11] Cambridge sub-region Strategic Housing Market Needs Assessment, May 2013

Table 4.1: Gross Affordable Housing Completions in SC, 2011/12 to 2024/25

	2011 -12	2012 -13	2013 -14	2014- 15	2015 -16	2016 -17	2017 -18	2018 -19	2019 -20	2020 -21	2021 -22	2022 -23	2023 -24	2024 -25	Total
Completions	192	105	207	329	129	132	201	341	379	311	359	472	503	424	4,084
Need	451	451	451	451	451	451	451	451	451	451	451	451	451	469	6,332

Source: SHMA, 2013 & Authority Monitoring Reports

4.7 As Table 4.1 illustrates, since 2011/12 South Cambridgeshire have recorded 4,084 gross affordable completions equating to 292 per annum. This is set against the need of 6,332 affordable dwellings over the same period (452 per annum). Only 64% of need has therefore been delivered.

Affordable Housing Stock Losses

4.8 Notwithstanding the significant shortfall identified above, the delivery figures between 2011-2021 are gross completions and do not take account of losses to the affordable stock.

4.9 The government record losses through sales and demolitions and we have therefore set these figures out in Table 4.2 below to provide net affordable completions.

Table 4.2: Gross affordable completions, affordable losses, and net affordable completions in SC

	2011 -12	2012 -13	2013 -14	2014- 15	2015 -16	2016 -17	2017 -18	2018 -19	2019 -20	2020 -21	2021 -22	2022 -23	2023 -24	2024 -25		Total
Gross	192	105	207	329	129	132	201	341	379	311	359	472	503	424		4,084
Losses	63	53	69	78	62	72	81	75	51	45	52	0*	0*	0*		701
Net	129	52	138	251	67	60	120	266	328	266	307	472	503	424		3,383

Source: Live tables on social housing sales - GOV.UK, and FoI return (see Appendix 1).
*from 2022-2025 the losses have been incorporated into the figures, thus only the net figures were provided.

4.10 Table 4.2 illustrates how there were 701 affordable stock losses between 2011/12 and 2024/25. This means that there were 3,383 net affordable completions in SCDC over the same period. This means that net affordable completions accounted for only 53% of need.

Households on the Council's Housing Register

4.11 The number of homes on the Housing Register can also provide an indication of the need for affordable housing. Table 4.3 provides register data from 2016 following changes to the criteria for accessing housing waiting lists were introduced by the Government in October 2013.

Table 4.3: SCDC Housing Waiting Lists 2015/16-2024/25

2016	2017	2018	2019	2020	2021	2022	2023	2024	2025
1,563	2,152	2,269	1,315	1,130	1,763	1,762	1,918	2,054	1,956

Source: DLUHC live table 600: local authority waiting lists

4.12 These changes in 2013 allowed councils to consider whether prospective council tenants had a 'local connection' to the area – usually by living in the area, but occasionally working, a condition previously applied to a council's homelessness duty.

4.13 It is evident that Covid has impacted housing waiting lists in South Cambridgeshire, with there being an increase of 633 households on the waiting list from 2020 to 2021. A similar pattern was experienced across the country following Covid.

4.14 Notwithstanding these impacts, Table 4.3 shows how the number of households on the waiting list remains higher in 2025 (1,956 households) than it was a decade earlier in 2016 (1,563 households). If these households were converted to individuals, it is estimated there would be approximately 4,500 individuals on the waiting list.

4.15 This is considered to emphasise the need for affordable housing across SC.

Homelessness

4.16 In respect of homelessness, Table 4.4 illustrates the position in SCDC over the past seven years.

Table 4.4: Homelessness in SC, 2018/19 to 2024/25

Year	Number of households assessed	Total households owed a duty	Threatened with homelessness - Prevention duty owed	Homeless - Relief duty owed
2024/25	621	592	302	290
2023/24	611	583	325	258
2022/23	456	451	194	257
2021/22	438	435	186	249
2020/21	431	423	187	236
2019/20	479	469	255	214
2018/19	517	503	339	164

Source: MHCLG

4.17 As Table 4.4 illustrates, since data started to be collected in this way in 2018/19, the number of households assessed for homelessness has increased from 517 households to 621 households.

4.18 The number of households then assessed to have been owed a duty has increased from 503 to 592 households (18% increase), and the number actually assessed as homeless has increased by 77% from 164 households in 2016 to 290 households in 2025.

Affordable homes within Orwell

4.19 As part of our FoI request to the local authority, we have obtained data on affordable housing within Orwell parish (see Appendix 1).

4.20 The FoI has also provided information on the number of bids for the year ending 31st March 2026, with the average number of bids for 1-bedroom properties being 41.5, and 17 for 2-bedroom properties. No data was provided for larger properties.

4.21 Furthermore, in the year 2025-2026, the average wait time for an affordable home in Orwell was 23 months.

4.22 As of March 2026, the South Cambridgeshire District Council's housing register identified that 586 households indicated a preference for Orwell on their housing applications.

4.23 The data from the Council indicates high demand and low supply of affordable housing within Orwell.

Summary

4.24 The evidence presented in this section demonstrates a persistent and substantial unmet need for affordable housing across South Cambridgeshire. Successive assessments of affordable housing need have identified requirements in the region of 450 to 470 affordable dwellings per annum, yet delivery has consistently fallen below this level. Since 2011/12, only 4,084 gross affordable homes have been delivered against an identified need for 6,332 dwellings, equivalent to approximately 64% of need. When losses from the affordable housing stock are taken into account, net delivery falls to 3,383 dwellings, meeting only 53% of assessed need. This shortfall is reflected in sustained pressure on the Council's Housing Register, increasing levels of homelessness, and rising costs associated with the provision of temporary accommodation.

4.25 At the local level, the evidence indicates that Orwell experiences many of the same affordability pressures encountered across the wider district. High levels of demand for affordable housing, long waiting times, and a significant number of households expressing a preference for accommodation within the parish demonstrate that affordable housing need is both real and ongoing.

4.26 When considered alongside the parish's ageing population, high levels of under-occupation, limited availability of smaller homes, and the challenges faced by younger households in accessing the local housing market, the provision of additional affordable housing would play an important role in supporting a more mixed and balanced community.

4.27 Consistent with the objectives of the National Planning Policy Framework, affordable housing delivery within Orwell would help address identified local needs, enable younger households and families to remain within the parish, and contribute to the long-term social sustainability of the village.

5. SELF AND CUSTOM BUILD HOUSING NEED

Introduction

5.1 The proposed development will provide 5% of the residential plots for self and custom build homes and this represents a significant benefit of the scheme. Nationally there has been a significant deficit in the delivery of self and custom build housing and The Times recently (30th July 2025) highlighted the poor delivery of self-build housing in their article *'How lawbreaking councils are killing Britain's self-build dream'*. The research of the article found how self-build and custom homes account for 60% of delivery in Germany and France compared with only 5% in England.

5.2 The Times article also found that around 57% of English councils have failed to meet their legal duty to permit enough self-build plots. This includes 126 councils — 40% of local authorities — that missed their self-build requirement by at least half. Furthermore, the article found that 23 councils have recorded no self-build permissions in the decade since the 2015 Act was introduced.

Planning Policy

5.3 The provision of self and custom-build housing is imperative in the context of the National Planning Policy Framework (NPPF) objective to significantly boost housing supply of all types and tenures, and the provisions of the Self-build and Custom Housebuilding Act 2015.

5.4 Paragraph 63 of the NPPF states the *"size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. These are said to include those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes."*

5.5 The Government's recent (December 2025) consultation on changes to the existing NPPF have also emphasised the importance of providing self and custom build housing. Draft policy HO1 (Assessing the need for homes) states *"development plans should also take into account an assessment of the size, type and tenure of housing or other accommodation needed for different groups. These groups include people wishing to commission or build their own homes."*

5.6 The importance of meeting self-build housing need has also been identified by the Planning Inspectorate who have afforded the provision of self-build housing 'significant' or 'substantial' weight in the planning balance in several recent decisions which we discuss later in this report.

5.7 On 5th September 2025 the Government's self-build and custom housebuilding data reported that across England there were 64,851 individuals and 766 groups recorded on the register between 31st October 2023 and 30th October 2024, 2% and 5% increases respectively. A total of 4,302 planning permissions were granted, a decline of 18% from the previous year.

Legal Duty

5.8 As summarised in the Planning Practice Guidance, the Self-Build and Custom Housebuilding Act 2015 (as amended by the Housing and Planning Act 2016) placed a legal duty on local authorities to keep a register of individuals, and associations of individuals who are seeking to acquire serviced plots of land in the authority's area, for their own self-build and custom housebuilding.

5.9 Section 10 of the Housing and Planning Act (2016) Act confirms that an authority must give suitable development permission in respect of enough serviced plots of land to meet the demand for self-build and custom housebuilding in the authority's area arising in each base period.

5.10 It also confirms that the demand for self-build and custom housebuilding arising in an authority's area in a base period is the demand as evidenced by the number of entries added during that period to the register (under section 1) kept by the authority.

5.11 Section 2 of the Self-Build and Custom Housebuilding (Time for Compliance and Fees) Regulations (2016) confirms that the time allowed for an authority to comply with the duty to grant planning permissions in relation to any base period, is the period of 3 years beginning immediately after the end of that base period.

Self-build and custom housebuilding in Greater Cambridge

5.12 The following Table 5.1 provides a summary of the Greater Cambridge (Cambridge City and South Cambridgeshire) self-build register for each base period since the period up to 30th October 2016 as sourced from the Government's self-build and custom housebuilding data register (24th June 2025). Cambridge and South Cambridgeshire have a joint register and did not provide separate figures. We

have then compared the number of registrations with the number of planning permissions reported.

Table 5.1: Self and custom build housing registrants and plot permissions in Greater Cambridge

A		B	C	Base period (year ending 30th October)										D	E	F
	Base Period (year ending 30th October)	New Entries	To be met by 30th October in year	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	Plots permitted	Annual Shortfall/ Oversupply	Cumulative over/under supply
1	2016	539	2019		0	7	401							408	-131	-131
2	2017	253	2020			0	0	45						45	-208	-339
3	2018	176	2021				0	0	14					14	-162	-501
4	2019	212	2022					0	0	64				64	-148	-649
5	2020	142	2023						0	0	48			48	-94	-743
6	2021	178	2024							0	0	103		103	-75	-818
7	2022	130	2025								0	0	TBC	TBC	TBC	TBC
8	2023	98	2026									0	0	TBC	TBC	TBC
9	2024	48	2027										0	TBC	TBC	TBC
10	2025	TBC	2028											TBC	TBC	TBC
Total Entries		**1776**	**Plot Permissions**	**n/a**	**0**	**7**	**401**	**45**	**14**	**64**	**48**	**103**	**0**	**682**		

Source: Self-build and custom housebuilding data - GOV.UK

5.13 As Table 5.1 illustrates, the data returned to the government indicates there to have been a shortfall year on year across the joint area, and a mounting cumulative shortfall which has reached 818 plots as of the most recent 2023/34 data (1,776 registrations and only 682 approvals over the period since self and custom build was introduced).

5.14 However, we have noted that the government register states there to have been cumulative register entries of 788 individuals and 15 groups (803 total) by the end of year 2 of people being able to register for self and custom build which includes 2016 and 2016/17.

5.15 Conversely in the following year this *reduces* to only 405 individuals and zero groups for the first 3 years (2016, 2016/17, and 2017/18). There is no explanation as to why the total has fallen from 968 in those first 3 years to 405.

5.16 If we were to use the revised figure there would be a total of 1,152 individuals and 16 groups (1,168 in total) rather than the 1,776 registrants in Table 5.1. After subtracting the planning permissions reported this would still result in a shortfall of 486 units.

