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

From: Head of Planning & Development
Operations Directorate
South East Region
National Highways
PlanningSE@nationalhighways.co.uk

To: Mid Sussex District Council (FAO Mr S Ashdown)
mpc@midsussex.gov.uk

CC: transportplanning@dft.gov.uk
spatialplanning@nationalhighways.co.uk

Council's Reference: DM/23/2866

Location: Land East of Ansty Way, Cuckfield Bypass, Cuckfield, West Sussex

Proposal: Outline planning application (All matters reserved except for access) for the redevelopment of land to the east of Ansty to create a new Garden Community, comprising of the erection of up to 1,450 homes (including 30% affordable housing), up to 90 residential care units (C2 class), a primary school, a SEND school, health hub, sports facilities including all weather hockey pitches and tennis centre, allotments, retail, community and employment uses together with ancillary and associated development including new and enhanced pedestrian/cycle routes, open spaces, and landscaping

National Highways Ref: NH/23/04120

Referring to the consultation on a planning application dated 12 December 2023 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 a condition 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: 4 April 2025**
Name: Kevin Bown	**Position:** 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.

Recommendation: that a condition should be attached to any planning permission that may be granted

Reasons

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 near Cuckfield.

Background

National Highways was initially consulted with regard to this site at the pre-application stage and we highlighted several key points for consideration. Since then we have engaged with the applicant to agree SRN related evidence

In recent times National Highways was consulted on 14 November 2024 and asked to review updated Technical Transport Note #10 NH Response (TTN10). We commented as follows on 29 November 2024:

- Additional information to be provided with regard to the routes used by the generated traffic
- To address concerns with forecast traffic flows, it was suggested that a manual adjustment could be undertaken
- Traffic flow numbers to be clarified in various locations, for example zero total traffic flows forecast but then an amount of heavy goods vehicles forecast
- Modelling input soft copy files to be provided
- Junction P to be calibrated and validated by use of 'direct intercept' adjustment
- Junction AG geometry to be reviewed

National Highways was consulted by Ardent on 19 December 2024 and asked to review Junctions files and geometry measurements. A National Highways email dated 5 March 2025 included the following comments:

- Traffic flows to be reviewed as previously noted
- Traffic flow diagrams to be provided to represent revised traffic flows
- Junction P roundabout assessment to be clarified
- Junction AH to be calibrated and validated

National Highways has subsequently been contacted on 6 March 2025 and asked to review a further update of TTN10 dated December 2024 and produced by Ardent.

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TTN10 Review

Collision Analysis

We are content there are no significant existing road safety deficiencies with the assessment junctions with regards the SRN.

Travel Plan

We have previously provided comments on the FTP. TTN10 notes that 'financial contributions to support the FTP will be included within the Section 106 agreement for the development, as required and agreed with WSCC' and we are content with this.

We previously agreed to the approach adopted whereby the Travel Plan modal shift is not considered within the network assessment.

Trip Rates and Trip Generation

We previously agreed with the presented trip rates and trip generation.

We previously requested that information is provided which provides greater clarity as to what main routes the generated traffic is travelling to and from the development during each peak period, for example, A23 (southbound), A23 (northbound) etc. This would typically be in the form of 'select link analysis' showing trips to and from the development site during each assessment period.

It is noted that select link analysis (SLA) has now been undertaken and is included within Appendix D of TTN10. We note the following with regard to the presented SLA:

- Traffic travelling to/from the north is primarily travelling on A23 and Bolney Road
- Traffic travelling to/from the south is primarily travelling on A23, A2300 and Cuckfield Road
- Traffic travelling to/from the west is primarily travelling on Bolney Road and Cowfold Road

From review of the SLA we have concluded that the assignment of development trips is generally as expected and is therefore acceptable. We confirm that we do not therefore require the manually adjusted assignment as highlighted previously.

Traffic Flow Diagrams

We previously queried forecast traffic flows at the London Road / Broxmead Lane junction and also the A23 / Broxmead Lane junction. TTN10 has advised that the resulting low traffic flows are as a result of the coding within the assignment model, with Broxmead Lane to the east of the A23 southbound off-slip not being included within the model. We note the provided response and have no further comment on this issue.

