



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

From: Michelle Berrington (Head of Planning & Development)
Operations Directorate
South East Region
National Highways

To:

CC:

Council's Reference: DM/25/0017

Location: Land West Of Turners Hill Road And North Of Huntsland, Turners Hill Road, Crawley Down, West Sussex

Proposal: Outline planning application (appearance, landscaping, layout and scale reserved) for the erection of up to 150 dwellings, a 65 bed care home, and community facility, and associated infrastructure including new access points off of Wychwood with associated spine road and car and cycle parking, together with provision of open space, play facilities, utilities infrastructure, surface water drainage features, and associated works.

National Highways Ref: NH/25/09997

Referring to the consultation on a planning application dated 13 February 2025 referenced above, in the vicinity of the M23 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)~~

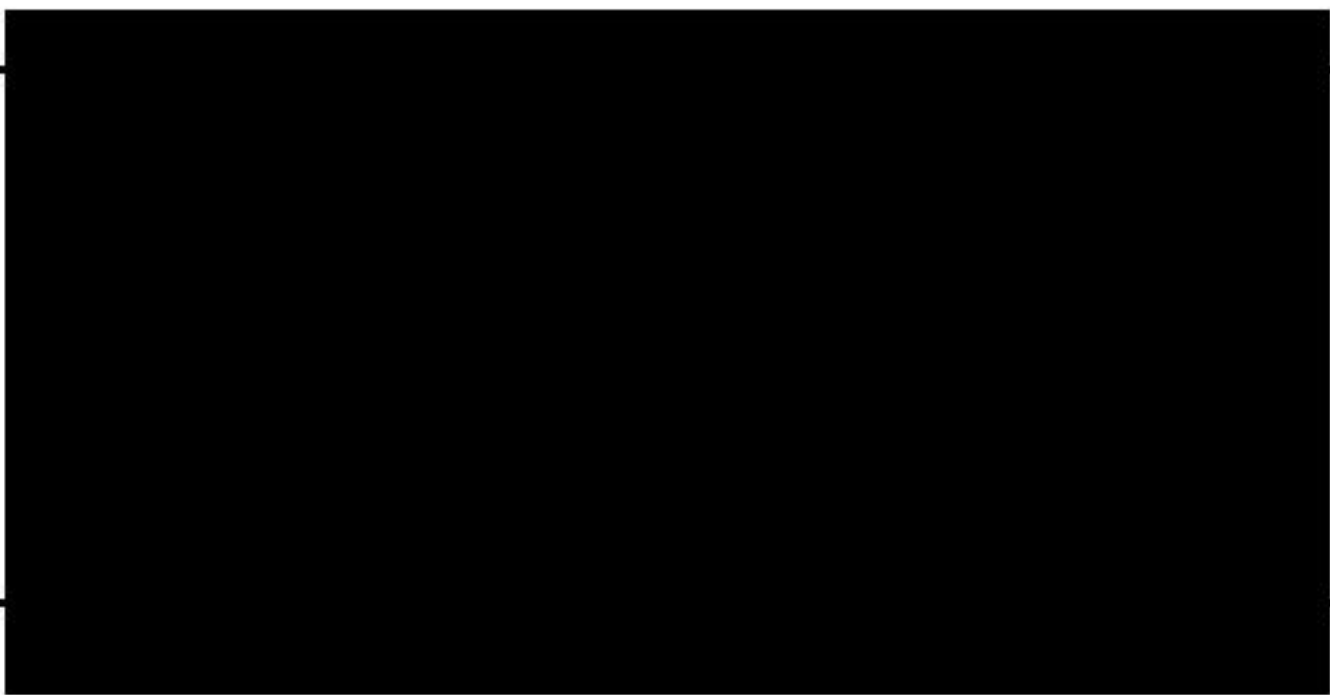
Highways Act 1980 Section 175B is not relevant to this application.¹

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 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: 4 March 2025
Name: Elizabeth Cleaver		Position: Assistant Spatial Planner
National Highways Bridge House, 1 Walnut Tree Close, Guildford GU1 4LZ		

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. We will therefore 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 M23.

