

# Greater Cambridge Local Plan 2024–2045

Regulation 18 Consultation December 2025–January 2026

Land west of Malton Road, Orwell.

On behalf of Cemex UK Properties Ltd.

Date: 23 January 2026 | Pegasus Ref: P25-2504

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## Document Management.

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# 1. Introduction

- 1.1. These representations have been prepared by Pegasus Group on behalf of Cemex UK Properties Ltd in respect of their interests at Land west of Malton Road, Orwell, Cambridgeshire ('the site'). The site is recorded under 'Site ID: SCB2035' within the Greater Cambridge Housing and Economic Land Availability Assessment (2022) which previously promoted a larger parcel of land for up to 150 dwellings.
- 1.2. These representations are submitted in response to the current Greater Cambridge Local Plan (GCLP) Regulation 18 consultation which sets out the emerging approach to accommodating growth across the shared Local Planning Authority areas of Cambridge City Council (CDC) and South Cambridgeshire District Council (SCDC) over the next plan period (2024-2045).
- 1.3. The purpose of these representations is primarily to respond to the relevant emerging Vision; Development Strategy; and Draft Allocations proposed by the consultation and to reaffirm the deliverability (suitability, availability and viability) of the above site alongside the provision of a site-specific policy that allocates the site for residential-led development in the emerging Local Plan.
- 1.4. These representations are accompanied by an Opportunities & Constraints Plan (Appendix 1), a Development Framework Plan (Appendix 2), an emerging Access Strategy (Appendix 3) and a baseline BNG assessment (Appendix 4) for the site. The Development Framework Plan has been informed by technical surveys which identify the local constraints and illustrates the opportunities presented to deliver a high-quality and sustainable residential-led development capable of contributing positively towards addressing identified housing needs and complementing the economic ambitions for Greater Cambridge.

## 2. Summary of the Greater Cambridge Local Plan

### Our Vision for Greater Cambridge

- 2.1. The Vision for Greater Cambridge is to be supported and clearly sets out the ambition for a sustainable and prosperous future for the area.
- 2.2. The Government is clear on the importance of Cambridge internationally and to the UK economy, with successive Government's promoting the 'Case for Cambridge' and the current Government reigniting plans to deliver the Oxford-Cambridge Growth Corridor. The Government has subsequently established the Cambridge Growth Company to seek to address barriers to growth and help unlock Cambridge's full potential by 2050, including through the proposed establishment of a centrally led Development Corporation.
- 2.3. The level of growth proposed by the Case for Cambridge is unprecedented and it is therefore critical that the anticipated growth comes forward in a sustainable manner and delivers exemplar place-making, combining good design and sustainable transport with new employment and housing that benefits everyone.
- 2.4. However, as highlighted within our representations the proposed Development Strategy for achieving these goals is misguided and places too much reliance on new settlements and complex major development sites, which are in turn reliant on significant infrastructure projects to serve these new places. New infrastructure projects take time to deliver and the delays in delivery of new settlements in the Greater Cambridge area, along with the necessary strategic infrastructure are well documented, indeed necessitating the Government intervention above. It is considered that the GCLP is overly optimistic regarding the delivery timescales of many of the proposed draft allocations which represents a real risk that Greater Cambridge will fail to deliver the homes it needs within the plan period to support its economic ambitions.
- 2.5. As expanded on below, a more balanced approach to the spatial distribution of growth is required - one that recognises the role of villages in contributing to the overall sustainable growth of the region. The restriction of growth opportunities in villages; many of which are sustainable location such as Orwell is not in line with the guidance in the emerging NPPF and fails to recognise Group villages as being capable of playing an important role in contributing to the success of Greater Cambridge.

### **3. Development Strategy**

#### **Vision for Greater Cambridge**

- 3.1. As noted in the summary above, the general Vision for Greater Cambridge and the seven Strategic Priorities are to be supported for their ambition to deliver a sustainable and prosperous future for the area.
- 3.2. The Strategic Priorities in respect of Climate Change; Biodiversity and Green Spaces; Well-Being and Social Inclusion; Great Places; Jobs; Homes; and Connectivity and Infrastructure, all align with the Government's existing and emerging overarching national planning policy objectives to deliver mutually supportive economic, social and environmental net gains through new development.
- 3.3. However, the proposed Development Strategy to achieve this Vision is misguided and overly reliant on the delivery of a small number of new settlements and complex major development projects, which are in turn reliant on significant infrastructure projects to serve these new places. The GCLP has significantly underestimated the timescales to deliver these key sites which risks the ability to deliver the stated Vision within the plan period.
- 3.4. It is evident that the Development Strategy underplays the role of existing sustainable settlements including villages and given the anticipated delays to the delivery of key sites, a more balanced approach to the spatial distribution of growth is required – one that recognises the role of the Group Villages in contributing to the success of Greater Cambridge.

## 4. Development Strategy

### Vision for Greater Cambridge

#### Policy S/JH: New jobs and homes

- 4.1. The general ambition of Draft Policy S/JH/: New Jobs and Homes is supported.
- 4.2. The National Planning Policy Framework (2024) seeks to significantly boost the supply of new homes (paragraph 61) informed by a local housing need assessment using the standard method in national planning guidance. Moreover, the National Planning Guidance highlights there will be circumstances where it is appropriate to consider whether actual housing need is higher than that indicated by the standard method. As highlighted within the 'Greater Cambridge Employment and Housing Needs Updated 2024–2025 (September 2025)', the economic-led housing need for Greater Cambridge broadly aligns with the standard method. The GCLP therefore appropriately identifies its housing needs for the period 2024–2045 based on the Government's standard method as 2,295 net new homes per annum totalling 48,195 homes over the plan period. The GCLP anticipates that the existing allocations within the adopted 2018 plan will deliver around 37,865 homes by 2045 and as such identifies new sites to deliver the shortfall of around 13,460 new homes and provide a buffer.
- 4.3. It is worth noting that the 'Case for Cambridge' envisaged growth scenarios of between 100,000–150,000 new homes for Cambridge by 2050 – potentially doubling or even tripling the number of homes currently being planned for in the GCLP. Whilst further details are yet to be published, there is clearly a potential misalignment of the growth scenarios being planned for in GCLP. Until the Cambridge Growth Company's plans are made public, the current approach of seeking to meet objectively assessed local housing needs in full and ensuring a buffer to overall housing provision is welcome to ensure flexibility and resilience in delivery. However, some of the sites relied upon to deliver new homes and the anticipated rate of housing delivery are challenged, as explored below under Draft Policy S/DS: Development Strategy. As highlighted below, it is critical that housing need and delivery keeps pace with anticipated jobs growth in order to deliver the economic ambitions for Greater Cambridge and the Mayor for Cambridgeshire & Peterborough's target of tripling the size of the local economy by 2050 as set out within the Local Growth Plan (2025).
- 4.4. Whilst the overall provision of housing is supported, it is noted that the supporting text to Draft Policy S/JH: New jobs and homes, provides housing requirements for neighbourhood areas as set out in Appendix D. Appendix D identifies a need for just c.23 net new homes for Orwell. Accordingly, there is an anticipation in the GCLP that some new growth will be directed to Orwell, which is supported. However, the level of anticipated growth (c. 23 net new homes) significantly underplays the role of Group villages and the potential they can play towards delivering the Vision for Greater Cambridge, as further explored under Draft Policy S/DS: Development Strategy.
- 4.5. The potential for villages to accommodate larger schemes can be evidenced in Orwell and other Group villages across the local plan area. In 2017 an Inspector allowed an appeal for 49 dwellings. Appeal Reference: **APP/WO530/W/16/3157596 (Application Ref: S/3190/15/OL)**. The implications of this decision are explored in section 6 of these representations.

## Policy S/DS: Development Strategy

- 4.6. The Development Strategy for the Greater Cambridge Local Plan states on page 16:
- 4.7. *"Our development strategy aims to direct development to where active and public transport is the natural choice, where green infrastructure can be delivered alongside new development, and where jobs, services and facilities can be located near to where people live."*
- 4.8. However, most of the proposed allocations, both existing and proposed, are in locations where the required public transport does not currently exist and the delivery of which is outside the control of the Greater Cambridge authorities. For instance, Cambourne North is reliant on the delivery of East-West Rail; Bourn Airfield is reliant on the delivery of the Cambourne to Cambridge Busway; Waterbeach is reliant on the delivery of a new railway station; and Cambridge East is reliant on the Cambridge Eastern Access busway and a potential new railway station.
- 4.9. Whilst there is no objection in principle to the inclusion of these particular allocations, the GCLP evidently underestimates the time involved to deliver the necessary public transport infrastructure to serve the draft allocations and overestimates the delivery rates for the associated new homes.
- 4.10. In respect of the first point, the GCLP states (para 2.88) that the proposed strategy is 'heavily informed by the location of existing and committed public transport schemes', however as highlighted above, in many instances, the funding and necessary approvals for the supporting infrastructure are still unconfirmed and therefore uncertain. The reliance on such locations for growth in favour of directing proportionate growth to established sustainable settlements is therefore unsound.
- 4.11. Delays to the delivery of new infrastructure and the knock-on effects for the delivery of new housing is well documented in the Greater Cambridge area. Appendix E of the Greater Cambridge Local Plan highlights a reliance on a spike in housing delivery in 2028–2030 from strategic sites such as Northstowe, which assumes some very ambitious delivery rates of up to 300 dwellings per annum (dpa) for individual parcels. However as reported by <sup>1</sup>Lichfield, the mean annual build-out rates on large sites have continued to fall and now stands at c.100–188 dpa due to persistent challenging market conditions, particularly for new settlements where demand can be more muted given the absence of established communities and the slow pace of delivering supporting infrastructure.
- 4.12. Figure 12 of the GCLP illustrates the over-reliance now placed on new settlements in meeting housing needs. 44% of the proposed distribution in housing growth in the Greater Cambridge Local Plan is now anticipated to come forward at the new settlements, compared to 23% in the adopted Local Plan and 18% in the previous Structure Plan. The previous more balanced approach to the distribution of development is considered to be the key to Greater Cambridge's success to date, providing inherent flexibility and resilience to ensure housing delivery continued to come forward across the Greater Cambridge area, even where

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<sup>1</sup> [https://lichfields.uk/media/w3wjmw5O/start-to-finish-3\\_how-quickly-do-large-scale-housing-sites-deliver.pdf](https://lichfields.uk/media/w3wjmw5O/start-to-finish-3_how-quickly-do-large-scale-housing-sites-deliver.pdf)

unexpected delays have been experienced at some key sites. In this context, the GCLP is considered to be overly dependent on a limited number of large and complex sites to achieve its stated strategic objective of meeting identified development needs in the plan period.

- 4.13. Furthermore, whilst the proposed allocation of major sites within the Cambridge Urban Area is supported in principle given the inherent sustainability of these locations, the GCLP recognises the challenges in delivering sites such as North East Cambridge in light of recent Government announcements that it will not be funding the relocation of the Cambridge Waste Water Treatment Plan (CWWTP). This has created significant uncertainty and whilst North East Cambridge is retained as a potential allocation at this Regulation 18 stage, it is considered that should no alternative funding become available ahead of the Regulation 19 stage later in 2026, it would be unsound to continue to include the site for allocation in the Plan.
- 4.14. With regard to the proposed allocations on the edge of Cambridge, it is also questioned whether the assumptions in the GCLP for Cambridge East are realistic given recent announcements that Marshalls has cancelled its planned move from Cambridge Airport to Cranfield. Whilst it is understood that Marshalls still aims to vacate the site by 2030 to enable the new neighbourhood at Cambridge East to come forward, this is predicated on now identifying and relocating to a new premises for its aerospace operations. Such sensitive commercial negotiations take time and accordingly the delivery trajectory for Cambridge East is considered to be similarly uncertain.
- 4.15. The above remarks do not seek to object in principle to the inclusion of these particular draft allocations but seek to highlight the inherent uncertainty associated with the presumed delivery rates for these major development sites which are heavily reliant on new public transport infrastructure provision to serve them; or are subject to unresolved viability constraints; or subject to factors outside the control of the planning system, all of which take time to resolve. These draft allocations will undoubtedly take longer to deliver than anticipated and it is therefore essential for the GCLP to allocate additional suitable and sustainable sites to ensure identified housing needs are addressed now and to support the ambitious economic growth objectives for the Greater Cambridge area.
- 4.16. Cumulatively Group villages can play a crucial role in ensuring an achievable level of growth through the plan period as they do not have the infrastructure and delivery uncertainties associated with urban extensions.