In addition, we previously highlighted a number of issues with the traffic flow diagrams, such as total traffic flow shown as zero and an amount of HGV being reported. This has now been addressed within the updated traffic flow diagrams contained within Appendix B of TTN10.

Junction Assessment

Junction O – A23 / London Road Roundabout

We previously noted the traffic flows should be clarified; the traffic flows have been clarified and the input traffic flows are confirmed to be acceptable. The assessment results for the A23 / London Road roundabout are shown in Table 1.

Table 1 : A23 / London Road Roundabout - Junctions 10 Assessment

	AM Peak Hour			PM Peak Hour		
	Q (Veh)	Delay (s)	RFC	Q (Veh)	Delay (s)	RFC
	2019 Baseline					
1 - London Rd (N)	0.1	2.39	0.07	0.1	2.0	0.05
4 - A23 Northbound offslip	0.2	1.66	0.14	0.1	1.61	0.13
5 - London Rd (S)	0.1	1.68	0.13	0.1	1.57	0.09
	2039 Do Nothing					
1 - London Rd (N)	0	0	0	0	0	0
4 - A23 Northbound offslip	0.1	1.51	0.11	0.1	1.53	0.13
5 - London Rd (S)	0.2	1.76	0.17	0.2	1.62	0.13
	2039 Do Something Isolated					
1 - London Rd (N)	0	0	0	0	0	0
4 - A23 Northbound offslip	0.1	1.5	0.11	0.1	1.53	0.13
5 - London Rd (S)	0.3	1.88	0.22	0.2	1.64	0.14

Source: TTN10 Table 2.5 (Ardent, December 2024)

The assessment results have been reviewed, the 2019 modelled queues appear to align with Google Maps data. It is seen that at 2039 the proposed development does not result in a significant impact on the SRN.

Junction P – A272 Cowfold Road / London Road priority junction

We previously noted that the Google Maps information shown above indicates the London Road arm having an existing queue of approximately 30 vehicles during the AM peak hour and 20 vehicles during the PM peak hour. We requested that the model should be calibrated by use of ‘direct intercept’ adjustment to ensure that the queues within the model have close alignment with those occurring on site.

The assessment results for the A272 Cowfold Road / London Road priority junction are shown in Table 2.

Table 2 : A272 Cowfold Road / London Road priority junction - Junctions 10 Assessment

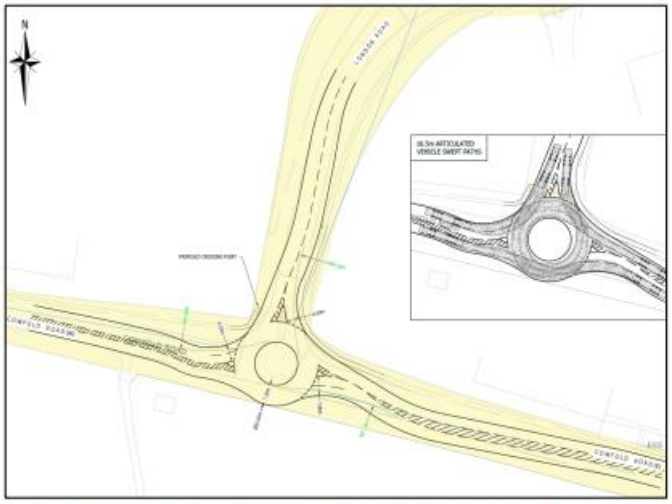
	AM			PM		
	Q (Veh)	Delay (s)	RFC	Q (Veh)	Delay (s)	RFC
	2019 Baseline					
Stream B-C	0	0	0	0	8.84	0
Stream B-A	35.2	266.17	1.14	12.3	105.99	0.98
Stream C-AB	0.6	11.54	0.37	0.1	7.78	0.05
	2039 Do Minimum					
Stream B-C	0.1	12.16	0.1	0.4	14.73	0.3
Stream B-A	35.6	439.59	1.3	3	46.74	0.77
Stream C-AB	1.4	23.69	0.59	0.1	10.07	0.13
	2039 Do Something					
Stream B-C	0.1	12.13	0.1	0.4	14.62	0.3
Stream B-A	38.1	507.28	1.35	3.4	53.29	0.79
Stream C-AB	9.6	54.34	0.94	0.2	10.84	0.19
	2039 Do Something (Manually Adjusted Alternative - NH)					
Stream B-C	0.1	12.13	0.1	0.4	14.62	0.3
Stream B-A	38.1	507.28	1.35	3.6	56.72	0.8
Stream C-AB	9.6	54.34	0.94	0.2	10.84	0.19

