

17 March 2026

Project/File: 333102644/A3

via Email

Jason Hawkes
Horsham District Council
Albery House
Springfield Road
Horsham
West Sussex
RH12 2GB

Dear Jason,

Employment Land Road (DC/25/1543) Update

We are writing on behalf of Legal & General (Strategic Land North Horsham) Limited ('L&G') to clarify the outstanding matters in relation to the application for full planning permission for the Employment Land Road (LPA reference DC/25/1543).

The above application was submitted in September 2025. A response to initial consultee comments was submitted on 7 and 9 January 2026. Further comments from the HDC Ecology Officer and Arboricultural Officer were subsequently received (2 and 25 February 2026 respectively).

This letter and submission seeks to provide responses/ clarifications to the ecology and arboricultural follow-up comments We have also sought to provide an update in respect of Biodiversity Net Gain ('BNG') to provide context to the further amended landscape scheme and updated BNG Metric.

HDC Ecology

No.	Comment	Response
Baseline		
1.	It should be highlighted that no methodology or location of MoRPH surveys have been provided. This is requested to determine that this has been carried out to a satisfactory level.	The MoRPH methodology is fixed in structure and has been carried out by a Certified Surveyor (Derek Finnie, Derek Finnie Associates). A ten-figure grid reference is included on the submitted RCA results sheet and was undertaken at location of the proposed inflow.
Habitat Map		

No.	Comment	Response
2.	The ecologist has confirmed in the Further Ecology Information note that the woodland is 'contiguous with the Channells Brook along the north of the site'. However, this does not appear to be mapped, and it is my understanding that this parcel of woodland is outside the red line boundary and not subject to any impacts. On further investigation, I believe the woodland included in the metric are the sections to be removed to facilitate drainage and earth works in the west of the site. Please can these parcels be added to the Phase 1 Map for purposes of including in the HMMP. In addition, please can the watercourses subject to RCA also be added.	An amended Phase 1 Map is appended BNG Report (March 2026).
3.	The loss of T277 (and partial removal of the woodland edge W281) is now omitted from the AIA. It is noted that T277 is diseased (ash dieback) but has a fair structural condition. Clarification is requested as to why this tree is now marked as retained.	The scheme was amended following previous consultation responses, with amended plans submitted 9 January 2026. The amended scheme allows for the retention of T277 which is reflected in the AIA.
4.	The ecologist has confirmed in the Further Ecology Information note that the mixed scrub mentioned in the LEMP is in error, and there is no mixed scrub within the application boundary. Please can this section be removed from the LEMP, as this is still present in the updated version (see Section 4.13 onwards).	The LEMP has been amended to clarify the above. Please find appended to this letter.
Metric		
5.	Confirmation has been provided in the Ecology and Landscape Consultee Responses document that the tree planting is separate to the hedgerow, and the native hedgerow has been added to the metric. Concern resolved, with thanks. Note that on the Planting Proposals, the hedgerow comprises 5 woody species and therefore qualifies as species-rich, and therefore this entry in the metric may be amended.	An amended Metric is appended to this letter to reflect the species-rich nature of the hedgerow.
Habitats		
6.	Given the reluctance to change this approach, it is requested that any remedial measures in case of planting failure (and existing tree failure or deterioration as a result of any works or disturbance) be included in the LEMP/HMMP.	It is expected that the replacement of planting failures during the first 5-years from the date of completion of the development would be secured by condition, per standard practice.

No.	Comment	Response
		This is reflected in 5.63 of the LEMP.
Planting Proposal		
7.	(Previous comment) 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. Not fully addressed, with non-native specimen trees still located in close proximity to the priority woodland habitat in the east of the site.	We disagree on the approach to tree planting proposals within the Site. The proposed planting provides a degree of consistency in appearance along the important corridor through the Employment Land and into and out of Phase 2.
Habitat Creation for Protected and Priority Species		
8.	(Previous comment) It is acknowledged from the ES that skylark is still recorded onsite. The habitats proposed within the site do not cater for skylark, which prefer undisturbed open habitat such as treeless grasslands and farmland. As such, further information is sought on what habitat creation is being offered across the larger strategic site for this species to compensate for the loss of farmland habitat. Not addressed.	The loss of farmland and associated habitat was highlighted in the site wide ES submitted as part of the Outline Planning Application (DC/16/1677). Significant impacts were identified at a local level, though no mitigation proposed as mitigation is not possible on-site. This loss was deemed acceptable.
Grassland		
9.	(Previous comment) Other mechanisms should be explored to reduce nutrient soil prior to employing topsoil 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	Reference to meadow grassland has been removed as none is proposed for the development. Grass mixes have been added to the key.