5.17 The Greater Cambridge web site also reports figures[12] and this states there to have been 1,110 people added to the register between 2016 and 2025 (a year

[12] https://www.greatercambridgeplanning.org/the-planning-application-process-and-advice/self-build-and-custom-build-property-register

extra from the government register). The page also reports 533 permissions as of October 2022, meaning there is a shortfall of 577 permissions.

Summary

5.18 Based on the evidence presented, there is a clear and persistent unmet need for self and custom build housing across Greater Cambridge. National policy and legislation require local authorities to assess and respond to the needs of people wishing to build or commission their own homes, while also maintaining sufficient permissions to meet demand arising from entries on the self-build register. Despite these requirements, the available evidence demonstrates a substantial and longstanding shortfall in plot delivery within the Greater Cambridge area.

5.19 Whichever dataset is used, whether the Government's published register data or the figures reported by Greater Cambridge itself, a significant deficit remains between identified demand and permissions granted. The evidence indicates an unmet need of between approximately 486 and 818 plots, reflecting a sustained failure to provide sufficient opportunities for self and custom housebuilding. This mirrors wider national trends, where many local authorities have struggled to fulfil their statutory duties and where delivery continues to fall substantially short of demand.

5.20 Against this background, the provision of self and custom build plots forms an important planning benefit of the proposed development. The delivery of 5% of residential plots for self and custom build housing would make a meaningful contribution towards addressing the area's identified shortfall, widening housing choice, supporting housing delivery, and assisting Greater Cambridge in meeting both its statutory obligations and national planning policy objectives. Given the scale of unmet need evidenced by the self-build register and the continuing under-supply of permissions, there is a strong justification for securing and promoting self and custom build opportunities as part of new residential developments across Greater Cambridge.

6. HOUSING DELIVERY AND HOUSING NEED

Introduction

6.1 This section of our report considers the amount of housing which has been delivered in Orwell parish and what the outstanding need is now and into the future.

6.2 The calculation of overall housing need is based on the methodology set out in 'Housing Needs Assessments at Neighbourhood Plan Level' published by Locality and referred to in the Neighbourhood Planning section of Planning Practice Guidance.

6.3 Orwell is yet to adopt a Neighbourhood Plan, although AECOM prepared a Housing Need Assessment (HNA) in July 2024. However, this HNA states *"It is outside of the scope of this HNA to provide an overall housing need figure or housing requirement for Orwell for the Neighbourhood Plan period.*[13]*"* (our emphasis)

6.4 Marrons have therefore calculated an up-to-date figure based on the Locality guidance, an approach endorsed in planning appeals.

Methodology for assessing housing need

6.5 For our assessment of overall need we follow the methodology referred to above from the PPG published by Locality which states how the assessment of need should be 'policy off' and unconstrained. The guidance also states, *"The most logical, sensible and robust way to calculate a housing need figure for your neighbourhood plan is to follow an approach which reflects the Government's standard method for calculating housing need."* [14] The methodology follows the steps below.

Step 1: Determine your share of the Local Plan requirement, based on the population of the neighbourhood area.

6.6 The guidance states that the **first step** in determining need is to work down from the housing target or requirement for the local planning authority, however the guidance states *"If the Local Plan was adopted before January 2019, the housing target is likely to have been determined under previous planning policy and guidance. If this is the case, speak to your local authority about whether they*

[13] Page 6, Orwell Housing Needs Assessment, AECOM
[14] Page 57, Housing Needs Assessments at Neighbourhood Plan Level, Locality

intend to produce an up-to-date figure or whether the Local Plan requirement remains valid."[15]

6.7 The subsequent worked example in the guidance incorporates a Local Plan prepared 7 years before the calculation is made in 2019 and states *"In this case, the Local Plan was adopted in 2012 and the LHN for the local authority must be calculated from scratch."*[16]

6.8 South Cambridgeshire's Local Plan was adopted in 2018 and is therefore 8 years old. Need must therefore be calculated from scratch in line with the above guidance.

6.9 The revised standard method introduced on 12th December 2024 is 1,205 dpa for South Cambridgeshire district as of May 2026.

6.10 **Step 1b** is then to determine the *"'share' of the current local authority housing target or housing need figure produced by the standard method, based on the population of the neighbourhood plan area."* [17]

6.11 The 2024 mid-year population estimates published by the ONS are the most recent source available for this purpose. This shows 1,268 people in Orwell which is 0.74% of South Cambridgeshire District's total population (172,544 people).

6.12 **Step 2** is then to review the most recently available local authority planning strategy, taking into account the intended distribution of development including targets for specific areas. This is set in the context of the NPPF (paragraph 69) which states *"strategic policies should also set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations."*

6.13 In this regard the guidance states, *"If no indication is given, or it is not quantified in some way, you should check with your local planning authority for guidance and, if no guidance is given, simply rely on the baseline figure in Step 1b above."*

6.14 Due to the outdated nature of the existing Plan, and the early stage of the emerging Plan we consider the baseline determined in Step 1b is most applicable.

6.15 The calculation based on Step 1b is therefore 1,205 x 0.74% = 8.9 dwellings per annum, which over the adopted Plan period (2011-2031) would be 178 dwellings.

[15] Page 58, Housing Needs Assessments at Neighbourhood Plan Level, Locality
[16] Page 60, Housing Needs Assessments at Neighbourhood Plan Level, Locality
[17] Page 58, Housing Needs Assessments at Neighbourhood Plan Level, Locality

6.16 We have used 2011-2031 as there is currently no indication of what the Neighbourhood Plan period will be.

6.17 **Step 3** of the guidance then states *"any dwellings that have already been completed over the neighbourhood plan period to the present date (or to the last date for which data is available) should be deducted from the total to provide a housing need figure for the remainder of the Plan period that reflects past under- or over-delivery"* [18] (our emphasis).

6.18 The FoI response from the Council (see Appendix 1) confirms the net housing completions for Orwell Parish between 2011-2025 as follows.

Table 6.1: Housing completions in Orwell Neighbourhood area, 2011/12-2024/25

Year	Market	Affordable
2011/12	0	0
2012/13	1	1
2013/14	1	1
2014/15	-1	15
2015/16	2	0
2016/17	0	0
2017/18	0	0
2018/19	1	0
2019/20	12	7
2020/21	25	13
2021/22	0	0
2022/23	0	0
2023/24	1	4
2024/25	-1	0
Total	41	**39**

Source: Freedom of Information request response from South Cambridgeshire District Council (see Appendix 1 to this report).

6.19 As Table 6.1 illustrates, there have been 80 completions in Orwell parish since the start of the adopted Local Plan period (2011) according to the Council's own evidence.

6.20 Table 6.2 therefore summarises what the outstanding need is up to 2031.

[18] Page 59, Housing Needs Assessments at Neighbourhood Plan Level, Locality

Table 6.2: Outstanding housing need in Orwell, 2011-2031

Area	Need based on population %	Completions to date (2011-2025)	Outstanding housing need
Orwell	178	80	98

6.21 Table 6.2 illustrates how based on the baseline figure of housing requirements, there would be an outstanding need in Orwell of 98 dwellings.

6.22 The AECOM guidance then moves on in Step 3 to state *"Outstanding housing commitments (planning permissions that have been granted but where construction is still underway or has not begun) can be considered here as well. However, they should not be discounted from the housing need figure until they are completed*[19] (our emphasis).

6.23 Although the guidance states that outstanding commitments which have not been completed should not be deducted from the housing need figure, it is useful to understand how they would affect the need determined for information purposes.

6.24 The FoI confirms there is one dwelling under construction and 1 commitment at the time the FoI was raised, thus we revise Table 6.2 (above) to take account of these commitments in Table 6.3.

Table 6.3: Housing need in Orwell to 2031, minus extant planning permissions and commitments

	A		C	D		E
Area	Need based on population %		Extant planning permissions at 31/03/2025	Under construction at 31/03/2025		Need minus planning permissions (A – C+D)
Orwell Parish	98		1	1		96

Source: South Cambridgeshire District Council FoI (Appendix 1)

6.25 As Table 6.3 illustrates, even if we were to take account of extant planning permissions 2031, there would remain an outstanding need of 96 dwellings up to 2031.

[19] Page 59, Housing Needs Assessments at Neighbourhood Plan Level, Locality

6.26 Footnote 62 of the PPG states "*In most, but not all, cases, it makes sense to align the neighbourhood plan period with that of the adopted or emerging Local Plan.*[20]"

6.27 Table 6.4 therefore incorporates the remaining outstanding need to 2031, plus new need to 2045 (the end date of the emerging Greater Cambridge Plan).

Table 6.4: Housing need 2025-2045 based on the baseline figure

Area	Outstanding housing need (2011-2031)	New housing need (2025-2045)	Total housing need (2025-2045)
Orwell	98*	125	223

*96 if we include planning permissions and commitments

6.28 In this additional scenario, following guidelines of footnote 62 of the PPG, there would remain the outstanding need to 2031 (98 dwellings), plus new need to 2045 (125 additional dwellings), making a total of 223 dwellings 2025-2045. Even if we include outstanding planning permissions/commitments the need would be 221 dwellings.

Summary

6.29 In summary, this section of the report has determined there to be an outstanding housing need in Orwell.

6.30 Based on the approach set out in Planning Practice Guidance, there is an outstanding need for 98 dwellings to 2031, and 125 between 2025 and 2045 in Orwell, i.e. 223 dwellings 2025-2045.

6.31 The AECOM local needs assessment guidance included in the national Planning Practice Guidance is clear that outstanding housing commitments (planning permissions that have been granted but where construction is still underway or has not begun) should not be discounted from the housing need figure until they are completed.

6.32 Notwithstanding this guidance, even if we were to deduct all the commitments listed in the Council's most recent five year housing land supply report, there would remain an outstanding need for 96 homes to 2031, and 125 between 2025 and 2045 in Orwell, i.e., 221 dwellings 2025-2045.

[20] Page 61, Housing Needs Assessments at Neighbourhood Plan Level, Locality

7.0 SUMMARY AND CONCLUSIONS

7.1 Marrons national socio economics team have prepared this neighbourhood housing need assessment to illustrate the need for housing development in Orwell, and the consequences of not providing adequate levels of new housing.

7.2 As part of our overall assessment we have followed the methodology set out in Appendix A of the 'Housing Needs Assessments at Neighbourhood Plan Level' document drafted by AECOM for Locality and referred to in paragraph ID: 41- 105-20190509 of the 'Neighbourhood Planning' section of Planning Practice Guidance (PPG) to determine the housing need in the parish of Orwell.

7.3 We have also considered the 2021 Census and how the demographics of Orwell have changed since the 2011 Census, and whether the trends experienced are likely to support Local and Neighbourhood Plan objectives and aspirations.

7.4 Our conclusion is that there remains an outstanding need for housing in Orwell which is summarised below.

Orwell

7.5 Orwell is an important Group Village within South Cambridgeshire, providing a range of services, facilities, and amenities for its residents and the residents of surrounding villages, including a pub/ restaurant, village hall and a primary school.

7.6 Development Plan objectives for the settlement are to ensure limited development is undertaken in order to maintain remaining facilities and provide affordable housing to meet local needs.

7.7 In this context it is important to note how Petersfield CofE Aided Primary School has a capacity of 210 pupils aged 4-11 years, but as of 29th June 2026 was only 60% full (125 pupils). This indicates more families with children are needed to ensure the school remains viable and meet existing planning policies for Group Villages.

7.8 Orwell's HNA highlights significant housing affordability challenges within Orwell, with average incomes falling short of what is needed to buy or rent market housing. The HNA suggests this will restrict who can move into Orwell and concludes that most market housing remains unaffordable even for above-average earners. The HNA confirms that a calculation of overall housing need or Orwell was outside of its scope and we have therefore provided this calculation based on PPG.

