



**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  
[PlanningSE@nationalhighways.co.uk](mailto:PlanningSE@nationalhighways.co.uk)

To: [Mid Sussex District Council] (FAO Ms J Fisher)  
[joanne.fisher@midsussex.gov.uk](mailto:joanne.fisher@midsussex.gov.uk)

CC: [transportplanning@df.gov.uk](mailto:transportplanning@df.gov.uk)  
[spatialplanning@nationalhighways.co.uk](mailto:spatialplanning@nationalhighways.co.uk)

**Council's Reference:** DM/25/1129

**Location:** Land at Foxhole Farm Foxhole Lane Bolney West Sussex

**Proposal:** Outline application (appearance, landscaping, layout and scale reserved), for the erection of up to 200 residential dwellings, including affordable housing; a community building (use class F1) encompassing land for education provision, together with associated access, ancillary parking and landscaping; the creation of a vehicular access point from the A272 Cowfold Road, and pedestrian and cycle only access to The Street; and creation of a network of roads, footways, and cycleways through the site; together with the provision of countryside open space, children's play areas, community orchard, and allotments; sustainable drainage systems and landscape buffers.

**National Highways Ref:** NH/25/11086

Referring to the consultation on a planning application dated 7 May 2025 referenced above, in the vicinity of the A272 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.<sup>1</sup>

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](mailto: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](mailto: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: 28 May 2025**

**Name: Darren Kirkman**

**Position: Assistant Spatial Planner**

**National Highways**

**Bridge House, 1 Walnut Tree Close, Guildford GU1 4LZ**

**[planningSE@nationalhighways.co.uk](mailto:planningSE@nationalhighways.co.uk)**

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<sup>1</sup> 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 and policies that have the potential to impact the safe and efficient operation of the SRN, in the case of this proposal, particularly the A272

### **Recommended Non-Approval**

It is recommended that the application should not be approved until 28 August 2025 to allow the applicant to address the points set out below. Action points are shown in **bold underlined**

#### Reason

National Highways have reviewed the documents provided in support of this application, and we have the following comments.

### **Transport Assessment Review**

#### **Development Vision**

The TA includes a vision statement which notes the following key transport related outcomes which the development is seeking to achieve:

- Reduced vehicles movements on the external road network
- Reduced vehicle movements soon the internal street network
- Reduced disturbance associated with traffic noise and pollution arising from vehicle emissions

**The TA should state how the aims of the transport vision align with the requirements of DfT Circular 01/2022.**

#### **Existing Traffic Data**

The TA notes that the peak hour on the road network is 07:30-08:30 during the AM peak and 16:00-17:00 during the PM peak. The observed traffic flows are shown in Figure 1 of Appendix 7.A. **The traffic survey data together with the video files should be provided.**

**The observed queue data should be summarised within the TA, demonstrating the average queue on each arm of each junction during each 15-minute time period.**

## **Trip Distribution and Assignment**

The TA provides the overall trip distribution/assignment and the journey to work calculation is presented within Appendix 8.D. **However, we require details of the trip distribution/assignment calculations associated with each of the trip purposes, to allow us to fully understand the presented trip distribution and assignment. We need to understand how the summary residential trip distribution and assignment contained within Table 8.6 of the TA was obtained.**

The community building trip distribution is stated to be based on a gravity model of the population within a 20-minute drive time using 2021 census data.

**The community building trip distribution and assignment calculations which have informed Table 8.7 of the TA should be provided**

## **Assessment Scenarios**

**Whilst we assume that the proposed opening year of the development is no later than 2031, this should be confirmed by the applicant.**

## **Committed Development**

The TA has noted that WSCC has advised during pre-application that there is no committed developments that are required to be considered. **Documentation from MSDC should be provided which confirms that there is no committed development to be considered.**

**The status of Burgess Hill Northern Arc development (planning reference DM/18/5114/ DM/21/3279) should be clarified as it is understood the mitigation at the A272 Cowfold Road / London Road priority junction was to be implemented prior to 400 dwellings being occupied. As the mitigation has not yet been implemented, our understanding is that this development is not yet complete.**

## **Junction Assessment**

### **Junction 2: A272 Cowfold Road / London Road Priority Junction**

The submitted Junctions 11 PDF for A272 Cowfold Road / London Road junction, as contained within the TA Appendix 7.B, has been reviewed and we note the following:

- 'flat' traffic profile type
- AM assessment hour – 07:30 to 08:30

**The PDF contains details of only 2030 Total (Base + Development) AM, the output settings are required to be modified to ensure all scenarios are reported**

**The traffic profile type should be modified to 'one hour' profile, to better reflect the actual on-site operation.**

The geometric parameters included within the model have been reviewed against Google aerial imagery and we note the following:

- Cowfold Road – carriageway width, right-turn width, visibility and queue blocking are confirmed to be acceptable

- London Road – the arm is modelled with two full lanes, we acknowledge the length of the two lanes is greater than the observed queueing

