



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

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To: Mid Sussex District Council (FAO Stuart Malcolm)
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CC: transportplanning@dft.gov.uk
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Council's Reference: DM/26/0238

Location: LVS Hassocks, London Road, Sayers Common, Hassocks

Proposal: Hybrid application that seeks consent for separate and severable elements comprising: Demolition of all existing buildings bar the chapel, to retained for use within Use Class F and: a) Full planning permission for the development of the north western part of the Land at LVS Hassocks so as to accommodate a new SEN School with associated access from London Road, car parking, landscaping and drainage works; and b) Outline planning permission (Appearance, Landscaping, Layout and Scale Reserved) for the development of the rest of the land at LVS Hassocks so as to accommodate up to 210 dwellinghouses (including 30% affordable housing) with associated access, car parking, landscaping, play areas, informal outdoor space and .drainage works

National Highways Ref: NH26/15036

Referring to the consultation on a planning application dated 11 February 2026 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 as follows:

~~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: 03 March 2026

Name: Nigel De Wit

Position: 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 that planning permission not be granted for a specified period of time: Reasons

It is recommended that the application should not be determined for a period of three months until **03 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.

Our response has been informed by our review of this application and supporting documents. We have focused on the transport evidence comprising a Transport Assessment (TA) and Travel Plan (TP) both prepared by i-Transport and dated 22 January 2026.

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

Policy Context

The TA includes reference to National Planning Policy Framework [NPPF] (Ministry of Housing Communities and Local Government, December 2024), including paragraph 118 of NPPF which highlights the requirement for developments which generate significant amounts of traffic to be provided with a Travel Plan and to be vision-led.

The TA should also include reference to and adhere to DfT Circular 01/2022.

Transport Vision

The TA contains the transport vision for the development; this has been reviewed and is noted to include reference to the prioritisation of sustainable transport modes and integration with the surrounding area. The provided transport vision is deemed to be appropriate for the proposed development.

Existing Traffic Data

The TA notes that traffic surveys have been undertaken at several locations and include the following SRN junctions:

- A23 / A2300 junction
- A23 / B2118 merge / diverge

The manual classified count (MCC) surveys are stated to have been undertaken on Thursday 5 June 2025, from 06:30 to 09:30 and 16:30 to 18:30. **The raw traffic data and video files are not provided and these should be submitted for review.**

There is no mention of queue surveys having been undertaken and this is a requirement for the purpose of model calibration. At unsignalised junctions the queue survey should comprise spot queue survey at 5-minute intervals. It is particularly important to note that, in addition to stationary traffic, slow moving traffic is designated as a queue to ensure alignment with Junctions model outputs. Video surveys are required to ensure that the full length of any queue is satisfactorily captured.

Collision Analysis

The TA contains collision data along the A23, from south of Sayers Common to the north of the A23 / A2300 junction. The data is noted to have been obtained from Safer Sussex Road Safety Team and cover the five-year period from 2020 to 2025. The data contained within Appendix A of the TA has been reviewed and it is concluded that there is no significant existing safety concern within the assessment area.

Trip Rates and Trip Generation

The TA contains residential trip rates per dwelling which have been obtained from the TRICS database version 7.11.1. The TRICS sub land use has been taken as 'houses privately owned'. The proposed pre-vision trip rates are shown in Table 8.2 of the TA. The TA notes that the trip generation has been forecast based on 224 dwellings, while the planning application is for 210 dwellings, as a result of an evolving development masterplan.

The pre-vision trip rates are confirmed to be acceptable.

The vision-led scenario comprises a 10% reduction in vehicle trips, with 95 two-way vehicle trips in the AM peak hour and 93 two-way vehicle trips in the PM peak hour. The measures which are proposed within the TP have been reviewed and are seen to include physical off-site measures along the B2118. It is concluded that the proposed measures are appropriate to achieve a 10% reduction in the forecast vehicle trips.