## **Proposed Alternative Development Strategy – Role of Sustainable Group Villages**

- 4.17. The above demonstrates the uncertainties associated with the proposed Development Strategy and the need to allocate additional suitable and sustainable sites to make up the anticipated shortfall in housing delivery within the plan period.
- 4.18. As highlighted at paragraph 2.26 of the GCLP, meeting the requirement for new homes and jobs brings the need to support development with the right infrastructure. However, the GCLP is currently overly reliant on potential new public transport infrastructure which will take time to deliver (if approved). A more balanced approach would be to recognise the role of existing Group villages which have sustainable credentials. Such locations are evidently capable of contributing positively to the development needs for Greater Cambridge.

- 4.19. The Development Strategy is driven by the stated objective to protect the Green Belt. Whilst this approach is now floored given the identification of Grey Belt in the Dec 2024 and emerging NPPFs the strategy should have a focus in identifying Group villages especially if they are located in non-Green Belt locations such as Orwell. These non-green belt Group villages should be given a greater scope for larger development given this advantage.
- 4.20. The GCLP is not planning positively to meet its identified needs as required by national planning policy (para 36) and has failed to consider all reasonable options for meeting its identified needs in a sustainable way, including directing growth to the villages especially in non Green Belt Locations. It is our view therefore that directing appropriate growth towards sustainable villages such as Orwell which also benefits from a non-Green Belt location, aligns with the national planning policy objective to promote sustainable patterns of development.
- 4.21. The previous Local Plan adopted a similar approach with an emphasis on growth at the major settlements. Subsequently, our interrogation of the supply suggests the authority has not maintained a 5 YHLS during the plan period to date. At the time of writing this report we consider that the authority would not be able to evidence a 5-year supply for based on the latest evidence and applications.

## 5. Policy S/SH Settlement Hierarchy

### Objection

5.1. The proposed Settlement Hierarchy is generally supported in terms of the settlements identified in each level however the level of development identified for each tier of the hierarchy is not supported.

5.2. As set out earlier in these representations there is an over reliance in the strategy on placing the majority of new housing growth at major urban extensions and new settlements which potentially take years to come forward. A more balanced approach to development would accord with the emerging NPPF (2025). Emerging NPPF Policies S5 and HO6 are relevant in this context. The relevant policy references to allowing development outside of development frameworks and encouraging local plans to deliver a diverse range of sites are set out below:

#### S5: Principle of Development outside settlements

*Only certain forms of development should be approved outside settlements, as set out in the following list. These should be approved, unless the benefits of doing so would be substantially outweighed by any adverse effects, when assessed against the national decision-making policies in this Framework:*

*i. The development of land allocated for that purpose in the development plan (where this lies outside settlements); and*

*j. 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 and where the development would:*

*i. be well related to an existing settlement (unless the nature of the development would make this inappropriate) and be of a scale which can be accommodated taking into account the existing or proposed availability of infrastructure.*

#### HO6: Planning for a diverse mix of sites

*1. To support the provision of a diverse mix of sites, local plans should:*

*a. Allocate land to accommodate at least 10% of the housing requirement on sites no larger than one hectare, and a further 10% on sites of between one and two and a half hectares, unless there are strong reasons why these targets cannot be achieved; and*

*b. Allocate sites which will support and enhance the vitality of rural communities and enable villages to grow and thrive, especially where this will support local services.*

*(our underlining)*

5.3. The emerging NPPF seeks to ensure Local Authorities have a balanced approach to new housing delivery including the allocation of sites outside of development frameworks at villages to support local services, meet local housing needs and to help villages thrive. Subsequently there should be no development restriction placed on Group villages.



Development proposals should be assessed on their merits including the suitability of the site and the villages' sustainable credentials. The emerging NPPF does not reference the need to set restrictive development caps in rural areas.

- 5.4. It is more than likely that this Local Plan will be assessed under the emerging NPPF including the new development control policies therefore this consultation needs to apply the Government's approach as set out in the consultation draft.
- 5.5. The previous local plan has a similar restriction of 8 dwellings (15 on brownfield) on sites located inside the framework of the group village. However, there are numerous examples across all the Group Villages of where developments have exceeded this level of growth and a wide number of larger sites approved which adjoining the village outside of the framework. Many of these developments including the scheme allowed in Orwell for 49 units were approved at appeal with Inspectors placing the delivery of housing and improvement of the vitality of villages and their services as a key justification for allowing the appeal. This approach now fully aligns with the aims of the emerging NPPF and notably Policy HO6.
- 5.6. The settlement hierarchy should also reflect the importance of meeting local housing needs in rural locations. Housing growth is important for maintaining village communities. Villages development provided opportunities to meet local housing needs for local people and allows people to be able to stay in their communities. Spreading growth through the hierarchy helps all areas to deliver a balanced regional development which helps all parts of the Local Authority area to thrive – not just urban centres.
- 5.7. Without appropriate scale new housing rural villages can also experience population decline as younger people move away in seek of affordable housing (The average house price in Orwell is over £600,000 which emphasises the need for a better choice of housing in the village). This leaves behind an aging population.
- 5.8. Housing growth also sustains services such as schools, shops, post offices, pubs etc. New population keeps these services viable. Growth also assists in the local economy through the construction period and beyond. It allows people to work from home or run rural enterprises and work in the rural area.
- 5.9. There may also need to be development in villages to support community developments for new village facilities such as football pitches, a village hall, new open space, allotments and other much needed facilities. If development is restricted, it is unlikely this would be sufficient to make any such development viable. Suitable allocations should be made in Group villages to address this need and restrictions of development inside the framework should be removed.
- 5.10. We would also argue that Group villages not located in the green belt should sit one stage higher in the hierarchy. With the emphasis on the plan to protect the green belt (although a review of Grey Belt land now being required as part of the site assessment) the opportunities to develop in villages outside the green belt should be considered within the hierarchy.

## 6. Site Allocations – Rest of the Rural Area

### Allocation of Land west of Malton Road, Orwell

- 6.1. Given our desire to see a more balanced approach to housing delivery we are seeking the allocation of land to the west of Malton Road Orwell with a fully policy compliant scheme of up to 75 dwellings with associated over provision of open space; play area and the potential to deliver a football pitch for the village given that Orwell FC currently play their home matches in Royston.
- 6.2. The proposed site is accessed from Malton Road (See Appendix 3) and is well related to the village and a short walking distance from the High Street where many of the villages' services are found. In terms of constraints there is nothing really that impacts on a potential development of the site:
- The land is in ownership of Cemex and is ready to be developed immediately.
  - Orwell is a non-Green Belt location.
  - The entire site is flat agricultural land and is entirely in Flood Zone 1.
  - The site is not constrained by any heritage or ecology designations or assets.
  - The site is well related to the village opposite existing employment use and can be easily linked to the High Street via a new footpath/cycleway
  - The site is a mix of Grade 2 & 3 Agricultural Land
  - Reduction in site area (from previous SHLAA promotion) to 5.23ha/75 units has reduced its overall scale to one more appropriate for a village of this size and services.
  - There is a lack of high-quality habitats on site (See Appendix 4)
- 6.3. The previous site promotion to the HELAA identified a larger area for potential development (8.78 ha) over two phases. The overall assessment of the site scored very well as a residential site identifying that it has no constraints to development, could be delivered early in the plan period and would be attractive to the market. Despite these positive assessments ratings which can also be applied to this latest submission scheme, the site was not considered as a potential allocation due to the overall scale of the development.
- 6.4. This latest promotion scheme significantly reduces the site's development potential to a maximum of 75 dwellings by reducing a large proportion of the western part of the site which will be retained in agriculture. This represents a more realistic scale of development for the village whilst retaining an overprovision of open space along the lines of the scheme which was approved in the village at Hurdleditch Road for 49 dwellings.
- 6.5. Whilst it is recognised at the time of the appeal that SCDC could not demonstrate a 5-year supply of houses it is still relevant how the Inspector assessed the suitability of this scheme of development in the village based on its sustainability. In allowing the appeal the Inspector confirmed the sustainable credentials of the site:

- There is no conflict with Policy ST/6 limiting residential development to 8 dwelling within village frameworks as the site was located outside the framework. (at Para. 14)
- *'In terms of shops and services, Orwell contains a village store (including post office), a public house, a hairdresser, a village hall, church hall, some recreation facilities and a mobile library service. Whilst located just outside of the village framework, the proposal would be within reasonable walking distance of facilities within the village. Such facilities would be unlikely to fully cater for the day-to-day needs of residents of the village including those of the proposed development. Nevertheless, whilst being limited I consider that they provide a reasonable level of facilities providing residents with the opportunity for some day to day needs to be met without needing to travel by car.'* (Para. 16)
- *'...the site is located adjacent to Petersfield Primary School which has capacity to accommodate the primary school needs of the proposed development. There is a secondary school in nearby Bassingbourn which also has sufficient capacity and is accessible from the village via a school bus service operating from the village. Access to early years and sixth form education provision would be more limited, but overall, the site has reasonably good access to local education provision.'*
- *'In terms of the opportunity to access other facilities by public transport, the proposal includes provision for two new bus stops to be provided on Hurdleditch Road close to the site. This would provide access via bus to Cambridge, though such provision would be constrained by the limited frequency of buses. Other bus services to nearby centres would also be available but their use would also be constrained by the infrequency of services.'* (Para. 20)
- *'Further opportunities for travel by rail would be available from the nearby railway station at Shepreth with reasonably regular services on the Cambridge to London line, including stops at Royston, Hitchin and Stevenage...'* (Para. 21)

6.6. The proposed site offers the opportunity to deliver a similar scheme in a village location, which the Inspector considered would allow for some travel by public transport and within the village to local services.

6.7. The proposed scheme lies outside the village framework so the restriction on capacity of development is not relevant albeit we are seeking the site to be allocated in any instance.

6.8. The allocation would meet the requirements of the emerging NPPF in respect of Policy HO6 (b) Planning for a diverse mix of sites as referenced earlier. It also is located in a non-Green Belt location therefore not caught by Policy GB6: Control of development in the Green Belt.

6.9. The site has been subject to several preliminary studies to support this representation:

**Design/Landscape**

6.10. The indicative masterplan which accompanies these representations provides an indication of how the site could be delivered for the proposed 75 dwellings. The built form would be located closest to the existing village framework boundary and front onto Malton Road.

6.11. The layout will be served off a single spine road served off a new access from Malton Road. The site will benefit from landscaping around the whole site and a significant over provision



of landscaping; play space and potential formal sports pitch (or pitches) to the south of the proposed residential layout.

- 6.12. The scheme will be relatively low density and provide a high-quality residential environment.

### **Highways**

- 6.13. The proposed access to the site has been positioned after a full engineering review taking into account existing access points nearby. The junction is sufficient to serve the development.

- 6.14. A new footpath/cycle path will be delivered from the site along Malton Road to the High Street to allow pedestrian and cycle access to the local facilities.

### **Ecology/BNG**

- 6.15. An initial assessment has identified that the site does not contain any primary habitats. It contains hedgerows, trees and arable farmland.

- 6.16. These findings indicate that the 10% BNG requirement will be fully delivered on site rather than through offsite credits.