Source: TTN10 Table 2.7 (Ardent, December 2024)

The assessment results have been reviewed, the 2019 queues are noted to align with Google Maps and the calibration is acceptable. Based on the outcome of the traffic modelling analysis undertaken as set out in Table 2 above, we are of the view that the development would not result in an unacceptable safety impact and would not have a severe residual cumulative impact on the SRN.

While there is no requirement for mitigation, we acknowledge that the applicant has proposed a roundabout mitigation option at this location. The proposed roundabout at A272 Cowfold Road / London Road is shown in Figure 3. We have investigated the SRN boundary based on the information we have to hand and it is seen that the London Road arm is entirely within the SRN boundary, this is contrary to TTN10 which states that the junction is not within the SRN boundary.

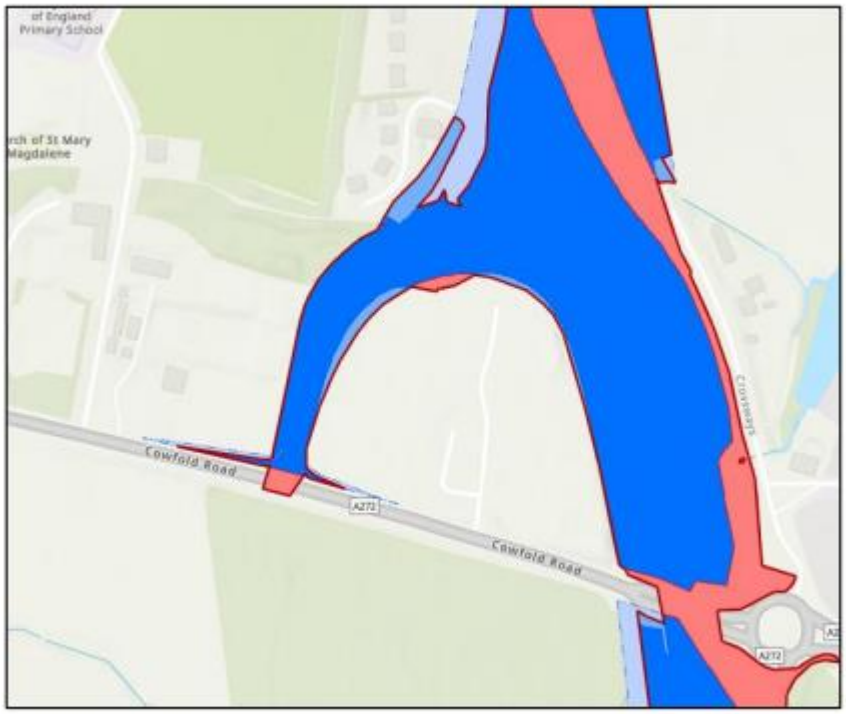
Figure 3 : A272 Cowfold Road / London Road – proposed roundabout



Source: Drawing No. 2207280-SK012 (Ardent, 11 October 2024)

The SRN boundary, based on the information we have to hand, at this location is shown in Figure 4.

Figure 4 : SRN Boundary



Source: Highway Boundary (RedLine)

The results of the Junctions assessment based on the roundabout are shown in Table 3. The presented Junctions model has been reviewed and is concluded to be in order. The assessment results show a significantly reduced queue on London Road.