No.	Comment	Response
	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. Does not appear to be addressed.	
Target Conditions		
10.	(Previous comment) The LEMP does not refer to the target condition criteria to reach the overall desired condition as per the entries within the metric. Does not appear to be addressed.	We envisage a Habitat Management and Monitoring Plan will be secured by condition upon grant of planning permission. This information will be presented in that document post-permission.

HDC Arboriculture

'Concerning the points they have raised in Para 10 of their response, the tree with the level changes in the RPA as shown below, is an Ash, which is showing the advanced signs of Ash dieback, and is due to be removed, photo attached. The wooded area where the tree is located is separated from the main area of development by a old deep ditch which would imply, that it is unlikely any root disturbance would occur to the south of the ditch as it would have acted as a barrier preventing any major root development in this area, subject to the works falling to the south of the ditch I would not raise any tree related concerns with this part of the scheme; please seek confirmation that the road and ground/ land level changes works associated with the scheme would be sited south of the ditch.'

We can confirm that all engineering works will take place to the south of the watercourse.

'At para 7 of the response, landscapes highlight concerns with land level changes connected to the road /footway; there are a few good mature trees in this area that could be impacted by the change in land levels. It would be preferable to seek an engineering solution to address this such as retaining wall, or something similar to limit the impact on the RPAs of the affected trees.'

The question asked is whether it would be appropriate to have a retaining wall (or something similar) along the northern side of the road where land levels change instead of the re-grading of soil in this area to create a slight incline as per the current proposals.

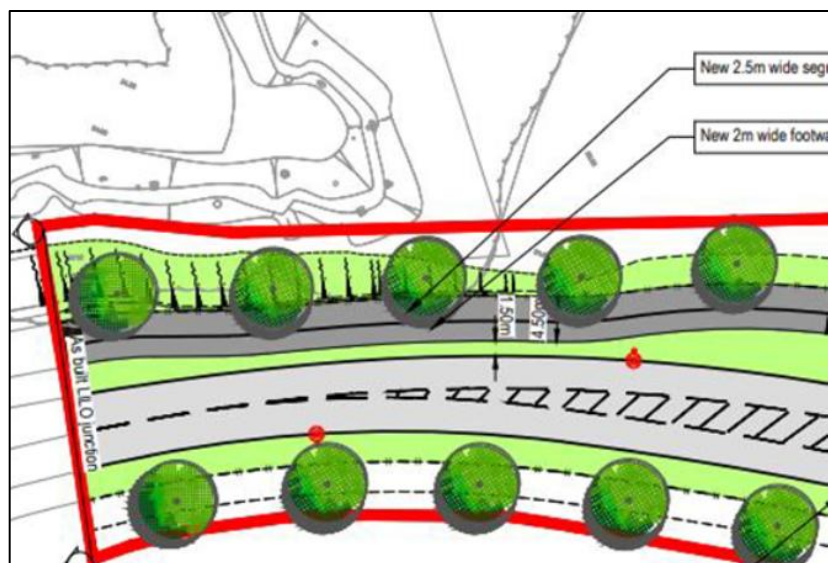


Figure 1: Proposed bank on northern side of Employment Road.

The tree cover in this area was surveyed under the BS:5837 Phase 1 Tree Survey by PJA trees. The whole tree group has been included in the Survey as a category 'B' group under Ref: G45-PA.

The area consists of dense blackthorn and smaller multi-stem coppice goat willow with occasional slender Alders (mostly on the far side of the bank). None of the trees are notable as individual specimen trees, however, collectively they create continuous tree canopy cover and are visually significant as a landscape group.



Figure 2: Dense Blackthorn in-situ

The area of required soil level changes will encroach marginally into the group in two specific areas of G45-PA which have been annotated onto the plan below. In both areas existing Blackthorn scrub and suckering growth will be cut back.