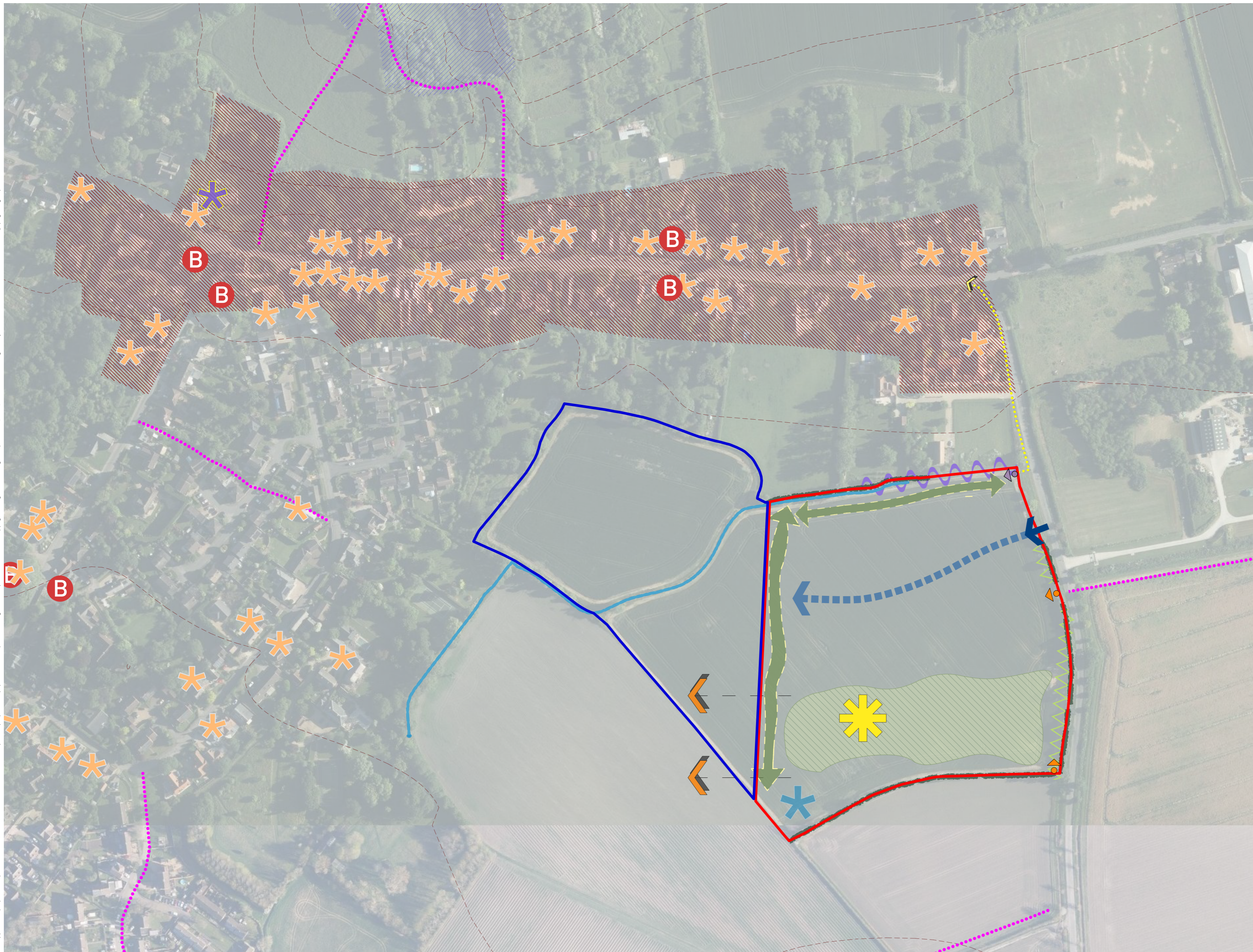
## 7. Summary






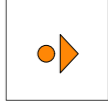
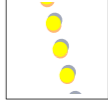
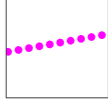
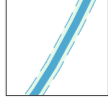

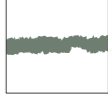




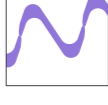

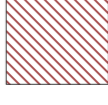
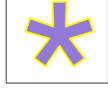

- 7.1. The draft strategy set out on the GCLP is flawed due to the over reliance on the delivery of larger complicated sites. The estimated build out rates look to be unachievable based on the need to deliver major infrastructure to unlock these sites, coupled with expected market absorption rates.
- 7.2. Furthermore, the growth agenda for Cambridge is likely to see the need for a higher number of houses than currently being projected in the Plan period.
- 7.3. A more balanced delivery approach is required which also meets the requirements of the emerging NPPF which requires authorities plan for a diverse mix of sites across the Local Plan region. This is likely to be the framework which will be in place by the time this Plan reaches Public Examination
- 7.4. Orwell represents a viable option for a housing allocation of a suitable scale. The previous assessment of the site through the SHLAA process identified the site had no constraints to its development and would be available to develop in the short term. The village is also located in a non-green belt location.
- 7.5. The Inspector in the 2017 Hurdleditch Road appeal found the village to have a number of sustainable credentials including a railway station nearby at Shepreth and local facilities which can be accessed via sustainable modes of transport. The proposed allocation will deliver a policy compliant scheme which will link well to the village and deliver significant benefits including public open space and the possibility of a formal sports pitch (or pitches).
- 7.6. The major benefit however; it will deliver 75 dwellings within the early stages of the Local Plan period.

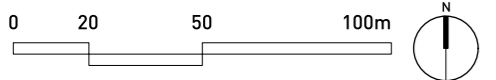


## **Appendix 1: Opportunities and Constraints Plan**

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- KEY**
-  SITE LOCATION (5.25HA)
  -  ADDITIONAL LAND IN OWNERSHIP OF CLIENT
  -  PROPOSED PRIMARY ACCESS POINT OFF MALDON ROAD
  -  POTENTIAL PRIMARY ACCESS ROUTE
  -  PROPOSED EMERGENCY, CYCLE AND PEDESTRIAN ACCESS POINT
  -  POTENTIAL INFORMAL PEDESTRIAN LINK (UP TO SITE BOUNDARY)
  -  PROPOSED PUBLIC FOOTPATH / CYCLEPATH LINKING SITE TO HIGH STREET
  -  EXISTING PROWL (PUBLIC RIGHT OF WAY)
  -  EXISTING WATER FEATURE / COURSE
  -  POTENTIAL ATTENUATION BASIN (SUBJECT TO SPECIALIST INPUT)
  -  EXISTING VEGETATION / TREES
  -  POTENTIAL LANDSCAPE BUFFER AND OPPORTUNITIES TO STRENGTHEN EXISTING VEGETATION
  -  POTENTIAL GREEN CORRIDOR
  -  POTENTIAL GREEN AMENITY SPACE
  -  POTENTIAL LOCATION FOR A CHILDREN'S PLAY AREA
  -  VIEWS TOWARDS COUNTRYSIDE
  -  NEIGHBOURING RESIDENTIAL EDGE
  -  CONTOURS
  -  SITE OF SPECIAL SCIENTIFIC INTEREST
  -  CONSERVATION AREA
  -  GRADE II\* LISTED BUILDING
  -  GRADE II LISTED BUILDING
  -  BUS STOP



## LAND WEST OF MALTON ROAD, ORWELL - OPPORTUNITIES AND CONSTRAINTS PLAN

| PEGASUSGROUP.CO.UK | TEAM/DRAWN BY: JS | APPROVED BY: MH | DATE: 28/01/2026 | SCALE: 1:2000@A2 | DRWG: P25-2504\_DE\_002\_A\_01 | CLIENT: CEMEX UK PROPERTIES LTD |



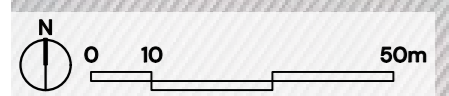


## **Appendix 2: Development Framework Plan**

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- KEY**
- SITE LOCATION (5.25HA)
  - ADDITIONAL LAND IN OWNERSHIP OF CLIENT
  - RESIDENTIAL AREA  
UP TO 75 DWELLINGS @ 30DPH
  - PROPOSED PUBLIC OPEN SPACE  
EXCL. SUDS
  - PROPOSED LOCATION OF CHILDREN'S PLAY AREA
  - PROPOSED LOCATION OF SPORT PITCH
  - INDICATIVE LOCATION OF CAR PARK FACILITY
  - EXISTING VEGETATION & TREES  
(SUBJECT TO SPECIALIST INPUT)
  - EXISTING WATER COURSE
  - INDICATIVE ATTENUATION BASIN  
(SUBJECT TO SPECIALIST INPUT)
  - INDICATIVE RADIAL FOOTPATH  
(SUBJECT TO DETAILED DESIGN)
  - PROPOSED PUBLIC FOOTPATH / CYCLEPATH LINKING SITE TO HIGH STREET  
(SUBJECT TO SPECIALIST INPUT)
  - EXISTING PUBLIC RIGHTS OF WAY (PROW)
  - PROPOSED VEHICULAR ACCESS POINT  
(SUBJECT TO SPECIALIST INPUT)
  - PROPOSED EMERGENCY, CYCLE AND PEDESTRIAN ACCESS POINT  
(SUBJECT TO SPECIALIST INPUT)
  - POTENTIAL INFORMAL PEDESTRIAN LINK  
(UP TO SITE BOUNDARY)
  - POTENTIAL INDICATIVE ACCESS POINT TO SPORT PITCH
  - PROPOSED PRINCIPAL STREET
  - INDICATIVE SECONDARY AND TERTIARY STREETS  
(SUBJECT TO DETAILED DESIGN)



**LAND WEST OF MALTON ROAD, ORWELL – DEVELOPMENT FRAMEWORK PLAN**

| PEGASUSGROUP.CO.UK | TEAM/DRAWN BY: JS | APPROVED BY: MH | DATE: 29/01/2026 | SCALE: 1:1250@A2 | DRWG: P25-2504\_DE\_002\_B\_02 | CLIENT: CEMEX UK PROPERTIES LTD |





## **Appendix 3: Access Strategy**

# Transport Strategy.

Land to the West of Malton Road, Orwell.

On behalf of Cemex UK Properties Ltd.

Date: January 2026 | Pegasus Ref: P25-2504 TR01

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## Document Management.

| Version | Date         | Author | Checked/<br>Approved by: | Reason for<br>revision |
|---------|--------------|--------|--------------------------|------------------------|
| TRO1    | January 2026 | JC     | LRD/KS                   | -                      |



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# Figures.

Figure 3.1 Site Location, Facilities and Amenities Plan

Figure 4.1 Proposed Access Arrangement



# 1. Introduction

- 1.1. This Transport Strategy (TS) has been prepared by Pegasus Group on behalf of Cemex UK Properties Ltd. It supports the promotion of land west of Malton Road in Orwell, Cambridgeshire, for circa 75 residential dwellings.
- 1.2. The site is located within the village of Orwell on open land directly to the west of Malton Road. The site is bound by Malton Road to the east, existing residential dwellings to the north and west and open land to the south. The site is currently served by an existing informal agricultural access at the northeastern corner of the site.
- 1.3. There are opportunities to make trips to and from the site by walking, cycling and public transport. Access to local amenities such as the primary school, the local shop, beauty salon and churches can be achieved by walking, with additional facilities located in Haslingfield, Shepreth and Foxton including two train stations and restaurants within typical cycling distances. Further facilities are available in higher order settlements such as Cambridge, which is accessible from Orwell via a local bus service.
- 1.4. Where car borne trips are considered necessary, there is the opportunity to minimise the lengths of trips between the scheme and typical local services and facilities, when measured against national average trip lengths. This means there is the opportunity for car trips created by the development to be short.
- 1.5. This TS addresses transport matters associated with residential development including access, parking and travel planning at a high level. It is intended to work collaboratively with the highway authority at Cambridgeshire County Council (CCC) and other stakeholders to agree appropriate strategies associated with the scheme in due course.
- 1.6. It is concluded that residential development of this scale and at this location provides an appropriate opportunity to minimise the length and numbers of vehicular trips, relative to the site's context within its surroundings, and that the site is accessible and acceptable in transportation terms.

