

Employment Land Road Ecology & Landscape Consultee Responses: Full Planning Application for the Employment Land Road (DC/25/1543)

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HDC Ecology (11/11/25)		
1.	The submitted metric demonstrates that the development will have a 10.21% net gain (+1.32 units) in area habitats and a 17.18% net gain (+0.82 units) in hedgerow habitats. As per HDCs definition, this is considered significant on-site BNG and therefore will require a legal agreement to secure.	HDC are engaged with the Applicant's solicitors with a view to securing a legal agreement. Conversations are ongoing, though we believe a finalised agreement is forthcoming.
2.	Lowland mixed deciduous woodland (priority habitat) is located immediately adjacent to the red line boundary of the site, both in the north-west and east. Ancient woodland is approximately 20m away to the north-west of the site, and this woodland is intercepted from the site by Bush Lane. Given the proximity of these sensitive habitats, mitigation such as installation of fencing and dust sheets, a lighting strategy sympathetic to wildlife, and adherence to pollution prevention guidelines throughout the construction and operational phase will be required within the CEMP. Assurance is also requested that these habitats will not be publicly accessible.	It is expected that a CEMP will be subject to condition. Mitigation of potential impacts will be provided as required post-determination. Paragraph 5.1 of the Landscape and Ecological Management Plan has been amended to clarify areas of access. The areas of lowland mixed deciduous woodland (priority habitat) and ancient woodland are outside the Site's red-line. No new accesses are being created to provide access.
3.	Channells Brook lies immediately adjacent to the red line boundary, and as such the site lies within the riparian zone (10m). There is also a watercourse running	A River Conditions Assessment has been carried out, and the statutory BNG metric updated. The RCA data and updated metric are appended to this response.

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	along the centre of the site. Both watercourses and their riparian zones are therefore caught under the BNG requirement. Para 3.1.9 of the BNG Report states that as there is no suggestion that the stream would meet priority habitat status, the watercourse module has been omitted due to it falling under the de minimis exemption. The BNG exemptions do not apply to the different modules individually, and for a development to be exempt, the Regulations state that the development must meet the first and second condition, with the second condition having two points whereby both must be met for an exemption to apply. The development is not exempt as it impacts more than 25sqm of on-site area habitat and more than 5m of linear habitat (both points to condition two of the exemption). Therefore, this has been incorrectly applied, as the entirety of the site is triggered by the biodiversity net gain requirement, and therefore by default includes the watercourse module section of the metric. As such, a River Condition Assessment will need to be undertaken by a certified assessor, and the watercourse module of the metric will need to be completed. The RCA results and metric must be resubmitted prior to grant of any planning permission. Note that many culverts are proposed to be installed on the existing watercourse within the site, and a headwall outfall is proposed to Channells Brook. Please see the metric user guide on how to account for the installation of culverts and headwalls/outfalls.	Means to achieve the necessary net gain will continue to be explored, however it is currently proposed that river credits will be purchased if alternative solutions cannot be found prior to the commencement of works.
4.	130sqm of woodland has been entered within the metric, although it cannot be clearly ascertained from the Phase 1 Map whereabouts this is located on the site. Please can this be added. It is also noted that several individual trees are mapped within the Phase 1 Map, however only one tree has been inputted into the metric which is to be removed. It is understood that T356 (oak, DBH 40cm), T272 (5x holly, avg DBH 15cm) T273 (alder, avg DBH 26cm), T277 (ash, DBH 60cm) and mixed tree group G54 (DBH <40cm) are to be cleared, and partial clearances of mixed species groups	The 130m² of woodland is contiguous with Channells Brook along the north of the Site. An updated Arboricultural Impact Assessment is enclosed. Only T272, T273 and T356 are proposed for removal to facilitate construction works. This is reflected in the updated BNG Metric. Only T356 is considered sufficient to provide for the potential presence of Possible Roost Features. No PRFs have been noted on ground inspections though, given the tree's moderate ivy growth, there remains a low potential to