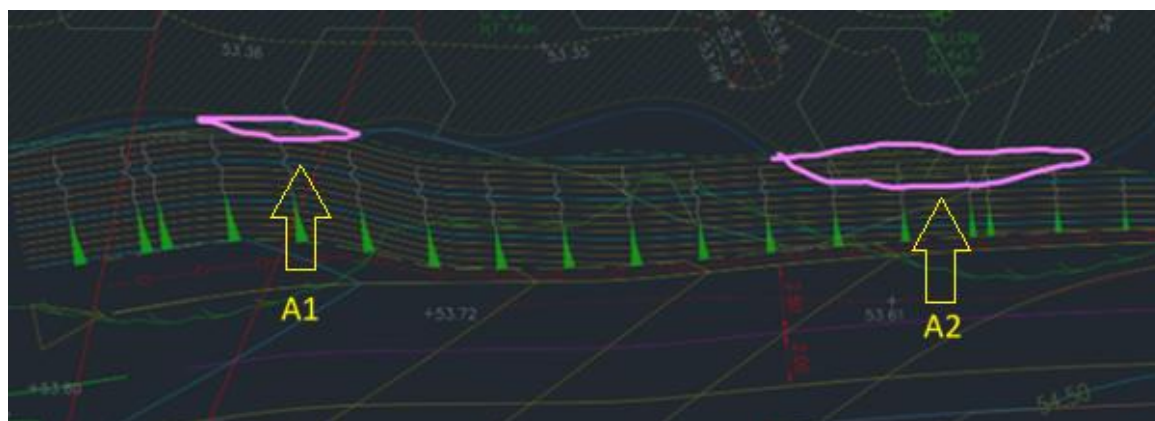


Figure 3: Areas of Encroachment

A1 (west) requires a very minor re-grading of the soil levels over 2.5m² into G45-PA with a maximum of 200mm of soil displacement. This very minor encroachment would be approximately 5m from the base of a single stem Alder which is dead or in advanced decline (see Figure 4).

The area proposed for re-grading is therefore likely to be outside of the RPA of the tree. Furthermore, as the Alder is a poor-quality specimen in declining health, alternative engineered options are not justified on this occasion.



Figure 4: Dead / Declining Alder close to A2

With regards to 'A2', the eastern area of soil re-grading is 3.4m from the base of a multi-stem Goat Willow. Whilst this tree was not detailed specifically in the BS:5837 survey, the topographical survey recorded a multi-stem tree, 8m tall and with four stem 120mm diameter. Under BS:5837 (2012) the tree therefore requires a Root Protection Area radius of 2.9m (area of 26.1m²).

Based on this information, the Applicant's Arboricultural Consultant is satisfied that the proposed re-grading of soil in A2, being 3.4m from the tree, is outside of the root protection area of the Goat willow and will have no significant impact on tree health or stability.