## 2. Baseline Transportation Issues

### Current National Transport Related Policy

#### National Planning Policy Framework (December 2024)

- 2.1. In transport terms the thrust of the National Planning Policy Framework (NPPF) is:
- i. A presumption in favour of sustainable development (paragraph 10).
  - ii. To make the fullest use of public transport, walking and cycling (paragraph 111) and when making planning decisions ensuring the opportunities for sustainable transport modes have been taken up (paragraph 115) whilst noting that opportunities will vary between urban and rural areas (paragraph 110).
  - iii. To locate and design development to give priority to pedestrian and cycle movements, and have access to high quality public transport facilities (paragraph 117).
  - iv. Ensuring that safe and suitable access to the development can be achieved for all people (paragraph 115); and
  - v. That development should only be refused on transport grounds where there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network are severe (paragraph 116).

### Current Local Transport Related Policy and Guidance

#### Cambridgeshire County Council Transport Strategy for Cambridge and South Cambridgeshire (2014)

- 2.2. The Cambridgeshire County Council Transport Strategy for Cambridge and South Cambridgeshire outlines the overall action plan for development of Cambridge and South Cambridgeshire in transport terms until 2031, detailing the major infrastructure schemes and short, medium, and longer term goals for the county.
- 2.3. The document specifically sets out the opportunity for potentially providing a 'rural hub' at Shepreth Railway Station, with the potential for improvements to the facilities at the Station. The document also recognises that there are a 'number of villages' that are within a 'reasonable cycling distance' to Stations along this rail corridor (page 5–20). As set out at **paragraph 3.14**, Shepreth Railway Station is located around 4.9 kilometres from the approximate site centre, which is within the typical eight kilometre cycle distance threshold set out in national guidance.

#### Cambridgeshire Local Transport Plan 2011–2031 (2015)

- 2.4. The Cambridgeshire Local Transport Plan outlines the challenges and opportunities for transport growth and improvements within Cambridgeshire. These include for reducing travel times, increasing quality of active travel and existing transport routes, and futureproofing transport links to mitigate the impacts of climate change.

#### Cambridgeshire Long Term Transport Strategy (2015)

- 2.5. The Cambridgeshire Long Term Transport Strategy builds upon the local transport plan with targeted goals for development up to and beyond 2031. This includes aims relating to improving pedestrian and cyclist networks throughout the County, and ensuring that new developments provide links to existing pedestrian and cyclist networks.

#### Cambridgeshire County Council Active Travel Strategy (2023)

- 2.6. The Cambridgeshire County Council Active Travel Strategy outlines the aims and objectives for walking and cycling within the county. It highlights the high level of average cycling with the region compared to the UK average, with 7.6% of residents in south Cambridgeshire cycling to work in 2011, and sets out the aim of expanding the existing active travel network to link with towns and villages with main employment areas, schools and transport hubs.

#### Cambridgeshire County Council Local Cycling and Walking Infrastructure Plan (2022)

- 2.7. The CCC Local Cycling and Walking Infrastructure Plan (LCWIP) outlines the policies and planned improvements to the greater Cambridge area between 2025 and 2040. It highlights existing cycle desire lines across the county, with Figure 8 showing that there is an existing desire line between Orwell and Shepreth.

- 2.8. Cambridgeshire Highways Development Management General Principles for Development (2023)

- 2.9. The Cambridgeshire Highways Development Management General Principles for Development document sets out design guidance for highways within the county. This includes dimensions of access roads and the number of dwellings served from single access points, as well as visibility splay and adoption requirements.

#### **Summary and Way Forward**

- 2.10. It is considered that development of Land West of Malton Road, Orwell, can be provided broadly in accordance with the objectives of local transport planning policy.
- 2.11. **Chapter 3** confirms that the site is within walking and cycling distance of some facilities and amenities that could be required by future residents on a daily basis, and that it is also located within reasonable distance of existing bus stops. **Chapter 3** also confirms that there are a number of facilities and amenities that are within shorter distances than the national average, providing the opportunity to reduce vehicle trip lengths.
- 2.12. It is concluded that the development provides the opportunity to minimise the numbers and length of vehicular trips at levels appropriate for its locational context, given the recognition in the 2024 NPPF that sustainable transport solutions will vary between urban and rural areas.

## 3. Accessibility

### Local Context

- 3.1. The site is bound by existing residential dwellings to the north and west, Malton Road to the east and open land to the south. The location of the site in the context of its surroundings is shown at **Figure 3.1**.

### Local Highway Network

#### Malton Road

- 3.2. Malton Road comprises an unlit single carriageway road measuring approximately five metres in width within the vicinity of the site. Malton Road is subject to 40mph speed limit along the eastern site boundary, although this reduces to 20mph approximately 35 metres north of the site boundary. To the north, Malton Road connects to the High Street in Orwell, and to the south it connects to North End in the village of Meldreth.
- 3.3. There is no existing pedestrian or cyclist infrastructure along Malton Road.

#### High Street

- 3.4. High Street comprises a partially lit single carriageway road measuring approximately six metres in width. High Street is subject to a 20mph speed limit within the village of Orwell, with a speed gate located directly adjacent to the priority junction between Malton Road and High Street, where the speed limit increases to 40mph. The carriageway serves existing residential dwellings and provides a connection through the settlement between Barrington to the east and the A603 Cambridge Road to the west.
- 3.5. High Street is provided with footways on both sides of the carriageway that measure between approximately one and two metres in width. Dropped kerbs are provided at crossing points, as appropriate.

### Local Services and Facilities

- 3.6. The Department for Transport (DfT) document Manual for Streets (MfS) published in 2007 states at paragraph 4.4.1 that walking offers the greatest potential to replace short car trips, particularly those under two kilometres, although this is not an upper limit.
- 3.7. The Department for Education (DfE) "Travel to School for Children of Compulsory School Age" document (2024) suggests that school children will only be eligible for free school transport if a scheme is beyond a walking distance of 3.2 kilometres (two miles) for those aged up to eight years old, and 4.8 kilometres (three miles) for children aged between eight and 16 years old. On this basis, it is typically reasonable to consider that a number of children will walk to schools within these distances.
- 3.8. The DfT Local Transport Note 'Cycle Infrastructure Design' at paragraph 1.5.1 confirms that many utility journeys are under three miles (approximately five kilometres), although for commuter journeys a trip distance over five miles (approximately eight kilometres) to work is not uncommon.

- 3.9. The 2015 CIHT publication *Planning for Cycling* states on page 4 that the majority of cycling trips are for short distances, with 80% being less than five miles (eight kilometres) and with 40% being less than two miles (3.2 kilometres). It also states that electric bicycles extend the range that can be cycled comfortably, and combined cycle-rail or cycle-bus journeys offer an alternative to cars for many longer trips.
- 3.10. Within walking distance of the site, there is a primary school (1.7 kilometres), a public house (1.2 kilometres), a village shop and post office (1.2 kilometres), hairdresser (one kilometre) and a village hall (600 metres). These are all within around 1.7 kilometres of the approximate centre of the site, or around a 8-21 minute walk.
- 3.11. Within cycling distance of the site, additional facilities and amenities are available including Foxton and Shepreth Railway Stations, as well as local shops, restaurants, takeaways and playing grounds in the surrounding settlements of Haslingfield, Shepreth and Foxton.

### **Public Transport**

- 3.12. Bus provision within the vicinity of the site is provided via services 15 and 75, accessed from the High Street bus stops located around 600 metres northwest of the approximate site centre. This equates to an approximate eight minute walk.
- 3.13. Service 15 operates a daily service on Wednesdays between Haslingfield and Royston, arriving and departing from the High Street bus stops. Service 75 provides a connection between Wrestlingworth and Cambridge every two to three hours from the High Street bus stops. The first service departs the High Street towards Cambridge at 07:08 and arrives in Cambridge at 08:33. The final returning service departs at 17:45 and arrives in Orwell at 18:27. The returning service is not timetabled to stop at the High Street stops, but instead stops at the Chequers Close bus stop, located around 1.2 kilometres, or a 15 minute walk, from the approximate site centre using the proposed pedestrian site access. It is therefore considered that there are commuting opportunities during peak hours to travel by bus between Cambridge and the site.
- 3.14. The nearest Train Station is Shepreth, located approximately 4.9 kilometres south of the proposed development, which equates to an approximate 18 minute cycle from the approximate centre of the site, using the proposed site access. The station provides 13 car parking spaces and nine secure bicycle stands. The Station provides services to both Cambridge and London Kings Cross approximately twice an hour.

### **Length of Journeys**

- 3.15. The National Travel Survey (NTS) provides the national average trip length by purpose for all modes of transport. These distances have been compared with the distances between the approximate centre of the site and key local services in **Table 3.1**.

Table 3.1 – Length of Journeys

| Trip Purpose                                      | Service / Facility                     | 2024 NTS Average Trip Distance (km) | Distance by Road from Site (km) | Difference (km) |
|---|--|-------------------------------------|---------------------------------|-----------------|
| Primary School                                    | Petersfield Primary School             | 3.2                                 | 1.7                             | -1.5            |
| Personal Business                                 | Niche Orwell (Hairdressers)            | 5.0                                 | 1.0                             | -4.0            |
|   | Orwell Post Office                     |                                     | 1.2                             | -3.8            |
|   | Eversden Surgery                       |                                     | 4.5                             | -0.5            |
| Commuting   | Accora Ltd                             | 13.0                                | 0.5                             | -12.5           |
|   | Volac International Limited            |                                     | 1.3                             | -11.7           |
|   | Melbourn Science Park                  |                                     | 7.9                             | -5.1            |
|   | Cambridge Medical Technologies Limited |                                     | 8.3                             | -4.7            |
|   | Royston Town Centre                    |                                     | 12.4                            | -0.6            |
|   | Cambridge City Centre                  |                                     | 15.4                            | +2.4            |
| Shopping  | Orwell Londis                          | 3.7                                 | 1.2                             | -2.5            |
|   | Tesco Extra                            |                                     | 12.1                            | +8.4            |
|   | Royston Town Centre                    |                                     | 12.4                            | +8.7            |
| Entertainment/Public Activity/Sporting Activities | Orwell Village Hall                    | 6.3                                 | 0.6                             | -5.7            |
|   | Orwell Clunch Pit Hiking Area          |                                     | 0.7                             | -5.6            |
|   | The Chequers Public House              |                                     | 1.2                             | -5.1            |
|   | Barrington Cricket Club                |                                     | 3.5                             | -2.8            |
|   | Shepreth Wildlife Park                 |                                     | 5.2                             | -1.1            |
|   | South Cambridgeshire Equestrian Centre |                                     | 4.8                             | -1.5            |

- 3.16. **Table 3.3** confirms that vehicular trips associated with future residents of the scheme would be shorter to various services and amenities than the national average trip distance to most facilities. It is considered that a development in this location would therefore help to minimise the length of car trips in the wider context when considering delivery of new housing.

#### **Conclusion on Accessibility**

- 3.17. It is concluded that the site is located within walking and cycling distance of existing services and facilities within Orwell and surrounding settlements. It provides the opportunity to combine walking, cycling and public transport trips. Nearby bus services are within walking distance and could be used by future residents to commute to Cambridge. The site's location also provides the opportunity for relatively short car journeys to access local facilities, amenities and services, when compared to the national average.

## 4. Transport Strategy

- 4.1. A high-level draft transport strategy dealing with currently identified key issues is set out below, although this will be refined in due course through collaboration with stakeholders as appropriate.
- 4.2. In order to facilitate a development at Land west of Malton Road that reduces car borne trips, a new pedestrian link will be introduced to connect to the village of Orwell.
- 4.3. The intention is to work collaboratively with CCC and other relevant stakeholders to agree the transport strategy for Land West of Malton Road in due course.