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	are mentioned – see Para 5.14 and 5.15 of the Arboricultural Report (David Jarvis Associates 2025, ref: 2898-2-17-TD-0001-S5-P1). Please can the final individual tree number for the baseline assessment be confirmed, and the trees to be removed (both individually, and within other area habitat parcels whereby the species is not excluded as a tree sp. within UKHab description and has a DBH of 30cm or greater) and their corresponding references be accounted for within the metric baseline and marked as lost. It is also noted that the Bat tree roost assessment plan (Bioscan UK Ltd, 2016) submitted under DC/16/1677 highlighted that several trees had medium bat roosting potential, with one tree having high bat roosting potential. It is acknowledged that 2025 surveys have been undertaken across the site, and the ES claims that the results of these surveys remain largely unchanged. Further information is therefore requested as to the relationship between the trees to be removed and the potential for roosting bats.	support roosting bats. As a precaution, the tree will be inspected again before being dismantled, with any major limbs left in place for 24 hours. Further information and mitigation can be found in the “Further Ecology Information” letter attached.
5.	Mixed scrub is mentioned within the LEMP, with the habitat being present at baseline and post-development (excluding woodland scrub edge), however does not appear within the metric or Planting Proposals. Please can this be amended and clearly depicted on a landscape map. The inclusion of mixed scrub is desirable for the linnet population identified onsite.	The LEMP has been amended to remove mention of scrub. The habitat is not present on site.
6.	No completed condition assessments are provided for individual trees. Please can this be provided.	A Tree Condition Sheet is enclosed within this response which provides the assessments for the two trees identified for removal. Both are identified as being of moderate condition.
7.	It is noted that throughout the centre of the site, hedgerow and trees are proposed to be created to line the road. Confirmation is requested if the planting of these trees are separate to the hedgerow. If not, these should not be counted separately and should instead be inputted as a length of native hedgerow with trees. Note that no hedgerow creation has been included within the metric. If minded to include one more native woody species to the hedgerow mix, this would then qualify as a species-rich native hedgerow with trees.	The trees are separate to the hedgerow. The amended BNG metric has been amended accordingly.

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8.	It is noted that much of the proposed woodland copse is situated within existing tree RPAs, with tree planting proposed on the other side of these trees, increasing competition for space and resources. It would be preferable to keep any new tree planting outside of the retained trees canopies and RPAs, to ensure they will establish well. It is also recommended to have a minimum width of 20m, and a length larger than 6.5m to better conform to woodland definitions within government guidance.	The LEMP seeks to ensure that proposed planting would be established. Planting within the RPA and canopies of trees is standard practice and provides a more natural appearance.
9.	A greater variety of native tree specimen species are requested, with planting of the non-native specimens being restricted near to the lowland mixed deciduous woodland priority habitat (reference is made to Planting Proposals 5 of 6, David Jarvis Associates 2025, ref: 2898-5-2-20). Specimen trees in these areas should be species locally found within the woodland adjacent to the site. Planting of climbing species such as native honeysuckle (<i>Lonicera periclymenum</i>) and traveller's joy (<i>Clematis vitalba</i>) should also be incorporated into the woodland mix, as these provide good links between the shrub and canopy layer, as well as providing additional habitat and autumn resources for small mammals and invertebrates.	Amended planting plans are enclosed to provide a greater mix.
10.	Please can all relevant plans, including an overall landscape plan, be appended to the LEMP for the purposes of the legal agreement. Note that all responsibilities should be known at the signing of the agreement.	This information is available and can be submitted at the appropriate time.
11.	Note that biocides should only be used as a last resort, unless eradicating species as listed under Schedule 9 of the Wildlife and Countryside Act 1981 (as amended). Please can words to this effect be added into the LEMP to cover all habitats.	Paragraph 1.7 of the LEMP has been amended to clarify the use of herbicides as a last resort.
12.	Note that cutting back vegetation on a 3-year rotation will not control vigorous plants, and the frequency of cutting will need to be increased if control is necessary.	Paragraph 4.10 of the LEMP has been amended to clarify that more frequent cutting cycles may be adopted where necessary.
13.	Use of fertilizer on grassland areas will encourage vigorous plants and is not recommended when trying to achieve a diverse floristic sward. Other mechanisms should be explored to reduce nutrient soil prior to employing topsoil	See 5.90(d) of the amended LEMP. Granular fertiliser shall be applied only as required to help establish a healthy sward between spring and autumn.

