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26 August 2026

Project/File: 333102644/A3

via Email

Jason Hawkes
Albery House
Springfield Road
Horsham
RH12 2GB

Dear Jason,

Reference: Application reference DC/26/0731 (Sub-Phase 2C Road): Consultee Comment Responses

We write on behalf of Legal & General (Strategic Land North Horsham) Limited in response to comments received from consultees on our application seeking the approval of Reserved Matters for the Primary Road through Sub-Phase 2C.

At the time of writing, comments have been received from the following bodies:

Southern Water (22 May 2026)	NatureSpace Partnership (11 June 2026)
HDC Conservation (28 May 2026)	WSCC LLFA (25 June 2026)
London Gatwick (4 June 2026)	Place Services (30 June 2026)
WSCC Highways (5 June 2026)	Rusper Parish Council (2 July 2026)
HDC Arboriculture (8 June 2026)	HDC Environmental Health (9 July 2026)
Surrey County Council Historic Environment (9 June 2026)	HDC Landscape (15 July 2026)

Of the bodies listed above, only those shown in bold have raised concerns regarding the proposed development. This letter seeks to offer responses to the comments made by those consultees. A schedule of our responses is provided in Appendix A of this letter.

Appendix B provides an update to the list of submitted plans and documents that now comprise this Reserved Matters Application.

Reference: Application reference DC/26/0731 (Sub-Phase 2C Road): Consultee Comments Responses

Sincerely,

Stantec UK Limited

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c. Alex Jones (Stantec)

Mark Wild (L&G)

Reference: Application reference DC/26/0731 (Sub-Phase 2C Road): Consultee Comments Responses

Appendix A – Response Schedule

COMMENT	RESPONSE
London Gatwick	
Planning permission should be granted subject to a Bird Hazard Management Plan condition. Template Bird Hazard Management Plan attached.	The template Bird Hazard Management Plan has been complete and is appended to this response.
WSCC Highways	
The proposals amount to a length of access road forming an extension to that length of road within DC/25/1543. The proposal essentially continues with the same design principles established within other infrastructure planning applications within Phase 2. There are no concerns in these regards with carriageway, foot, or cycle way widths or alignments.	A Road Safety Audit has been completed and agreed with WSCC Highways (signed by WSCC on 19 June 2026). This is appended to this response.
The layout is noted as including a number of priority junctions and bus stops. The proposals also include a Pegasus crossing albeit this lies across the cut line between the current application and DC/25/1543. The Pegasus crossing was effectively considered as part of the 2025 application and is not considered again here. Consistent with other adjoining phases, the layout includes a segregated two-way cycle-way along with a separate footway on the eastern side. As part of this and in accordance with current best practice, priority is given where the foot/cycle way crosses a junction. The principle of this has already been established within other phases. At all junctions shown, a partial set-back is included; this effectively means that a vehicle turning in will not fully clear the main carriageway if it then has to stop to give-way to anyone crossing. The alternate arrangement is a full setback, allowing a turning vehicle to turn in and wait clear of the main carriageway.	WSCC have been approached separately, with the following response offered: <i>(...) consistent with the adjoining phases, where the segregated two-way cycleway located on the west side of the primary road crosses any side road, priority is given to pedestrians and cyclists over turning vehicles, and this principle has already been established within other phases.</i> <i>Whilst Outline planning permission has been granted for the wider Mowbray development, L&G is yet to submit Reserved Matters applications for the land parcels to either side of this section of primary road. Therefore, there is not currently a fixed layout to determine the precise numbers of units that will be accessed from each junction where a partial set-back crossing is proposed. We can, however, confirm that the greatest number of residential units that will be served from any one of the 5no. junctions where partial set-back crossings are proposed will be 45 (+/- 10 units). The two most northerly partial set-back junctions will serve a maximum of only 10 units each, although the actual number is likely be closer to 7 units.</i>

Reference: Application reference DC/26/0731 (Sub-Phase 2C Road): Consultee Comments Responses