### Access and Highway Strategy

#### Vehicular Access Arrangement

- 4.4. The proposed vehicular access is shown in **Figure 4.1**. At this stage it is anticipated that access to the site will be from Malton Road via a new priority junction, with the site access road measuring five metres wide with six metre radii at the bellmouth. This is in accordance with the suggested dimensions set out for a 'minor estate road' in the Cambridgeshire Highways Development Management General Principles for Development document (2023), which is able to serve up to 100 dwellings from a single point of access.
- 4.5. Footways are anticipated to be provided on the northern side of the site access point, and on both sides of the carriageway within the site, that measure two metres wide. It is proposed that the existing 20mph speed limit to the north of the site would be relocated to the south of the site access as part of the access strategy. In light of this, visibility splays are provided at 2.4 metres x 25 metres in both directions, commensurate with a 20mph speed limit.
- 4.6. It is proposed that the existing carriageway on Malton Road could be widened to 5.5 metres between the site access and the High Street junction to the north. The two metre wide footway on the northern side of the site access will continue on the western side of Malton Road to the High Street junction in the north, in order to provide a continuous pedestrian connection between the site and the existing pedestrian infrastructure to the north. In order to accommodate a footway at the High Street/Malton Road junction, it is proposed that the priority junction is reconfigured from its current 'Y' arrangement to a simple priority junction. All off-site improvements are anticipated to be undertaken within land which is Highway Maintained at Public Expense (HMPE).
- 4.7. Tactile paving and dropped kerbs will be provided at a new uncontrolled pedestrian crossing point to the west of the High Street/Malton Road junction to connect to the existing footway to the north of the carriageway. Pedestrian visibility splays of 1.5 x 25 metres are achievable here, commensurate with the signed 20mph speed limit.

### Non-Motorised User Access Arrangement

- 4.8. It is currently proposed that an access for non-motorised users will be provided at the northeastern corner of the site, approximately in the location of the existing informal agricultural access. It is currently proposed that this will measure 3.7 metres wide and would link to the proposed footway on Malton Road. This access point could also serve as an emergency access point, if ultimately required by the local highway authority.

### Forecast Trip Impact

- 4.9. The TRICS database version 8.25.6 has been interrogated in order to provide initial multi-modal trip forecasts at this stage for residential development. The parameters applied when searching for comparable sites include houses privately owned dwellings in neighbourhood centre areas at sites up to 150 dwellings that are not subject to a Travel Plan. This is considered to provide a robust assessment at this stage.
- 4.10. The forecast trip numbers for circa 75 dwellings are shown in **Table 4.1**.

Table 4.1 – Forecast Multi Modal Trip Generation

| 75 Dwellings          | Trip Rate (per dwelling) |            |       | Forecast Development Trips |            |       |
|-----------------------|--------------------------|------------|-------|----------------------------|------------|-------|
|                       | Arrivals                 | Departures | Total | Arrivals                   | Departures | Total |
| <b>Total People</b>   |                          |            |       |                            |            |       |
| AM Peak (08:00–09:00) | 0.300                    | 0.749      | 1.049 | 23                         | 56         | 79    |
| PM Peak (17:00–18:00) | 0.527                    | 0.300      | 0.827 | 40                         | 23         | 62    |
| <b>Vehicles</b>       |                          |            |       |                            |            |       |
| AM Peak (08:00–09:00) | 0.176                    | 0.319      | 0.495 | 13                         | 24         | 37    |
| PM Peak (17:00–18:00) | 0.314                    | 0.143      | 0.457 | 24                         | 11         | 34    |

- 4.11. This initial trip assessment forecasts that a scheme of circa 75 residential dwellings could generate around 37 two-way vehicle trips in the AM peak and around 34 two-way vehicle trips in the PM peak. This equates to approximately one additional vehicular trip every one to two minutes in the peak hours on average, which is not considered to be material in real terms.
- 4.12. As an alternative assessment, travel to work census data for the Middle Super Output Area (MSOA) E02003787: South Cambridgeshire O13 in which the site is located suggests that around 71% of the population commute via driving a car. From the total people trips reported in **Table 4.1** above, this equates to approximately 56 two-way vehicular trips in the AM peak and 44 two-way vehicular trips in the PM peak. This equates to an average of less than one vehicular trip per minute, which is not considered to be material in real terms. This is considered to provide a robust assessment.
- 4.13. Detailed Transport Assessment work will be completed to confirm trip forecasts and the propensity for modal shift in due course.

### **Walking and Cycling Strategy**

- 4.14. High quality pedestrian and cycle links would be provided throughout the development. The framework masterplan provides an illustrative network of pedestrian connections. These would be investigated fully and brought forward as appropriate in connection with the development.
- 4.15. The development scheme provides the opportunity for improvements to the pedestrian infrastructure on Malton Road to come forward alongside the development, in order to connect with the existing pedestrian infrastructure on the High Street to the north of the site. This could include pedestrian facilities along Malton Road, introducing dropped kerbs with tactile paving. The proposals are set out further at **paragraph 4.7**.

### **Public Transport Strategy**

- 4.16. Existing public transport routes are located within reasonable walking distance on High Street. It is considered that the existing pedestrian infrastructure along High Street in combination with the proposed footway along Malton Road would be provided to accommodate public transport access of the development, particularly for the purposes of commuting to Cambridge. If ultimately considered necessary by the local highway authority, it is considered that reasonable financial contributions towards improved local bus services and bus stops could come forward in due course.

### **Travel Planning Strategy**

- 4.17. The development will be subject to a Residential Travel Plan Strategy that would follow CCC travel plan guidance, as set out in the Cambridgeshire County Council Transport Assessment Requirements document (2024). This will comprise the preparation of Travel Welcome Packs that offer active travel vouchers to future residents, in order to influence the travel habits of the site residents from first occupation of the development to promote a culture of using sustainable travel modes from first occupation.

### **Parking Strategy**

- 4.18. On site parking is intended to be provided with reference to parking guidance set out at Policy TI/3 of the South Cambridgeshire Local Plan, or the prevailing guidance at the time that the site comes forward. The current guidance suggests one car parking space for up to two-bedroom dwellings, and two car parking spaces for dwellings with more than two bedrooms.
- 4.19. Cycle parking is also intended to be provided as per the prevailing guidance at the time that the site comes forward, with current guidance suggesting one space per bedroom up to a three-bedroom dwelling, three space for a four-bedroom dwelling, and four spaces for a five-bedroom dwelling.

### **Off-Site Mitigation Strategy**

- 4.20. As set out at paragraph 4.9, it is currently proposed that a new footway measuring two metres wide will be provided on the western side of Malton Road as part of the development proposals, linking to the existing infrastructure on the High Street to the north of the site. As part of this provision, it is proposed that the High Street/Malton road 'Y' junction is reconfigured to a simple priority junction.



- 4.21. It is the intention of the site promoter to work collaboratively with the stakeholders to appropriately address the various issues, in due course.



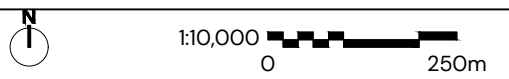
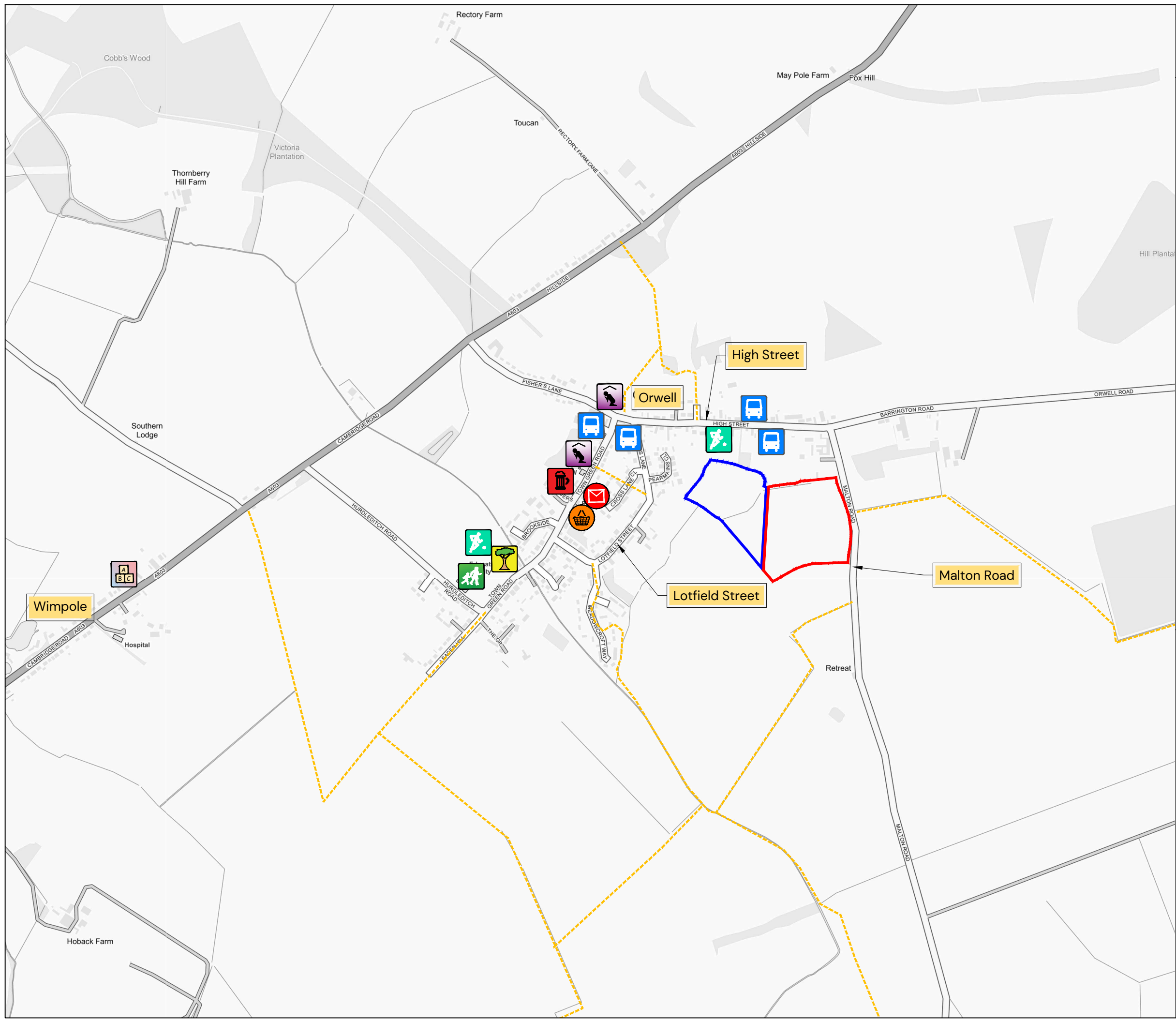
## 5. Summary and Conclusions

- 5.1. This Transport Strategy has been prepared by Pegasus Group on behalf of Cemex UK Properties Ltd. It supports the promotion of land west of Malton Road in Orwell, Cambridgeshire, for circa 75 residential dwellings.
- 5.2. This Transport Strategy has considered transport matters associated with residential development at the site including access, connectivity, and accessibility by non-car modes at a high level.
- 5.3. It is considered that the site is located within walking and cycling distance of some facilities and amenities that may be required by future residents on a daily basis, including bus routes that provide peak hour services to Cambridge. This will enable the number and length of car trips to be minimised.
- 5.4. The Walking and Cycling Strategy would connect with existing and proposed off-site routes to encourage permeability within Orwell including local bus stops and the primary school.
- 5.5. The development will be subject to a Travel Plan Strategy. This will be designed to influence the travel habits of the site residents from first occupation of the development. This will promote a culture of using sustainable travel modes with incentives and associated management and targeting regimes.
- 5.6. It is concluded that the development of Land to the West of Malton Road can be accommodated in transport terms.
- 5.7. It is finally concluded that the development of this site can be made accessible and acceptable in transportation terms and in accordance with national and local planning policy requirements.