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	stripping, as this disrupts the soil microbial communities and releases stored carbon. Spraying a field-wide application of glyphosate is not considered appropriate as an initial method. Whilst other mechanisms take longer, they are more sustainable. It is recommended to conduct soil testing to know whether 'meadow grassland' is feasible and to monitor nutrient levels. Given that 'other neutral grassland' in moderate condition is proposed, management methods under Section 5.116 onwards should generally be applied across the site (excluding areas of modified grassland for recreational amenity). Note that yellow rattle will only successfully germinate after a period of cold stratification and with a very short sward before sewing in autumn (50mm) and during early spring (the latter max 2cm if possible). No cuts should be undertaken in waterlogged or very wet conditions to avoid soil compaction. Generally, arisings are left in situ for no more than 72 hours.	Depending on the vigour and health of the plant, fertiliser applications may be suspended as part of the regular inspection programme.
14.	It is noted that Section 5.3 refers to publicly accessible areas of woodland for all visitors. Please can further detail be provided as to proposed footpaths through the woodland, and if there are any inaccessible areas dedicated to biodiversity.	Paragraph 5.1 of the LEMP has been amended to clarify the areas which are inaccessible.
Place Services (Ecology; 18/11/25)		
1.	We note from the BS:5837 Arboricultural Report (David Jarvis Associates, September 2025) that Trees 272 (Holly x 5), T273 (Alder) and T356 (Penduculate Oak) will be removed to facilitate construction. In addition, T270 (mixed species group) and W281 (mixed woodland) will be cleared for the new roadway/footpath routes, together with various hedgerows, and T270 (Goat Willow) will be coppiced. We understand from Section 3.6.5 of Chapter 12 Ecology Environmental Statement (Stantec, September 2025) that updated and on-going surveys in 2025 confirm that the site has not changed significantly since the 2017 ES Addendum. However, it is not clear if the trees have been assessed for Potential Roost Features (PRFs) in the recent surveys. Sections 4.4 and 4.20 of the Landscape and Ecological Management Plan (David Jarvis Associates, September 2025) states that the trees will be assessed prior to	The AIA has been reviewed and the number of trees to be removed reduced. As noted above in this response, only T356 is considered sufficient to provide for the potential presence of Possible Roost Features. No PRFs have been noted on ground inspections though, given the tree's moderate ivy growth, there remains a low potential to support roosting bats. As a precaution, the tree will be inspected again before being dismantled, with any major limbs left in place for 24 hours. Further information and mitigation can be found in the "Further Ecology Information" letter attached.

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	felling or tree work. However, we highlight that the outcome of these assessments is required prior to determination.	
2.	We request that confirmation is provided on whether the trees to be removed/undergo works to facilitate the development contain PRFs and, if they do, then whether they are PRFs for individual bats or for multiple bats. This additional information needs to be submitted to the LPA prior to determination in accordance with Government Standing Advice for bats and so that the LPA has certainty of likely impacts on protected species.	
3.	We also request that the results of the other protected species update surveys undertaken in 2025 are submitted to the LPA.	Please find the up-to-date surveys enclosed.
4.	The additional information for bats and other protected species is required prior to determination because paragraph 99 of ODPM Circular 06/2005 highlights that: "It is essential that the presence or otherwise of protected species, and the extent that they may be affected by the proposed development, is established before the planning permission is granted, otherwise all relevant material considerations may not have been addressed in making the decision." <i>The results of these surveys are required prior to determination because paragraph 99 of the ODPM Circular 06/2005 highlights that: "It is essential that the presence or otherwise of protected species, and the extent that they may be affected by the proposed development, is established before the planning permission is granted, otherwise all relevant material considerations may not have been addressed in making the decision."</i> This information is therefore required to provide the LPA with certainty of likely impacts on legally protected species and be able to secure appropriate mitigation either by a mitigation licence from Natural England or a condition of any consent. This will enable the LPA to demonstrate compliance with its statutory duties, including its biodiversity duty under s40 NERC Act 2006 (as amended) and prevent wildlife crime under s17 Crime and Disorder Act 1998. Furthermore, the Local Planning Authority, as a competent authority, should have regard to the requirements of The Conservation of Habitats and Species	Please find the up-to-date surveys enclosed. Additional comments regarding the consideration of these assessments are provided in the Ecology Further Information document.