The TA highlights that LVS SEN school is not forecast to have an increase in vehicle trips, as there are currently 90 pupils and the permitted capacity is 100 pupils. The TA also states that *'to provide a robust assessment, a traffic impact assessment has been undertaken to assume that the school is operating at full capacity as part of the*

development proposals'. **The TA should provide clarity on the LVS SEN generated traffic, clarifying if this has been assumed to remain as existing or has been factored.**

Trip Distribution / Assignment

The trip distribution information contained within the TA has been reviewed however it is not possible for us to fully review for multiple reasons. Essentially, the key factor that needs to be considered is that information needs to be presented which clearly explains the detailed methodology used. As it stands, this is not the case, there are many issues, including but not limited to the following:

- Comments provided at the pre-application stage have not been fully addressed.
- We previously requested (at the pre-application stage) a breakdown of non-work trips and this has not been provided.
- Commuting/business trip distribution was agreed at the pre-application stage, however calculations are not included within the TA.
- We previously noted (at the pre-application stage) that education and leisure trips should be distributed based on specific schools and leisure facilities which residents are expected to travel to – this has not been done, the TA presents separate gravity models for both education and leisure.
- We previously noted (at the pre-application stage) the retail and remaining non-work trips should be distributed based on a gravity model – this is not included.
- The TA includes a gravity model for employment – as commented previously (at the pre-application stage), we do not know the purpose of this, as employment is also stated to be distributed based on journey to work data.
- The TA appears to have somehow amalgamated the individual gravity models to provide a 'combined gravity model' – there is no information provided as to how or why this was done.
- Notwithstanding the above comment, as advised previously (at the pre-application stage), we require each trip purpose to be provided with a separate trip distribution and assignment, resulting in separate AM/PM generated traffic diagrams for each trip purpose – this has not been undertaken.
- The TA does not contain any traffic flow diagrams which show the trip distribution and assignment for each trip purpose.
- There is only one development traffic diagram provided (Figure 22) – it is not clear what this diagram is or what time period it represents – the diagram shows 89 vehicles departing the site and 29 vehicles arriving at the site, which does not align with the vision-led AM peak trip generation.
- We previously provided comments (at the pre-application stage) on route assignment, insufficient information is provided to allow review of trip assignment.
- It is concluded that the presented trip distribution and assignment information is unclear and not possible to fully review.

Developing trip distribution and assignment based on trip purpose, as opposed to all trips together, requires clarity in methodology and presentation. When this information is not available, our advice is to use a standard methodology which is to distribute all trips based on journey to work data.

We suggest that this matter could be dealt with separately in a brief technical note. The resulting details, when agreed, would then be included within the subsequent updated TA. In summary, EITHER the current trip distribution and methodology needs to be revised as suggested incorporating further explanation OR a standard 'journey to work' methodology needs to be adopted including details of calculations etc for review.

Assessment Scenarios

The TA includes future year assessment at 2031. In accordance with the requirements of DfT Circular 01/2022, any assessment of the SRN is required to be undertaken at end year of the Adopted Local Plan, therefore 2031 is confirmed as acceptable.

Committed Development

The TA notes that no committed development has been included within the assessment as a result of advice by WSCC that there are none required to be considered.

We previously noted (at the pre-application stage) that the LPA should be consulted for advice on committed development requirements, with the correspondence provided to National Highways for review.

Background Traffic Flows

The TA contains background traffic flow growth which has been forecasted using TEMPro for the Mid Sussex 016 MSOA using core scenario with no alternative assumptions. The 2025 to 2031 growth factors are reported within the TA as 1.0575 for the AM peak hour and 1.058 for the PM peak hour.

We have undertaken independent assessment based on TEMPro version 8.1, Mid Sussex 016, core scenario and trunk road type for the period 2025 to 2031. The growth factors we obtained are 1.0734 for the AM peak and 1.0739 for the PM peak. It is possible the figures within the TA are lower as a result of selecting A road rather than trunk road; we request that TEMPro is based on trunk road type and aligns with the values we have presented.

In the event there is committed development to be included within the assessment, alternative assumptions may be applied only when the committed development is both located within Mid Sussex 016 and is an allocated site within the Adopted Local Plan.

Traffic Flow Diagrams

The traffic flow diagrams contained within the TA have been reviewed and we note the following:

- **Figure 22 is unclear as to what development traffic flows this is denoting.**
- **As noted above, we expect to see the route assignment percentages together with the AM and PM generated traffic assigned to the road network.**
- **As highlighted above, if generated traffic trip purposes are considered then there should be separate route assignment and AM / PM generated traffic figures for each trip purpose.**
- **Figures 1 and 2 are stated to be 2026 Observed Traffic Flows – this should be clarified as we understood the traffic surveys were undertaken in 2025, not 2026.**
- **In many locations there are no HGVs shown, this should be reviewed against the survey data.**

Junction Assessment

We previously advised (at the pre-application stage) that the requirement for any junction assessment can only be identified once there is an agreed trip generation, distribution and assignment.