Demographic Trends

7.9 Our demographic analysis has highlighted a high and growing level of under-occupation within Orwell's housing stock. Around 81% of homes in Orwell were under-occupied in 2021, with 56% of under-occupied homes being 2+ bedrooms, significantly exceeding district, regional and national levels. This is consistent with the comparatively high proportion of older residents, retired households and households headed by those aged 65+.

7.10 The high level of under-occupation, particularly in larger properties is reflected by the overall proportion of younger households and households with dependent children remaining below district, regional and national averages as of the 2021 Census.

7.11 The housing stock remains heavily dominated by detached properties, which account for 59% of all homes. The proportion of terraced housing and apartments remains substantially lower than district, regional and national averages, indicating a limited supply of smaller and more affordable housing.

7.12 Together, these trends suggest an ongoing need for both family housing and smaller homes suitable for first-time buyers, helping to create a more mixed and balanced community in line with NPPF objectives and address the effects of under-occupation and an ageing population.

Housing Affordability

7.13 The pressure which the demographic trends have placed on the housing market locally is represented by housing costs remaining significantly above local earnings and household incomes. District-wide affordability ratios are higher than both regional and national averages, with lower quartile affordability ratios indicating that entry-level housing is even less accessible to lower-income households.

7.14 Furthermore, across the wider MSOA in which Orwell is located, a median home would cost 9.31 times gross median household income, higher than the eastern regional average and almost double the ONS affordability benchmark of 5.0. Households seeking to purchase a typical home require substantially higher incomes and significant savings for deposits and associated costs, creating a considerable barrier to home ownership.

7.15 Median house prices in Barrington, Orwell & Gamlingay have increased at a faster rate than the wider South Cambridgeshire district over the last nine years, and property values have consistently remained well above district, regional and national averages. Lower quartile house prices have also continued to rise, particularly since 2021, further reducing access to more affordable housing options.

7.16 These trends indicate that affordability pressures remain severe and persistent within Orwell and its surrounding housing market area, with house prices continuing to outpace local incomes and limiting access to home ownership for many existing and future households.

Affordable Housing Need

7.17 The evidence demonstrates a substantial and persistent need for affordable housing across South Cambridgeshire district and high demand in Orwell. The Council's most recent evidence identifies a requirement for around 469 affordable homes per year.

7.18 Since 2011/12, affordable housing delivery has fallen significantly below identified need. Once losses from the affordable housing stock are considered, net completions fall to 3,383 dwellings, meeting only 53% of identified need over 15 years.

7.19 The continued shortfall in delivery is reflected in wider indicators of housing pressure. The number of households on South Cambridgeshire's housing register remains higher than a decade ago, with almost 2,000 households registered in 2025, while homelessness pressures have also increased, with the number of households assessed as homeless rising by 77% since 2018/19.

7.20 Within Orwell itself, the evidence points to particularly strong demand for affordable housing. Average waiting times for an affordable property are almost two years, and there is significant competition for available homes. As of March 2026, 586 households on the Council's housing register had identified Orwell as a preferred location, demonstrating substantial unmet demand and a limited supply of affordable housing locally.

Housing Delivery and Need

7.21 Based on the guidance for determining local housing need referred to in Planning Practice Guidance (PPG), this report has established there to be an outstanding housing need in Orwell parish, as set out in Table 7.1.

Table 7.1: Housing need based on the standard method minimum (1,205 dpa) for South Cambridgeshire District 2011-2031, accounting for completions from 2011-2025.

Need based on population %	Completion to date (2011-2025)	Outstanding housing need
178	80	98

7.22 The PPG guidance we have followed states, *"Outstanding housing commitments (planning permissions that have been granted but where construction is still underway or has not begun) should not be discounted from the housing need figure until they are completed"* and Table 7.1 therefore does not consider commitments.

7.23 However, even if we were to assume the delivery of all commitments listed in the FoI, an outstanding need of 96 dwellings would remain for Orwell to 2031.

7.24 If we were to consider the emerging Plan period on the same basis, there would remain a need of 223 dwellings to 2045 (221 when the two commitments are deducted) as set out in Table 7.2.

Table 7.2: Housing need based on the standard method minimum (1,205 dpa) for South Cambridgeshire District 2025-2045, accounting for outstanding need to 2025.

Outstanding housing need	Newly arising need	Overall need
98	125	223

7.25 In addition to the general and affordable housing needs identified above, there is also clear evidence of an unmet need for self and custom housebuilding across Greater Cambridge. National planning policy and legislation require local planning authorities to support and provide opportunities for those wishing to build or commission their own homes, yet the evidence reviewed in this report demonstrates a substantial and persistent shortfall between demand recorded on the self-build register and the number of permissions granted. Depending on the dataset used, the current shortfall is estimated to be between 486 and 818 plots, indicating a significant level of unmet demand.

7.26 Against this background, the provision of self and custom build plots as part of Cemex's proposals would represent an important additional benefit. The proposed allocation of 5% of residential plots for self and custom build homes would contribute towards addressing a recognised housing need, broaden housing choice within Orwell and the wider Greater Cambridge area, and assist in meeting national policy objectives relating to housing diversification and customer choice. Given the scale of the identified shortfall, the delivery of self and custom build opportunities should attract positive weight in the overall planning balance.

Overall Conclusion

7.27 This report has showed there is an outstanding need for housing in Orwell over the remainder of the Local Plan period to 2031. This equates to a need for a minimum of 96 dwellings to 2031 and 221 dwellings to 2045.

7.28 Failure to provide these homes through housing developments offering a range of household sizes and types such as Cemex's proposals on land west of Malton Road, Orwell will lead to a continuation of the demographic and affordability trends we have illustrated in this report.

7.29 This will in turn lead to the population of Orwell becoming even more unbalanced towards an elderly population than it was in the 2021 Census.

7.30 This will in turn fail to achieve the NPPF objectives of significantly boosting housing supply, creating mixed and balanced communities, and enhancing or maintaining the vitality of rural communities.

7.31 This should also be considered in the context of the NPPF objective for planning policies to identify opportunities for villages to grow and thrive, especially where this will support local services.

7.32 Continuation of the trends we have identified will lead to many of the existing services and facilities becoming unviable, affecting residents of Orwell and residents of the nearby rural settlements which also rely on them. Petersfield school is a good example of this, currently running at only 60% capacity.

7.33 In summary, Cemex's proposal on land west of Malton Road, Orwell would provide a range of household sizes and types which contribute to the outstanding housing need we have identified. This would include a significant contribution to affordable housing, a need for which has been identified by the Local Plan. It would therefore contribute to a rebalancing of Orwell's population and draw in a demographic capable of supporting local services and amenities in line with NPPF objectives.

Appendix 1

Freedom of Information response

Dan Usher

From: 3csharedservices@infreemation.co.uk
Sent: 01 June 2026 15:53
To: Dan Usher
Subject: [FOI/21518] (SCDC) Freedom of Information request - planning
Attachments: FoI060526 (1).pdf

Follow Up Flag: Follow up
Flag Status: Flagged

This Message originated outside your organization.

Request FOI/21518

Dear Dan Usher

Further to your request received on 06/05/2026, I confirm that the South Cambridgeshire District Council has now considered your request under the Freedom of Information Act 2000/Environmental Information Regulations. Copy of your request that was on a PDF is attached

I hope the following will answer your query:
1. and 2. The **Total housing completions in Orwell, 2011-2025** table answers Q1& 2.

Total housing completions in Orwell, 2011-2025

Row Labels	2011-2012	2012-2013	2013-2014	2014-2015	2015-2016	2016-2017	2017-2018	2018-2019	2019-2020	2020-2021	2021-2022	2022-2023	2023-2024	2024-2025	Grand Total
Market housing		1	1	-1	2			1	12	25			1	-1	41
Affordable housing				15					7	13			4		39
Grand Total		**1**	**1**	**14**	**2**			**1**	**19**	**38**			**5**	**-1**	**80**

4. and 6. The **Total housing commitments in Orwell, 31 March 2025** table answers Q4 & 6.

Total housing commitments in Orwell, 31 March 2025

Row Labels	Sum of OUTLINE	Sum of UNDERCONSTRUCTION	Sum of UNIMPLEMENTED	Sum of ALLOCATED	Sum of Total_Housing

Market housing	0	1	1	0	2
Affordable housing					
Grand Total	**0**	**1**	**1**	**0**	**2**

3. & 5. Can be located from Greater Cambridge Housing Trajectory and Housing Land Supply. The report sets out a delivery profile for all sites of 10 or more dwellings and details of, including delivery assumptions, all smaller planning permissions. The Housing Trajectory does not distinguish between market and affordable housing.

7. Please provide the total number of households on South Cambridgeshire District Council's housing register that have identified Orwell parish as their preferred location and confirm the date on which this information was recorded?
586 households have indicated a preference to Orwell on their housing applications. Date recorded 29/05/2026.

8. Please provide the most recent available data for the average number of bids or applications per affordable property, by bedroom size, within Orwell Parish, for the latest complete monitoring year. Please also confirm the date this was recorded?
Properties let in Orwell from 01/04/2025 to 31/03/2026

Number of bedrooms	Average number of bids.
1	41.5
2	17

9. Please confirm the most recently recorded total number of dwellings defined as social rent in Annex 2, page 70 of the 2024 NPPF within the Orwell parish area, and the date on which this was recorded?
There are 72 social rented properties in Orwell

10. Please confirm the total number of social housing lettings within the Orwell parish area over the two most recent 12-month periods available. Please enter the dates of these periods?
In the period 01/04/2025 to 31/03/2026 Nine social rented properties were let in Orwell.
In the period 01/04/2024 to 31/03/2025 Seven social rented properties were let in Orwell.

11. Please state the average waiting time for an affordable home in Orwell Parish and the date this was recorded on?
The average wait time 23 months – for properties let in Orwell between 01/04/2025 to 31/03/2026.

We aim to provide a high-quality service to you and hope that you are satisfied with this response.

Yours Sincerely

Information Management Team

3C Shared Services

Email:
For South Cambridgeshire DC (SCDC) - foi@scambs.gov.uk
For Cambridge City Council (CCC) -foi@cambridge.gov.uk
For Huntingdonshire DC (HDC) - foi@huntingdonshire.gov.uk

3C Shared Services is a strategic partnership between Cambridge City Council, Huntingdonshire District Council and South Cambridgeshire District Council

Appeals Process

The Council is committed to transparency and openness, and it is our intention to comply fully with the laws that govern access to information. If you have any cause to believe that the terms of the Freedom of Information Act 2000 are not being met by us, please let us know in the first instance. Please advise us by responding to this email. Please do not amend the Subject line. If applicable, we will then undertake an Internal Review of your case. Internal review requests should be submitted within 60 days of the date of receipt of the response to your original request. Further to this you have the subsequent option to contact the Information Commissioner's Office.

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Appendix 2

Appeal decision APP/C3810/W/24/3349836

Planning Inspectorate

Appeal Decision

Hearing held on 11 March 2025

Site visits made on 10 and 11 March 2025

by Graham Chamberlain BA (Hons) MSc MRTPI

an Inspector appointed by the Secretary of State

Decision date: 7 April 2025

Appeal Ref: APP/C3810/W/24/3349836
Land East of Wandleys Lane, Fontwell, West Sussex

- The appeal is made under section 78 of the Town and Country Planning Act 1990 (as amended) against a refusal to grant outline planning permission.
- The appeal is made by Welbeck Strategic Land II LLP against the decision of Arun District Council.
- The application Ref is WA/35/23/OUT.
- The development proposed is described as 'outline planning application for up to 95 dwellings (including 30% affordable), with all matters reserved apart from access'.