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	Regulations 2017 (as amended) when reaching planning decisions and must not leave this until the licence application stage. Therefore, if a European Protected Species Mitigation Licence is required for this application, appropriate mitigation measures to support the provision of the licence must also be outlined prior to determination to allow certainty to the LPA that a licence will likely be granted. This is needed to enable the LPA to demonstrate its compliance with its statutory duties including its biodiversity duty under s40 NERC Act 2006 (as amended).	
HDC Landscape (25/11/25)		
1.	The proposed layout deviates from the previously approved parameter plan and results in major change to the green infrastructure, further resulting in the undermining of the mature hedge and treeline in the centre of the site, as well as the loss of a significant green corridor positive to the setting of these retained features. While the preference to bring the northern and southern parcels closer together is appreciated, it mustn't be at the cost to the existing well established landscape features, and a middle ground must be found.	This application for the Employment Land Road is not a Reserved Matters application and is therefore separate to the OPP. Whilst the scheme seeks to align with the approved parameters to provide a cohesive scheme, there is no policy or conditional requirements to comply with parameters. In any event, the revised approach to the Employment Land seeks to retain more of the existing hedgerow than would have been possible if the OPP parameters continued to be followed. The northwestern part of the Employment Land on the OPP Parameter Plans had a larger development parcel that would have required full removal of the hedgerow running through its centre. The roundabout in this location would also have likely resulted in the removal of the adjacent mature trees.
2.	The retention of existing vegetation is cited as integral to the proposals, with aims of retaining and enhancing green ecological corridors within the site being highlighted within the 3.6 of the LEMP.	Noted.
3.	We request that the layout is revisited in order to better align with the approved parameter plan and conserve the connectivity and thus resilience of the central mature hedge and treeline as well as the existing field boundary which also aligns with the current positioning of the PRoW. The existing landscape features (hedgerow and ditch) will provide a mature setting to the users of the footpath, and we are concerned as to the future relationship of the hedge with the development. Further, allowing the existing hedgerow to be placed within a green corridor, will strengthen its presence and understanding of the original landscape character and pattern. We note in addition that an over-delivery of 80	This application for the Employment Land Road is not a Reserved Matters application and is therefore separate to the OPP. Whilst the scheme seeks to align with the approved parameters to provide a cohesive scheme, there is no policy or conditional requirements to comply with parameters. As above, more, not less, of the existing hedgerow and trees are retained through the revised approach compared to the OPP Parameters. The majority of the hedgerow parallel to the existing PRoW is located outside of the red line of this application and is proposed for retention in any event, with areas of removal only where necessary and kept to a minimum. The new alignment of the PRoW has

