



National Highways Planning Response (NHPR 25-01) Formal Recommendation to an Application for Planning Permission

From: Hermes Luli (Head of Planning & Development)
Operations Directorate
South East Region
National Highways
Planningse@nationalhighways.co.uk

To: Mid Sussex District Council (FAO Stuart Malcolm)
stuart.malcolm@midsussex.gov.uk

CC: transportplanning@dft.gov.uk
spatialplanning@nationalhighways.co.uk

Council's Reference: DM/26/0238

Location: LVS Hassocks, London Road, Sayers Common, Hassocks

Proposal: Hybrid application that seeks consent for separate and severable elements comprising: Demolition of all existing buildings bar the chapel, to retained for use within Use Class F and: a) Full planning permission for the development of the north western part of the Land at LVS Hassocks so as to accommodate a new SEN School with associated access from London Road, car parking, landscaping and drainage works; and b) Outline planning permission (Appearance, Landscaping, Layout and Scale Reserved) for the development of the rest of the land at LVS Hassocks so as to accommodate up to 210 dwellinghouses (including 30% affordable housing) with associated access, car parking, landscaping, play areas, informal outdoor space and .drainage works

National Highways Ref: NH26/15036

Referring to the consultation on a planning application dated 11 February 2026 referenced above, in the vicinity of the A23 that forms part of the Strategic Road Network, notice is hereby given that National Highways' formal recommendation is as follows:

~~a) offer no objection (see reasons at Annex A);~~

- ~~b) recommend that conditions should be attached to any planning permission that may be granted (see Annex A – National Highways recommended Planning Conditions & reasons);~~
- c) recommend that planning permission not be granted for a specified period (see reasons at Annex A);**
- ~~d) recommend that the application be refused (see reasons at Annex A)~~

Highways Act 1980 Section 175B is not relevant to this application.¹

This represents National Highways' formal recommendation and is copied to the Department for Transport as per the terms of our Licence.

Should the Local Planning Authority propose not to determine the application in accordance with this recommendation they are required to consult the Secretary of State for Transport, as set out in the [Town and Country Planning \(Development Affecting Trunk Roads\) Direction 2018](#), via transportplanning@dft.gov.uk and may not determine the application until the consultation process is complete.

The Local Planning Authority must also copy any consultation under the 2018 Direction to Planningse@nationalhighways.co.uk.

This response and all comments outlined herein are made in respect of planning matters only in National Highways' position as a statutory planning consultee, and does not confer any proprietary rights nor amount to the giving or refusal of consent, assent, approval, or awareness of or by National Highways in or of any other aspects or matters (including, but not limited to, the use of property belonging to National Highways). If anyone wishes for National Highways to consider any aspects which do not relate to planning submissions, they should call our contact centre on 0300 123 5000.

Signature:



Date: 01 May 2026

Name: Nigel De Wit

Position: Spatial Planner

National Highways

Ground Floor, Building 1000, Cathedral Square, Guildford, GU2 7YL

www.nationalhighways.co.uk

¹ Where relevant, further information will be provided within Annex A.

Annex A **National Highways' assessment of the proposed development**

National Highways has been appointed by the Secretary of State for Transport as a strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). The SRN is a critical national asset and as such we work to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

Recommend that planning permission not be granted for a specified period of time: Reasons

It is recommended that the application should not be determined for a period of three months until **03 August 2026**.

This recommendation can be replaced, renewed, or reviewed during the three-month period, or at its end, dependent on progress made with regards to the outstanding matters.

We will be concerned with proposals that have the potential to impact on the safe and efficient operation of the SRN, in this case, particularly within the vicinity of the A23.

Our response has been informed by our review of additional information submitted by the applicant since our response of 03 March 2026. This additional information comprises Junctions 11 files and the Technical Note response to our comments.

Throughout this response **ACTION points** for the applicant are highlighted in **underlined bold**.

Existing Traffic Data

We previously requested additional information to be provided regarding the traffic surveys at the following SRN junctions:

- A23 / A2300 junction
- A23 / B2118 merge / diverge

The manual classified count (MCC) surveys are stated to have been undertaken on Thursday 5 June 2025, from 06:30 to 09:30 and 16:30 to 18:30. **The raw traffic data and video files are not provided, and these should be submitted for review.**

However, the applicant has provided queue surveys which form Appendix B of their NHRN. Our review of the queue data to the modelled queue shows there to be discrepancies. **The Applicant should provide AM and PM peak queue length**

surveys which contain all arms of both junctions and also provide the raw traffic data and video files for review.

Trip Rates and Trip Generation

With regard to the LVS SEN School, ***we previously requested that the TA should provide clarity on the LVS SEN generated traffic.*** The applicant has confirmed the time of the traffic surveys; the school was operational and will continue to be operational until such a time that a replacement facility is construction therefore existing trips have been captured within the baseline traffic surveys.

Therefore for the purposes of robustness, the updated traffic impact assessment and junction modelling, has assumed full capacity of 100 pupils at the school. Also, because the school day finishes at 15:00 therefore all pupils will have left the school premises by the evening peak period. No additional trips have been added to the evening peak period traffic flows. This is approach acceptable.