Decision

1. The appeal is allowed, and outline planning permission is granted for up to 95 dwellings (including 30% affordable) with all matters reserved apart from access, at Land East of Wandleys Lane, Fontwell, West Sussex in accordance with the terms of the application, Ref WA/35/23/OUT, subject to the conditions in the attached schedule.

Preliminary Matters

2. The planning application was submitted in outline with all matters of detail reserved for future consideration save for access into the site. I have assessed the proposal on this basis and have otherwise treated the drawings as simply being an illustration of how the proposal could ultimately be configured. The late evidence listed at the end of this decision was brief and capable of being addressed by those at the hearing. As such, I accepted the evidence and have considered it in reaching my decision. The National Planning Policy Framework (the 'Framework') was revised after the appeal was submitted. The Council and appellant provided further comments on this, which I have considered in reaching my findings.

Background and Main Issues

3. The Council refused the planning application for four reasons. In response to the second reason for refusal, a planning obligation in the form of a counterpart legal agreement has been submitted pursuant to Section 106 of the Town and Country Planning Act 1990. This makes provision for affordable housing and education transport. Both the Council and West Sussex County Council are content with its terms and party to the agreement. On this basis, the Council has understandably confirmed that it does not wish to pursue its second reason for refusal.

4. Further discussions between the appellant, Council and National Highways have taken place since the application was refused. Common ground has been reached between these parties that the proposal would not have an adverse impact on the

strategic road network. The reasons for this are set out in a Highways Statement of Common Ground between the appellant's Highway Engineers and National Highways. Accordingly, the Council confirmed that it did not wish to pursue its third reason for refusal. I have no substantive reason to conclude contrary to this expert opinion. Indeed, it is clear from correspondence that National Highways undertook a protracted and robust assessment which required the submission of additional evidence by the appellant.

5. Further survey work has taken place in respect of T35 and T36, both being Ash trees subject to a Tree Preservation Order (TPO). These additional investigations concluded that the trees have Ash Dieback. This will result in a marked deterioration in their physical condition over time. Furthermore, the trees are suffering areas of decay which is having an impact on the structural stability of some branches. The appellant's arboriculturist is therefore recommending a 30% reduction in the crowns of both trees regardless of the outcome of the appeal.

6. Expert evidence to the contrary is not before me and the Council does not dispute these findings in any event. Consequently, it has no objection to the removal of T35 and T36. During the hearing, the Council also confirmed that the loss of G16, the only other Category B trees which would be affected by the proposed access, would be outweighed by the benefits of the scheme. On this basis, the Council confirmed that it no longer wished to pursue its fourth reason for refusal because a conflict with Policy ENV DM4 of the Arun Local Plan would not occur. On the balance of the evidence before me they were right to do so.

7. Considering the foregoing, the main issues in this appeal are:

   - Whether the appeal site is a suitable location for the proposed development with reference to the spatial strategy in the development plan; and
   - The effect of the proposed development on the character and appearance of the area.

Reasons

The suitability of the location with reference to the spatial strategy

8. The Walberton Neighbourhood Development Plan (NP) sets out several key aims, including prioritising the use of brownfield sites for housing, avoiding large development sites in the countryside and dispersing new housing on several small sites to avoid urbanising the villages. To this end, Policy HP1 of the NP states that proposals for development within the Built-Up Area Boundaries (BUAB) of Walberton and Fontwell will be supported, as will proposals outside the BUAB where they accord with the countryside policies of the Arun Local Plan (LP). This approach echoes that in Policy SD SP2 of the LP.

9. Policy C SP1 of the LP is concerned with development outside BUABs and states that land defined as countryside, such as the appeal site, will be recognised for its intrinsic character and beauty. The policy goes on to explain that certain listed types of development in the countryside will be permitted, such as where it is for agriculture or informal recreation. The corollary of this is that types of development not listed would be contrary to Policy C SP1.

10. Being a proposal for up to 95 homes in the countryside, the appeal scheme would not be within a BUAB and would not be any of the types of development listed in

Policy C SP1. It would therefore be at odds with Policies SD SP2 and C SP1[1], and the broad strategic approach in Policy SD SP1a to focus development on the major towns whilst maintaining the countryside setting of villages. As a result, the proposal would be at odds with Policy HP1 of the NP because it would not be in accordance with the countryside policies of the LP.

11. Accordingly, the appeal site is not a suitable location for the appeal scheme when applying the spatial strategy in the development plan. Indeed, being a large development on a greenfield site, the proposal would seriously undermine the aims of Policy HP1 and the spatial strategy more widely. This would be harmful given the public interest in having a planning system that provides consistency and direction on account of being genuinely plan led.

The effect on the character and appearance of the area

Baseline conditions of the site and its context

12. The appellant has submitted a Landscape and Visual Impact Assessment (LVIA) as a means of methodically assessing the effects of the proposal on the character and visual amenity of the area. The Council does not take issue with the methodology in the LVIA and therefore I have used it to guide my assessment.

13. The first step is to consider the baseline character of the area. This is informed by the condition and intactness of the landscape and the extent to which it is representative of the key characteristics of the relevant landscape character area (LCA). Generally, an area will have a higher degree of character if it exhibits greater intactness and is more reflective of the positive key characteristics of the LCA. However, it is important to note that few if any parcels of land would have all the key characteristics of an LCA.

14. Historic mapping[2] demonstrates that around 100 years ago the area around Fontwell was deeply rural with small fields, woodland and hedges being predominant features. This has been significantly eroded over time by infilling, road infrastructure and estate development. Indeed, the villages of Walberton, Fontwell, Eastergate and Barnham are broadly contiguous. Nevertheless, the underlying rural character is still evident. The district landscape character assessment[3] places the appeal site and its environs in Landscape Character Area 16 (LCA 16) where ancient woodland, mature trees, undulating pasture, winding hedged lanes and leafy settlements are positive key characteristics.

15. The appeal site is a pastoral field that is flanked by ancient woodland and a chalk stream to the immediate south and the 'leafy' West Walberton Lane to the north. To the west is Wandleys Lane, which is a narrow route flanked by mature trees and defined in the NP as a biodiversity corridor. The area therefore has many of the positive key characteristics of LCA 16. That said, there are also the significant detracting influence of the suburban fringe of Fontwell, most notably Fontwell Meadows. Wandleys Lane has also seen extensive infilling and a deterioration in the extent and quality of the roadside hedges. Accordingly, the appeal site and its surroundings are of moderate character and condition, as there is a recognisable pattern of a once deeply rural landscape that over time has increasingly seen the

[1] The Council confirmed at the hearing that Policy SD SP1 was included in the first reasons for refusal in error, as there would be no direct conflict. The Council were correct to make this concession given the terms of the policy.
[2] See the Built Heritage Statement, November 2022 by RPS Group
[3] There is overlap with the county assessment '*A Strategy for the West Sussex Landscape'*

insertion of incongruous and detracting suburban elements. Because of this, the area has a medium susceptibility (or ability/capacity) for change.

16. A list of landscape attributes published by the Landscape Institute[4] can be used to frame an assessment of the value of the local landscape. Given the presence of ancient woodland, a chalk stream and biodiversity corridors, the area is of high natural heritage value. Indeed, the biodiversity surveys demonstrate the locality's functional importance for dormice, slow worm and bats. Wandleys Lane is also a pleasant route for walking, cycling and horse riding, and this imparts some moderate recreational value. Views along Wandleys Lane or across the appeal site towards mature trees or ancient woodland are also of scenic value.

17. That said, several of the properties in Fontwell Meadow incongruously back onto the lane. For example, there is a property broadly opposite the proposed site access which is positioned close to the lane and presents an unrelieved brick flank to the public realm. This is symptomatic of some of the insensitive alterations that have recently occurred in Wandleys Lane resulting in its rural character becoming more semi-rural or even suburban. There is also a proliferation of fencing and disjointed infilling along much of the road. As such, the scenic quality of the area, as principally experienced from Wandleys Lane, is of moderate value.

18. There are few listed buildings or archaeological sites nearby and the deeply rural pattern of the landscape has been considerably eroded. There is no substantive evidence before me that the area is associated with any notable events or people. As a result, there is limited cultural value. Similarly, noise from the A24 and A29, and the presence of the settlement fringe of Fontwell, means the area is not especially wild or tranquil. Overall, the attributes of the appeal site and its immediate environs are such that it is of moderate value. This is principally on account of the local natural heritage value.

19. In this respect my findings depart from those of the LVIA, which concluded in Table 1 that both LCA 16 and the site were of low value. However, by narrowly assessing the value of the site in isolation, important contextual features such as the ancient woodland were omitted. Alternatively, the LCA is too big an area and therefore features of local value get diluted. Instead, the judgments in respect of value should have focussed on the site and its context as the study area. The significance of this becomes apparent when applying the methodology in the LVIA. This is because the medium susceptibility to change and the moderate landscape value in combination result in the site and its immediate context having moderate, rather than low, sensitivity to change.

20. The baseline for considering the visual impact of the scheme is focussed on a zone of visual influence (ZoVI) and representative viewpoints. The Council are content that both the ZoVI, and the viewpoints within, have been correctly identified. This demonstrates that the visual envelope of the appeal scheme would be a modest geographical area. The ZoVI would be much smaller if only public vantage points were included. This demonstrates that the existing tree and woodland cover, taken with existing buildings along West Walberton Lane and Wandleys Lane, provide a high degree of screening and containment from public views. The appeal site is, however, very visible from several neighbouring residential properties. Each view

[4] *Assessing Landscape Value Outside National Designations*, Landscape Institute

has been analysed to ascertain its susceptibility to change as well as its value and sensitivity. Again, the Council take no issue with this analysis or the findings.

The effects of the proposal

21. The construction of 95 homes and estate roads with the associated activity and lighting would be an inherently urbanising intrusion into this rural field resulting in a high magnitude of change to the appeal site. There is no dispute between the Council and appellant that this would have a substantial negative impact on the field's landscape character. Similarly, the Council and appellant seem to agree that there would be a minor adverse impact on the wider landscape character of LCA 16 taken as a whole.

22. However, and as already explained, I share the view of the Council that the assessment of effects should focus on the site and its immediate context rather than the site and its wider context. Outside the appeal site, the impacts on character would be most apparent in Wandleys Lane, as the semi-rural feel of this thoroughfare would be urbanised by the presence of a large housing estate. In addition, the proposed access would breach the boundary hedge and thus interrupt the continuity of planting along the lane. Indeed, a Category B tree group (G16) would need to be removed. In addition, a pavement could be provided along Wandleys Lane as well as white line markings. These features would negatively suburbanise Wandleys Lane. The development would also result in an increase in traffic along the lane, adding perhaps 1 movement every minute in the peak hours. This activity, taken with the localised road widening required to allow vehicles to pass, would be a further erosion of the semi-rural character of the lane.

23. However, the appeal scheme would read as a continuation of the Fontwell Meadows development. This scheme already has a notable and inescapable presence and influence on the local context given the proximity of housing to the lane and lack of extensive new boundary planting. Indeed, the proposal would read as a logical expansion of the settlement, especially so when considering the enclosing effect of existing development along West Walberton Lane. The ancient woodland also provides a natural defensible boundary to the south which would be enhanced by the provision of further buffer planting and a public opens space. As such, there would be no coalescence with other settlements.,

24. The density of the proposal would not reflect that in West Walberton Lane or Wandleys Lane, but it would be reasonably low for a modern estate and not out of place relative to Fontwell Meadows. Indeed, the proposed density would be a reasonable trade-off between making an efficient use of land whilst responding to the semi-rural settlement edge character of the area.

