National Highways Planning Response (NHPR 24-02)
Formal Recommendation to an Application for Planning Permission

From: Christine Allen (Regional Director)
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To: Mid Sussex District Council FAO Mr Ashdown
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CC: transportplanning@dft.gov.uk
spatialplanning@nationalhighways.co.uk

Council's Reference: NH/23/04120

Location: Land East of Ansty Way, Cuckfield

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 14 November 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.[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 not propose 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.

Signature: *Marius Pieters*	**Date: 4 December 2024**
Name: Marius Pieters	**Position:** Spatial Planning Manager
National Highways Bridge House, 1 Walnut Tree Close, Guildford GU1 4LZ planningSE@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.

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

Recommend that planning permission not be granted for a period of six months until 4 June 2025

National Highways currently recommends that planning permission not be granted (other than a refusal if the Council so wishes) for a period of six months until June 2025 to allow the applicant to resolve the outstanding matters. This recommendation can be replaced, renewed, or reviewed during the six-month period, or at its end, dependent on progress made with regards to the outstanding matters.

Reasons

We require further information to be provided by the applicant in order that an informed decision can be made in relation to the potential impacts of the development on the SRN. In particular, the following comments should be passed onto the applicant:

Trip Rates and Generation

We previously highlighted the trip generation in the TA and noted the arrival and departure figures during the PM appear to be reversed. This has now been corrected and the updated data is shown in **Table 1.**

Peak Hour	Total Development Trips (Without Reduction)			Total Development Trips (With Reduction)		
	Arr	Dep	Tot	Arr	Dep	Tot
AM (08:00 - 09:00)	196	547	743	181	514	695
PM (17:00 - 18:00)	460	206	666	427	190	617

Table 1 : Total Development Trips With & Without Reduction
Source: TAA Appendix D Table 2.3 (Ardent, November 2024)

We previously requested that a table or graphic is submitted which provides greater clarity 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.

The TAA refers to Appendices B and C of Appendix D, containing details of the impact on the SRN associated with the proposed development. We note these

figures are the same figures which are included within TTN10 and do not respond to our above comment. We acknowledge the provided traffic flows are output from MSSHM, however the flow difference diagram (between 2039 Do Nothing and 2039 Do Something) is not sufficient to understand where the development traffic is traveling.

We therefore reiterate 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.

Traffic Flow Diagrams

Our technical advisors previously reviewed the traffic flows and noted the following:

- *We would typically expect the proposed development trips during the PM peak hour to be broadly the reverse of the AM peak hour, however at many locations along the SRN this is not the case*
- *A2300 (westbound) to A23 (southbound) is 93 vehicles during the AM peak, while A23 (northbound) to A2300 (eastbound) is 3 vehicles during the PM peak, there is negligible traffic from the A23 (northbound) at the other junctions, evidence should be presented to justify the differences between each peak hour*
- *A272 to A23 (northbound) is 116 vehicles during the AM peak, while A23 (southbound) to A272 is 52 vehicles during the PM peak, we acknowledge this is closer to what we would expect, however it remains a relatively large difference*

The TAA has responded that the presented traffic flow diagrams are an accurate representation of the MSSHM outputs and further noted that '*concerns with perceived imbalances in traffic flows between peak periods should be addressed to the designer and maintainer of the MSSHM, namely Systra on behalf of MSDC'*. As Ardent was provided with the MSSHM, undertook a number of 'strategic model amendments', undertook the modelling and subsequently reported that the MSSHM provides a 'robust assessment', we would have expected Ardent to attempt to provide explanations for the queries.

As a way of moving forward we suggest**:**

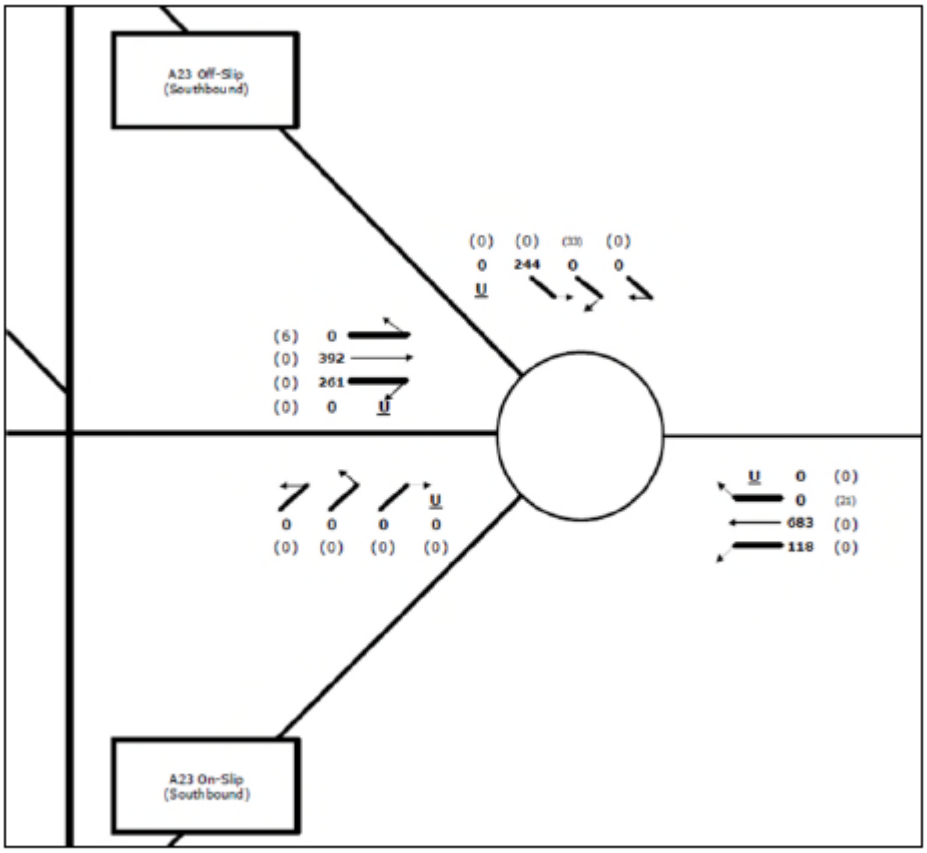
The applicant provides a 'manually adjusted alternative 2023 Do Something' scenario to ensure that the PM peak hour assessment better aligns with the AM peak hour. For example, this would mean manually adjusting the 3 A27 northbound trips referred to above to 93 to provide some reassurance given our concerns which have not been addressed. The same procedure should be applied at the other movements where there is a noticeable discrepancy between the AM and PM development impact at SRN junctions.

