



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

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

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

Council's Reference: DM/25/2661

Location: Land at Coombe Farm, London Road, Sayers Common

Proposal: Outline planning application (with all matters reserved except for access) comprising a residential development of up to 210 dwellings (Use Class C3); with associated access; landscaping; amenity space, drainage and associated works.

National Highways Ref: NH/25/13461

Referring to the consultation on a planning application dated 28 October 2025 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 that we:

- 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: *Marius Pieters*

Date: 11 November 2025

Name: Marius Pieters

Position: Spatial Planning Manager

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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: Reasons

It is recommended that the application should not be determined for a period of three months until **11 February 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.

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

Policy Requirements

No reference in the application has been made to DfT Circular 01/2022.

The Transport Assessment should include a vision for the site prepared in accordance with the requirements of DfT Circular 01/2022 and also set out how the vision will be realised.

At this stage, the presented vehicular trip generation forecast is accepted as a *pre-vision* scenario.

Trip Distribution and Assignment

We note that trips have only been distributed/assigned at the proposed site access onto the LRN, not considering the SRN beyond this. Furthermore, the distribution appears to be oversimplified and doesn't show full consideration all destination districts within the census data.

The applicant needs to include the SRN within the distribution/assignment analysis and provide the supporting raw 2011 Census data on which this is based, together with full details of the distribution/assignment methodology.

This should include relevant sections/junctions on the SRN (including junction diagrams showing turning movements) in order for National Highways to determine the need or otherwise for further analysis. This needs to be supported by appropriate evidence.

Decide and Provide

Any modal shift needs to be linked to the Transport Vision for the site as required by DfT Circular 01/2022. Thus, this TA does not currently comply, having not set out a vision.

In line with DfT Circular 01/2022 we require that the methodology and justification for modal share assumptions be clearly provided before we can accept or reject these values. Any specific measures and assumptions for modal shift need to be specified.

Junction Modelling

At this stage, we are unable to determine the full scope of the SRN assessment required for junction modelling until further details are provided with regards to trip distribution/ assignment.

Survey Data

The applicant may need to collect further manual classified count and queue length surveys if SRN assessments are required.

Assessment Scenarios

We ask for confirmation as to what the opening year of the development will be. Any assessment of the SRN needs to be undertaken in accordance with Circular 01/2022.

Committed Development

There is need to review the committed developments considering the requirements of DfT Circular 01/2022. There is also a need to agree the committed developments with the LPA and to then provide this information to National Highways for review, with evidence of the LPA's acceptance.

Modelling

For information purposes, please note that a base model calibration/validation process is required for any junction that is required to be assessed.

Notwithstanding the above, at this stage we request a copy of the junction layout drawing for the B2118/Mill Lane roundabout junction, to verify the geometry included in the Junctions 11 model.

Additionally, we request a copy of the raw traffic and queue survey data used in the modelling and a copy of the electronic model files.

Collision Data

We can not confirm the full extent of any required collision analysis at this time, as the full study scope area is yet to be determined.

We would also require the full raw collision data provided by the LHA.

Travel Plan

We advise that the forthcoming Travel Plan needs to accord to the principle of Circular 01/2022 policies.

Firm financial commitment should be made in the Travel Plan with regards to funding for a range of measures (including infrastructure, incentive and information-based measures) proposed in the short medium and long term.

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 11 February 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.