The principle of partial setbacks has been established with it agreed that this would be acceptable at those more lightly trafficked junctions where there will be relatively few turning movements. For the purposes of the current application, there are no details as to what the various parcels will serve or any indication given as to the number of turning movements. Additional information would be sought to support the use of partial setbacks at all locations shown. In-accordance with current WSCC Policy, a Stage One Road Safety Audit has been undertaken (as included within Appendix C of the Transport Statement). The Applicant will be aware of WSCC requirements concerning this with a copy of the RSA Response needing to be provided to WSCC to complete the Overseeing Organisation and for Agreed Actions to be included. Once agreed, this can then be submitted and included as part of the planning file. In summary, there are no in-principle issues raised. Additional information would be required to support the use of partial setbacks as well as there being a need to complete the RSA Response having to be completed.	<i>Partial set-back junction arrangements have previously been agreed elsewhere on the primary road through the Mowbray development, including for the health centre to the west (towards the western extent of RMA2 and immediately east of the A264 Li-Lo junction), for the access to a residential parcel to the north of the RMA2 primary road, and for the access to the temporary bus turning head at the eastern extent of Bailey Road extension (RMA1) that will eventually serve 19 residential units.</i> <i>Furthermore, based on LTN 1/20 guidance (paragraphs. 10.5.13 and 10.5.20-22) the residential development parcels served by these partial set-back junctions would generate much fewer vehicle movements than the 2,000 per day per junction threshold where designs would lean towards a full set-back (bent-out) crossing arrangement. A total of 55 dwellings would generate only around 300 vehicle movements per day (two-way).</i> <i>We therefore consider that the continued provision of partial set-back junctions through RMA3 is appropriate given the modest number of dwellings each access would serve and to maintain some consistency of junction type along the primary road throughout the wider development.</i> WSCC Highways have since confirmed they are happy with this response and withdrawn their concerns.
HDC Arboriculture	
The application is supported by a BS:5837 survey, Arboricultural Impact Assessment, Method Statement, and Tree Protection Plan prepared by David Jarvis Associates on behalf of Legal & General (Strategic Land North Horsham) Limited. This provides a fair assessment of the quality of the surveyed trees and the potential impacts arising from the proposed development. Overall, the submitted arboricultural information demonstrates balanced approach to accommodating development while seeking to retain the higher value trees, wherever practicable.	No trees are located within the footprint of the basins. Some trees are located within the 3m maintenance margins, however these only represent a localised narrowing of the margin. All trees have now been moved to be at the edges of the maintenance margins, thereby providing a minimum clear width of 2m, which would allow ride-on lawn mowers / utility vehicles to pass easily around the trees to maintain the basins and surrounding open spaces.

Reference: Application reference DC/26/0731 (Sub-Phase 2C Road): Consultee Comments Responses

Some minor modification to the position of the attenuation basin in the north of the site is recommended, particularly where it is located at the very edge of tree Root Protection Areas. This is to ensure that appropriate working space is maintained between the fenced RPA areas, and any proposed excavation works.

MAIN COMMENTS

Trees to be removed

The following trees and groups are proposed for removal: T277 Common Ash; T288 Beech (C2); T359 Common Ash; G404 Mixed Broadleaves (C2); T458–T460 Common Ash (C1–C3); T461 Common Ash (C1); T482 Pedunculate Oak (B2); T502 and T504 Pedunculate Oak (B1–B2); G509 Hornbeam x4 (C2); G789 Mixed Species Group (C2); T812 Alder (C1/2); G813 Alder (C2); T902 Alder (C2); T903 Common Ash (U); T904 Alder (B2); T905 Goat Willow (U); T906–T907 Goat Willow (C2); T908 Pedunculate Oak (C1/2); and G926 Common Alder x15 (C2).

The key losses from an Arboricultural standpoint are T482 Pedunculate Oak (B2); T502 and T504 Pedunculate Oak (B1–B2)

These removals are proposed to facilitate the proposed road alignment. While the loss will be evident in the short-term, the retention of the majority of the existing tree belts, together with proposed mitigation planting, should be sufficient to offset impacts on visual amenity over time.

Root Protection Area (RPA) observations

Paragraph 6.37 of the AIA states that the pond design may be refined to avoid or minimise RPA incursions due to regrading works proposed within the RPA of T787. However, at present it is unclear whether this can be achieved.

As such, given the absence of certainty regarding this aspect of the scheme, it is not considered appropriate for the extent, depth, and location of any ground level changes to be determined on an ad hoc basis during construction, as advised in the

Reference: Application reference DC/26/0731 (Sub-Phase 2C Road): Consultee Comments Responses

AIA, AMS. Retention of existing ground levels would be preferable to avoid potential adverse effects on rooting conditions and long-term stability of the tree in question.

Whereby suppose the incursions are found to be unavoidable at the build out stages of the development, it would be too late for the Council to make an informed assessment of this impact. Therefore, it would be beneficial if detailed design information were provided in advance; even if this is provided as a worst-case scenario document, because a watching brief alone is not considered to be sufficient in this instance.

Road and site layout observations

The layout appears to demonstrate that consideration has been given to avoiding impacts on higher-category trees. Category 'A' and the majority of Category 'B' trees are retained, and infrastructure has generally been aligned to pass between key features; this is welcome.

In locations such as the Pegasus/Culvert area, the tree impacts are largely confined to lower-quality trees, including declining Ash and understorey vegetation, with more prominent Oak specimens retained, and safeguarded. Similarly, west of Pond 9A, the removal of young Alder groups of limited merit is unlikely to result in significant lasting tree loss induced landscape harm.

The second culvert crossing represents the most notable intervention within woodland. However, it has been aligned to retain two Category 'A' Oaks and passes through Ash trees significantly affected by Ash Dieback (*Hymenoscyphus fraxineus*). Given the reduced condition of the Ash trees in this area, and their eventually foreseeable removal on conditions grounds, the overall impact as a result of their removal is considered to be less significant when assessed within the wider scheme as a whole.

Elsewhere, including the northern road section and Pond 10A outfall, the limited removal of Category 'B' trees is offset by the retention of adjacent higher-value trees and the wider planting proposals as part of the scheme.