While we have not confirmed the SRN assessment locations, the TA highlights that assessment has been undertaken at the following SRN junctions:

- A2300 / Hickstead Lane roundabout
- A23 off-slip / A2300 / Shell Access roundabout

Junction Assessment: A2300 / Hickstead Lane roundabout

The submitted Junctions 11 PDF for the A2300 / Hickstead Lane roundabout, as contained within Appendix E of the TA, has been reviewed and we note the following:

- 'one hour' traffic flow type.
- AM assessment hour – 08:00 to 09:00.
- PM assessment hour – 16:30 to 17:30.

The existing geometric parameters have been reviewed and we note the following:

- **On each arm the half-width and entry width are larger than we expect.**
- **Hickstead Lane and A2300 (north) radii are larger than we expect.**
- **Geometric parameters should be measured using CAD and a plan submitted for review.**
- **Care should be taken to not include cycle lanes or any other areas which are outside of the designated vehicle lane markings.**

The traffic demand input within the submitted model has been reviewed and we note the following:

- **Inputs are in PCU/hr, while the traffic flow diagrams are in vehicles.**
- **Junctions inputs and the traffic flow diagrams should be in same units.**

- We have undertaken review of the 2025 demand flows within the model, are these appear to align with the provided '2026 Observed Traffic Flow' diagrams, however the units should be clarified.

The model currently contains no calibration, there is a requirement to use 'direct intercept' adjustment to ensure modelled queues align with the observed queues. The observed queue data for the purpose of calibration should be the highest of the 15-minute average queues observed on each arm.

Junction Assessment: A23 off-slip / A2300 / Shell Access roundabout

The submitted Junctions 11 PDF for the A23 off-slip / A2300 / Shell Access roundabout, as contained within Appendix E of the TA, has been reviewed and we note the following:

- 'one hour' traffic flow type.
- AM assessment hour – 08:00 to 09:00.
- PM assessment hour – 16:30 to 17:30.

The existing geometric parameters have been reviewed and we note the following:

- A23 off-slip half-width, entry width and radius are larger than we expect.
- Shell Access radius is larger than we expect.
- Geometric parameters should be measured using CAD and a plan submitted for review.
- Care should be taken to not include cycle lanes or any other areas which are outside of the designated vehicle lane markings.

The traffic demand input within the submitted model has been reviewed and we note the following:

- Inputs are in PCU/hr, while the traffic flow diagrams are in vehicles.
- Junctions inputs and the traffic flow diagrams should be in same units.
- We have undertaken review of the 2025 demand flows within the model and these appear to align with the provided '2026 Observed Traffic Flow' diagrams, however the units should be clarified.

The model currently contains no calibration, there is a requirement to use 'direct intercept' adjustment to ensure modelled queues align with the observed queues. The observed queue data for the purpose of calibration should be the highest of the 15-minute average queues observed on each arm.

The table heading within the TA is incorrect, as this roundabout is called A23 / B2119 Merge / Diverge, and should be updated.

Junction Assessment: A23 / B2118 Merge / Diverge

The TA states that assessment has been undertaken at this location, however there is no assessment provided within the TA. The need for assessment at this location will be clarified following finalisation of the trip generation, distribution and assignment.

Junction Assessment: Other Matters

In addition to the PDF outputs, **the soft copy model input files are required to be submitted for review.**

The TA contains numerous references to B2218 and also some references to B2119, this should be clarified as it is our understanding that the road referred to is the B2118.

Residential Travel Plan

The Residential Travel Plan (TP) specifies a target of a 10% reduction in single occupancy car journey mode share of employees after five years, based on 2011 Census data.

The TP highlights a number of measures which are proposed to achieve the TP target mode shift, including both on-site and off-site physical measures together with marketing and promotion. It is concluded that the proposed measures are appropriate for the target mode shift.

The TP highlights there will be ongoing monitoring of the plan, including interim travel surveys on the 1st, 3rd, and 5th anniversaries of the initial Baseline Travel Survey. These surveys will inform progress towards targets and help identify any needs for additional measures.

Whilst the TP references the NPPF, there is no reference to Circular 01/2022 policies. **The updated Travel Plan needs to demonstrate alignment with the development vision and associated supporting measures.**

Construction Traffic Management Plan

At the appropriate stage of the planning process, we are minded to recommend a suitable planning condition in relation to the preparation, agreement, and adherence to 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 03 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.