



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

From: Michelle Berrington (Head of Planning & Development)
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National Highways
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To: Mid Sussex District Council (FAO Mr S King)
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CC: transportplanning@dft.gov.uk
spatialplanning@nationalhighways.co.uk

Council's Reference: DM/25/0017

Location: Land West Of Turners Hill Road And North Of Huntsland Turners Hill Road
Crawley Down West Sussex RH1

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 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: D.Kirkman

Date: 4 June 2025

Name: Darren Kirkman

Position: Assistant Spatial Planner

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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 Planning Conditions

This is recommended that the Local Planning Authority, should they decide to grant permission to this development, should attach conditions, as set out below.

Reasons

The submitted transport modelling factors in an improvement scheme associated with consented application 13/04127/OUTES, and the outcome is that the proposed development would not have an unacceptable impact on the Strategic Road Network (SRN) providing the improvement to M23 Junction 10 is delivered.

The applicant has not provided transport evidence to demonstrate the impact of the proposal without an improvement to M23 Junction 10.

In the absence of this additional evidence, we have recommended a condition that recognises that an improvement to M23 Junction 10 is required to ensure that the proposed development, in combination with committed development, would not have an unacceptable impact on the SRN.

Pre-Commencement Condition: Improvement Scheme:

No more than 50 dwellings of the development hereby permitted shall be occupied until the improvement scheme for M23 Junction 10, as shown in accordance with drawing ref: 24205/13/001 Rev C or a similar scheme that will achieve the same improvement agreed with the local planning authority in consultation with the highway authority for the M23, is completed and open to traffic.

Reason: To mitigate any severe or unacceptable impact from the development on the M23 in accordance with paragraph 116 of the National Planning Policy Framework (December 2024) and paragraph 40 of DfT Circular 01/2022.

Pre-Commencement Condition: Construction Traffic Management Plan

No works shall commence on the site hereby permitted (including site clearance or preparation) until the details of a Construction Traffic Management Plan have been submitted to and approved in writing by the local planning authority (who shall consult with National Highways). Thereafter the construction of the development shall proceed in strict accordance with the approved Construction Traffic Management Plan unless

otherwise agreed in writing by the local planning authority (who shall consult National Highways).

Reason: To ensure that the M23 Trunk Road continues to be an effective part of the national system of routes for through traffic in accordance with section 10 of the Highways Act 1980 and to satisfy the reasonable requirements of road safety and paragraph 116 of the National Planning Policy Framework (2024)-.

Informative: The CTMP shall include details (text, maps and drawings as appropriate) of the scale, timing and mitigation of all construction related aspects of the development. It will include, but is not limited to: site hours of operation; numbers, frequency, routing and type of vehicles visiting the site; travel plan and guided access/egress and parking arrangements for site workers, visitors and deliveries; plus sheeting of loose loads and wheel washing and other facilities to prevent dust, dirt, detritus etc from entering the public highway (and means to remove if it occurs).

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.