25. The indicative layout also outlines how the scheme could be designed in a sensitive way. In particular, the site entrance could be flanked by a community orchard and woodland buffer planting. Trees could also be planted so that, in time, the canopy matures to breach the gap caused by the access. The houses nearest the lane could also face the public realm and be set back some way behind this new planting, so the sense of a green corridor is broadly retained. Internally, the development could also be leafy with hedging used to define front gardens and streets lined with trees. Over time, the development need not be a stark urbanisation and could soften to reflect the verdancy of West Walberton Lane.

26. It is also important to note that the road safety audit recommended the removal of the white lines on safety grounds. Moreover, and for reasons I go into, the necessity of the pavement has not been made out. Accordingly, there is no need to provide these harmful features. However, even if the pavement is provided then the evidence before me demonstrates it can be constructed without harming the longevity of trees along Wandleys Lane.

27. In the round, the magnitude of change to landscape character would be high for the site, dropping to medium for its immediate context and low beyond this. Given the moderate sensitivity of the site and its immediate context, the overall significance of effect would be somewhere between moderate and substantial at day 1, dropping to moderate at Year 15 if the extensive and well considered landscaping shown on the indicative layout is provided alongside a sensitive design. It is reasonable to consider the effects over a 15-year period given the likely lifetime of the development and the time it will take for the landscape mitigation to take hold.

28. In visual terms there would be a substantial negative effect on private views from adjoining properties in Wandleys Lane and West Walberton Road. However, this effect would soften in time as the buffer landscaping matures. Moreover, the indicative layout demonstrates that the new homes can be orientated to face the site boundaries thereby providing scope for attractive facades to be presented to existing neighbours softened by planting in front gardens. Moreover, the fencing and paraphernalia in rear gardens would be less prominent. In addition, the houses could (and should in my view) be no greater than two storeys in height to further reduce the visual impact. Therefore, the views from neighbouring properties need not be dominated by large or unattractive buildings. Thus, the initial raw and substantial significance of effect would fall to a moderate.

29. Public views from West Walberton Road would be broadly unaffected by the scheme given the distance, very dense planting and position of existing buildings. Thus, the main public views of the proposal would be from Wandleys Lane albeit a limited section of this route. Initially, there would be a high magnitude of change looking into the site along the proposed access and through gaps in the hedge. However, this would soften significantly over time if the areas of landscaping shown on the indicative layout are provided. As a result, by Year 15 the magnitude of the visual impact from the effected section of Wandleys Lane would drop from high to medium with a corresponding drop in the significance of the effect from substantial to moderate. The effect would also be experienced in the context of the Fontwell Meadows development across the lane.

Overall conclusions

30. Beyond the immediate context of the site, broadly defined by West Walberton Lane, Wandleys Lane and the Ancient Woodland, there would be little impact on either landscape character or visual amenity. This strongly illustrates the localised and contained nature of the impact. That said, the initial impact of the appeal scheme on the site and its immediate context would be substantial adverse. Over time, this could fall to a moderate adverse impact if the extent of landscaping proposed on the indicative layout is provided alongside a sensitive design.

31. Accordingly, the proposal would result in harm to the character and appearance of the area, albeit not a high level. It would therefore be at odds with Policies C SP1, D DM1, LAN DM1 and SD SP1a of the LP, which seek to secure development that

recognises the intrinsic character and beauty of the countryside, maintains the open countryside setting of villages and reflects the character of a site and its surroundings. The proposal would also be at odds with Policy VE3 of the NP, which seeks to resist the loss of trees and hedgerows of amenity value.

Other Matters

32. Several interested parties have raised concerns that the appeal scheme would harm highway safety and would result in congestion. I have already explained that a substantial body of evidence has been supplied to demonstrate to the satisfaction of National Highways an acceptable impact on the strategic road network. In a similar vein, the Local Highway Authority (LHA) have also reviewed the submissions, including the Transport Assessment (TA) and the TRICS data therein, and have concluded that the site access would operate safely and the movements arising from the scheme could be absorbed without severely impacting the highway network. This is an independent expert view to which I afford significant weight.

33. The TA has provided tracking to demonstrate that two cars can pass, although it is likely that passing places would need to be used if an HGV were to meet a car. This may be a likely occurrence during construction but less so during occupation. The temporary nature of the construction impacts and the ability to mitigate them through a condition are sufficient to ensure there would be no harm. The submissions also demonstrate that the site access would have adequate visibility. Accordingly, there is no substantive reason to depart from the conclusions of both the appellant's TA and the LHA.

34. The Flood Risk Assessment submitted by the appellant confirms that the appeal site is at a low risk of flooding from rivers and surface water. However, it also indicates that the site is at a medium risk from ground water and sewer flooding. The Council and appellant have confirmed that following ground water monitoring it can be concluded the site is at a low risk of ground water flooding. In addition, a condition can be imposed to prevent occupation of the scheme until any necessary upgrade to sewerage infrastructure is undertaken. This would ensure there is capacity for the foul water flows from the development and thus a low risk of flooding. Furthermore, another condition can be imposed to require details of the scheme's foul sewerage design with the aim of minimising surface water ingress. It is of note that the Lead Local Flood Authority did not object to the scheme after a robust assessment.

35. The appeal scheme would be located, and can be designed, to minimise adverse visual impacts on views out of the South Downs National Park. Indeed, the National Park Authority have not objected subject to a sensitive lighting scheme, which can be secured by condition. For reasons I go into, there would be no harm to the important bat colony within the National Park and therefore its setting, by virtual of functional links, would not be adversely affected in this regard.

36. The appeal site is not located within walking distance of a primary school and the Number 500 bus service is regular but not currently permanent. However, there is a shop, public house, community hall, fast food restaurant and public open spaces nearby. These could all be accessed easily through the Fontwell Meadows development or via West Walberton Lane. The site is also within a short cycle ride or drive from a rail station. It would also be possible to walk to Eastergate where there is a secondary school and other facilities. The walk would be longer than the

800m recommended in the National Design Guide or the preferred maximum of 1,200m in *Providing Journeys on Foot*. However, it is not an entirely unrealistic option or the only one available for reaching services and facilities.

37. It is also important to note that the appeal site adjoins Fontwell Meadows, which was an allocation of 400 homes that was judged a 'sustainable location' at the time it was approved. An inconsistency would arise if I found the locality to be unsustainable for up to 95 homes. Overall, there would be no conflict with Policies GA5 of the NP or T SP1 of the LP.

38. The appeal site adjoins ancient woodland, which is a highly fragile ecosystem and irreplaceable habitat influenced by surrounding land use. To this end, the indicative layout demonstrates that a minimum 15m buffer can be provided to protect the trees. Indeed, the buffer would be planted to prevent access and trampling, and no gardens need adjoin the woodland. As a result, garden clippings would not be deposited with the risk of invasive species taking root. In addition, and after discussions at the hearing, it was confirmed that a drainage scheme could be devised to ensure the hydrological conditions of the woodland are not harmed. Neither Natural England nor the Council's Ecological Advisors or Arboricultural Officer have objected to the scheme on account of a loss or deterioration of the ancient woodland. I afford these expert views significant weight.

39. Similarly, the appellant has advanced a mitigation and enhancement strategy for dormice, which is a European Protected Species (EPS). Natural England were consulted and did not give any indication they would withhold the grant of an EPS licence. Based on the submissions before me, including the evidence of expert ecologists, I am satisfied there is a reasonable prospect that a licence would likely be granted. This matter can therefore be addressed through the imposition of a planning condition. The scheme can also make provision, through a buffer, to protect species rich hedgerow, which is a Habitat of Principal Importance.

40. The appellant has confirmed that mineral extraction would be unviable on account of the small size of the site and the proximity of neighbouring residents. I also consider the overriding need for the development outweighs the safeguarding of minerals in this case. Accordingly, there would be no conflict with Policy M9 of the West Sussex Joint Minerals Local Plan. The proposal would result in a modest loss of Grade 3b agricultural land, but this would also be outweighed by the benefits of the scheme. Accordingly, there would be no conflict with Policy SO DM1 of the LP or Paragraph 187(b) of the Framework. Reference was made at the hearing to another application relating to a site in Wandleys Lane for a Permission in Principle. However, this related to a much smaller scheme with considerably fewer benefits. It is therefore of limited relevance. The Council operates a Community Infrastructure Levy so there would be a mechanism to address any issues with local infrastructure through this process.

Conditions and Planning Obligation

41. The Council and appellant agree that many of the appeal scheme's impacts can be entirely mitigated by the imposition of conditions and through the planning obligation submitted shortly after the hearing closed. In addition to standard commencement conditions, with a reduce time period to reflect the important of a quicker delivery, it is necessary to define the reserved matters and require their approval prior to development starting.

42. A drawings condition confirming the extent of the appeal site is added in the interests of certainty. In the interests of highway safety and accessibility, it is necessary to secure road widening and pedestrian improvements prior to occupation. To encourage walking to the cluster of services near to the Fontwell West Roundabout, as well as the bus stops, it is necessary to prevent occupation until either the pedestrian access from the Fontwell Meadows development to Wandleys Lane[5] is completed or a pavement along Wandleys Lane is constructed. The former would be preferable as it is more direct and would minimise the impact on Wandleys Lane. To secure a benefit of the scheme it is necessary to impose a condition requiring a biodiversity net gain of at least 10% as well as an ecological design, management and monitoring strategy.

43. To reduce carbon emissions from the scheme it is necessary to require a 10% energy supply reduction from renewable or low carbon sources, as required by the LP. Similarly, to manage water use, it is necessary to impose a condition limiting water consumption to 110 litres per person per day, as required by the LP. To safeguard the landscape and biodiversity it is necessary to secure details of external lighting. To secure a benefit it is necessary to impose a condition requiring the minimum quantums of open space by typology. To adhere to the LP it is necessary to trigger the optional Building Regulations M4(2) and M4(3) through the imposition of a condition.

44. As previously set out, it is necessary to secure details of the foul drainage system and to prevent occupation until any necessary upgrades have been undertaken. This would ensure the scheme would not exacerbate flooding of the sewer network. In the interests of safeguarding highway safety and living conditions, it is necessary to secure a construction management plan and an advisory construction traffic plan. A separate plan is also required to ensure construction works do not harm biodiversity. In the interest of managing surface water, it is necessary to secure a sustainable drainage scheme, including its management and implementation. To protect living conditions, it is necessary to investigate potential sources of land contamination and remediate any contaminants. To protect dormice, it is necessary to ensure the works do not start until a European Protected species licence has been granted by Natural England. To enhance bat habitat, it is necessary to provide at least 48 bat tubes, bricks and boxes. For similar reasons it is necessary to secure at least 48 bird nesting bricks.

45. In the interests of living conditions, and to comply with Policy AE DM3 of the LP, it is necessary to seek to minimise air pollution through an air quality assessment. To protect groundwater, it is necessary to control piling. To adhere to the development plan and support the local economy to grow, it is necessary to secure an Employment and Skills Plan. To minimise fire risk, it is necessary to secure the provision of fire hydrants. To protect currently unknown archaeology, it is necessary for a scheme of investigation and recording to be secured. In the interest of living conditions and highway safety it is necessary to ensure the roads, footways and parking areas are provided before occupation.

46. The legal agreement makes provision for the obligations set out below. These obligations are necessary to prevent harm or meet the requirements of the development plan, are directly related to the proposal and there is no substantive

[5] This has not been provided yet. However, it is part of the approved scheme, and I was advised at the hearing that the Council could pursue enforcement action to ensure the pedestrian access is provided.

evidence before me to demonstrate they would be unfair in scale and kind. I have therefore taken the obligations into account when having regard to Regulation 122 of the Community Infrastructure Levy Regulations and Framework Paragraph 58.