**A CAD drawing should be submitted demonstrating the Junctions input geometry as the Google aerial map is outdated and does not show the recent widening on the London Road arm**

The 2030 Total AM traffic demand input within the submitted model has been reviewed and this is seen to align with the traffic flow diagrams. **The remaining five scenarios cannot be checked as the details are not contained within the PDF.**

The existing model Junctions 11 results show a queue of three vehicles on the right-turn from London Road (stream B-A). **The TA should present the highest 15-minute average queues on each movement during each time period and compare this against the modelled queues, where necessary the Junctions model should be calibrated.**

We note there is no assessment presented to reflect the committed mitigation scheme at this junction. **Junction assessment should be presented both without and with the committed mitigation scheme associated with Burgess Hill Northern Arc.**

**The soft copy Junctions input file should be provided.**

#### **Junction 6: London Road / A23 Slip Roads Roundabout**

The geometric parameters included within the model have been reviewed against Google aerial imagery and we note the following:

- **A23 Slip Road – half road measured as 5.8m rather than 6.38m, entry width measured as 6.8m rather than 7.46m, flare length confirmed to be 6m, radius measured as 24m rather than 35.6m, inscribed circle diameter (ICD) measured as 49m rather than 50.7m**

- Sussex Junction Access – this is not shown in the aerial view, however based on streetview the half width, entry width and flare length parameters do not look unreasonable, **ICD measured as 49m rather than 50.7m**

- **London Road (west) – input geometry differs significantly from that shown in Google maps, half width measured as 3.7m, entry width measured as 6.9m, flare length measured as 23m, radius measured as 30m, ICD measured as 49m**

- **London Road (north) – half width confirmed to be 3.57m, entry width measured as 6.8m rather than 3.57, flare length measured to be 8m rather than 0m, entry radius measured as 24m rather than 26.7m, ICD measured as 49m rather than 50.7m**

- **A CAD drawing should be submitted demonstrating the Junctions input geometry**

The existing model Junctions 11 results show a queue of one vehicle on London Road. **The TA should present the highest 15-minute average queues on each movement during each time period and compare this against the modelled queues, where necessary the Junctions model should be calibrated using 'direct intercept' adjustment.**

**The soft copy Junctions input file should be provided.**

#### **Junction 7: A272 Cowfold Road / A272 Bolney Road / A23 Slip Roads Roundabout**

The geometric parameters included within the model have been reviewed against Google aerial imagery and we note the following:

- **A272 Bolney Road – half road confirmed to be 3m, entry width measured as 5m rather than 3m, flare length measured as 15m rather than 0m, radius measured as 25m rather than 56.9m, inscribed circle diameter (ICD) measured as 49m rather than 46.4m**

- **A272 Cowfold Road – half road measured as 3.7m rather than 4.7m, entry width measured as 8m rather than 9.25m, flare length cannot be determined from aerial view, radius measured as 25m rather than 33.8m, inscribed circle diameter (ICD) measured as 49m rather than 46.4m**

- **A23 Off Slip – half width measured as 6.2m rather than 6.6m, entry width measured as 7.8m rather than 9.24m, flare length confirmed to be 4.7m, radius measured as 6m rather than 10.7m, ICD measured as 49m rather than 50.7m**

- **Crossways – half width measured as 3.5m rather than 4.1m, entry width measured as 5.5m rather than 6.11m, flare length confirmed to be 2.3m, radius measured as 23m rather than 27.7m, ICD measured as 49m rather than 50.7m**

- **A CAD drawing should be submitted demonstrating the Junctions input geometry**

The traffic demand flows input within the submitted model have been reviewed and are seen to align with the traffic flow diagrams. **However, the vehicle mix is set to 0% for each scenario and this should be updated to reflect the observed vehicle mix.**

**The existing model Junctions 11 results are shown in Table 9 and show a queue of two vehicles on A272 Cowfold Road. The TA should present the highest 15-minute average queues on each movement during each time period and compare this against the modelled queues, where necessary the Junctions model should be calibrated using 'direct intercept' adjustment.**

**The soft copy Junctions input file should be provided.**

## **Framework Travel Plan**

The measures and initiatives include marketing of the FTP, specific measures to reduce single occupancy car travel and measures to encourage travel by walking, cycling, lift sharing and public transport. In addition to marketing and promotion, the proposed measures are noted to include physical measures, in particular walking and cycling infrastructure together with public bus service improvements.

**The details of the proposed walking and cycling infrastructure improvements and public bus service improvements should be progressed and included within the FTP.**

**The TP includes for monitoring to be undertaken at two-year intervals, together with setting targets and identifying the needs for additional measures to be considered. There is a need for firm financial commitments to support the objectives of the TP. This needs to be provided within the TP document.**

## **Recommendation: that planning permission is not granted for a specified Period**

National Highways recommend that the application should not be granted permission for a period extending until 28 August 2025; unless in the meantime all queries 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 either refuse the application or agree an extension of time beyond 28 August 2025.

## **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.