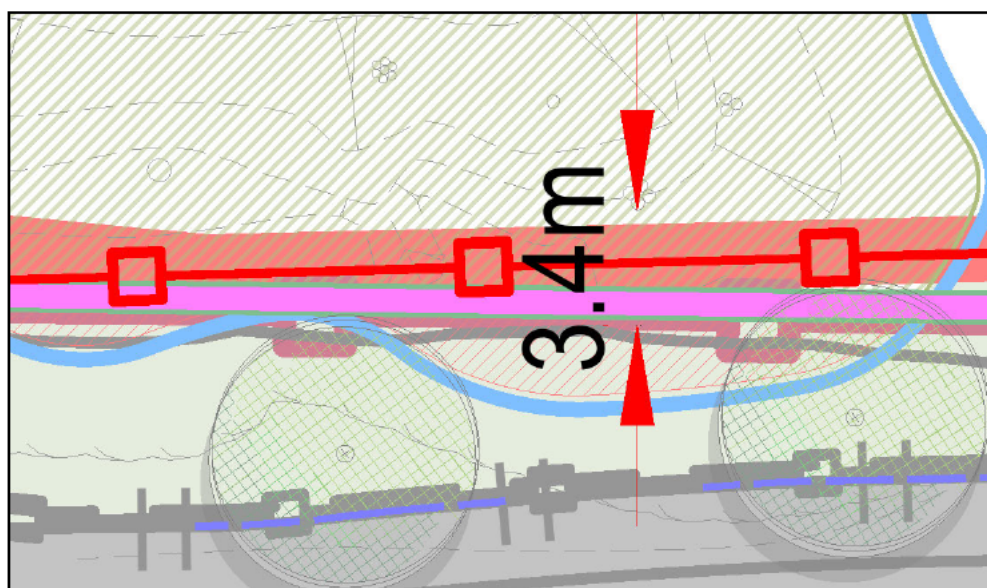


Figure 5: Distance between Goat Willow and edge of re-graded incline

Based on this assessment, the proposed re-grading of two areas within G45-PA will only necessitate the removal of dense blackthorn scrub / suckering growth and will have no detrimental impact to the health or stability of any individual specimen tree. The loss of Blackthorn at the edge of the wooded area will not detract from the amenity of the wider woodland group as a whole.

The proposed embankment is a natural-looking landscape feature which has been designed to be self-supporting. Increasing the slope or building a retaining wall in this area would create significantly greater ground disturbance and change the natural looking edge of the woodland group. The Applicant's highways consultants are also concerned that a retaining wall could create a safety hazard for road users that would need to be addressed.

Considering the above, we suggest, with regards to the arboricultural impact of the development, to retain the proposed ground levels as per the proposed plans.

Consultee Comments

In addition to the above, we wish to clarify the applications progress to date. The below schedule details the progress of the application against consultee comments to date:

Consultee	Status & Date of Comment	Date of Response	Status of Consultee
No objection			
Clarifications			
Objection			
London Gatwick	04/11/2026	07/01/2026	02/02/2026

Consultee	Status & Date of Comment	Date of Response	Status of Consultee
HDC Arboriculture	05/11/2025	N/A	
	Reviewed 25/02/2026	Addressed above	
WSCC PRoW	10/11/2025	-	
HDC Ecology	11/11/2025	15/01/2026	
	02/02/2026	Addressed above	
Ecology Place Services	18/11/2025	15/01/2026	
	05/02/2026	-	
HDC Conservation	18/11/2025	-	
HDC Landscape	19/11/2025	15/01/2026	
	13/02/2026	Partially addressed through response to further arb comments	
LLFA	30/11/2025	07/01/2026	
	05/02/2026	25/02/2026 (to conditions)	

HDC Ecology and Arboriculture are shown above to have comments outstanding. We trust the responses above and the amended plans enclosed provide sufficient clarifications to overcome any residual concerns.

Discussions are currently ongoing with the LLFA regarding suggested conditions which are being facilitated by the LPA. No specific concerns have been raised through previous consultations with the LLFA that should preclude a positive determination as it has been demonstrated that the site is safe from flooding and provides adequate drainage capacity.

This would leave HDC Landscape as the only consultee with comments outstanding. A comprehensive response was provided to the first set of HDC Landscape comments in January 2026. Responses and further comments have since been received from HDC Landscape. Whilst we are keen to continue to collaborate with HDC to achieve high-quality developments, we do not believe that these require a further response in this instance, though welcome clarification from HDC Planning Officers should they deem any further Applicant response is necessary.

Biodiversity Net Gain

L&G's team has reviewed the land that will be retained by L&G/ its management company and thus identified the land available to provide the necessary biodiversity enhancements to secure at least 10%

within the red line boundary. As a result of this, the land that will form the adoptable highway including the carriageway, verges and roundabouts have been excluded from the BNG metric. Likewise, any temporary embankments either side of the road that will form part of the future employment parcels has been excluded. To ensure the scheme continues to deliver a net gain of 10%, areas of meadow grass, to provide species rich grassland, have been included. The landscape plans and BNG metric have been updated accordingly and are enclosed with this addendum submission. This confirms that the scheme continues to exceed 10% BNG in hedgerow and habitat units. There remains a shortfall in watercourse biodiversity net gain though as set out in our consultee responses dated 15 January 2025, 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.

The final suite of drawing and report references are provided in Appendix A and Appendix B respectively. These comprise the final set of documents and drawings for approval. Plans and documents not for approval are contained within Appendix C.

We trust this is in order. Please do let us know if you require anything further to progress to determination.