## Figures

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- Key:**
- Approximate Red Line Boundary
  - Land within Ownership of the Applicant
  - Public Right of Way
  - Bus Stop
  - Post Office
  - Place of Worship
  - Leisure /Recreation
  - Pre-School
  - Primary School Public
  - House
  - Convenience Store
  - Playground

| REV | DATE | DESCRIPTION | REVISED BY | APPROVED BY |
|-----|------|-------------|------------|-------------|
|     |      |             |            |             |

**SITE LOCATION, FACILITIES AND AMENITIES PLAN**

MALTON ROAD, ORWELL

CLIENT:  
CEMEX UK PROPERTIES LTD

DATE: 15/12/2025    SCALE: 1:10,000@A3    DRAWING STATUS: INDICATIVE    REVISION: ----

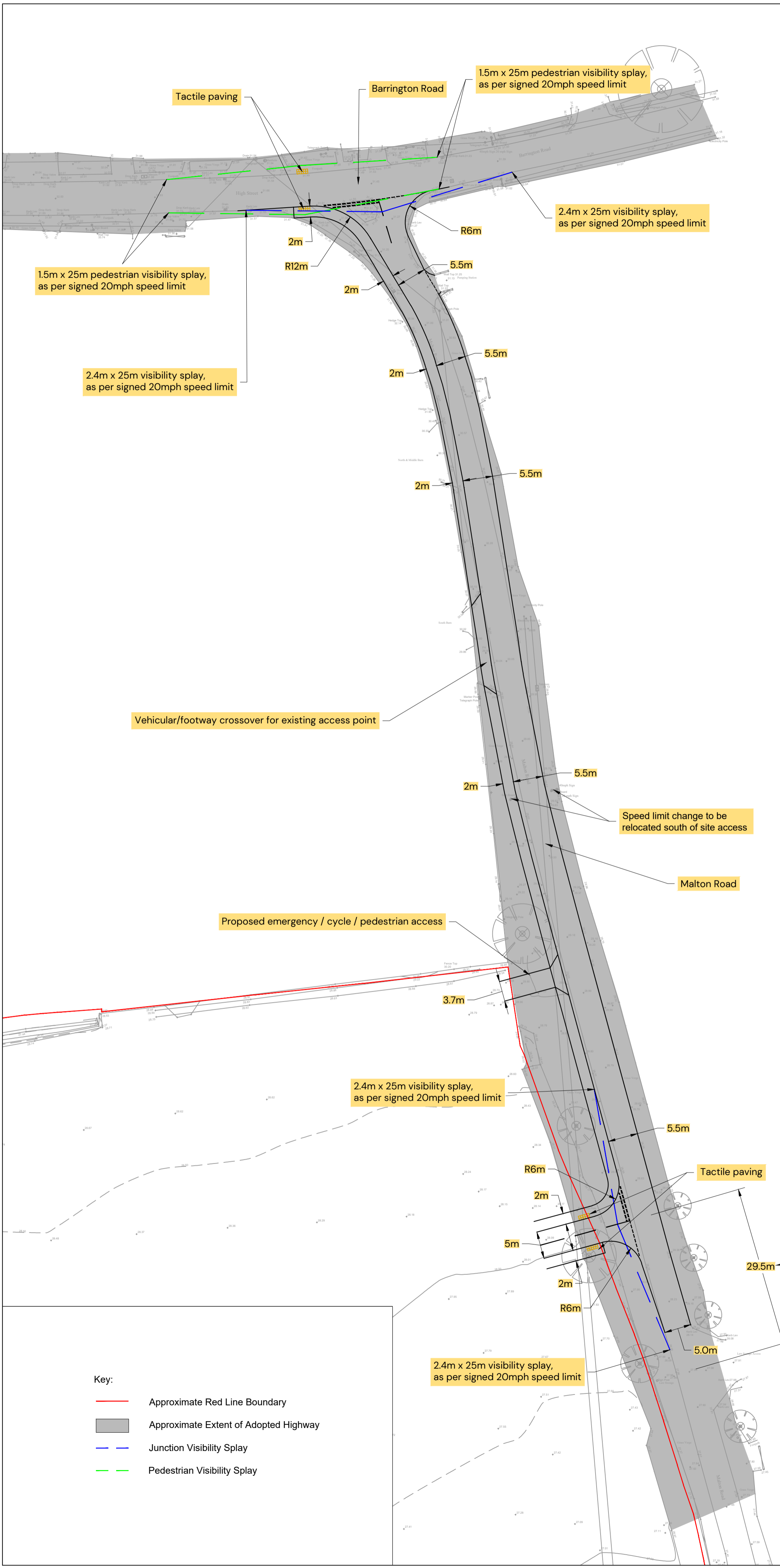
DRAWING NUMBER:  
P25-2504\_FIGURE 3.1

DRAWN BY: JAN/LRD    APPROVED BY: KS    OFFICE: BRS





1:500  
0 12.5m 25m



Key:

- Approximate Red Line Boundary
- Approximate Extent of Adopted Highway
- Junction Visibility Splay
- Pedestrian Visibility Splay

| REV | DATE | DESCRIPTION | REVISED BY | APPROVED BY |
|-----|------|-------------|------------|-------------|
|     |      |             |            |             |

### PROPOSED ACCESS ARRANGEMENT

MALTON ROAD, ORWELL

CLIENT:  
CEMEX UK PROPERTIES LTD

|                     |                    |                             |                   |
|---------------------|--------------------|-----------------------------|-------------------|
| DATE:<br>27/01/2026 | SCALE:<br>1:500@A2 | DRAWING STATUS:<br>FOR INFO | REVISION:<br>---- |
|---------------------|--------------------|-----------------------------|-------------------|

DRAWING NUMBER:  
P25-2504\_FIGURE 4.1

|                      |                    |                |
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| DRAWN BY:<br>JAN/LRD | APPROVED BY:<br>KS | OFFICE:<br>BRS |
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## **Appendix 4: BNG Baseline Assessment**

# BNG Feasibility Assessment, Technical Note.

|                        |   |
|------------------------|---|
| <b>Project name:</b>   | <b>Land West of Malton Road, Orwell, Cambridgeshire</b> |
| <b>Author:</b>         | Gary Lindsay ACIEEM – Associate Ecologist               |
| <b>Reviewer:</b>       | Tom Rothero MCIEEM – Director                           |
| <b>Date:</b>           | 9 January 2026  |
| <b>Project number:</b> | P25-2504  |
| <b>Reference:</b>      | Ecology Summary   |

---

## Introduction

Pegasus Group was commissioned to undertake a UK Habitat (UKHab) Survey and Biodiversity Net Gain (BNG) feasibility assessment at land near Orwell in Cambridgeshire (hereafter referred to as 'the Site'). The Site boundary is shown on **Figure 1**. This technical Note should be read in conjunction with the accompanying baseline BNG metric Statutory Metric '**Statutory Metric – Land West of Malton Road, Orwell**'.

### Limitations

This assessment aims to demonstrate the level of mitigation and enhancement measures required with regards to BNG to deliver statutory BNG requirements within the development site. This report is not intended to function as a Preliminary Ecological Appraisal (PEA), it is therefore outside the scope of this report to provide detailed information on the presence or likely absence of protected and notable species, or search for protected sites in the wider area. Where evidence of protected species or habitat suitable to support protected species was incidentally recorded during UK Hab field surveys this has been discussed under the 'Protected Species' section to inform further surveys that may be required to support any future development proposals.

Botanical surveys were undertaken outside of the optimum survey season; however, sufficient information was collected to accurately classify habitats in accordance with UKHab methodology. The habitats present were readily identifiable based on dominant species and structural characteristics, and this timing is not expected to affect the validity of the findings or the conclusions of this assessment.

### Site Description

The Site covers an area of approximately 8.55 ha and is currently in use for agriculture with marginal areas of high nutrient grassland, hedgerows and trees. The wider landscape is dominated by agricultural use in all directions with the exception of the village of Orwell which lies immediately northwest of the Site.

### Proposed Development

Proposals are for land west of Malton Road in Orwell, Cambridgeshire to be used for residential development. A detailed design was not available at the time of writing; however, the housing requirement for an individual neighbourhood area has been identified.

## **Relevant Local and National Legislation, Policies and Guidance**

The following relevant legislation, policies and guidance have been considered:

- Cambridgeshire & Peterborough Local Nature Recovery Strategy 2025
- The Conservation of Habitats and Species Regulations 2017 (SI 2017/1012), as amended by The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 (SI 2019/579).
- The Wildlife and Countryside Act 1981 (as amended).
- The Natural Environment and Rural Communities Act 2006 (NERC Act).
- The Countryside and Rights of Way Act (CRoW Act), 2000 (as amended).
- The Protection of Badgers Act 1992.
- The National Planning Policy Framework (NPPF) (September 2023).
- Environment Act 2021.
- The Biodiversity Gain Requirements (Exemptions) Regulations 2024.
- The Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024.
- The Biodiversity Gain (Town and Country Planning) (Modifications and Amendments). (England) Regulations 2024.
- Mandatory BNG (February 2024).

## **Methodology**

### **Field survey**

A baseline assessment of area, linear and watercourse habitats was undertaken by a suitably trained ecologist on 19 December 2025 using the UKHab Version 2.0. Sufficient information was collected to allow the condition of habitat to be assessed in line per BNG methodology. Surveys and habitat assessments have been undertaken in accordance with best practice guidance for species identification and habitat requirements, following the Chartered Institute of Ecology and Environmental Management (CIEEM) competencies for species survey. This ensures that methodologies applied are consistent with industry standards and provide robust, defensible data to inform ecological assessment and planning.

### **BNG Assessment**

All habitat data were entered into the Statutory BNG Metric to calculate the baseline biodiversity units for the Site. This included:

- **Area Habitat Units**
- **Hedgerow Units**
- **Watercourse Units**

The baseline calculation provides the foundation for determining the level of enhancement required to achieve the mandatory BNG target (minimum 10%) and informs future development proposals.

## Results

### Habitats

The results of the habitat survey are presented in **Table 1** and shown in **Figure 1** which illustrates the location and extent of habitat types recorded within the Site boundary. Information on individual trees is provided in **Table 2**. For the purposes of this BNG assessment it has been assumed that medium, large or very large trees within 'Hedgerow with trees' habitat are not being removed, as such these have not been recorded separately as 'individual trees' within the baseline, in line with BNG technical guidance.

Table 1 Habitats Recorded in the Survey

| Habitat                                       | Area / length on Site (ha/km) | Distinctiveness | Condition | Description  | Strategic Significance <sup>1</sup>  |
|---|-------------------------------|-----------------|-----------|--|--|
| c1c5 Arable and Horticulture – Winter stubble | 1.84                          | Low             | N/A       | Winter stubble with exposed earth.   | Formally identified in local strategy, see strategic significance section for further information. |
| c1c5 Arable and Horticulture – Winter stubble | 6.12                          | Low             | N/A       | Winter stubble with exposed earth.   | Area/compensation not in local strategy/ no local strategy   |
| g4 Modified grassland                         | 0.33                          | Low             | Poor      | Field margins consisted of modified grassland, all of which was short with low species diversity, dominated by perennial ryegrass <i>Lolium perenne</i> with abundant common nettle <i>Urtica dioica</i> .<br><br>Dove's-foot cranes-bill <i>Geranium molle</i> , cleavers <i>Galium aparine</i> and Bristly oxtongue <i>Helminthotheca echioides</i> were recorded occasionally with small amounts of herb Robert <i>Geranium robertianum</i> . | Formally identified in local strategy, see strategic significance section for further information. |

<sup>1</sup> Where habitats overlap with areas identified within the Cambridgeshire & Peterborough Local Nature Recovery Strategy Local Habitat Map they are assigned as being Strategically Significant.