Reference: Application reference DC/26/0731 (Sub-Phase 2C Road): Consultee Comments Responses

In relation to the northern SUDS basin, please see below. Whilst it is located outside adjacent RPAs, its proximity results in limited working space along the southern and western extents. A minimum 1 metre offset between the RPA boundary and areas of excavation, would be welcome and this is recommended to ensure adequate working space and to avoid inadvertent encroachment into RPAs during construction phase of the basin.	
ANY RECOMMENDED CONDITIONS: If minded approving without the above points addresses in full, please use the following conditions. 6.8 Arboricultural Method Statement - Implementation 1. Regulatory Condition: All works shall be executed in full accordance with the submitted Arboricultural Impact Assessment/Method Statement [BS:5837 Survey, Arboricultural Impact Assessment & Method Statement, 2898-2-17-TD-2001-S5-P2, 18 March 2025]. Reason: To ensure the successful and satisfactory protection of important trees, shrubs and hedges on the site in accordance with Policies 30 and 33 of the Horsham District Planning Framework (2015). 2. Regulatory Condition: Notwithstanding the approved Arboricultural Method Statement and Tree Protection Plan, no development shall commence until an Arboricultural Supervision and Monitoring Plan has been submitted to and approved in writing by the Local Planning Authority (LPA). i. The Plan shall include but not be limited to the name and qualifications of the appointed Arboriculturist, define the scope of supervision (including works within or near Root Protection Areas), and set out a schedule of inspections (pre-commencement, key stages, ongoing monitoring, and post-construction) with procedures for addressing non-compliance. ii. The appointed Arboriculturist shall undertake the approved supervision and submit written reports to the LPA within 20 working days of each visit. Development shall be carried out in accordance with the approved Plan and any agreed remedial measures.	We can agree to Condition 1 in principle, though wish to agree full conditions prior to determination, which may include updating reference to documents (as highlighted) if necessary. Condition 2 near duplicates Condition 16 of the OPP and is not therefore necessary.

Reference: Application reference DC/26/0731 (Sub-Phase 2C Road): Consultee Comments Responses

iii. Before any work begins on site, the person(s) responsible for supervising the works must meet the Arboricultural Officer of the Local Planning Authority, on site, so the Arboriculturist Officer can supervise that the tree protection measures have been installed in accordance with the approved drawing number Tree Protection Plan, Drawings numbered: (Insert plan ref here), dated iv. This condition shall only be discharged following completion of the development and submission of satisfactory evidence of monitoring and compliance. Reason: To ensure the protection and retention of important trees and hedgerows in the interests of amenity, biodiversity, and environmental sustainability, in accordance with Policy 33 of the Horsham District Planning Framework (2015).	
NatureSpace Partnership	
Thank you consulting us on the above application. I have reviewed the applicant's Ecological Mitigation and Management Plan (CSA Environmental, April 2026), within which it states that: • "As per the Ecological Survey Scoping Report (CSA/7937/02) which will be submitted to Horsham District Council in due course and should be read in conjunction with this EMMP, additional surveys proposed in 2026 will encompass all RMAs, with the exception of RMA 20, within Phase 2." • "Update surveys across Phase 2 are proposed in 2026, the results of which may stipulate amendments to any mitigation stated herein. Should update survey work indicate that GCN are present within ponds within c. 250m of suitable terrestrial habitat to be impacted by the RMA proposals, the implementation of RMA3 will need to be subject to a European Protected Species (EPS) licence from Natural England; and appropriate mitigation and compensation measures secured." The above report has stated that updated GCN surveys are being undertaken in 2026 and will be submitted to the LPA within or alongside an Ecological Survey Scoping Report. We are in agreement that this information is required as in line with condition 14 of permission DC/16/1677, however we do not believe this has yet	Great crested new survey work (comprising Habitat Suitability Index (HSI) and eDNA sampling of ponds within 500m of the Phase 2 area has now been completed (May and June 2026). The results of this work are provided within the Great Crested Newt Survey Report (CSA/7937/11) which forms Appendix H of the updated Ecological Mitigation and Management Plan (EMMP) for RMA3 (CSA/7937/01/D). No evidence of GCN has been recorded within ponds within 250m of the RMA3 Site, which reflects the findings of historic surveys undertaken across the eastern part of the Phase 2 area between 2014 and 2023. As such, it is not considered that GCN represent a constraint to the delivery of RMAs.

Reference: Application reference DC/26/0731 (Sub-Phase 2C Road): Consultee Comments Responses