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	car parking spaces is proposed and thus there are opportunities to make space for proposals without negatively impacting the green infrastructure.	further tree planting to overall increase the amount of landscape and diversity of habitats across the site. The hedgerow remains within a green corridor, albeit reduced compared to the OPP Parameters, with greenspace relocated and consolidated to the northwest around the SUDS basin to provide a multifunctional area with additional biodiversity benefits. No parking is proposed on the Employment Land Road planning application.
4.	Given the undeveloped nature of the site, the RPAs must be entirely avoided in order to secure the retention and healthy conditions of key landscape features such as trees and hedgerows, as per the scheme's aims (see point 2).	We do not consider RPA's need to be entirely avoided. A 20% encroachment into RPAs, for example, does not tend to be detrimental to a tree's quality, or otherwise detriment their long-term retention.
5.	As such, while the following examples adhere to minimum recommendations, the default position should be that development occurs outside of RPAs. We therefore request that footpaths and cycle paths are altered to avoid these areas (examples provided).	Most RPAs have been avoided where possible, though some are not possible to avoid. The given examples highlight the cycleway along southern edge of the site, where a no-dig solution is proposed and has been designed in accordance with advice from an arboriculturist. The path to the north follows the definitive line (i.e. legal route) of the PRow.
6.	As above, in the example below, the original layout as reflected in the lighting plans is preferred. In any case, we note that 'low dig' has not been indicated within the Tree Protection Plan (TPP) and must be amended accordingly.	The Lighting Plans have been amended to ensure consistency along the southern cycleway. The amended TPP specifies low-dig solutions along this route.
7.	Partial clearance of category A mixed woodland group W281 is proposed under 5.15 of the AIA, however, it has not been included within the tree survey, nor labelled in plan. We assume it is the area indicated below – if not please indicate the location of W281 in plan. Nevertheless, while the encroachment appears relatively minor, the deterioration of this existing vegetation would result in an eroding effect on the landscape character and as per points 2 and 4, its retention and healthy conditions should be secured from the outset. This arrangement is deemed an unnecessary undermining of green infrastructure and can be rectified by pulling the road, footpath and banking further south.	W281 was included in error on the AIA. Its retention has been clarified in the amended AIA. W281 is the triangle woodland labelled on TPP. The alignment of the road, and therefore the footpath and banking, are determined by the existing completed Li-Lo junction. The road cannot be pulled further south or lowered (to reduce embankments) as its horizontal and vertical alignment along this initial section is fixed by the horizontal and vertical alignment the recently constructed section of road just outside the red line boundary. Altering the road alignment more severely would lead to unacceptable impact on road safety. The proposed design sees the foot/cycleway pulled closer to the road in this initial section to mitigate the impact on the existing watercourse and vegetation.
8.	Further, the RPA of this woodland is not indicated within the TPP. Please update accordingly, noting that as per section 7.9 of the AIA, tree roots can be damaged	The RPA of the woodland is already shown on the submitted TPP.

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	by compaction and there should be no changes in ground levels within the identified rooting areas of retained trees.	
9.	RPAs and tree protection fencing are not indicated in the levels plans, and the proposed earthworks are not indicated within the TPP. It therefore appears that significantly more vegetation is likely to be lost or removed as result of the proposed levels and level of works around existing RPAs. We require both plans to be updated accordingly and that both the Arboriculturist and BNG officer are re-consulted as a result.	There is no requirement for earthworks to be demonstrated on the TPP, or vice versa. The plans are consistent with each other and are therefore sufficient for their intended purpose. The submitted AIA and TPP demonstrate the trees and vegetation to be removed.
10.	For example, while the road layout below is subject to a separate reserved matters application, major concern is raised in regard to the significant earthworks proposed within priority habitat woodland, which is reflected as retained within the TPP. As per points 2 and 4, this landscape feature must be avoided and thus we recommend reducing or removing changes to the topography.	Amended plans have been provided which demonstrate the provision of a retaining wall along the northern side of the road in its furthest eastern extent. This prevents incursion into the RPAs of any trees within the woodland.
11.	Levels are only reflected for the main road and appear to cut off in proximity to ancillary buildings, footpaths and secondary vehicle access routes. Please amend to reflect all proposed levels in order to ensure that the scheme is deliverable and that accessibility requirements are met. For example, how is the cycle route proposing to negotiate the proposed levels in the extracts below:	Embankments are not shown where the road adjoins future development parcels, as in these locations the proposed ground levels in these parcels will be brought up to meet the road levels when they are built out; details of this will form part of future planning applications. Details around levels north of the road between the two roundabouts have been added to the submitted Levels Layout for clarity. The proposals which form part of this planning application are fully accessible and deliverable in accordance with all relevant standards and guidance.
12.	The sections provided only reflect the roads. The following sections are requested: a. Demonstrating the relationship between the road and the surrounding landscape b. Connections between footpaths, cycle paths and the road, particularly the Diverted Public Right of Way (With Permissive Cycle Agreement) c. The attenuation basin	Section plans have been provided in the following; <u>Glanville</u> - RMA2 - Employment Land Pond 7a Sections (MOW-RMA2-PH2-1220 P1) <u>DJA</u> - Section A-A (2898-5-2-20 DR-0011 S0-P1) - Section B-B (2898-5-2-20 DR-0012 S0-P1) - Section C-C (2898-5-2-20 DR-0013 S0-P1)