| Habitat   | Area / length on Site (ha/km) | Distinctiveness | Condition | Description  | Strategic Significance <sup>1</sup>                        |
|---|-------------------------------|-----------------|-----------|--|--|
| g4 Modified grassland   | 0.26                          | Low             | Poor      | As above   | Area/compensation not in local strategy/ no local strategy |
| h2a Native Hedgerow with trees                                      | 0.222                         | Medium          | Good      | Hawthorn <i>Crataegus monogyna</i> hedgerow with dogwood <i>Cornus sanguinea</i> and blackthorn <i>Prunus spinosa</i> also present. Tree species include 18 young/semi mature field maple <i>Acer campestre</i> and ash <i>Fraxinus excelsior</i> and a single mature oak <i>Quercus robur</i> . | Area/compensation not in local strategy/ no local strategy |
| h2a Native Hedgerow with trees – associated with ditch <sup>1</sup> | 0.109                         | High            | Good      | Hawthorn hedgerow with occasional wild privet <i>Ligustrum vulgare</i> , field elm <i>Ulmus minor</i> and bramble <i>Rubus fruticosus</i> . Also contains semi-mature horse chestnut <i>Aesculus hippocastanum</i> trees.  | Formally identified in local strategy                      |
| h2a Native hedgerow with trees <sup>1</sup>                         | 0.203                         | Medium          | Good      | Hawthorn hedgerow with blackthorn, ivy <i>Hedera helix</i> , dog-rose <i>Rosa canina</i> , bramble and wild privet also present. Contained seven young ash trees.  | Area/compensation not in local strategy/ no local strategy |
| h2a Native hedgerow –   | 0.062                         | Medium          | Good      | Blackthorn hedgerow with occasional hawthorn.  | Formally identified in local strategy                      |

| Habitat               | Area / length on Site (ha/km) | Distinctiveness | Condition     | Description  | Strategic Significance <sup>1</sup>                                      |
|-----------------------|-------------------------------|-----------------|---------------|--|--|
| associated with ditch |                               |                 |               |  |  |
| Rural Trees           | 0.069 <sup>2</sup>            | Medium          | Moderate/Good | Four young trees (one Willow <i>Salix spp.</i> and three ash) and two mature ash trees. Further details are provided in Table 2  | Formally identified in local strategy                                    |
| Ditches               | 0.687                         | Medium          | Poor          | Ditches within the Site are generally shaded, with low water levels and inundated with bramble scrub. Contained standing water but likely dry throughout much of the year. | 555 m Formally identified in local strategy, 133 m not in local strategy |

Table 2 Individual Trees Recorded on Site

| Tree ID | Size <sup>3</sup> | Species | Condition | Location       | Notes   |
|---------|-------------------|---------|-----------|----------------|---|
| 189     | Small             | Willow  | Medium    | TL 36641 50253 |   |
| 191     | Large             | Ash     | Good      | TL 36460 50225 | Contains feature on main trunk with Moderate suitability for roosting bats. |
| 192     | Small             | Ash     | Medium    | TL 36446 50210 |   |

<sup>2</sup> Combined area calculated using 'tree helper' tool within the BNG metric

<sup>3</sup> Size assigned as per Statutory Biodiversity Metric user guide based on diameter at breast height (Small = greater than 7.5cm and less than or equal to 30cm, Medium = greater than 30cm and less than or equal to 60cm and Large = greater than 60cm and less than or equal to 90cm)

|     |        |     |          |                |  |
|-----|--------|-----|----------|----------------|--|
| 193 | Medium | Ash | Good     | TL 36499 50194 |  |
| 194 | Small  | Ash | Moderate | TL 36557 50187 |  |
| 195 | Small  | Ash | Moderate | TL 36576 50183 |  |

The only priority habitat recorded on Site was 'Hedgerows' habitat (any hedgerows made up of at least 80% native woody species classified as priority habitat), no other priority habitats were recorded.

### **Strategic Significance and Local Nature Recovery Strategy**

The following layers were identified within the Site boundary within the northwestern field. This has been identified by Cambridge & Peterborough combined authority via a Local Nature Recovery Strategy (LNRS) as an area that the following nature recovery efforts should be targeted:

**ACB** – Areas that could become of particular importance for biodiversity

**G1A** – enhance existing chalk and limestone grassland sites to create a diverse set of micro-habitats to support the diversity of scarce and common species associated with this habitat.

**G1B** – improve biodiversity by creating species-rich calcareous grassland adjoining to, and up to 500 metres from, existing designated and other chalk and limestone grasslands. There is no minimum site size, but larger sites are preferable (in combination with other complementary habitats), and there should be a realistic ambition for sites to become priority habitat in the future (it usually takes 50–60 years to create this priority habitat from former arable land).

**G2A** – enhance existing species-rich neutral grassland sites to support the diversity of scarce and common species associated with this habitat.

**G2B** – improve biodiversity by creating species-rich neutral grassland adjoining to, and up to 500 metres from, existing designated and other neutral grassland sites. There is no minimum size threshold, but larger sites are preferable (in combination with other complementary habitats) and there should be a realistic ambition for site to become priority habitat in the future.

**G3A** – deliver wider environmental benefits such as runoff reduction, water quality enhancement and potential access to nature, by creating species-rich grasslands in appropriate locations.

Local Nature Recovery Strategies will be used to help guide and focus funding from Environmental Land Management schemes. The LNRS will enable farmers and land managers to better understand and determine if there are actions that they could undertake that would have particular benefit in their areas. The LNRS will not create designations or protections. Its purpose is to help inform land managers and promote nature recovery as a viable alternative to other land uses.

The LNRS is designed to work with local area planning. The Environment Act 2021 requires that LNRSs are considered when making decisions about both planning policy and development management. It will be a key source of evidence to inform local plans, neighbourhood plans and their reviews. **The LNRS itself will not stop planning and does not carry a legal status in the planning process, but it will inform the process.**

### **Biodiversity Net Gain**

Habitats described in **Table 1** were used to calculate the BNG baseline for the site with the results provided below in **Table 3**. With the passing of the Environment Act (2021) there is a mandatory requirement for major development projects to deliver a minimum of 10% net gain. The number of Biodiversity Units (BU) required to achieve this is summarised in **Table 3**. To satisfy trading rules within BNG there is also a requirement that additional units created should be of the same or greater distinctiveness.

Table 3 Results of BNG Baseline

| Unit type    | Current baseline | Total number of BU required post-development to achieve 10% BNG | Distinctiveness of habitats |
|--------------|------------------|---|-----------------------------|
| Area Habitat | 18.63            | 20.49   | Low/Moderate                |
| Hedge        | 8.21             | 9.03  | Medium/High                 |
| Watercourse  | 3.08             | 3.39  | Medium                      |

As no detailed masterplans are currently available it is not possible to provide estimates of the expected net change in units post-development.

### Protected Species

Although protected species surveys were outside of the scope of this work a summary of findings in relation to protected species is provided below. A summary of Target Notes (TN) taken during field surveys is provided in **Table 4** and shown on **Figure 1**:

- **Bats** – The Site was of low suitability for foraging and commuting bats, with suitable habitats limited to the hedgerows and tree lines along the field boundaries. A full ground level tree assessment (GLTA) for bats was not undertaken, however a high-level assessment identified a number of trees with bat roosting potential, these are shown on **Figure 1**.
- **Birds** – The Site provided suitable habitat for nesting birds, including ground nesting species such as skylark given the arable habitat.
- **Reptiles** – No evidence of reptiles was recorded on Site. Suitable habitat was limited to the boundary features which provided sheltering and foraging opportunities. Deadwood was found along hedgerow bases with opportunities for refugia and hibernation for reptiles (TN 1).
- **Amphibians (including Great Crested Newt)** – a number of wet ditches were identified within the Site with connectivity to the wider landscape. A search was not carried out for waterbodies within 500m of the Site that may be functionally connected with the Site. The Site provided negligible terrestrial habitat for amphibians, with the majority of the Site being cropland. However, the field margins include bramble scrub and native hedgerows, which provide sheltering opportunities. Deadwood was found along hedgerow bases with opportunities for refugia and hibernation for amphibians (TN1).
- **Badger** – A badger latrine was recorded outside of the Site but within 5m of the Site boundary. No evidence of sett building activity was recorded. The Site is suitable to support foraging, commuting and sett-building habitat due to the presence of arable field margins and bramble scrub.
- **Hazel dormouse** – Native hedgerows provide potential habitat for dormice although connectivity to the wider landscape is generally poor reducing the potential for this species on Site. The surrounding environment is heavily managed for agriculture further reducing the likelihood of metapopulations of dormice existing within the wider landscape.

- **Otter**– No evidence of otter was recorded on or adjacent to the Site and the ditches are considered to be unsuitable to support otter beyond occasional commuting. The site is not considered to be suitable for holt creation. Otter are therefore scoped out of further assessment.
- **Water vole** – No evidence of water vole was recorded on Site. The ditches on site are too shaded and lack sufficient emergent aquatic vegetation to provide high quality water vole habitat. The Site is therefore unlikely to support resident water vole populations with low potential for commuting within ditches remaining. Water vole are therefore scoped out of further assessment.
- **Hedgehog** – No evidence of hedgehog was identified on Site, however the Site provided suitable foraging and sheltering habitat, including hedgerows and arable land.
- **Brown hare** –The Site provided suitable habitat for brown hare given the presence of arable land.
- **Invertebrates** – The Site is likely to support common and widespread invertebrates given the arable habitats, bramble scrub and native hedgerow.

Table 4 Target Notes

| Target Notes | Description   |
|--------------|---|
| 1            | Deadwood along hedgerow base provides opportunities for invertebrates, reptiles, amphibians and hedgehog. |
| 2            | End of ditch widens with higher water levels suitable for GCN.  |
| 3            | Area dominated by sedges suggesting wet ground conditions.  |

## Summary and Next Steps

The BNG feasibility assessment has not identified any area-based habitats on the Site that are likely to present significant challenges for offsetting under BNG guidance if lost to development.

It is recommended that ditches be retained and enhanced as part of any scheme due to challenges associated with offsetting watercourse loss.

Areas overlapping with the LNRS are more sensitive but also present opportunities for habitat creation or enhancement to deliver greater benefits, due to the ‘strategic significance’ multiplier applied within the metric.

Impacts on ‘native hedgerows with trees and associated ditches’ should be avoided where possible, as these are classified as high-distinctiveness habitats. If such features are lost, there will be a requirement to provide replacement habitats of equal or greater distinctiveness, which can be costly and challenging to achieve.

Any Proposed Development requiring the loss of habitat should focus as much as possible on low value habitats such as the large areas of winter stubble in line with the mitigation hierarchy.

**Summary of potential constraints identified:**

- **Trees with Bat Roost Potential**  
Several mature and semi-mature trees, including a large ash (Tree ID 191), contain features with moderate suitability for roosting bats. Under the Wildlife and Countryside Act 1981 and Conservation of Habitats and Species Regulations 2017, bats and their roosts are strictly protected. Further surveys (Ground Level Tree Assessment and, if required, aerial inspection or emergence surveys) are recommended prior to any tree removal or works to ensure compliance and avoid committing an offence.
- **Hedgerows (Priority Habitat)**  
Native hedgerows with trees are present along site boundaries and are classified as priority habitat under Section 41 of the NERC Act 2006. Removal or significant alteration would require mitigation and compensation in line with local policy and BNG requirements.
- **Great Crested Newt**  
Ditches on site, although shaded and of poor condition, provide potential habitat for amphibians (including great crested newt) and commuting corridors for wildlife. Works affecting these features may require further assessment such as environmental DNA (eDNA) surveys for great crested newt.
- **Nesting Birds**  
Hedgerows, trees, and scrub provide suitable nesting habitat for birds. Vegetation clearance should be timed outside the breeding season (March–August) or preceded by a nesting bird check.
- **Badgers**  
A latrine was recorded near the site boundary, indicating local badger presence. Pre-construction checks are recommended to confirm absence of setts within or near the working area.

