



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: 18 May 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 **18 August 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 26 March 2026, we have been consulted on additional information submitted in support of this application. This additional information comprises a Transport Technical Note (TTN) (April 2026) and a Travel Plan Statement (TPS) (March 2026).

We have reviewed our previous comments in the context of the TTN and TPS.

There remain outstanding SRN-related matters that the applicant needs to resolve.

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

Policy Requirements

The submitted material still does not provide a site-specific transport vision or refer to Circular 01/2022. **We therefore request that the applicant should revise the Transport Assessment to include a site-specific vision prepared in accordance with the requirements of DfT Circular 01/2022 and explain how that vision will be delivered. Any proposed modal shift should be clearly linked to the site's Transport Vision.**

Trip Generation

No revised vision-led trip rates have been provided, and the applicant's vehicle trip rates remain suitable for a pre-vision scenario, we maintain that this is acceptable.

Trip Assignment and Distribution

The applicant has provided 2011 Census Journey to Work data (Appendix A3). The Census data identifies the site location within Mid Sussex 016 MSOA and which uses Google Maps to assign traffic to the network during a peak hour. Whilst the methodology is acceptable in principle, the assignment chooses a preferred route as opposed to incorporating alternative routing choices and does not include all destination MSOAs. This could underestimate the forecast level of traffic expected to arrive and depart via SRN junctions.

Additionally, the flow diagrams do not show arrivals or departures at the site access, nor are they clearly labelled or titled, making them difficult to verify or review.

We request that the applicant provides updated trip distribution and assignment which clearly shows assignment of traffic routed towards the SRN and updated Census Data to show percentages routing to each SRN junction.

Assessment Scenarios

The TTN does not clarify the proposed opening year for the development or provided any further detail on the assessment scenarios. Therefore, we reiterate our previous response: **Any required assessment of the SRN needs to be undertaken in accordance with Circular 01/2022, including a validated and calibrated base year model.**

Traffic Growth and Committed Development

The TTN has not provided any further information regarding traffic growth or committed development. It does not provide a committed development schedule; does not distinguish clearly between committed and allocated development in the Circular 01/2022 sense; and does not include evidence of agreement with the Local Planning Authority (LPA) on committed developments for SRN purposes.

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

On collision analysis, as the full study area and raw collision data have not yet been provided, we reiterate our previous response. Once agreed, **we recommend that the applicant provides an assessment of the existing conditions, including STATS-**

19 collision data with detailed analysis of trends and contributory factors for the latest five complete years for which accident data is available.

Travel Plan

While the TPS has been strengthened through £100 travel vouchers per dwelling for initial residents and Travel Plan management and monitoring secured by legal agreement, it still lacks a clear vision in line with Circular 01/2022 and any firm financial commitments beyond monitoring. The baseline and target modal splits are derived from 2025 Census-based data for Mid Sussex 016 MSOA using journey-to-work patterns. It seeks a 10% mode shift away from private car use over five years.

Given the above, we request that the forthcoming Travel Plan 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 suitable planning condition in relation to the preparation, approval and adherence to a Construction Traffic Management Plan.

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 18 August 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.