Sincerely,

Stantec UK Limited



James Taylor

Planner

Phone: 



stantec.com/uk

cc. Alex Jones (Stantec)

Appendix A – Drawing List for Approval

No.	Drawing Name	Drawing Reference	Rev	Author
1.	Employment Road Red Line Plan	19003-SBR-SW-XX-DR-A-00002	10	Scott Brownrigg
2.	Typical Substation	19003-SBR-SW-XX-DR-A-83001	4	Scott Brownrigg
3.	Landscape proposals GA	2898-5-2-20 DR-0001	P7	DJA
4.	Planting Proposals (1 of 6)	2898-5-2-20 DR-0002	P7	DJA
5.	Planting Proposals (2 of 6)	2898-5-2-20 DR-0003	P7	DJA
6.	Planting Proposals (3 of 6)	2898-5-2-20 DR-0004	P7	DJA
7.	Planting Proposals (4 of 6)	2898-5-2-20 DR-0005	P7	DJA
8.	Planting Proposals (5 of 6)	2898-5-2-20 DR-0006	P7	DJA
9.	Planting Proposals (6 of 6)	2898-5-2-20 DR-0007	P7	DJA
10.	Section A-A'	2898-5-2-20 DR-0011	P1	DJA
11.	Section B-B'	2898-5-2-20 DR-0012	P1	DJA
12.	Section C-C'	2898-5-2-20 DR-0013	P1	DJA
13.	Standard Detail – Timber P&R Fencing	2898-5-5-BND-0007	P5	DJA
14.	Standard Detail – Benches and Seats	2898-5-5-FRN-0001	P5	DJA
15.	Standard Detail – Dog Waste Bin	2898-5-5-FRN-0004	P4	DJA
16.	Standard Detail – Lighting	2898-5-5-FRN-0005	P5	DJA
17.	Standard Detail – Litter Bin	2898-5-5-FRN-0007	P4	DJA
18.	Standard Detail – Timber Bollard	2898-5-5-FRN-0009	P4	DJA
19.	Standard Detail – Self Binding Gravel	2898-5-5-SUR-0002	P4	DJA
20.	Standard Detail – Tree Planting Details	2898-5-5-VEG-0001	P6	DJA
21.	Standard Detail – Tree Planting Details	2898-5-5-VEG-0002	P6	DJA
22.	Standard Detail – Tree Planting Details	2898-5-5-VEG-0003	P5	DJA
23.	Lighting Design	25-286-2	D	DW Windsor

No.	Drawing Name	Drawing Reference	Rev	Author
24.	Section 38 Street Lighting Layout Drawing Sheet 1 of 4	EVO20036006-LD-001	A	Enerveo
25.	Section 38 Street Lighting Layout Drawing Sheet 2 of 4	EVO20036006-LD-002	A	Enerveo
26.	Section 38 Street Lighting Layout Drawing Sheet 3 of 4	EVO20036006-LD-003	A	Enerveo
27.	Section 38 Street Lighting Layout Drawing Sheet 4 of 4	EVO20036006-LD-004	A	Enerveo
28.	General Arrangement Sheet 1 of 3	MOW-RMA2-PH2-1001	P11	Glanville
29.	General Arrangement Sheet 2 of 3	MOW-RMA2-PH2-1002	P12	Glanville
30.	General Arrangement Sheet 3 of 3	MOW-RMA2-PH2-1003	P13	Glanville
31.	Long Sections Sheet 1 of 5	MOW-RMA2-PH2-1007	P4	Glanville
32.	Long Sections Sheet 2 of 5	MOW-RMA2-PH2-1008	P4	Glanville
33.	Long Sections Sheet 3 of 5	MOW-RMA2-PH2-1009	P4	Glanville
34.	Long Sections Sheet 4 of 5	MOW-RMA2-PH2-1010	P4	Glanville
35.	Long Sections Sheet 5 of 5	MOW-RMA2-PH2-1011	P4	Glanville
36.	Levels and Contours Sheet 1 of 3	MOW-RMA2-Ph2-1012	P4	Glanville
37.	Levels and Contours Sheet 2 of 3	MOW-RMA2-Ph2-1013	P4	Glanville
38.	Levels and Contours Sheet 3 of 3	MOW-RMA2-Ph2-1014	P5	Glanville
39.	Employment Land Pond 7a Sections	MOW-RMA2-PH2-1220	P1	Glanville