been received. The details of the further survey work and proposed mitigation will need to be submitted prior to determination of the reserved matters application.	
WSCC LLFA	
This is an application for approval of Reserved Matters pursuant to Condition 5 of Outline Planning Permission reference DC/16/1677 for the construction of a primary road through Sub Phase 2C, footpaths and cycleways, foul and surface water drainage including SuDS basins, landscaping, and associated infrastructure. Following a review of the documents submitted, we require further information on: Urban creep – As mentioned for several other applications, the Policy for the Management of Surface Water has been superceded by the National Standards for SuDS, therefore 10% urban creep is required.	From Glanville's Technical Note RMA3: <i>As agreed in all Reserved Matters applications for infrastructure on the wider development to-date, the urban creep allowance has been based on development density in each parcel and was calculated in-line with Table 5.2 of WSCC's LLFA Policy for the Management of Surface Water, i.e. with a maximum urban creep allowance of 10% for development densities of 25 dwellings per hectare or less, and a minimum of 2% for development densities of 50 dwellings per hectare or more. This was calculated at 7.8% for Catchment 9 and 8.8% for Catchment 10, with no urban creep allowance for the road infrastructure.</i> <i>Nevertheless, in-line with updated policy requirements, the urban creep allowance has been updated to 10%. Updated areas are included in Table 2 and calculations Appendix C.</i>
Long Term Storage – we have some concerns that Table 8 does not correspond with the InfoDrainage outputs. For example, for catchment 9, Table 8 states that 2,976 m³ of storage volume is provided below the first flow control. However, in the InfoDrainage outputs, the volume at 1.10m depth (relevant flow control level), the volume is 1,732.6 m³. We therefore request that long term storage calculations are reviewed by the applicant and additional information provided to demonstrate it is sufficient for all catchments. This will ensure that flood risk is not increased elsewhere.	From Glanville's Technical Note RMA3: <i>The wrong column from InfoDrainage results was used to transpose numbers into the report. This has now been corrected and the long-term storage volumes from the updated hydraulic calculations in Appendix C are provided in Table 4.</i>
There are some clashes between the landscaping plans and basins, which could affect maintenance.	From Glanville's Technical Note RMA3: <i>No trees are located within the footprint of the basins. Some trees are located within the 3m maintenance margins, however these only represent a localised narrowing of the margin. All trees have now been moved to be at the edges of the maintenance margins, thereby providing a minimum clear width of 2m, which would allow ride-on</i>

Reference: Application reference DC/26/0731 (Sub-Phase 2C Road): Consultee Comments Responses

	<i>lawn mowers / utility vehicles to pass easily around the trees in order to maintain the basins and surrounding open green space.</i>
The easement for culvert 2 needs to be added, to ensure there is maintenance access.	Both Culvert 1 and Culvert 2 will be adopted by WSCC Highways under a S.38 Agreement. The detailed design of the culverts will be dictated by the Highway Agreements Officer in WSCC Development Control and the WSCC Highway Structures team, which will ensure access for maintenance is provided to WSCC Highways.
Place Services	
Summary We have reviewed the following documents supplied by the applicant, relating to the likely impacts of development on designated sites, protected & Priority species and habitats and identification of proportionate mitigation: • Ecology Mitigation and Management Plan (CSA, April 2026) • General Arrangement Plans (Glanville, January 2026) • (RMA 3) Phase 2 Road – Landscape and Ecological Management Plan (David Jarvis Associates, March 2026) Please note that comments on Biodiversity Net Gain are provided by Horsham District Council in-house. Additionally, regarding Great Crested Newt as we have been instructed to leave comments on this European Protected Species to the NatureSpace Partnership. We are not satisfied that there is sufficient ecological information available for approval of this reserved matters application. The reasons for this are outlined below: European Protected Species: (Hazel Dormouse and Bats), Protected species (reptiles) and Priority species (breeding birds and Invertebrates)	The following survey work has now been undertaken: • Hazel Dormouse – Habitat Quality Assessment, - completed April 2026. Woodland and hedgerows assessed as being of 'good' or 'excellent' condition. As such, surveys over a 3 month period (July to Sept) are underway (in line with Hazel Dormouse Mitigation Hand.book (Wells et al., 2025) to determine presence / likely absence. No evidence of dormice was recorded during the July 2026 survey; however evidence of dormice have previously been recorded within habitat further to the south-west of the wider Phase 2 Site within the last 5 years (Sports Sub Phase in 2024; and Employment Land Road in June 2026). The EMMP has been updated to reflect these findings and sets out mitigation and licencing proposals for this development. • Bats – Results of a Ground Level Tree Assessment (GLTA), to inform whether trees proposed for removal require suitable mitigation/ compensation strategies, possibly needing to be informed by further surveys, are presented within the Bat Survey Report (CSA/7937/14) which forms Appendix E of the updated EMMP. Of the trees to be removed to facilitate delivery of this development comprise 2x PRF-M trees and a further 12x trees which could not be fully assessed from ground level. Further trees climbing / emergence surveys will be undertaken to confirm the presence / likely absence of any roosts prior to works commencing. Where the presence of bat roosts is identified, then felling works will be subject to European Protected Species (EPS) licencing from Natural England (post-consent).

Reference: Application reference DC/26/0731 (Sub-Phase 2C Road): Consultee Comments Responses

We note this reserved matter application is to be considered concurrent with Condition 5 which states “*Pre-Commencement Condition: Details relating to the layout, scale, appearance, means of access (save for the accesses approved pursuant to Condition 1) and landscaping associated therewith (hereafter called the Reserved Matters) for each Area of the site as shown on the Reserved Matters Area Plan approved pursuant to condition 7 of this permission shall be submitted to and approved by the Local Planning Authority before development of that Reserved Matters Area is commenced.*”

Reason: To enable the Local Planning Authority to control the development in detail and to comply with Section 92 of the Town and Country Planning Act 1990.”