Recommended Non-Approval

National Highways recommend that planning permission should not be granted for a specified period until **4 June 2025**; unless in the meantime all concerns and requirements raised by National Highways are fully resolved and this Holding Recommendation is replaced. This does not fetter the Council's ability, if they so wish, to refuse the application or agree an extension of time beyond 4 June 2025.

Reasons

We require further information to be provided by the applicant on this application in order that an informed decision can be made in relation to the potential impacts of the development on the strategic road network. In particular, the following comments should be passed to the applicant:

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

We have reviewed the Transport Assessment (TA) and Framework Travel Plan (FTP) submitted in support of this application and we have the following observations and requirements.

Transport Assessment Review

Existing Traffic Data

Appendices E1 and E2 of the TA contain the observed traffic flows and highlight that the AM peak hour is reported to be 07:15-08:15 while the PM peak hour is reported to be 16:45-17:45. **The raw traffic survey data for M23 J10 should be provided.**

The TA highlights that queue surveys were undertaken, the queue survey data is required to be provided. The earlier Scoping Note Transport Modelling (SNTM) does not contain reference to the queue surveys being undertaken.

Collision Analysis

The TA contains collision analysis for the local road network (LRN) and not the SRN. **There is requirement for collision analysis to be undertaken at M23 J10, for the most recent 5-year period for which STATS19 collision data is available**

Trip Rates and Generation

There are no trip rates contained within the TA. The residential trips rates which have been utilised within the Traffic impact Note (TIN) are contained within the SNTM and based on TRICS data. We have undertaken independent assessment and concluded that the presented residential TRICS data is acceptable. **The trip rates and trip generation associated with the residential development quantum for which permission is sought should be provided within an updated TA.**

Trip Distribution and Assignment

The trip distribution and assignment methodology and calculation are not contained within the TA. **The residential development trip distribution and assignment calculations and diagrams should be included within an updated TA.**

Committed Development

The TA contains no information on committed development. The TIN notes that committed development assumptions have been advised by WSCC and comprise the following three sites:

- North East Sector / Forge Wood – CR/1998/0039 – 434 dwellings at phase 4B outstanding.
- Imberhorne Farm – DM/23/2699/OUT – 550 dwellings
- Land south of Crawley Down Road – DM/23/0810 – 200 homes

The committed development traffic shown in Appendices E5 and E6 of the TA is confirmed to be consistent with Appendices A9 and A10 of the TIN.

In addition to the above sites, we request that the following sites are considered:

- **Land at Hill Place Farm, Turners Hill Road, East Grinstead – 200 dwellings (appeal ref. AP/16/0009)**
- **Heathy Wood Residential Development (planning ref: DM/13/04127/OUTES) – 500 total dwellings, 257 dwellings occupied and 243 dwellings yet to be constructed and occupied (note, this is understood to be based on the Mid Sussex Housing Supply report dated July 2023 and therefore the latest situation should be clarified)**

We request that MSDC is consulted to seek advice on the committed development assumptions which should be applied. The correspondence with MSDC should be provided to us for review.

The committed development assumptions are required to be included within an updated TA.

Background Traffic Growth

The TA contains no information on background traffic growth. The TIN notes that the TEMPro growth factors have been developed between 2023 and 2031 with 'alternative assumptions' applied, to '*to prevent double counting*'. We would note that alternative assumptions should only be applied when the committed development is contained both within the adopted Local Plan and also within the specific middle layer super output area (MSOA) of the proposed development.

There is a requirement to provide justification for the alternative assumptions that have been applied together with specific details of the MSOA and adjustments applied.

Junction Assessment

The TA contains the results of assessment of one junction on the SRN, M23 J10, however no modelling input files or PDF output files are provided.

The latest LinSig modelling output PDF and input files are required to be submitted for review, for both the exiting layout and the committed scheme.

The performance of the existing layout at 2023 should be calibrated and validated against the observed queue data.

Traffic Signal Details – Committed Scheme

The traffic signal details within the model of the committed scheme contained within the TIN have been reviewed and we note the following:

- The signal phasing and staging align with the modelling undertaken for the Heathy Wood assessment
- **Intergreens are set to 7 seconds compared with 5 seconds in the Heathy Wood assessment, please clarify if the 7 seconds reflect current on site timings**

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.