Table 3 : A272 Cowfold Road / London Road roundabout - Junctions 10 Assessment

	AM			PM		
	Q (Veh)	Delay (s)	RFC	Q (Veh)	Delay (s)	RFC
	2019 Baseline					
A272 (E)	1.3	5.48	0.56	1.4	5.19	0.59
London Road	1.2	9.93	0.55	1.1	9.24	0.53
A272 (W)	1.8	8.53	0.64	1.3	6.73	0.57
	2039 Do Minimum					
A272 (E)	5.5	15.96	0.85	3.1	8.73	0.76
London Road	0.9	10.68	0.48	0.9	9.76	0.49
A272 (W)	7.5	26.15	0.89	2.8	10.41	0.74
	2039 Do Something					
A272 (E)	7.6	22.76	0.9	3.2	9.21	0.77
London Road	0.8	10.33	0.46	0.9	9.74	0.48
A272 (W)	13.9	44.88	0.96	3	11.07	0.76
	2039 Do Something (Manually Adjusted Alternative - NH)					
A272 (E)	7.6	22.76	0.9	3.2	9.21	0.77
London Road	0.8	10.33	0.46	0.9	9.74	0.48
A272 (W)	13.9	44.88	0.96	3.4	11.96	0.78

Source: TTN10 Table 2.11 (Ardent, December 2024)

Whilst the proposed scheme does provide a clear betterment, as per paragraph 24 above, we are of the view that in policy terms there is no requirement for the scheme. Therefore, to be clear National Highways do not require the junction to be modified as proposed. We also understand that it is not a requirement of West Sussex County Highways either.

Junction Q – A23 / Bolney Road / Cowfold / Crossroads roundabout

We previously noted the traffic flows should be clarified; the traffic flows have been clarified and the input traffic flows are confirmed to be acceptable. The assessment results for the A23 / Bolney Road / Cowfold / Crossroads roundabout are shown in Table 4.

Table 4 : A23 / Bolney Road / Cowfold / Crossroads roundabout - Junctions 10 Assessment

	AM			PM		
	Q (Veh)	Delay (s)	RFC	Q (Veh)	Delay (s)	RFC
	2019 Baseline					
A23 SB offslip	0.2	2.23	0.14	0.2	2.41	0.2
A272 (E)	0.8	3.38	0.45	0.9	3.67	0.47
A272 Cowfold Rd (W)	0.5	2.39	0.32	0.5	2.36	0.35
	2039 Do Minimum					
A23 SB offslip	0.3	4.84	0.25	0.4	3.92	0.3
A272 (E)	2.2	7.78	0.69	2.4	7.73	0.71
A272 Cowfold Rd (W)	1	3.21	0.5	0.9	2.9	0.47
	2039 Do Something					
A23 SB offslip	0.4	4.81	0.26	0.5	4.16	0.35
A272 (E)	2.8	9.11	0.74	2.3	7.43	0.7
A272 Cowfold Rd (W)	1	3.2	0.5	0.9	2.91	0.47
	2039 Do Something (Manually Adjusted Alternative - NH)					
A23 SB offslip	0.4	4.81	0.26	0.7	4.48	0.4
A272 (E)	2.8	9.11	0.74	2.4	8.04	0.71
A272 Cowfold Rd (W)	1	3.2	0.5	0.9	2.91	0.47

Source: TTN10 Table 2.8 (Ardent, December 2024)

The 2019 modelled queues have been compared against Google Maps and concluded to be a satisfactory representation of queues occurring on site and the calibration is acceptable. Based on the outcome of the traffic modelling analysis undertaken as set out in Table 4 above, we are of the view that the development would not result in an unacceptable safety impact and would not have a severe residual cumulative impact on the SRN.

Junction AG – A23 / A2300 eastern roundabout

We previously noted the traffic flows should be clarified; the traffic flows have been clarified and the input traffic flows are confirmed to be acceptable. The assessment results for the A23 / A2300 eastern roundabout are shown in Table 5.