It is our professional opinion that Condition 14 must also be considered concurrent with this application to ensure to proposed layout will not negatively impact protected and Priority species and habitats. Condition 14, which relates to the Ecology Mitigation and Management Plan (EMMP) states

“Pre-Commencement Condition: Prior to the submission of an Ecological Mitigation and Management Plan (EMMP) with an application seeking approval of Reserved Matters pursuant to the planning permission, up to date ecological surveys shall be carried out to provide up to date information regarding the potential of the area covered by the Reserved Matters application to support protected and notable species and inform the future design of measures that will be required to avoid, mitigate or compensate for impacts and to inform the Ecological Mitigation and Management Plan for that Reserved Matters application. These surveys shall be completed by suitably qualified ecologist(s), recognised by a relevant professional body such as CIEEM, and in accordance with current survey guidelines. The scope of these surveys shall be agreed in advance with the LPA, and may include advanced surveys for rare bat species. The surveys shall be completed in accordance with the agreed scope prior to the submission of the EMMP for that Reserved Matters area and the results and associated reports appended to the Ecological Mitigation and Management Plan for that Reserved Matters area.

- Badgers – update Badger Survey Report (CSA/7937/08) has been provided in Appendix F of the updated EMMP. No direct impacts to badgers are anticipated as a result of this application.

- Reptiles – surveys undertaken in 2014 / 2015 recorded small populations of common lizard and slow-worm across the Phase 2 Site. Updated surveys in 2023 did not record any reptiles. Updated surveys completed to date in 2026 (4 of 7 survey visits) has recorded a peak of 2x male slow-worm and no common lizard. No reptiles have been recorded directly within the Site. The Reptile Survey Report (CSA/7937/13) is provided as Appendix I of the updated EMMP. As such, it is considered that RAMs will be appropriate to ensure direct impacts to reptiles is avoided during construction.

- Breeding birds – Update breeding bird surveys have been completed across the Phase 2 site (March to July); the result of which have not yet been fully reported. However, any habitat clearance will be undertaken outside of nesting periods (March to August) and compensation for habitat loss will be provided through new habitat creation (including landscape planting and nest boxes within the Site) as part of the wider landscape buffers for the Phase 2 area. As such, it is considered that appropriate mitigation can be secured.

- Invertebrates – An update invertebrate assessment was undertaken in June 2026; the Invertebrate Scoping Survey Report is provided as Appendix J of the updated EMMP. This indicated that the wider Phase 2 Site supports a reasonable invertebrate assemblage but unlikely to support an important invertebrate assemblage, but no further details surveys were deemed necessary. Measures to maintain and enhance opportunities for invertebrates are detailed within the EMMP.

- GCN – NatureSpace comments have been addressed above.

Reference: Application reference DC/26/0731 (Sub-Phase 2C Road): Consultee Comments Responses

Reason: As this matter is fundamental to safeguard and enhance the ecology and biodiversity of the area in accordance with Policy SD6 and Policy 31 of the Horsham District Planning Framework (2015), the Wildlife and Countryside Act 1981 (as amended), Conservation of Habitats and Species Regulations 2010 (as amended), NERC Act 2006 and the NPPF.”

The submitted Ecology Mitigation and Management Plan (CSA, April 2026) states following ecological surveys are underway during 2026 and the results are required to inform the mitigation/ compensation measures:

- Hazel Dormouse – Habitat Quality Assessment, to inform whether further surveys are required to inform if the existing licence present in a different phase requires modification or if a Non-Licensed Method Statement would be appropriate. The section does pass through areas of existing hedgerow and woodland; thus, the results are required.
- Bats – Results of a Ground Level Tree Assessment (GLTA), to inform whether trees proposed for removal require suitable mitigation/ compensation strategies, possibly needing to be informed by further surveys.
- Reptiles – It is our understanding that the site was subject to reptile surveys in 2022 by a different consultant and no reptiles were identified. The EMMP has recommended updated reptile surveys. As such, if considered necessary, as has been recommended the results are required prior to approval.
- Breeding birds – The EMMP states updated breeding bird surveys are underway. The results of these surveys are required.
- Invertebrates - The EMMP states invertebrate surveys are required due to the presence of notable species, which are not listed. The results of these surveys are required.

The EMMP recommends other ongoing surveys, which would form part of the long-term monitoring.