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13.	No drainage information has been submitted; however, multiple drainage features are found within the red line boundary including the large attenuation basin and the 'selective tree removal for drainage trench agreed under Arboricultural Supervision within Mixed tree group G54 PA'. This information is requested.	This information was provided within the submitted Flood Risk Assessment.
14.	The previously highlighted slopes conflicting with woodland to the west and to the east will direct polluted run-off into the woodland, Channells Brook watercourse, ditch and the existing pond. Thus, robust pollution protection measures must be in place to avoid impacts to the landscape features, watercourses and other controlled waters in the long-term. These measures need to be coordinated across both landscape and drainage strategies.	Footways and cycleways crossfall towards the carriageway, as standard. Run-off from the footways and carriageways are therefore conveyed via gullies and the surface water drainage network via the basin into Channells Brook. Therefore, there is no direct polluted run-off into watercourses and woodland areas. The Flood Risk Assessment details the pollution control measures within this surface water drainage network and demonstrates that they are suitable in accordance with the SuDS Manual.
15.	We note from the Landscape Statement under section 4.4 that the attenuation basin will be available as open space, however this is deemed unrealistic as the conditions are inappropriate for general amenity use. This is highlighted further by the proposed fence around the eastern perimeter.	The attenuation basin features shallow side slopes, and a low-flow channel at the centre surrounded by grass. The fencing proposed on the perimeter is intended to prevent cyclists access to the basin.
16.	As per the 'Open Space, Sport & Recreation Review 2021 (OSSRR), SuDS schemes will not be counted towards the amenity space quantity standard as these areas cannot be used for recreational purposes.	Furthermore, Appendix 3 of the NPPF provides examples of "Water Compatible Development". This includes "amenity open space, nature conservation and biodiversity, outdoor sports and recreation and essential facilities such as changing rooms." Whilst we do not deem this to be an unrealistic secondary use of the basin, there is also no requirement within the submitted application for any open space provision. The application proposes a road, and other transitory facilities. Open space provision is not therefore necessary.
17.	The ground contouring, inlet and outlet design of all SuDS features should be carefully considered to maximise the amenity value. We recommend that headwalls are designed to appear more naturalistic in character, for example, by cladding in Horsham stone. Please provide details	All other headwalls within the Mowbray development have been clad in Horsham stone. Either Horsham stone or Sussex Sandstone will be used as detailed on the Drainage Layouts (Appendix H) contained within the Flood Risk Assessment. Headwalls to pipe culverts will be brickwork. This follows the approach to headwall design for the wider Mowbray development.