Table 5 : A23 / A2300 eastern roundabout - Junctions 10 Assessment

	AM			PM		
	Q (Veh)	Delay (s)	RFC	Q (Veh)	Delay (s)	RFC
	2019 Base					
A23 Off-Slip	1.1	4.6	0.53	1	3.67	0.5
A2300 (E)	0.9	3.26	0.48	0.7	2.74	0.4
A2300 (W)	0.4	3.66	0.26	0.2	3.19	0.18
	2039 Do Minimum					
A23 Off-Slip	4.1	11.16	0.81	2.5	6.3	0.71
A2300 (E)	8	14.96	0.9	3.9	7.72	0.8
A2300 (W)	0.5	4.43	0.35	0.3	3.48	0.21
	2039 Do Something					
A23 Off-Slip	4.4	11.7	0.82	2.5	6.39	0.72
A2300 (E)	14.3	25.57	0.95	4.1	8.07	0.81
A2300 (W)	0.5	4.41	0.35	0.3	3.51	0.22
	2039 Do Something (Manually Adjusted Alternative - NH)					
A23 Off-Slip	4.4	11.7	0.82	2.8	7.28	0.74
A2300 (E)	14.3	25.57	0.95	4.1	8.07	0.81
A2300 (W)	0.5	4.41	0.35	0.4	3.79	0.29

Source: TTN10 Table 2.9 (Ardent, December 2024)

The 2019 modelled queues have been compared against Google Maps and concluded to be a satisfactory representation of queues occurring on site. Based on the outcome of the traffic modelling analysis undertaken as set out in Table 5 above, we are of the view that the development would not result in an unacceptable safety impact and would not have a severe residual cumulative impact on the SRN.

Junction AH – A23 / Hickstead Lane roundabout

We previously noted the traffic flows should be clarified; the traffic flows have been clarified and the input traffic flows are confirmed to be acceptable. In addition, we also previously noted that there was a need to ensure that the model accurately reflected existing queueing; in particular the A23 northbound off-slip arm where Google Maps indicates an AM queue in the order of 200m.

The assessment results for the A23 / Hickstead Lane roundabout are shown in Table 6.

Table 6 : A23 / Hickstead Lane roundabout - Junctions 10 Assessment

	AM			PM		
	Q (Veh)	Delay (s)	RFC	Q (Veh)	Delay (s)	RFC
	2019 Baseline					
A2300 (N)	0	0	0	0	0	0
A2300 (E)	4.2	18.76	0.82	2	10.18	0.67
A2300 (S)	6	66.46	0.89	0.7	12.65	0.41
Hickstead Lane	0.2	9.05	0.19	0.2	5.98	0.14
	2039 Do Minimum					
A2300 (N)	0	0	0	0	0	0
A2300 (E)	34.1	107.26	1.03	41.4	119.81	1.05
A2300 (S)	9.3	135.65	0.98	1.4	32.19	0.6
Hickstead Lane	1.2	19.06	0.56	0.3	8.27	0.24
	2039 Do Something					
A2300 (N)	0	0	0	0	0	0
A2300 (E)	39.4	120.07	1.05	44	125.88	1.05
A2300 (S)	9.7	141.07	0.99	1.5	33.98	0.62
Hickstead Lane	1.2	17.73	0.55	0.3	8.41	0.25
	2039 Do Something (Manually Adjusted Alternative - NH)					
A2300 (N)	0	0	0	0	0	0
A2300 (E)	39.4	120.07	1.05	44	125.88	1.05
A2300 (S)	9.7	141.07	0.99	8	114.52	0.95
Hickstead Lane	1.2	17.73	0.55	0.4	9.53	0.28

Source: TTN10 Table 2.10 (Ardent, December 2024)

We have undertaken review of the submitted model and note there has been no calibration undertaken. TTN10 states that the queue on A2300 (south) arm is consistent with Google Maps data, however we do not agree with this.

We have undertaken calibration of the model and it is concluded that the maximum impact is during the PM peak hour when the queue is forecast to increase by 5 vehicles. We are of the view that the development would not result in an unacceptable safety impact and would not have a severe residual cumulative impact on the SRN.

Monitor and Manage Strategy

We acknowledge that it has been agreed between the applicant and WSCC that a Monitor and Manage Strategy will be agreed via the S106 agreement. We are content it is not necessary for National Highways to be involved in the Monitor and Manage Strategy considering the results of the traffic modelling analysis.

Overall Conclusion and Recommendation

Based on the submitted evidence we are content that the proposed development will not have an unacceptable impact on the safety, reliability and/or operational efficiency of the SRN and in this respect is complaint with national planning and transport policy set out in DfT C1/22 and MHCLG NPPF (2024).

However, in order to safeguard the SRN during the construction period we recommend the following condition be attached to any consent granted.

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 A23 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 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