Reference: Application reference DC/26/0731 (Sub-Phase 2C Road): Consultee Comments Responses

To fully assess the impacts of the proposal the LPA needs ecological information for the site, particularly for bats and Hazel Dormouse, European Protected Species. These surveys are required prior to approval because Government Standing Advice indicates that you should *“Survey for Hazel Dormouse if the development proposal will affect an area of woodland (including deciduous, conifer or mixed woodland), hedgerow or scrub”* and

“Survey for bats if the area includes buildings or other structures that bats tend to use or there are trees with features that bats tend to use nearby”. Regarding protected species (reptiles), Government Standing Advice indicates that you should survey for *“reptiles if the development proposal is likely to lead to harm to individual reptiles or their habitats”* Survey for invertebrates if *“distribution and historical records suggest protected invertebrates may be present”* and Survey for wild birds *“if development proposal affects any natural habitats utilised by birds”*

The results of these surveys are required prior to approval 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.”*

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 Regulations 2017 (as amended) when reaching planning decisions including the Favourable Conservation Status licensing test and must not leave this until the licence application stage. Therefore, if a European Protected Species Mitigation

Reference: Application reference DC/26/0731 (Sub-Phase 2C Road): Consultee Comments Responses

Licence is required for this application, appropriate mitigation measures to support the provision of the licence must also be outlined prior to approval 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	
SuDS/ Trees 1. Review the location of the proposed northern attenuation basin in line with the indicative layout and principles set within the Phase 2 Design and Landscape Strategy submitted under DISC/26/0145. The basin is shown encroaching into the RPA's of the existing tree belts to the west and south of the basin. 2. In addition, a proposed self-biding gravel path and mown path are also indicated within the RPA's. Please provide construction details for the self-biding gravel path. The specification must include a no dig construction methodology, in accordance with best practice. 3. Please provide a plan identifying existing and proposed levels, including the attenuation basins alongside the location of all RPA's, to demonstrate the that the proposed earthworks can be accommodated without significant changes to the surrounding landscape or negatively affecting the retained trees and their rooting environment. 4. Reconsider the percentage of proposed Iris pseudacorus within the aquatic proposed planting mix. This species is known to be vigorous and suppressing the establishment of other species.	The basin, nor any of the earthworks required for its installation, would incur into the RPAs of existing trees. Pond levels can be seen on the pond section drawings which are included in Appendix E of the FRA. The top of bank of pond is the maximum extent of earthworks required, which is located wholly outside of any RPAs. A section detail of the low-dig footpath is enclosed as part of this response (RMA3 / Private Works Private Construction Details (MOW-RMA3-PH2-2561 P1))
Landscape proposals Highway - Tree species proposed	Development parcels adjacent to the Sub-Phase 2C Road are residential per the approved Land Use Parameter Plan and subsequent RM Areas Plan. RM Area 16/17 will be positioned on the western side of the road, with RM 18 on the eastern.

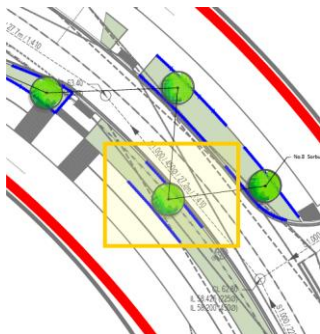
Reference: Application reference DC/26/0731 (Sub-Phase 2C Road): Consultee Comments Responses

5. Review the use of Sorbus aucuparia as an avenue tree in the main/primary route. While attractive, it is of a modest scale more suited to a minor residential street. Please revise the planting proposals to include larger growing tree species, more suited to establish a strong avenue character and a stronger landscape structure in this prominent location. We recommend species listed within the Primary Street Tree palette in the Design & Landscape Strategy under DISC/26/0145, such as Aesculus hippocastanum or Tilia cordata.	Whilst comments on scale are noted, the design seeks to reduce the scale of planting to provide a clearer separation between the residential scale of this area and that of the Employment Land to the west whilst retaining the tree lined avenue as set out in the Phase 2 Design and Landscape Strategy. We therefore consider the proposed planting appropriate in both scale and character.
6. In addition, avenue tree species must be proposed as a minimum size of 20-25cm girth	We do not believe this is a material planning requirement, nor does it form part of the proposed Phase 2 Design and Landscape Strategy.
7. Consider softening the appearance of substations by introducing planting	Underground cabling limits the extent of planting that can be placed around the substations. Opportunities for additional landscaping will nonetheless be explored in later residential RM applications to provide screening where possible.
8. Add bulb planting within the verges to add interest.	These have been added. Illustrated on the amended General Arrangement and Planting Plans.
9. Clarify what replacement planting is being proposed in those areas where the existing landscape corridors are being removed to facilitate the construction of the road, as highlighted crudely in yellow (planting plan sheet 3 of 7 and 6 of 7)	Every opportunity has been taken to incorporate new tree and landscape planting across the Site. The removal of existing landscaping necessary to facilitate the road alignment is consistent with the approved parameters of the Outline Planning Permission. In this context, the comprehensive landscaping strategy proposed is considered to provide an appropriate level of compensatory planting, while contributing positively to visual amenity and landscape.
Hardscape: 10. Please consider the provision of some benches with armrests to promote inclusive access for those less able users.	The benches proposed are consistent with benches approved across the wider Mowbray development.
Underground services 11. It is unclear if the proposed trees in some locations have enough clearance from proposed underground services. Some of these lines appear to be visibility splays, others I'm unclear if a proposed underground service is currently clashing with the	The grey lines shown in the background of the screenshots provided are visibility splays rather than underground services.