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18.	We note within the AIA under section 5.18 that footpaths within RPAs will be porous to better allow tree roots to thrive. As such, we request the low-dig section below to reflect a porous material.	Porous materials are only proposed for use on pedestrian only areas and cannot be used where accessible to cyclists as the route must be tarmacked if suitable and safe use by cyclists is to be permitted. Low dig is specified to WSCC satisfaction as stated in the Arboricultural reports and a less than 20% incursion into RPAs has been achieved.
19.	As above, the section below should reflect a porous material. However, as per point 5, the default position is that it should avoid the RPA entirely.	
20.	While <i>Crataegus monogyna</i> is welcomed within woodland mix and hedgerow, it is not deemed appropriate as a specimen tree. Please consider a lesser-used alternative within the planting palette or a species found in the adjacent woodland, as per the BNG officer's guidance.	The hawthorn (<i>Crataegus monogyna</i>) has been replaced by Turkish Hazel. Hawthorn has been retained within the overall proposal within the woodland mix.
21.	We recommend adding a 5th woody species to the proposed hedgerow in order to make it species rich and thus more resilient.	Acer campestre has been added to the hedging proposals, illustrated on the amended Planting Proposals plans.
22.	As highlighted within the OSSR, attenuation basins should blend aesthetically into the surroundings and be planted and combined with variations in vegetation structure to ensure habitat diversity and landscape effect. We therefore recommend a greater diversity and provision to reflect nectar rich plants, various grasses and variations in vegetation structure. Please amend the planting proposals accordingly.	Areas surrounding attenuation basins are required to be predominantly grassed in order to maximise drainage capacity. Greater planting diversity cannot therefore be implemented without sacrificing drainage capacity.
23.	Despite being illustrated within planting proposals, the marginal/aquatic planting is not listed within the schedule. We note from the Landscape Statement under section 4.4, however, that the basin is designed to be dry much of the time, therefore as above, these species should be reviewed and added to the schedule as necessary.	The Planting Proposals have been amended to include marginal aquatic planting. Planting for these species will be focussed in low flow channel that will be permanently wet
24.	As above, given the expected dry conditions, we recommend species like <i>Mentha aquatica</i> are only to be planted in reliably damp locations.	
25.	We echo comments made by the BNG officer in regard to avoiding planting within existing RPAs. As such, while swathes of bulb planting is welcomed, these should be relocated outside RPAs to avoid unnecessary disturbance and competition with existing roots.	Noted.

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26.	HDC requires any timber equipment to be installed with steel footings to prolong their longevity and avoid rotting. Please update the furniture specification as necessary.	There is no policy basis for this request.
27.	Woodland and hedgerows, which are key characteristics of the local landscape, can be deteriorated due to increasing levels of light pollution, therefore light spill must be considered sensitively so as not to cause potential adverse effects. The current lighting layout plan only indicates the southern cycle path. Please amend to reflect all lighting within the red line boundary.	Please find lighting designs on the enclosed plans below; • Section 38 Street Lighting Layout Drawing Sheet 1 of 4 (EVO20036006-LD-001 A) • Section 38 Street Lighting Layout Drawing Sheet 2 of 4 (EVO20036006-LD-002 A) • Section 38 Street Lighting Layout Drawing Sheet 3 of 4 (EVO20036006-LD-003 A) • Section 38 Street Lighting Layout Drawing Sheet 4 of 4 (EVO20036006-LD-004 A)
28.	Kirium 200 Bollards are indicated within the lighting layout plan, however Kirium 160 Bollards are indicated in the lighting document. Regardless, the lighting layout has considered 1725 lumens, which reflects neither product. Please confirm that Kirium 160 Bollards are the proposed, specifying the 2700K model so as to minimise adverse effects on surrounding existing vegetation.	Lighting detail and lighting design documents to be amended to align more closely. Kirium KB200 bollards are proposed, shown on the amended Lighting (2898-5-5-FRN 0005 S5-P5) and Employment Road Cycleway (25-286-2D) documents enclosed.
29.	Uplighters and columns are also indicated in the lighting document, but no locations or associated lux levels are indicated in plan. Please amend accordingly.	These are standard details are not proposed for use in this development, only bollard lights are proposed. No up-lights or column lights are proposed.
30.	Please confirm if no lighting is proposed for the footpaths and cycle paths north of the main road.	No lighting is proposed in these locations.
31.	As per points 2 and 4, we recommend that utilities avoid RPAs where possible. As such, please consider slightly altering the locations of bollards and associated utility runs – see examples below.	Utilities do not require substantial incursion or earthworks into RPAs. Any necessary incursions would be minor and are unlikely to detriment tree health or compromise their long-term retention.
32.	Please include tree pit details for sloping ground as many trees are proposed on slopes or embankments.	Please find these details on the Tree Planting Details (2898-5-5-VEG 0002 S5-P6) enclosed.