47. A*ffordable Housing* – As will be explained, there is an identifiable need to provide affordable housing in the district. To this end, and in this instance, Policy AH SP2 of the LP seeks to secure 30% of homes as affordable housing. The planning obligation would do this. The Council has not raised any objections to the inclusion of First Homes pursuant to Footnote 31 of the Framework.

48. *Travel plan* – To promote sustainable transport as required by Policy T SP1 of the LP, it is necessary for a travel plan to be prepared and implemented to promote a proportionate modal shift away from car travels. As part of this, it is necessary for the developer to pay a monitoring fee to the County Council, to provide vouchers and appoint a Travel Plan Co-Ordinator. In addition, a bus service contribution of £448.73 per dwelling plus a monitoring fee is necessary.

49. *Secondary school transport contribution* - For the reasons set out in West Sussex County Council's hearing statement, it is necessary to secure a financial contribution, in accordance with a set methodology, towards secondary school transport plus a monitoring fee. This is because local schools are at capacity and a new one needs to be constructed. Consequently, there may be a need to bus pupils living at the appeal scheme to other schools in the interim.

Habitat Regulations Assessment

50. To the north of the appeal site is the Singleton and Cocking Tunnels Special Area of Conservation (SAC). This area is designated on account of hosting Barbastelle and Bechstein's bats. The SAC citation explains that Singleton and Cocking Tunnels constitute the most important sites for hibernating bats in southeast England. The conservation objectives of the SAC can be summarised as ensuring its integrity, by maintaining or restoring the populations and habitats, structures and supporting processes of the qualifying species.

51. The proposed development site falls within the 12km wider conservation area of Singleton and Cocking Tunnels SAC, but outside the 6.5km Key Conservation Area. Impact pathways can be divided into direct and indirect. Direct impacts are usually associated with development on land that is designated or undesignated land that is 'functionally linked'. The latter is land, which is used by, or important to, the qualifying features. Indirect effects and those that may not result in the direct loss or fragmentation of habitats.

52. Bats are mobile species that can forage or roost on land outside of the SAC boundaries. Development within the appeal site boundaries may impact upon flight lines within the wider landscape, in turn impacting upon the qualifying features of the SAC. Accordingly, the proposal in combination with other plans and projects would be likely to have a significant adverse effect on the SAC when following a precautionary approach. Hence, an appropriate assessment, in accordance with the Habitat Regulations[6], is required to consider the implications of the proposal on the SAC in view of the conservation objectives.

[6] See Regulation 63 Conservation of Habitats and Species Regulations 2017 (as amended).

53. To assess the levels of use of the site by Bechsitens and Barbastelle bats, surveys were conducted throughout 2022. In total 3917 bat passes were recorded over the survey period comprising at least nine bat species. The fourth most frequent species on site is Barbastelle, accounting for 4.9% of the total. The lack of significant woodland blocks near to the appeal site limits the likelihood of Bechsteins being present. Moreover, Wandleys Copse is too small to support a colony of Bechsteins. This survey work indicates that Barbastelle bats use the site boundaries on a regular basis as a flight line and for foraging, albeit in low numbers and probably not for roosting. Thus, it can be concluded that the appeal site is functionally linked to the SAC.

54. The development will avoid impacts from loss or severance of flightlines by retaining and enhancing the perimeter hedges and trees. Moreover, additional native buffer species will be planted around the edge of the site as well as a community orchard. A buffer would also be provided with the ancient woodland and extensive areas of open space included. Furthermore, no gardens need back on to the ecological enhancement zone, allowing them to be retained in a natural state. Built development would also be away from the site boundaries and lighting minimised and controlled by condition to prevent severance of the commuting and foraging routes. With the mitigation in place, the proposal would avoid effects on commuting, foraging and roosting barbastelles.

55. Natural England have reviewed the suite of proposed mitigation measures and are satisfied the proposal would not have an adverse effect with them secured. I afford this expert independent view significant weight. Thus, the proposal would not adversely affect the use of functionally linked land by qualifying features. The integrity of the SAC and qualifying features would therefore be preserved and no conflict with Policy VE10 of the NP would occur.

Other Considerations

56. An appeal should be determined in accordance with the development plan unless material considerations indicate otherwise. The benefits of the scheme and the provisions of the Framework are important considerations in this instance.

The benefits of the appeal scheme

57. The Council are only able to currently demonstrate a housing land supply of between 2.83 - 3.41 years. This is well below the five years required by the Framework and, even on the Council's figures, amounts to a significant shortfall of at least 2,822 homes. The situation has deteriorated from a year ago given the changes to the Framework and the subsequent increase in the housing requirement. In addition, the Council's Housing Delivery Test measure is 70%. This is a slight improvement but is still below the threshold of 75%. As such, the delivery of housing has been substantially below the housing requirement for the last three years. In fact, delivery is even worse than this, as evidence provided by the appellant, which is not disputed by the Council, demonstrates that the Council has failed to deliver its housing requirement in every year between 2012 and 2024.

58. The appellant has indicated that the appeal scheme would likely be commenced in the next five years and therefore promptly contribute to addressing the significant shortfall. They are content with a shorter implementation timescale for this reason. Therefore, it would seem that matters have moved on from the Council's Housing and Economic Land Availability Assessment in 2021, which indicated the site is 'not

currently developable'. Moreover, going forward there is likely to be a 'policy off'[7] need for between 187-465 homes in the parish before 2041[8]. These figures are based on the application of a methodology outlined in the Planning Practice Guide (PPG)[9] which states that outstanding commitments should not be discounted from the housing need figure until they are completed.

59. However, I am mindful that the NP area has already had high levels of growth in recent years with perhaps an 'over delivery' of around 64-184 homes[10] (excluding outstanding commitments). It is also likely that several commitments will become completions soon, including a large site currently under construction at Tye Lane. This will reduce the outstanding need going forward. In a local context, there has been a significant boost in the supply of housing in recent years. That said, the proposal would make a notable contribution to the persistent shortfall in housing when considered at a district level. Overall, the delivery of housing carries significant rather than substantial weight in favour of the proposal

60. Evidence provided by the appellant, which is also unchallenged by the Council, demonstrates that housing affordability in Arun has got worse in the last ten years and is acute in the context of the southeast of England. At a local level, Walberton is an expensive area. This may account for the significant reduction in the population of those under 49 years of age in the parish. Because of the appellant's analysis, the Council has changed its position from that recorded in the committee report and is now of the view the provision of affordable housing should carry significant weight as a benefit and I share this view.

61. The appeal scheme is not caught by the requirement in the Environment Act to provide a mandatory 10% biodiversity net gain. Instead, the LP requires net gains to biodiversity. The indicative details before me demonstrate how a net gain of at least 10% could be achieved. Added to this, the appellant has committed to planting at least 200 trees (not including the community orchard or woodland scrub). Over time this would result in notable benefits to biodiversity that carry at least moderate weight. The proposal would also include large areas of public open space including allotments, play areas and a community orchard. This carries moderate rather than significant weight because the open space would be tucked away and principally used by residents of the proposal. Although there would be scope to form part of a network or trail with the open space at Fontwell Meadows subject to the provision of the pedestrian link between the schemes.

62. The proposal would deliver economic benefits during construction and again during the subsequent occupation of the houses as the residents spend on local services and facilities. Some of the residents may use the temporary 500 bus service and thus make it a more viable prospect as a long-term facility. Other residents could also get involved in local clubs and societies and consequently add to the vitality of the community. These would amount to moderate benefits.

63. The indicative landscape masterplan details the foundations of a promising scheme. It includes generous levels of landscaping and open space, street trees, hedged front gardens and a carefully considered response to the character of Wandleys Lane, albeit mindful of the inherent design constraint of providing a

[7] This is the total housing demand unconstrained by the limits of the land available to build on
[8] Fontwell Local Housing Need Assessment February 2025 - Summary Note, Tables 3 and 4
[9] Planning Practice Guide - Paragraph: 105 Reference ID: 41-105-20190509
[10] Fontwell Local Housing Need Assessment February 2025 - Summary Note, Tables 1 and 2

engineered highway access. The structure of the indicative layout also exhibits important urban design principles such as perimeter blocks, coherent building lines, active edges and internal views. Aspects of the street scene could be tightened up and better balanced[11] and some of the house types would need refinement[12], but overall, the scheme has the groundings of being internally well designed and thus a pleasant place to live. Although this is to be expected as a prerequisite, it nevertheless carries weight as a benefit.

64. Substantive evidence has not been provided by the appellant or the Local Highway Authority which demonstrates that the safety of pedestrians currently using Wandleys Lane needs to be improved. Having walked the route several times, I found traffic speeds to be low, forward visibility good and the width more than adequate to allow cars and pedestrians to coexist. Although a snapshot in time, there is nothing to suggest what I observed and experienced was untypical. Indeed, no pedestrian improvements are proposed to the southwest along Wandleys Lane, which is the most direct route to the centre of Eastergate, around a mile from the site access. This suggests walking within Wandleys Lane is safe and will continue to be so. As such, the provision of a pavement is unnecessary to improve existing pedestrian safety and would not be a benefit.

Whether Paragraph 14 of the Framework is relevant

65. To promote localism, Paragraph 14 of the Framework provides added protection to areas covered by a neighbourhood plan. It states that in situations where Paragraph 11d of the Framework is engaged, the adverse impacts of allowing development that conflicts with a neighbourhood plan is likely to significantly and demonstrably outweigh the benefits if the neighbourhood plan is less than five years old and it contains policies and allocations to meet its identified housing requirement. Paragraph 70 of the Framework explains that the identified housing requirement can be an indicative figure offered by the local planning authority provided it takes into account relevant factors, such as the latest evidence of housing need, the population of the neighbourhood plan area and the most recent planning strategy of the local planning authority.

66. During the hearing, the Council submitted that the indicative housing requirement is 51 homes. This figure is a proportion of the 1,250 homes allocated to the rural areas in the LP and was calculated by a Local Plan subcommittee. The Council advised the NP Examiner that the figure was formulated after considering the local population and the existing spatial strategy, amongst other factors. It also flowed from the housing requirement in the local plan, which itself was based on evidence of local housing need. It would therefore seem that this figure was calculated with reference to the relevant factors in Paragraph 70 of the Framework that should guide an indicative housing requirement for the purposes of a neighbourhood plan.

67. However, there are two problems with the 51-home figure. Firstly, there is little evidence to indicate how the Council calculated it with due regard to the relevant criteria in the Framework. Indeed, the Examiner makes the point in their report[13]

[11] For example, Plots 15, 23 and 76 would appear squeezed in or fail to response to the building line. Plot 77 would not turn the corner very well. Plots 60-63 would not amount to coherent street scene whereas Plots 79 and 80 would affect the balance of another given the semi-detached form of Plots 89-92.
[12] For example, the house types show on the character area elevations lack local distinctiveness and detailing, those shown in Character Area A would have awkward forms and a single window at first floor in the gable ends would be an architectural improvement.
[13] See Paragraph 42 of the Examiners Report. The 51 home figure was originally 60.

that the evidence behind the 51-home figure is very limited. Secondly, the Examiner specifically confirms that the 51-home figure is not an indicative housing figure as set out in the Framework. It is therefore difficult to reconcile the Council's position with what the Examiner ultimately concluded. Indeed, the Examiner clearly states that the indicative housing figure for Walberton NP Area is 748 homes. This is then reiterated in the NP itself, albeit with little to explain how it was calculated.

68. However, in arriving at the 748-home figure, the Examiner seems to have included existing strategic allocations[14], existing NP allocations and existing commitments. It is unclear where this methodology derives from. There is also the added complication that if the indicative figure is to be taken as 748, then the NP does not include policies and allocations to meet it. This is because the Fontwell Meadows development was allocated in the LP and not the NP. The PPG[15] is clear that policies and allocations in other development plan documents will not meet the criterion in Paragraph 14b of the Framework.