Reference: Application reference DC/26/0731 (Sub-Phase 2C Road): Consultee Comments Responses

landscape strategy. Of particular concern will be the street lighting. Please confirm or coordinate and adjust plans, some examples below (but not limited to, please review the full scheme):

Planting plan 2 of 7



Planting plan 4 of 7



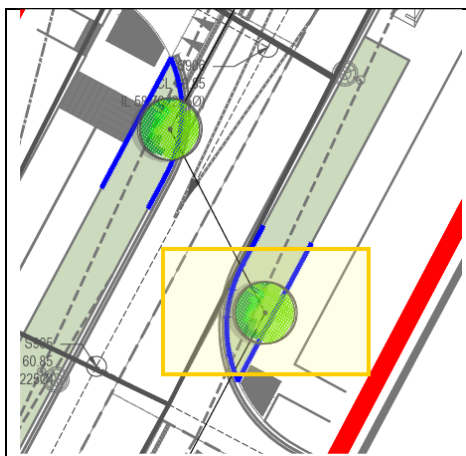
Planting plan 5 of 7

All services are proposed to be located beneath the footways, and all sewers are proposed beneath the carriageway. No sewers or services are proposed to run along the landscaped verges.

Where service spurs or crossings are required, these have been coordinated with the proposed tree locations. The lighting design has also been reviewed and will be coordinated with the landscape proposals prior to resubmission to ensure that lighting columns are appropriately positioned in relation to proposed trees and in accordance with WSCC Highway requirements.

The submitted and amended plans demonstrate that the proposed landscape strategy can be delivered without conflict with underground services, sewers, visibility splays or street lighting infrastructure.

Reference: Application reference DC/26/0731 (Sub-Phase 2C Road): Consultee Comments Responses

	
Landscape Spec & LEMP: We strongly 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. 1.7 of the LEMP, stating that “<i>biocides should only be used as a last resort, unless eradicating species as listed under Schedule 9 of the Wildlife and Countryside Act 1981</i>” is therefore welcomed. However, herbicides remain proposed within the rest of the documentation. Please make the following amendments: a) Remove herbicides from the following sections of the LEMP: 6.4.j; 7.7.e; Landscape Maintenance Schedule (LMS) 9.1; LMS 9.2; LMP 24.5; and LMP 24.6. b) Remove herbicides from the following sections of the Landscape Specification: 168; 210; 212; and 421. c) Amend the following sections of the Landscape Specification to clarify Schedule 9 species: 300; and 305. d) Specify alternative methods for weeding. Please refer to pan-uk.org for guidance and resources.	There continues to be no policy basis for this request (see Village Centre reference DC/25/1018 and Employment Land Road reference DC/25/1543). Alternative methods will be used first, though herbicides will also be used where necessary. Whilst we note HDC Landscape comments in response to the above reference HDC’s Greenspace Strategy 2024-29, this document does not form part of HDC’s development plan. Moreover, per Page 1 of the Strategy, “set(s) the approach to the management of the <i>Council’s own landholdings</i>”.

Reference: Application reference DC/26/0731 (Sub-Phase 2C Road): Consultee Comments Responses

13. Please amend the LEMP to clarify that any stakes, ties and guards should be removed upon successful establishment or after 4 years of planting, whichever is sooner. This is in order to ensure that paraphernalia is not left in situ, compromising the long-term health of trees and impeding their establishment.	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.
14. Please amend the LEMP to include details of the parties/organisation who will manage and maintain the site, as well as a plan delineating the areas that they will be responsible for.	Details are provided in Section 8 of the existing LEMP. The proposed responsibilities remain the same in the amended LEMP enclosed.

Appendix B – Submitted Plans and Documents

- 01 Application Form (dated 30 April 2026)
- 02 Community Infrastructure Levy: Additional Information Form (dated 30 April 2026)
- 03 Covering Letter (dated 30 April 2026)
- 04 Planning Statement (dated 30 April 2026), prepared by Stantec
- 05 Redline Boundary Plan (MOW-BM-PH2-RMA3-34854-DR-A-02749 05), prepared by Broadway Malyan
- 06 Application Drawings, prepared by Broadway Malyan
 - Topographical Survey (MOW-BM-PH2-RMA3-34854-DR-A-02750 05)
 - Substation 01 Plans, Sections, Elevations Proposed (MOW-BM-PH2-RMA3-34854-DR-A-03757 SK02)
 - Substation 02 Plans and Sections Proposed (MOW-BM-PH2-RMA3-34854-DR-A-03758 SK02)
 - Substation 02 Elevations Proposed (MOW-BM-PH2-RMA3-34854-DR-A-03759 SK02)
- 07 Transport Statement and Appendices (259_8220585_JB_Transport_Statement_RMA3), prepared by Glanville
- 08 Highways drawings, prepared by Glanville
 - Adoption Plan - Sheet 1 of 2 (MOW-GLA-RMA3-PH2-1001 ~~P3~~ P4)
 - Adoption Plan - Sheet 2 of 2 (MOW-GLA-RMA3-PH2-1002 ~~P3~~ P4)
 - General Arrangement - Sheet 1 of 2 (MOW-GLA-RMA3-PH2-1101 ~~P3~~ P4)
 - General Arrangement - Sheet 2 of 2 (MOW-GLA-RMA3-PH2-1102 ~~P3~~ P4)
 - Levels and Long Sections Sheet 1 of 2 (MOW-GLA-RMA3-PH2-1103 ~~P3~~ P5)
 - Levels and Long Sections Sheet 2 of 2 (MOW-GLA-RMA3-PH2-1104 ~~P3~~ P4)
 - Visibility Splays - Sheet 1 of 2 (MOW-GLA-RMA3-PH2-1105 ~~P3~~ P4)
 - Visibility Splays - Sheet 2 of 2 (MOW-GLA-RMA3-PH2-1106 ~~P3~~ P4)
 - Vehicle Tracking - Buses - Sheet 1 of 2 (MOW-GLA-RMA3-PH2-1301 ~~P3~~ P4)
 - Vehicle Tracking - Buses - Sheet 2 of 2 (MOW-GLA-RMA3-PH2-1302 ~~P3~~ P4)
 - Vehicle Tracking - Refuse Lorry - Sheet 1 of 2 (MOW-GLA-RMA3-PH2-1303 ~~P3~~ P4)
 - Vehicle Tracking - Refuse Lorry - Sheet 2 of 2 (MOW-GLA-RMA3-PH2-1304 ~~P3~~ P4)