Trip Distribution / Assignment

We previously noted that developing trip distribution and assignment based on trip purpose, as opposed to all trips together, requires clarity in methodology and presentation.

We previously commented on the applicant's trip distribution and assignment and recommended that a clear and robust methodology be adopted, such as a standard journey-to-work assessment using census data.

The applicant has now provided a journey to work distribution methodology which forms Appendix B of their NHRN.

We note that this information has now been provided. Table 5.1 of the National Highways Response Note identifies workplace destinations and the corresponding percentage share of census trips for residents within the Mid Sussex 016 MSOA.

Table 5.1: Key workplace destinations for residents of Mid Sussex 016

Workplace Destination	Percentage of Total (%)
Balcombe	2.6%
Brighton	18.4%
Burgess Hill	11.0%
Crawley	7.3%
Crawley Down	0.9%
Gatwick	3.3%
Hassocks	3.8%
Haywards Heath	9.8%
Horsham	7.6%
Lewes	5.0%
London	4.6%
Mole Valley	2.5%
Sayers Common	10.5%
Tandridge	0.5%
Other	12.1%
TOTAL	100%

While Table 5.1 lists destinations, several MSOAs appear to be omitted, despite the likelihood that they would account for a proportion of trips routed through Strategic Road Network junctions. Additionally, the table does not include the relevant MSOA codes, which limits our ability to undertake a review of the analysis.

Table 5.2 of the applicant's submission reproduced below sets out the applicant's trip routing assignment.

Table 5.2: Trip Distribution Model

Route	Percentage of trips (%)
B2118 N	60%
B2118 S	40%
Albourne Road / High Street	2%
B2118 N	58%
Mill Lane	2%
A23 N	45%
A2300	14%

We note that B2118 N appears twice in the list, which suggests either duplication or an error in presentation. We also note that no trips have been assigned to the following Strategic Road Network routes:

- A272 Bolney Road (eastbound at its junction with the A23);
- A272 Cowfold Road (westbound at its junction with the A23); and;
- A23 southbound at the slip road from Brighton Road.

Additionally, we note the trip percentages presented in Table 5.2 total 221%, This would appear to indicate either double counting, overlapping assignments, or an error in the calculation methodology.

As such, the applicant needs to address the discrepancies identified within their trip distribution/assignment assessment. The resulting details, when agreed, should then be included within the subsequent updated TA.

Committed Development

We previously noted in both AN01, AN02 and AN03 that the LPA should be consulted for advice on committed development requirements, with the correspondence provided to National Highways for review. In their NHRN the applicant states “following discussions with WSCC it has been advised that no committed development sites were required to be considered as part of the traffic impact assessment for the site. This has been confirmed in the WSCC response to the planning application (ref: DM/26/0238)”. The applicant has included the WSCC response as part of Appendix C.

Having reviewed the response, we do not agree with the applicant’s statement. In their pre-application response, WCC advised that, while no committed development had been included within the assessment at that stage, applications had subsequently been submitted for other proposed allocations within Sayers Common, and that the standard approach would be for all applications to consider cumulative impacts.

We therefore expect such developments if consented to be considered as part of this assessment. As such we reiterate our previous requests, **that the LPA must be consulted for advice on committed development requirements on which developments should be included, evidenced within any supporting Transport Assessment, with the correspondence provided to National Highways for review.**

Background Traffic Flows

The TA contained background traffic flow growth which has been forecasted using TEMPro for the Mid Sussex 016 MSOA using core scenario with no alternative assumptions. Based on our previous advice the applicant has provided updated TEMPro growth factors based on the use of a ‘trunk road type’ for the Mid Sussex 016 MSOA which now correlate to our rate calculations.

Whilst the above is agreeable at this stage, pending confirmation from the LPA regarding any committed development to be included within the assessment, it may be necessary to apply alternative assumptions where committed developments are located within Mid Sussex 016 and form allocated sites within the adopted Local Plan. This information remains required.

Traffic Flow Diagrams

In our previous advice, we identified various discrepancies in the traffic flow diagrams. The applicant has confirmed that the diagram titles have been updated to reflect a 2025 baseline year and that the diagrams have been reviewed and correctly show the number of HGVs when compared with the survey data. However, this information has not been provided within the NHTR for review. **The applicant needs to submit this information for review.**

Junction Assessment

We would re-iterate that the requirement for any junction assessment can only be identified once there is an agreed trip generation, distribution and assignment.

However, in light of the outstanding issues relating to trip generation, distribution and assignment, our review has been limited to the base year models, having regard to the advice previously provided to the applicant where amendments were required.

Our review of the recently submitted model files has identified discrepancies within the A2300 / Hickstead Lane Roundabout and the A2300 / A23 Slip Road / Services Roundabout models. These discrepancies will need to be addressed before we can be satisfied with the models.

