



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/25/3067

Location: Land West of Kings Business Centre Reeds Lane Sayers Common West Sussex

Proposal: Erection of 80 new residential dwellings (Use Class C3), including affordable housing units, vehicular, pedestrian and cycle access (including new footpath links to the east and west of the site along Reeds Lane), landscaping and open space, parking, sustainable drainage and other related works

National Highways Ref: NH/25/14070

Referring to the consultation on a planning application dated 8 December 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: 	Date: 26 August 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 conditions should be attached to any planning permission that may be granted: Reasons

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.

On 05 August 2026 we were consulted on additional information submitted in support of this application. This additional information comprises a Transport Technical Note (TTN) (June 2026) which was uploaded to the planning application webpage on 21 July 2026. The TTN is a response to the matters raised in our earlier response dated 18 May 2026.

Our previous response outlined a number of matters which remained to be resolved in order to make the development acceptable to National Highways. An updated position on each of these is outlined below.

Policy Requirements

We requested that the applicant revised their Transport Assessment to include a site-specific vision prepared in accordance with the requirements of DfT Circular 01/2022 and to explain how that vision will be delivered.

In response, the developers transport consultants state that they do not deem it necessary for the site to be supported by a site-specific vision.

The reason for our request, other than being a policy requirement, is that the A23 is a finite resource and capacity improvement would be of a strategic scale for which the government has no current plans. The evidence base for the emerging Local Plan 2021-2039, which includes the subject site as an allocation, forecasts that the A23 will reach operational capacity towards the end of the Local Plan period. Capacity improvement to the A23 would be of a strategic scale for which the DfT has no current plans, as made clear by the government's Road Investment Strategy (RIS) 3 which is focused on maintenance and renewal.

We are in discussions with the Council about a Monitor and Manage approach aimed at ensuring that the A23 continues to function as a safe and efficient strategic route

for as long as possible by supporting sustainable transport policies and initiatives. Such an approach requires buy-in from stakeholders, including developers. The policy requirements of DfT Circular 01/2022 include no exemptions based on development scale.

Trip Assignment and Distribution

We requested that the applicant provides updated trip distribution and assignment which clearly shows assignment of traffic routed towards the SRN and updated Census Data to show percentages routing to each SRN junction.

Additional information has now been provided by the developers transport consultants and this together with conclusions from the Local Plan evidence base satisfies our requirements on this point.

Assessment Scenarios, Traffic Growth and Committed Development

We requested that any required assessment of the SRN needs to be undertaken in accordance with Circular 01/2022, including a validated and calibrated base year model.

No assessment of SRN impact has been undertaken, but we are content that the Local Plan evidence base removes the need for any site-specific assessment for developments allocated within the Plan.

Collision Analysis

We recommended that the applicant provides an assessment of the existing conditions, including STATS-19 collision data with detailed analysis of trends and contributory factors for the latest five complete years for which accident data is available.

Additional information has now been provided by the developers transport consultants and this satisfies our requirements on this point.

Travel Plan

We requested that the forthcoming Travel Plan accords to the principle of Circular 01/2022 policies; including a linkage to a development vision.

No further information has been provided to address this point, but a number of previous points have been reiterated.

We note from the consultation response of West Sussex County Council dated 5th February 2026, that a number of matters remain to be addressed in relation to sustainable transport infrastructure. National Highways are content to leave such matters to West Sussex County Council in this case.

Construction Traffic Management Plan

As previously stated, given the proximity of the site to the SRN (A23), at the appropriate stage of the planning process we are minded to recommend a suitable planning condition in relation to the preparation, approval and adherence to a Construction Traffic Management Plan. This recommended condition is set out below.

Conclusion

This site is an allocation in the emerging Mid Sussex Local Plan 2021-2039. The transport evidence base supporting that Plan forecasts that the A23 will reach operational capacity towards the end of the Local Plan period. This would result in congestion in future years and would likely alter travel patterns for parts of a typical day. Capacity improvement to the A23 would be of a strategic scale for which the DfT has no current plans.

We are in discussions with the Council about a Monitor and Manage approach through the Local Plan process aimed at ensuring that the A23 continues to function as a safe and efficient strategic route for as long as possible by supporting sustainable transport policies and initiatives to help manage down traffic demands. Such an approach requires buy-in from stakeholders, including developers. We note from the consultation response of West Sussex County Council dated 5th February 2026, that a number of matters remain to be addressed in relation to sustainable transport infrastructure which would contribute to minimising growth on private car usage and hence traffic. National Highways are content to leave such matters to West Sussex County Council in this case.

National Highways therefore has no objection to the planning application subject to the imposition of a planning condition requiring the pre-commencement preparation and approval of a Construction Traffic Management Plan (CTMP) and adherence to the approved CTMP during the construction period. Recommended condition:

1. Construction Traffic Management Plan

Condition: Prior to the commencement of the development hereby permitted a comprehensive Construction Traffic Management Plan (CTMP) shall be submitted to and approved in writing by the Local Planning Authority. The CTMP shall include as a minimum:

- Routing plans for construction and delivery vehicles
- Construction traffic arrival and departure times – avoiding network peaks where possible
- Details of site access and egress
- Delivery and collection management procedures
- Construction vehicle parking and turning arrangements

- Workforce travel arrangements and parking provision
- Management of loose loads
- Wheel washing facilities and road-cleaning measures
- Temporary traffic management measures
- Procedures for abnormal loads, if required
- Monitoring, review and enforcement arrangements.

Thereafter all construction traffic activity in respect of the development shall be undertaken in full accordance with such approved details unless otherwise approved in writing by the Local Planning Authority.

Reason: To mitigate any adverse impact from the development on the A23 in accordance with DfT Circular 01/2022.

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.