

Employment Land Road WSCC LLFA, Gatwick Airport and WSCC Highways Consultee Response: Full Planning Application for the Employment Land Road (DC/25/1543)

No.	Comment	Applicant Response
WSCC Highways (22/10/25)		
1.	The Applicant should provide an editable version of the RSA Response to enable WSCC to enter comments as Overseeing Organisation as well as to include any Agreed Actions.	An editable version of the Response Report in respect of the Stage 1 Road Safety Audit was provided to WSCC Highways as the Overseeing Organisation and completed dated 4 November 2025. Please find appended to this response.
2.	It would be helpful to understand what the intention is for this route in terms of future maintenance; that is whether it will be offered for adoption as public highway or whether the route is to remain effectively private albeit with permissive rights of access for walking and cycling. If the route is to be adopted as highway, suitable lighting would be required in accordance with WSCC requirements. If the route is to be permissive, an appropriate legal mechanism would be required to ensure future access. This could be as part of a s106 or permissive use agreement.	The intention is for L&G (the Applicant) to grant permissive rights to enable cyclists to use the section of this route that will be a public footpath (which forms part of the footpath diversion), between the primary road and the private route that continues eastwards, parallel with the north side of the A264. The route parallel with the A264 will remain private rather than be offered for adoption as public highway or designated as a PROW. An appropriate legal mechanism would be required to ensure future access, which could be as part of a S106 or permissive use agreement.
3.	Noted that the red line boundary at the far eastern end of the proposed road includes part of the Pegasus crossing, the majority of which falls outside of the current application. Also, part included in the current application are areas of embankment, and a culvert. It's unclear why the red line boundary wasn't drawn to fully include or exclude the crossing, culvert, and embankment. The situation	The red line boundary at the far eastern end of the road cuts diagonally across the proposed Pegasus crossing of the primary road for the bridleway. This is a result of the need for the boundary to match the planning boundary of the Employment Land from the Land North of Horsham outline consent. It should be noted that the design of the section of primary road beyond the extent of the current planning boundary has been developed to a similar level of detail, but any information shown on the application drawings beyond the red line is provided for

	presented is somewhat unusual with these features overlapping into separate applications.	illustrative and contextual purposes only as this section of primary road will be subject to a separate planning application in due course. However, when it comes to the construction of the primary road under a Section 38 agreement, a more logical boundary between the two sections of road will be drawn such that the Pegasus crossing will be entirely within one of the work areas.
London Gatwick (04/11/25)		
1.	The proposed development has been examined from an aerodrome safeguarding perspective and could conflict with safeguarding criteria unless any planning permission granted is subject to the condition detailed below. <u>Submission of a Bird Hazard Management Plan</u> Development shall not commence until a Bird Hazard Management Plan has been submitted to and approved in writing by the Local Planning Authority. The submitted plan shall include details of; - Monitoring of any standing water within the site temporary or permanent The Bird Hazard Management Plan shall be implemented as approved, upon completion of the SuDS and shall remain in force. No subsequent alterations to the plan are to take place unless first submitted to and approved in writing by the Local Planning Authority. Draft Bird Hazard Management Plan is attached, which will need to be signed, dated and submitted.	Please find the signed and dated Bird Hazard Management Plan attached.
WSCC Lead Local Flood Authority (30/11/25)		
1.	We disagree with the statement that while this is a full planning application, this application is based on the outline site-wide drainage strategy. This is because policy and guidance have both changed since the site wide drainage strategy was created, and this new application must be in accordance with policy etc at the time of determination as it is a full planning application (not a reserved matters).	Whilst reference is made within Section 6 of the FRA to the outline site-wide strategy, it is clearly stated that Catchment 7 has been designed to accord with the most recent national and local surface water drainage strategy policy and guidance, i.e. using FEH 2022 rainfall data, current climate change allowances, QBAR discharge rate approach, and complying with the new National SuDS Standards (see Comment Ref. 2) Catchment 6 drains via the piped drainage network, basin and flow control which was designed, approved and constructed under the outline planning permission

		(DC/16/1677) and subsequent approval of reserved matters (DC/22/1026). Given that the primary drainage infrastructure, including storage and flow control, has been approved and constructed, it is not considered reasonable or appropriate to apply new drainage standards to the upstream catchment area which forms part of this application. See Section 6, paras 6.1 to 6.8 of amended Flood Risk Assessment.
2.	We require evidence to demonstrate how the application follows the National Standards for SuDS. This has replaced the previous WSCC Policy for the Management of Surface Water. We suggest addressing each Standard in a separate drainage report section. We'd then suggest that the Case Officer consults HDC landscaping, so they can assess the Drainage Strategy from an amenity and possibly biodiversity perspective.	A new section detailing how the proposed development complies with the National SuDS Standards is included in Section 7 (National Standards for SuDS Compliance Assessment) of the FRA enclosed.
3.	Appropriate easements for the basin and the watercourses/culverted watercourses are required to be on drawings.	A 3m strip for maintenance is shown around the basin, as well as proposed culverts and existing watercourses.
4.	The exceedance plan shows that during exceedance events, surface water from the highway will enter watercourses, without required water quality treatment.	Exceedance flows which overtop the road kerbs are unlikely to contain a high pollutant load as most pollutants will be taken in the "first flush" into the drainage network. Any surface water exceeding the drainage system will first pond at low spots on the road network, before overtopping kerbs and flowing above ground over embankments and verges prior to discharge to the watercourse. The vegetated embankments and verges will act as filter strips in this event, thereby providing some level of treatment prior to discharge into the watercourse for the low pollutant load expected.