Appendix B – Documents List for Approval

No.	Drawing Name	Drawing Reference	Rev	Author
1.	Landscape and Ecological Management Plan	LM-0004	P4	DJA
2.	AIA/AMS	2898-2-17-TD-0001	P2	DJA
3.	Tree Protection Plan	2898-2-17-DR-0001	P3	DJA
4.	Bird Hazard Management Plan	January 2026	-	-

Appendix C – Other Submitted Documents (Not for Approval)

No.	Drawing Name	Drawing Reference	Rev	Author
Plans				
1.	Illustrative Planting Palettes	2898-5-2-20 DR-0008	P1	DJA
2.	Illustrative Planting Palettes	2898-5-2-20 DR-0009	P1	DJA
3.	Furniture and Materials Palette	2898-5-2-20 DR-0010	P1	DJA
4.	Roundabout 1 Geometry	MOW-RMA2-PH2-1004	P5	Glanville
5.	Roundabout 2 Geometry	MOW-RMA2-PH2-1005	P5	Glanville
6.	Long Sections Location Plan	MOW-RMA2-PH2-1006	P5	Glanville
7.	Visibility Splays Layout Sheet 1 of 3	MOW-RMA2-PH2-1015	P3	Glanville
8.	Visibility Splays Layout Sheet 2 of 3	MOW-RMA2-PH2-1016	P3	Glanville
9.	Visibility Splays Layout Sheet 3 of 3	MOW-RMA2-PH2-1017	P4	Glanville
10.	Adoption Plan Sheet 1 of 3	MOW-RMA2-PH2-1018	P3	Glanville
11.	Adoption Plan Sheet 2 of 3	MOW-RMA2-PH2-1019	P3	Glanville
12.	Adoption Plan Sheet 3 of 3	MOW-RMA2-PH2-1020	P4	Glanville
13.	Swept Path Analysis - Western Roundabout 16.5m Articulated Vehicle	MOW-RMA2-PH2-6201	P3	Glanville
14.	Swept Path Analysis - Eastern Roundabout 16.5m Articulated Vehicle	MOW-RMA2-PH2-6202	P3	Glanville
15.	Swept Path Analysis 12m Bus	MOW-RMA2-PH2-6203	P3	Glanville
16.	Swept Path Analysis 11.2m Refuse Vehicle	MOW-RMA2-PH2-6204	P3	Glanville
17.	Swept Path Analysis 11.2m Refuse Vehicle	MOW-RMA2-PH2-6205	P3	Glanville
18.	Swept Path Analysis 11.2m Refuse Vehicle	MOW-RMA2-PH2-6206	P3	Glanville
19.	Swept Path Analysis 11.2m Refuse Vehicle	MOW-RMA2-PH2-6207	P3	Glanville
20.	Swept Path Analysis 11.2m Refuse Vehicle	MOW-RMA2-PH2-6208	P3	Glanville
21.	Swept Path Analysis 9.5m Tanker	MOW-RMA2-PH2-6209	P3	Glanville

22.	Swept Path Analysis - Car Park 1 Large Car	MOW-RMA2-PH2-6210	P2	Glanville
23.	Swept Path Analysis - Car Park 2 Large Car	MOW-RMA2-PH2-6211	P2	Glanville
24.	RMA2 / Employment Land Pedestrian and Cycle Route Strategy	MOW-RMA2-PH2-SK02	P4	Glanville
Documents				
25.	Landscape Statement	LS-2002	P1	DJA
26.	Landscape Specification	SP-0001	P2	DJA
27.	Flood Risk Assessment	December 2025	3	Glanville
28.	Transport Statement	September 2025	3	Glanville
29.	Stage 1 Road Safety Audit Response Report (RMA2 Employment Land)	August 2025	-	Glanville
30.	River Conditions Assessment		-	DFA
31.	Employment Land – GCN Report	January 2026 (DFA250692)	-	DFA
32.	Employment Land – Reptile Survey Report	January 2026 (DFA250693)	-	DFA
33.	Employment Land – Breeding Bird Report	January 2026 (DFA250694)	-	DFA
34.	Employment Land – Bat Survey Report	January 2026 (DFA250695)	-	DFA
35.	BNG Design Report – March 2026	DFA25062V4	-	DFA
36.	Tree Condition Sheet	-	-	DFA
37.	Commercial Road Statutory BNG Metric	-	-	DFA
38.	River Conditions Assessment Results	-	-	DFA