Reference: Application reference DC/26/0731 (Sub-Phase 2C Road): Consultee Comments Responses

- Vehicle Tracking - Fire Tender - Sheet 1 of 2 (MOW-GLA-RMA3-PH2-1305 ~~P2~~ P3)
 - Vehicle Tracking - Fire Tender - Sheet 2 of 2 (MOW-GLA-RMA3-PH2-1306 ~~P2~~ P3)
 - Pedestrian and Cycle Strategy - Sheet 1 of 2 (MOW-GLA-RMA3-PH2-SK01 ~~P2~~ P3)
 - Pedestrian and Cycle Strategy - Sheet 2 of 2 (MOW-GLA-RMA3-PH2-SK02 ~~P2~~ P3)
 - **RMA3 / Private Works Private Construction Details (MOW-RMA3-PH2-2561 P1)**
- 09 Drainage Statement and Appendices (267_8220585_CS_Drainage_Statement_RMA3), prepared by Glanville
- 10 Ecology Mitigation and Management Plan (**August 2026**; CSA/7937/01 **rev. D**), prepared by CSA Environmental
- 11 Landscape Statement, prepared by David Jarvis Associates
- 12 Landscape drawings, prepared by David Jarvis Associates
- Landscape proposals GA (DR-2001 ~~P3~~ P5)
 - Planting proposals 1 of 7 (DR-2002 ~~P3~~ P5)
 - Planting proposals 2 of 7 (DR-2003 ~~P3~~ P5)
 - Planting proposals 3 of 7 (DR-2004 ~~P3~~ P5)
 - Planting proposals 4 of 7 (DR-2005 ~~P3~~ P5)
 - Planting proposals 5 of 7 (DR-2006 ~~P3~~ P5)
 - Planting proposals 6 of 7 (DR-2007 ~~P3~~ P5)
 - Planting proposals 7 of 7 (DR-2008 ~~P3~~ P5)
 - Tree protection plan (DR-2009 ~~P3~~ P5)
 - Illustrative Planting Palettes (DR-2010 P1)
 - Standard detail – Timber cleft 3 rail fencing (2898-5-5-BND-0002 P5)
 - Standard detail – Benches and seats (2898-5-5-FRN-0001 P5)
 - Standard detail – Dog waste bin (2898-5-5-FRN-0004 P5)
 - Standard detail – Litter bin (2898-5-5-FRN-0007 P4)
 - Standard detail – Wayfinding sign (2898-5-5-FRN-0010 P4)
 - Standard detail – Fingerpost detail (2898-5-5-FRN-0012 P1)
 - Standard detail – Tree planting details (2898-5-5-VEG-0001 P6)
 - Standard detail – Tree planting details (2898-5-5-VEG-0002 P6)

Reference: Application reference DC/26/0731 (Sub-Phase 2C Road): Consultee Comments Responses

- Standard detail – Tree planting details (2898-5-5-VEG-0003 P5)
- 13 Landscape and Ecological Management Plan (LM-2004 P1), prepared by David Jarvis Associates
 - 14 Landscape Specification (SP-2004 P1), prepared by David Jarvis Associates
 - 15 Arboricultural Impact Assessment / Arboricultural Method Statement (2898-2-17-TD-2001 P2), prepared by David Jarvis Associates
 - 16 Heritage Statement (274790.04), prepared by Wessex Archaeology
 - 17 Lighting Plans, prepared by Enerveo
 - Section 38 Street Lighting Layout 1 of 2 (EVO20041213-LD-001 A)
 - Section 38 Street Lighting Layout 2 of 2 (EVO20041213-LD-002 A)
 - 18 Bird Hazard Management Plan (dated 26 August 2026)

In addition to this Letter the following documents have been submitted for the purposes of this response;

- 01 Mowbray, North Horsham, West Sussex (Phase 2) Technical Note RMA3 (21 August 2026), prepared by Glanville