**Next Steps**

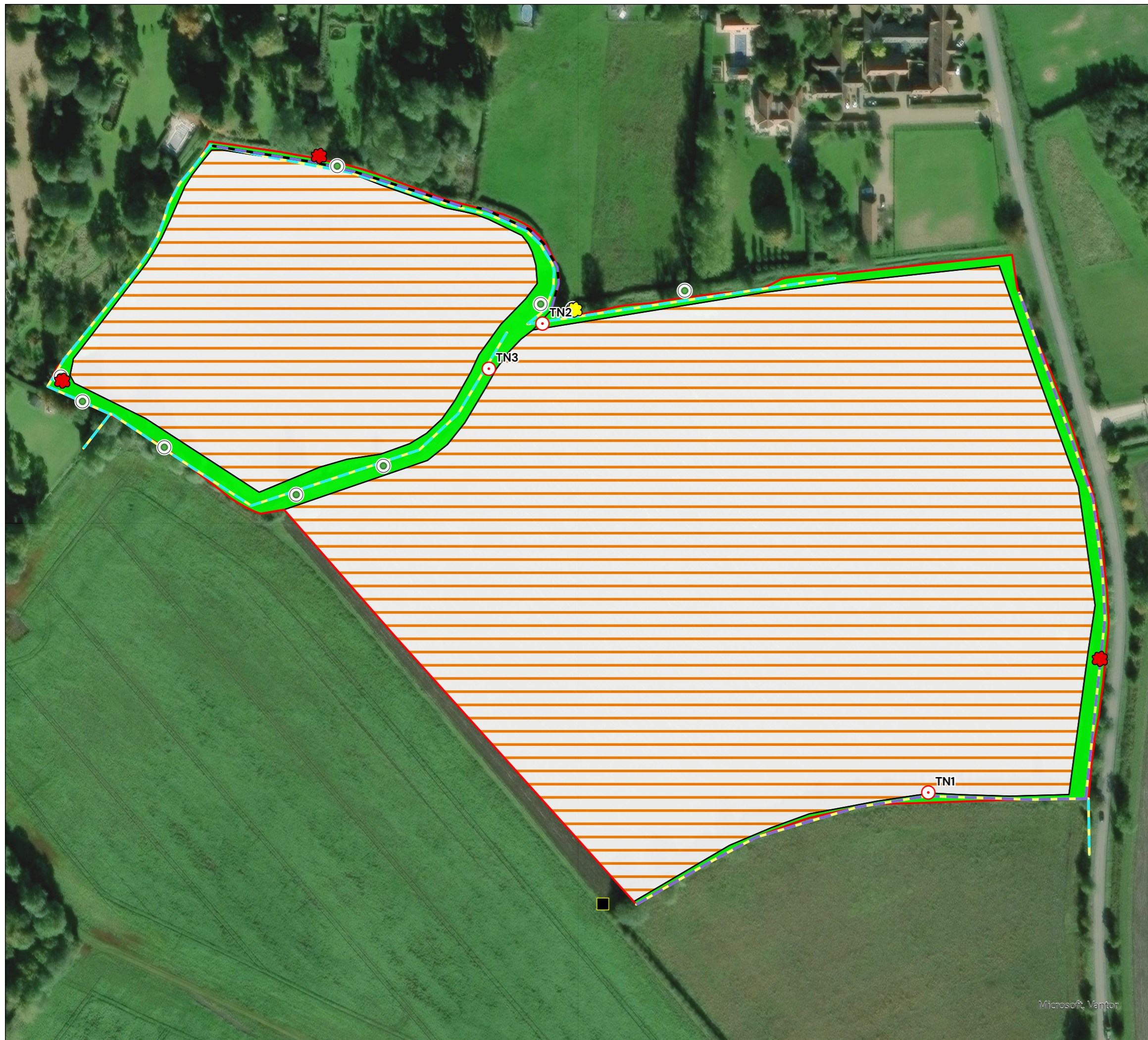
Once a design is available to show the proposed habitats on Site post-development an updated BNG assessment should be produced to calculate the anticipated loss or gain in BU and ensure the Proposed Development does not breach BNG trading rules. Development design can then be refined to ensure that the Proposed Development is able to deliver the 10% gain in BU required.

BNG report should be accompanied by a Habitat Management and Monitoring Plan (HMMP) which will detail how the final landscaping and ecological enhancements will be delivered within the Site, and any ongoing management required.

Once a proposed design is understood further recommendations can be made with regards to additional survey effort for protected species. Scheme design should seek to avoid features which have been identified as having potential for protected species such as trees with potential bat roosting features where possible.

It is recommended that a desk study is carried out as per PEA methodology, this will identify the presence of Protected Sites, priority habitats, records of protected species and waterbodies that may be suitable for protected species in the wider landscape.

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- KEY**
- Site Boundary
  - Target Note
  - Badger Latrine
- Ground Level Tree Assessment
- ✿ FAR
  - ✿ PRF-M
- Linear Habitats
- h2a6 Other native hedgerow
  - h2a6 Other native hedgerow - With trees
  - Ditches
- Area Habitats
- c1c Cereal crops
  - g4 Modified grassland
  - 200 Tree

| REV | DATE | DESCRIPTION |
|-----|------|-------------|
|     |      |             |

**FIGURE 1: BASELINE UKHAB**  
**LAND WEST OF MALTON ROAD, ORWELL**  
 CEMEX UK PROPERTIES LTD

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DRAWING NUMBER  
 P25-2504\_EN\_01



Land at Orwell, Cambridgeshire

Return to results menu

Headline Results

Scroll down for final results ⚠

On-site baseline

*Area habitat units*  
*Hedgerow units*  
*Watercourse units*

On-site post-intervention  
(Including habitat retention, creation & enhancement)

*Area habitat units*  
*Hedgerow units*  
*Watercourse units*

On-site net change  
(units & percentage)

*Area habitat units*  
*Hedgerow units*  
*Watercourse units*

Off-site baseline

*Area habitat units*  
*Hedgerow units*  
*Watercourse units*

Off-site post-intervention  
(Including habitat retention, creation & enhancement)

*Area habitat units*  
*Hedgerow units*  
*Watercourse units*

|  |                           |
|--|---------------------------|
| <p style="text-align: center;">Off-site net change</p> <p style="text-align: center;">(units &amp; percentage)</p> | <i>Area habitat units</i> |
|  | <i>Hedgerow units</i>     |
|  | <i>Watercourse units</i>  |

|   |                           |
|---|---------------------------|
| <p style="text-align: center;">Combined net unit change</p> <p style="text-align: center;">(Including all on-site &amp; off-site habitat retention, creation &amp; enhancement)</p> | <i>Area habitat units</i> |
|   | <i>Hedgerow units</i>     |
|   | <i>Watercourse units</i>  |

|   |                           |
|---|---------------------------|
| <p style="text-align: center;">Spatial risk multiplier (SRM) deductions</p> | <i>Area habitat units</i> |
|   | <i>Hedgerow units</i>     |
|   | <i>Watercourse units</i>  |

**FINAL RESULTS**

|  |                           |
|--|---------------------------|
| <p style="text-align: center;">Total net unit change</p> <p style="text-align: center;">(Including all on-site &amp; off-site habitat retention, creation &amp; enhancement)</p> | <i>Area habitat units</i> |
|  | <i>Hedgerow units</i>     |
|  | <i>Watercourse units</i>  |

|   |                           |
|---|---------------------------|
| <p style="text-align: center;">Total net % change</p> <p style="text-align: center;">(Including all on-site &amp; off-site habitat retention, creation &amp; enhancement)</p> | <i>Area habitat units</i> |
|   | <i>Hedgerow units</i>     |

(including all on site & off site habitat retention, creation & enhancement)

*Watercourse units*

Trading rules satisfied?

Ye

| Unit Type                 | Target | Baseline Units | Units Required |
|---------------------------|--------|----------------|----------------|
| <i>Area habitat units</i> | 10.00% | 18.63          | 20.49          |
| <i>Hedgerow units</i>     | 10.00% | 8.21           | 9.03           |
| <i>Watercourse units</i>  | 10.00% | 3.08           | 3.39           |

Input errors/rule breaks present in metric ▲

|       |
|-------|
| 18.63 |
| 8.21  |
| 3.08  |

|       |
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| 18.63 |
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| 0.00 | 0.00% |

On-site net gain is less than target set ⚠  
On-site net gain is less than target set ⚠  
On-site net gain is less than target set ⚠

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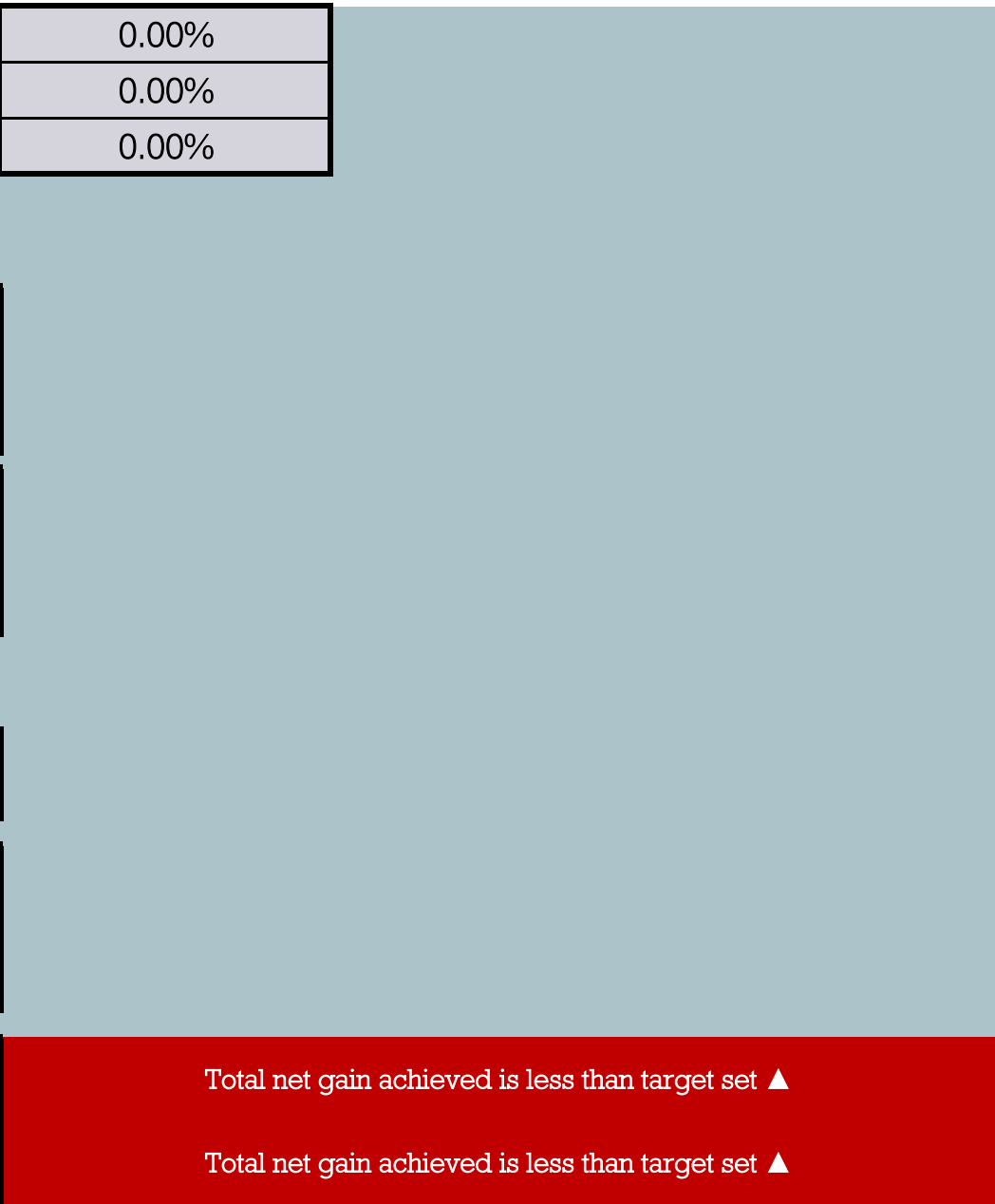
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| 0.00% |



Total net gain achieved is less than target set ▲

Total net gain achieved is less than target set ▲

0.00%

Total net gain achieved is less than target set ▲

s ✓

Unit Deficit

1.86

0.82

0.31

Town & Country Planning Act 1990 (as amended)  
Planning and Compulsory Purchase Act 2004

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