Notwithstanding the above, our review notes the following:

Geometric Parameters

The submitted geometric CAD layouts were reviewed and we noted the following:

- The A23 off-slip half-width, entry width and radius and the Shell Access radius shown in the geometrical layouts are acceptable.
- The CAD drawings indicate that the cycle lane shown at the A2300 (south) is not included within the designated vehicle lane markings and is therefore acceptable.
- The model file titled 'A23_B2119_Merge_Diverge' exhibits discrepancies for geometric input at the A23 Off-Slip (Arm 5 of the geometric layout). The measurements shown reflect that of the gated unused access arm (Arm 1 of the geometric layout).
- There are also discrepancy present for the Inscribed Circle Diameter (ICD) at both roundabouts. Each arm of the roundabouts shows different measurements even though both junctions central island are circular and not elliptical. At the A2300 (east) the ICD is 50.6m whereas the Shell Access shows 40.1m, this is an approximate 10m difference and requires rectification.

The Applicant should provide updated geometric parameters at both the A2300 / A23 Slip Road / Services roundabout and the A2300 / Hickstead Lane

Roundabout to reflect a revised ICD and amend the model geometric input for the A23 B2119 Merge Diverge to reflect the correct arm.

The TA contains numerous references to B2218 and also some references to B2119, this should be clarified as it is our understanding that the road referred to is the B2118.

Traffic Demand

The traffic demand input within the submitted model were reviewed and we noted the following:

- Modelled units are now in Veh/hr, which matches the '2026 observed' network flow diagram units for both the AM and PM peak periods. The flows appear to reflect the turning movements shown in the diagrams, this can therefore be accepted. The demand sets within the model files are titled '2025 Observed' and not '2026 Observed' **Clarification is required on whether the Observed Traffic Flows are 2026 or 2025 with amendments made to the model and traffic flow diagrams accordingly.**

Queue Length

The traffic demand input within the submitted model were reviewed and we noted the following:

- The model now contains 'direct intercept' calibration which, where survey data has been provided, we can confirm broadly aligns the queue length with what is shown in the observed queue data.
- There is only AM queue length data present within the National Highways Response Note as presented in Appendix A. Additionally, there is queue length data missing for some of the arms which have been recorded. Queue length data for A2300 (North), Hickstead Lane and A2300 (West) is absent from the dataset and should be provided. The applicant is requested to provide AM and PM Queue Length surveys which contain all arms of both junctions and calibrate both the AM and PM peak within the model files to align the modelled queues with the observed queues.

A23/B2118 Merge/Diverge

Notwithstanding the above, we acknowledge the submitted Transport Assessment dated 22nd January 2026, and the recently submitted information conducted a traffic impact assessment at the A2300 Interchange. However, we previously noted the 2026 TA stated that assessment has been undertaken at A23 / B2118 Merge / Diverge, however this assessment has not been evidenced within the TA.

Additionally, we note that WSDC, in its response to the applicant as set out in Appendix C of the NHRN, states: "Should the junction modelling be considered at face value, it details that all junctions would operate within capacity in a 2031 scenario." WSDC then goes on to refer specifically to the A23 / B2118 merge/diverge in bullet point 4.

We note no evidence has been evidenced to support this statement. As such we would expect the applicant to provide a DMRB CD122 complaint merge and diverge assessment. The assessment must be conducted on B2118 merge with the A23 NB and A23 SB diverge with Mill Lane and also at the A23 NB diverge to the A2300 and A2300 merge with the A23 SB on slip to Brighton.

Other Matters

We note that note an updated Transport Assessment was provided as part of this recent submission. Accordingly, we would expect any further supporting application documents to clarify references to the B2218 and B2119, as it is understood in the January 2026 TA that the road should correctly be identified as the B2118.

Travel Plan

47 The applicant has provided an updated Residential Travel Plan (RTP) dated 27th March 2026. The RTP referenced the NPPF, and DfT Circular 01/2022 policies. The updated Travel Plan needs to demonstrate alignment with the development vision and associated supporting measures.

CTMP Requirements

At the appropriate stage of the planning process, we suggest that National Highways recommend a suitable planning condition in relation to the preparation, agreement, and adherence to a Construction Traffic Management Plan (CTMP).

Conclusion

Given the above, it is currently not possible to determine whether the application would have an unacceptable impact on the safety, reliability and/or operational efficiency of the SRN.

National Highways currently recommends that planning permission not be granted (other than a refusal if the Council so wishes) for a period of three months until 03 August 2026 to allow the applicant to resolve the outstanding matters.

This recommendation can be replaced, renewed, or reviewed during the three-month period, or at its end, dependent on progress made with regards to the outstanding matters.

Standing advice to the local planning authority

The Climate Change Committee's [2022 Report to Parliament](#) notes that for the UK to achieve net zero carbon status by 2050, action is needed to support a modal shift away from car travel. The NPPF supports this position, with paragraphs 77 and 110

prescribing that significant development should offer a genuine choice of transport modes, while paragraphs 109 and 115 advise that appropriate opportunities to promote walking, cycling and public transport should be taken up as part of a vision-led approach.

Moreover, the carbon reduction hierarchy (avoid-switch-improve) as set out in clause 4.3 of PAS2080:2023 promotes approaches and measures to minimise resource consumption and thereby reduce carbon emissions.

These considerations should be weighed alongside any relevant Local Plan policies to ensure that planning decisions are in line with the necessary transition to net zero carbon.