



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 March 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: Reasons

It is recommended that the application should not be determined for a period of three months until **26 June 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.

Since our response dated 29 December 2025, we have noted that no additional information addressing the points we have raised has been submitted and uploaded to the planning application webpage. We therefore maintain our position, as set out below.

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

Transport Assessment

We have reviewed the Transport Assessment submitted in support of the planning application, and we have the following comments.

Policy Requirements

No reference has been made to DfT Circular 01/2022 or the transport vision/supporting measures for the site. The submission should include a vision together with supporting measures to reduce travel by private car, as per guidance set out in DfT Circular 01/2022.

The TA 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. Any modal shift needs to be linked to the Transport Vision for the site.

Trip Rates

The vehicle trip rates provided by the applicant are noted as being suitable as a pre-vision scenario.

Trip Distribution and Assignment

No trip distribution/assignment calculations or flow diagrams are provided.

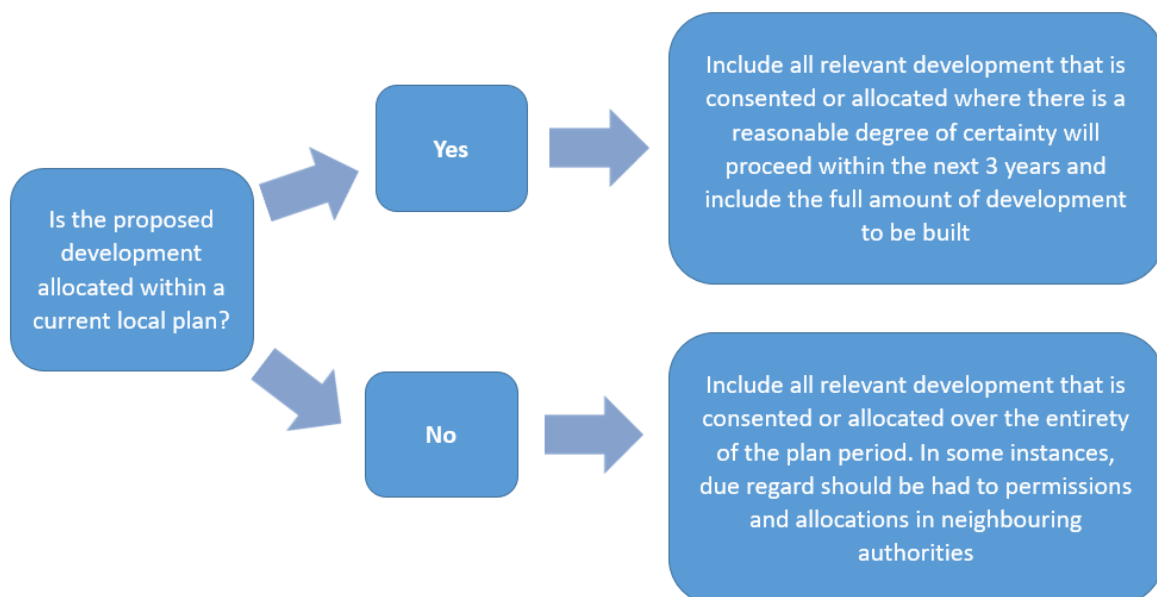
The applicant needs undertake a distribution/assignment analysis including the SRN in the vicinity of the site and provide the supporting raw 2011 Census data on which this is based together with full details of the distribution/assignment methodology.

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.

Assessment Scenarios

We ask for confirmation as to what the opening year of the development will be.

For guidance any assessment of the SRN needs to be undertaken in accordance with Circular 01/2022. In addition to the need for a validated and calibrated base year model, below is a guide to the general requirements for the opening year assessment:



Traffic Growth & Committed Development

The TA has presented Growth factors for 2024-2039 using TEMPro 7.2 and 'All-Roads' Mid-Sussex 016' MSOA. This information is unlikely to be directly applicable to the SRN, and the need or otherwise for assessment of the SRN is yet to be established.

Should it be subsequently determined that assessment of the SRN is required, there will be a need to present suitable growth factor information for review, in conjunction with details of committed developments.

Should it emerge that assessment of the SRN is required, there will be a need to review the committed developments considering the requirements of DfT Circular 01/2022. There would also be 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.

Collision Analysis

Collision data analysis is provided for the past five years (1 October 2020 to 30 September 2025), sourced from the West Sussex County Council website, namely their 'Collision Data Map' tool.

We cannot 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 Local Highway Authority.

Travel Plan

We have received the Travel Plan Statement provided in support of the planning application.

Whilst the TP references the NPPF, there is no reference to Circular 01/2022 policies.

We advise that the forthcoming TP needs to accord to the principle of Circular 01/2022 policies; including a linkage to a development vision.

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

Construction Traffic Management Plan

Given the proximity of the site to the SRN (A23), at the appropriate stage of the planning process we are minded to recommend a planning condition requiring the preparation and approval of 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 26 June 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.