69. The appellants submit that the Examiner's approach does not tally with the methodology in the PPG. Indeed, their illustrative analysis[16], which does follow the methodology in the PPG, suggests that an indicative housing requirement formulated using the factors in Paragraph 70 of the Framework would have been 280 homes if based on population or 400 if derived from the development strategy in the LP. However, this level of need would have been more than met by existing allocations, including Fontwell Meadows. This perhaps supports the Council's position that the indicative housing requirement should have been set at 51 homes, this being an additional requirement to existing allocations.

70. Accordingly, there is uncertainty as to whether the indicative housing requirement in the NP was properly formulated, underpinned by adequate evidence and informed by the methodology in the PPG. The Council's preferred figure of 51-homes lacks evidence and was discounted by the Examiner but seems logical from the evidence before me. The Examiner settled on a different figure but the methodology behind it is unclear. Even if the 748 figure is correct, the NP does not appear to contain allocations and policies to meet it.

71. However, an appeal made under s78 of the Town and Country Planning Act is not the forum to review a NP, rerun arguments tested at the Examination or set an indicative housing requirement. After hearing all the evidence, the Examiner ultimately reached a conclusion that the NP has proper regard to national policies and advice and complied with the basic conditions. Thus, I consider Paragraph 14 of the Framework should be engaged as a precaution.

Paragraph 11 of the Framework

72. In circumstances where the Council cannot demonstrate a five-year housing land supply, the relevant part of Paragraph 11 of the Framework states, in this instance, that permission should be granted unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits when considered against the policies in the Framework taken as a whole. In undertaking this balance Paragraph 14 of the Framework explains that the adverse impacts of allowing development that conflicts with a neighbourhood plan (where the two criteria are met) is likely to

[14] Including 400 homes at Fontwell Meadows
[15] Planning Practice Guide - Paragraph: 097 Reference ID: 41-097-20190509
[16] Fontwell Local Housing Need Assessment, February 2025

significantly and demonstrably outweigh the benefits. In other words, a conflict with a neighbourhood plan is a matter of considerable importance and is likely to be decisive. However, it is important to emphasise that this is the *likely* outcome of the balance rather than a prescribed one. Contextual circumstances may be such that a conflict with a NP would not be decisive, although this would be a rare occurrence.

73. As an adverse impact, the proposal would be residential development in the countryside at odds with the spatial strategy. The broad underlying aims of the spatial strategy to focus new development in settlements and close to services and facilities is broadly consistent with the Framework. Added to this, there would be moderate harm to the character and appearance of the area, including the loss of trees. In addition, and although not resulting in a policy conflict, the loss of agricultural land would also be a modest adverse impact of the proposal.

74. However, the significant and persistent shortfall in the five-year housing land supply and the substantial past under delivery demonstrate the spatial strategy at a district level has failed and will likely continue to fail for the time being. The acute shortfall in the number of homes in the area has had real-world impacts on the availability and affordability of housing. A rigorous application of the spatial strategy would undermine attempts to remedy this situation. Moreover, it is unclear how the Council intends to address the housing land supply shortfall as the Non-Strategic Sites Allocation Plan has not progressed and a new LP seems some way off.

75. At a local level the NP has been more successful and seen a significant boost in housing. However, the evidence before me suggests that there is an ongoing need in Walberton parish for perhaps 187 to 465 homes by 2041. With this in mind, the appeal scheme would, in a practical sense, be an extension of an existing strategic allocation in a 'sustainable location' on the edge of a settlement. In addition, it would only moderately harm the character and appearance of the area. Indeed, much of this moderate harm would be to the site itself, which will be an inevitable consequence if countryside is to be released for housing, as seems necessary. Moreover, for the reasons I have already gone into, the appeal scheme would have benefits of a high order. In particular, it would be a sizeable contribution to the housing land supply with 30% affordable housing.

76. Accordingly, this is a rare occasion where the adverse impacts of conflicting with a neighbourhood plan are unlikely to significantly and demonstrably outweigh the benefits. Indeed, the benefits of the scheme would outweigh the harm. This strongly indicates that the appeal should be allowed.

Conclusion

77. The proposed development would not adhere to the development plan but material considerations, namely the Framework, indicate that the appeal should be determined other than in accordance with the development plan. Accordingly, the appeal succeeds.

[redacted]

INSPECTOR

APPEARANCES

FOR THE APPELLANT

Robert Walton KC	Barrister
Huw James	ECE Planning
Gary Heard	Stantec
Dan Usher	Marrons
Saskia Lower	ECE Planning
James Bardey	Aspect Arboriculture
Tristram Bushby	Allen Pyke Associates

FOR THE LOCAL PLANNING AUTHORITY

Simon Davis	Arun District Council
Tracey Dun	West Sussex County Council
Tracey Flitcroft	West Sussex County Council

INTERESTED PARTIES

Andrew Vawer	Walberton Parish Council
Steve McAuliffe	District Councillor (Arundel and Walberton)
Sue Wallsgrove	Local Resident
Cathy Boniface	Local Resident
Amanda Sutton	Local Resident
Paul Madeley	Local Resident

DOCUMENTS SUBMITTED DURING AND AFTER THE HEARING

1. Plan showing parish boundaries
2. Email dated 10 March 2025 from Mr Davis regarding the housing land supply
3. Correct to the appellant's Fontwell Local housing Need Assessment Summary Note
4. Recommendation report for application BN/11/25/PIP
5. Decision notice for application BN/11/25/PIP
6. Updated list of suggested planning conditions following the discussion at the hearing
7. Counterpart Planning Obligation dated 18 March 2025

Schedule of Conditions

1	Details of the access (internal circulation routes), appearance, landscaping, layout and scale, (hereinafter called "the reserved matters") shall be submitted to and approved in writing by the local planning authority before any development takes place and the development shall be carried out as approved. Application for approval of the reserved matters shall be made to the local planning authority not later than two years from the date of this permission.
2	The development hereby permitted shall be begun before the expiration of 4 years from the date of this permission, or before the expiration of 2 years from the date of the approval of the last of the reserved matters to be approved, whichever is the later.
3	The development hereby approved shall be carried out in accordance with the following approved plan: Site Location Plan Dwg PL-03 Rev B.
4	The development hereby approved shall not be occupied until the road widening as detailed on drawing 332610169-STN-GEN-SW-DR-H-003 and either the approved pedestrian access from the Fontwell Meadows development to Wandleys Lane or the pedestrian improvements set out on drawing 332610169-STN-GEN-SW-DR-H-003 are completed.
5	The development shall achieve a minimum of 10% energy supply reduction from either the use of decentralised/renewable or low carbon energy sources (as described in the glossary at Annex 2 of the NPPF). Any physical features that are required as part of the works must be installed prior to the occupation of each dwelling and shall be thereafter permanently maintained in good working condition.
6	No dwelling hereby approved shall be occupied until the means to ensure a maximum water consumption of 110 litres use per person per day, has been complied with for that dwelling and retained in perpetuity thereafter.
7	Details to be submitted pursuant to condition 1 shall include full details of all new external lighting (including type of light appliance, the height and position of fitting, predicted illumination levels and light spillage). This submission should also cover new streetlighting if required. The scheme should seek to conform with the recommendations of the Institution of Lighting Professionals (ILP) "Guidance Notes for the Reduction of Obtrusive Light" (GN01:2011) but also be designed to be sensitive to bats.

	The lighting scheme shall include a bat friendly Lighting Plan. The recommended lighting specification shall use LED's (at 3 lux) with the recommended spectrum being 80% amber and 20% white with a clear view, no UV, a horizontal light spread of less than 70 degrees and a timer. A 3D plan of the illumination level should be supplied so that the Local Planning Authority can assess the potential impact on protected species. All external lighting shall be installed in accordance with the specifications and locations set out in the scheme and maintained thereafter in accordance with the scheme. Under no circumstances should any other external lighting be installed without prior consent from the Local Planning Authority.
8	The layout and landscape details to be submitted pursuant to condition 1 shall include full details of the required public open space (POS), play areas and management arrangements. The proposed provision should include an Open Space Area (minimum of 30,448sqm) comprising: • Community Orchard (minimum of 2,115sqm) • Allotments (minimum of 792 sqm) • Ecological Enhancement Areas (minimum of 13,000 sqm) • Shared POS and Ecological Enhancement (minimum of 3,300sq ²) • Public Open Space (minimum of 8,930 sqm) including LEAP and LAP • At least 200 new trees (in addition to those provided within the above areas) The above shall thereafter be completed in accordance with the approved details prior to occupation of the 48th dwelling and permanently retained thereafter. The approved management details shall be permanently adhered to.
9	Detailed plans and particulars of the Reserved Matters submitted to the Local Planning Authority for approval pursuant to condition 1 shall ensure that the scheme makes provision for accommodation to meet the Building Regulations Standards M4(2) and M4(3) in accordance with the Council's guidance note "Accommodation for Older People and People with Disabilities Guidance".
10	Before the development hereby permitted is commenced, details of the proposed foul drainage system shall be submitted to and approved in writing by the Local Planning Authority (including details of its siting, design and subsequent management/maintenance, if appropriate). The development shall not be occupied until a phasing and implemented plan has been submitted to and approved in writing by the local planning authority detailing how the development will be phased to align with the delivery by Southern Water of any sewerage network reinforcement required to ensure that wastewater network capacity is available to adequately drain the development. Thereafter, no dwelling shall be occupied otherwise than in accordance with the phasing and implementation plan.

11	No development shall commence until a Construction Management Plan and accompanying Site Setup Plan has been submitted to and approved in writing by the Local Planning Authority. Thereafter the approved Plan shall be implemented and adhered to throughout the entire construction period. This shall require the applicant and contractors to minimise disturbance during demolition and construction and will include (but not be limited to) details of the following information for approval: 1. The phased programme of construction works. 2. The anticipated, number, frequency, types, and timing of vehicles used during construction. 3. Provision of wheel washing facilities (details of their operation & location) and other works required to mitigate the impact of construction upon the public 4. Details of street sweeping. 5. Details of a means of suppressing dust & dirt arising from the development. 6. A scheme for recycling/disposing of waste resulting from demolition and construction works (i.e., no burning permitted). 7. Details of all proposed external lighting to be used during construction (including location, height, type & direction of light sources and intensity of illumination). 8. Details of areas for the loading, unloading, parking, and turning of vehicles associated with the construction of the development. 9. Details of areas to be used for the storage of plant and materials associated with the development. 10. Details of the temporary construction site enclosure to be used throughout the course of construction (including access gates, decorative displays & facilities for public viewing, where appropriate). 11. Contact details for the site contractor, site foreman and CDM co-ordinator (including out-of-hours contact details). 12. Details of the arrangements for public engagement/consultation both prior to and continued liaison during the construction works. 13. Details of any temporary traffic management that may be required to facilitate the development including chapter 8 traffic signage. 14. Measures to minimise the noise (including vibration) generated by the construction process to include hours of work, proposed method of piling for foundations, the careful selection of plant and machinery and use of noise mitigation barrier(s). 15. Details of pest control. Details of how measures will be put in place to address any environmental problems arising from any of the above shall be provided. A named person shall be appointed by the applicant to deal with complaints, shall be available on site and their availability made known to all relevant parties. No demolition/construction activities shall take place other than from 08:00 hours until 18:00 hours (Monday to Friday) and from 08:00 hours until 13:00 hours (Saturday) with no work on Sunday or Bank/Public Holidays.