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33.	We note the following in section 5.16 of the AIA: T270 (Goat Willow) is recommended to be re-coppiced just above ground level in order to clear the new footpath from which point it can be allowed to regrow and managed in a reduced form. Please include this information within the Landscape Specification as well as the LEMP in regard to future maintenance.	Please see paragraph 4.6 of the LEMP.
34.	Proposals must align with the requirements of the OSSR in order to comply with HDPF Policy 43. As such plants should be sourced from seed or stock from the Region of Provenance 40 in order to ensure resilience and therefore successful establishment. Where this is not possible, given the sensitive location in proximity to priority woodland and irreplaceable ancient woodland to the north, planting stock must be locally sourced from suppliers of accredited UK Sourced and Grown stock, in accordance with Woodland Trust guidance. Supplier information must be made available upon request. We note the relevant aims and objectives within the LEMP under 3.6.f and 4.1.d, however this should be amended to include all proposed planting, as opposed to solely replacement planting.	3.6 (f) and 4.1 (d) have been amended within the LEMP to specify all replacement planting shall be from local sources of provenance.
35.	We echo comments made by the BNG officer in regard to biocides and fertiliser, and recommend that chemical fertilisers, pesticides and herbicides including glyphosate are not to be applied at any time due to impacts on existing and proposed ecological features, particularly the abutting woodland and waterways. We note mention of alternative methods for weeding, however there is lack of clarity as well as a reliance on herbicides throughout the LEMP and Landscape Specification. Please refer to pan-uk.org for guidance and resources, noting that herbicides including glyphosate must only be used on Schedule 9 species. Please amend the following sections accordingly to clarify: a. Landscape Specification: 168.3, 421.1, 210, 212.2 (unless pernicious weeds are clarified), 300.3 b. LEMP: 5.115, 6.4.g, 6.4.j, 7.7.e, Section 9	No policy requirement (see Village Centre). Alternative methods first, herbicides to be used where necessary. The wording used reflects HDC suggested amendments to previous documents, such as the approved Moat Road Extension (DC/24/0446). <i>The comment from HDC dated 02/05/2024 read “As above, please remove all mention of herbicides and/or specify methods to hand weeding alone by careful digging or selective scything unless dealing with noxious and invasive non-native plant species listed under government standard guidance”.</i> Per previous comments on this point (also see Village Centre LPA reference DC/25/1018), there is no policy basis to preclude the use of herbicides. The LEMP and Landscape Statement make clear that herbicides are only to be used as a last resort. The approach has been adopted in the submitted Landscape Specification in accordance with previous HDC comments. There remain inconsistencies in the approach of HDC to these matters.

No.	Comment	Applicant Response
36.	We note that bark mulch is proposed around stems to retain soil moisture, however we recommend that a 120mm collar should be left free of mulch to prevent the stems/trunks from rotting. Please amend the Landscape Establishment Note, LEMP and Landscape Specification accordingly.	The LEMP (6.4 (h)), and Landscape Specification (845 (4), (4.2)) amended to include a 120mm collar around stems to prevent rot. The Establishment Note is longer required in the absence of water neutrality.
37.	Any stakes, ties and guards should be removed upon successful establishment or after 4 years of planting, whichever is sooner. Please update the LEMP accordingly.	This is stated on the existing LEMP. The current wording already provides for the removal of such paraphernalia upon successful establishment. The wording remains the same on the amended LEMP enclosed.
38.	Please include details of management responsibilities.	Details are provided in Section 8 of the existing LEMP. The proposed responsibilities remain the same in the amended LEMP enclosed.