12	No development shall commence on the site hereby permitted until the details of a Construction Traffic Management Plan have been submitted to and approved in writing by the local planning authority. Thereafter the construction of the development shall proceed in strict accordance with the approved Construction Traffic Management Plan unless otherwise agreed in writing by the local planning authority.
13	The layout and landscaping details submitted pursuant to condition 1 shall include a surface water drainage strategy. The supporting surface water drainage information must include: 1. A full winters groundwater monitoring, 2. Winter infiltration testing in accordance with BRE DG 365 or similar approved, 3. Details of the proposed method and location of surface water disposal, in accordance with the SuDS hierarchy, 4. Impermeable area or catchment plan, 5. Calculations modelling the surface water drainage network for the following storm events: a. 100% Annual Exceedance Probability [AEP] b. 10% AEP + climate change allowance c. 3.3% AEP + climate change allowance d. 1% AEP + climate change allowance All storm events must include an allowance for urban creep and surcharged outfalls where appropriate, 6. Detailed drainage plans conforming to local planning authority guidance, 7. A plan showing no conflicts between existing and proposed trees, their potential growth and surface water drainage design, 8. A plan showing the impact of the proposed development on existing watercourses (where applicable) 9. Details of any necessary permissions relating to the discharge location, works to watercourses or adoption of the SuDS scheme. 10. Details of how the drainage scheme shall effect the hydrological conditions of the adjoining ancient woodland such that no loss or deterioration shall occur Development shall be undertaken in accordance with the approved details.
14	Development shall not commence until full details of the proposed surface water drainage scheme have been submitted and approved in writing by the local planning authority. The detailed design must be based upon and build on the surface water information submitted pursuant to condition 16 (as required to be discharged through the reserved matters application). The full details submitted for approval shall include: 1. Detailed drainage plans conforming to Local Planning Authority guidance, 2. Specifications for all surface water drainage components and associated infrastructure or flow control mechanisms,

	3. Any relevant permissions relating to the discharge location, works to watercourses or adoption of the SuDS scheme. The scheme shall then be constructed as per the approved plans. No building shall be occupied until the complete surface water drainage system serving that building has been implemented in accordance with the agreed details. The surface water drainage scheme shall remain for the lifetime of the development unless agreed in writing by the local planning authority. The local authority shall be granted access to inspect the sustainable drainage scheme for the lifetime of the development.
15	Construction shall not begin until a detailed construction phase surface water management plan for the site has been submitted to and approved in writing by the Local Planning Authority. The scheme shall subsequently be carried out in accordance with the approved details.
16	The development hereby approved shall not be first occupied until details of the maintenance and management of the sustainable drainage scheme have been submitted to and approved in writing by the Local Planning Authority. The drainage scheme shall be implemented prior to the first occupation of the development hereby approved and thereafter managed and maintained in accordance with the approved details in perpetuity. The Local Planning Authority shall be granted access to inspect the sustainable drainage scheme for the lifetime of the development. The details of the scheme to be submitted for approval shall include: I. A timetable for its implementation, II. Details of SuDS features and connecting drainage structures and maintenance requirement for each aspect, IV. A management and maintenance plan for the lifetime of the development which shall include the arrangements for adoption by any public body or statutory undertaker, or any other arrangements to secure the operation of the sustainable drainage scheme throughout its lifetime.
17	Prior to first use, a detailed verification report, (appended with substantiating evidence demonstrating the approved construction details and specifications have been implemented in accordance with the surface water drainage scheme), shall be submitted to and approved (in writing) by the Local Planning Authority. The verification report shall include photographs of excavations and soil profiles/horizons, any installation of any surface water structure and Control mechanism.
18	Prior to commencement of the development hereby approved (or such other date or stage in development as may be agreed in writing with the Local Planning Authority), the following components of a scheme to deal with the risks associated with contamination of the site shall each be submitted to and approved in writing by the Local Planning Authority: 1. A 'Preliminary Risk Assessment' which has identified: all previous (historical) uses;

	potential contaminants associated with those uses; a conceptual model of the site indicating sources, pathways and receptors; and potentially unacceptable risks arising from contamination at the site. 2. A 'Site Investigation Scheme', based on (1) above to provide information for a detailed assessment of the risk to all receptors that may be affected, including those off site. 3. Based on the 'Site Investigation Scheme' and the detailed risk assessment (2), an options appraisal and remediation strategy giving full details of the remediation measures required and how they are to be undertaken. 4. A 'Verification Plan' providing details of the data that will be collected in order to demonstrate that the works set out in (3) are complete and identifying any requirements for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action. Any changes to these parts, (1) to (4) require the express written consent of the Local Planning Authority. The scheme shall be implemented as approved above and, prior to occupation of any dwelling (or such other date or stage in development as may be agreed in writing with the Local Planning Authority), a Verification Report demonstrating completion of the works set out in the approved remediation strategy and the effectiveness of that remediation shall be submitted to and approved in writing by the Local Planning Authority. The report shall include results of sampling and monitoring carried out in accordance with the approved Verification Plan to demonstrate that the site remediation criteria have been met. The report shall also include a 'long-term monitoring and maintenance plan' for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action, as identified in the Verification Plan, and for the reporting of this in writing to the Local Planning Authority.
19	No development shall commence until the applicant has secured the implementation of a programme of archaeological work in accordance with a written scheme of investigation which has been submitted by the applicant and approved in writing by the Local Planning Authority.
20	Any works which will impact the breeding / resting place of Hazel Dormice, shall not in in any circumstances commence unless the local planning authority has been provided with either: (a) a licence issued by Natural England pursuant to Regulation 55 of The Conservation of Habitats and Species Regulations 2017 (as amended) authorizing the specified activity or development to go ahead; or (b) a statement in writing from the Natural England to the effect that it does not consider that the specified activity/development will require a licence.

21	No development shall take place, (or such other date or stage in development as may be agreed in writing with the Local Planning Authority), until a construction environmental management plan (CEMP: Biodiversity) has been submitted to and approved in writing by the Local Planning Authority. The CEMP (Biodiversity) shall include the following. 1. Risk assessment of construction activities potentially damaging to biodiversity. 2. Identification of "biodiversity protection zones". 3. Practical measures (both physical measures and sensitive working practices) to avoid or reduce ecological impacts during construction (may be provided as a set of method statements). 4. The location and timing of sensitive works to avoid harm to biodiversity features. 5. The times during construction when specialist ecologists need to be present on site to oversee works. 6. Responsible persons and lines of communication. 7. The role and responsibilities on site of an ecological clerk of works (ECoW) or similarly competent person. 8. Use of protective fences, exclusion barriers and warning signs. 9. Containment, control, and removal of any invasive non-native species present on site. The approved CEMP (Biodiversity) shall be adhered to and implemented throughout the construction period strictly in accordance with the approved details, unless otherwise agreed in writing by the Local Planning Authority.
22	No development shall take place until an Ecological Design, Management and Monitoring Strategy (EDMMS) for the provision of a minimum 10% on-site biodiversity net gain, has been submitted to and approved in writing by the Local Planning Authority. The EDMMS shall include the following: 1. Description and evaluation of habitat/features proposed (to include full Metric (using most current version) and details of condition assessments). 2. Identification of adequate baseline conditions (for management and monitoring purposes) prior to the start of works (to include full Metric (using most current version) and details of condition assessments). 3. Aims and objectives for the proposed works. 4. Site specific and wider ecological trends and constraints that might influence works. 5. Details of the body/organisation/person/s responsible for undertaking the works and lines of communication. 6. Details of the legal and funding mechanism(s) by which the implementation of the EDMMS will be secured by the developer with those responsible for its delivery. 7. Detailed design(s) and/or working method(s) to achieve stated objectives including type/source of materials, disposal of any wastes arising from works and appropriate scale plans showing location/area of proposed works. 8. Works Schedule, aligned with any proposed phasing and including an annual work plan capable of being rolled forward over a five-year period.

	9. Prescriptions for initial aftercare and long-term management that will ensure the aims/objectives are met. 10. Details for on-going monitoring in years 2, 5, 10, 15, 20, 25 and 30, including: a. Appropriate success criteria, thresholds, triggers, and targets against which the effectiveness of the work can be measured. b. Methods for data gathering and analysis. c. Location, timing, and duration of monitoring d. Review, and where appropriate, publication of results and outcomes, including when monitoring reports will be submitted to the Local Planning Authority. e. How contingencies and/or remedial action will be identified, agreed with the Local Planning Authority, and implemented so that the original aims/objectives of the approved scheme are met. The EDMMS shall be implemented in accordance with the approved details and all habitats/features shall be retained in that manner thereafter.
23	Prior to any works commencing, an air quality assessment must be submitted to and approved in writing by the Local Planning Authority. The assessment shall include full details of the measures necessary to mitigate the emissions as calculated in the assessment which shall be implemented prior to the occupation of any dwellings.
24	Prior to commencement of development the applicant shall prepare and submit for approval in writing, an Employment and Skills Plan. Following approval of the Employment and Skills Plan the developer will implement and promote the objectives of the approved plan.
25	No development above damp-proof course (DPC) level shall take place unless and until details of the proposed location of the required fire hydrants have been submitted to and approved in writing by the Local Planning Authority in consultation with West Sussex County Council's Fire and Rescue Service. Prior to the first occupation of any dwelling or building forming part of the proposed development, the applicant/developer shall at their own expense install the required fire hydrants (or in a phased programme if a large development) in the approved locations to BS:750 standards or stored water supply and arrange for their connection to a water supply which is appropriate in terms of both pressure and volume for the purposes of firefighting. The fire hydrants shall thereafter be maintained as part of the development by the water undertaker at the expense of the Fire and Rescue Service if adopted as part of the public mains supply (Fire Services Act 2004) or by the owner/occupier if the installation is retained as a private network.
26	Details of bat tubes, bricks or boxes shall be submitted to and approved in writing by the Local Planning Authority prior to any development above damp-proof course (DPC) level.

	No less than 48 bat tubes or bricks shall be provided, and the details shall include the exact location, specification, and design of the habitats. The bat tubes, bricks or boxes shall be installed with the development prior to the first occupation of the building/s to which they form part or the first use of the space in which they are contained. The bat tubes, bricks or boxes shall be installed strictly in accordance with the details so approved and shall be permanently maintained in good working condition thereafter.
27	Details of integral nesting bricks shall be submitted to and approved in writing by the Local Planning Authority prior to any development above damp-proof course (DPC) level. No less than 48 integral universal nesting bricks shall be provided, and the details shall include the exact location, specification, and design of the bricks. The bricks shall be installed within the development prior to the first occupation of the building/s to which they form part or the first use of the space in which they are contained. The nesting bricks shall be installed strictly in accordance with the details so approved and shall be permanently maintained in good working condition as such thereafter.
28	No part of the development shall be first occupied until such time as the vehicular access serving the development has been constructed in accordance with the details shown on drawing 332610169-STN-GEN-SW-DR-H-003.
29	No part of the development shall be first occupied until the road(s), footways, and casual parking areas serving the development have been constructed, surfaced, and drained in accordance with the plans and details approved by the reserved matters permission and the relevant drainage conditions.
30	No dwelling shall be first occupied until the car parking serving the respective dwellings has been constructed in accordance with plans and details approved by the reserved matters permission. Once provided the spaces shall thereafter be retained at all times for their designated purpose.
31	No piling or any other foundation construction using penetrative methods shall be carried out other than with the express written consent of the local planning authority (who shall consult with the Environment Agency & Portsmouth Water). The development shall be carried out in accordance with the approved details. A piling risk assessment and method statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface water infrastructure, vibration, and the programme

	for the works) should be submitted to and approved in writing in consultation with Portsmouth Water. It must be demonstrated that any proposed piling: a. Will not result in contamination of groundwater. b. Will not increase risk to drinking water supplies (including turbidity); and c. Will not deteriorate the transmissivity of the aquifer.