There are instances where the traffic flow diagrams show the 'total traffic flow' as zero, but then there is an amount of heavy goods vehicles reported, the reverse is also apparent with total traffic flows having zero heavy goods vehicles where this is

not likely to be correct. **This should be reviewed within all traffic flow diagrams and corrected where necessary.**

An example is shown in Figure 1, highlighting the A23 / Bolney Road / Cowfold / Crossroads roundabout.

In association with this we request the applicant to explain why the right turn from the A23 southbound off-slip to Cowfold Road has zero traffic flows, as our technical advisors do not accept this as reasonable.



Source: TAA Appendix D Appendix B 2019 Baseline AM Peak Hour

Figure 1: Traffic Flow Diagram – Example of Apparent Anomalies

We note that at the A23 / London Road roundabout, at 2039 Do Nothing and 2039 Do Something, there are no (or very low, such as 1 vehicle) traffic flows on the London Road (arm) of the junction. This issue is also seen at the A23 / Broxmead Lane junction. **The applicant should advise the reason for there being no (or negligible) traffic flows at the above noted locations.**

Junction Assessment

Our technical advisors have previously reviewed the presented junction impacts and concluded (in the comments dated 18 January 2024 and 27 June 2024) that there was a need for junction assessment to be undertaken at the following locations:

- Junction O: A23 / London Road roundabout
- Junction P: A272 Cowfold Road / London Road priority junction
- Junction Q: A23 / Bolney Road / Cowfold / Crossroads roundabout
- Junction AG: A23/A2300 Eastern roundabout

The TAA Appendix D contains Junctions 10 output files, however we note there has been no soft copy Junctions 10 input files provided and these should be submitted for each assessment junction.

The traffic demand input within the submitted model files for Junctions O, P, Q and AG have been reviewed and this is seen to align with the traffic flow diagrams, however as noted in the section above, the traffic flow diagrams are likely to be subject to revision.

Junction P - A272 Cowfold Road / London Road priority junction

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

	AM Peak Hour			PM Peak Hour		
	Q (Veh)	Delay (s)	RFC	Q (Veh)	Delay (s)	RFC
	2019 Baseline					
Stream B-C	0.0	0.00	0.00	0.0	8.84	0.00
Stream B-A	171.7	2404.95	2.18	116.1	1245.80	1.75
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	0.10	0.4	14.73	0.30
Stream B-A	181.0	14312.87	19.38	66.2	1535.44	2.00
Stream C-AB	1.4	23.69	0.59	0.1	10.07	0.13
	2039 Do Something					
Stream B-C	0.1	12.14	0.10	0.4	14.62	0.30
Stream B-A	204.5	4291.13	9999999999.00	72.0	1838.93	2.19
Stream C-AB	11.1	55.62	0.95	0.2	10.84	0.19

Table 2 : A272 Cowfold Road / London Road priority junction - Junctions 10 Assessment
Source: TAA Appendix D Table 2.6 (Ardent, November 2024)

The assessment results have been reviewed, the 2019 queues are noted to not align with Google Maps. In particular, it can be seen from the results that at 2019 the right-turn from London Road is forecast to have a queue of 172 vehicles during the AM peak hour and 116 vehicles during the PM peak hour. The Google Maps information shown above indicates a queue of approximately 30 vehicles during the AM peak hour and 20 vehicles during the PM peak hour. **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.**

Junction AG – A23 / A2300 eastern roundabout

Assessment hours are not specified within the model, these should be included

There has been no CAD drawing provided which demonstrates the geometric parameters input to the model. We have, however, reviewed the geometry against aerial imagery and noted that:

A23 southbound off-slip – half width estimated to be 6.0m rather than 7.05, entry width estimated to be 8.4m rather than 9.56m, entry radius estimated to be approximately 8.0m rather than 18.3m, this should be reviewed.

The input half-widths and entry widths should not include area outside of the carriageway edge lines

It is noted that the model has not been subject to calibration. We acknowledge the traffic flows are all obtained from the MSSHM and there are no observed queues available against which to undertake calibration therefore Google Maps data may be referred to. The assessment results for the A23 / A2300 eastern roundabout are shown in **Table 3.**

	AM Peak Hour			PM Peak Hour		
	Q (Veh)	Delay (s)	RFC	Q (Veh)	Delay (s)	RFC
	2019 Base					
1 - A23 Off-Slip	1.1	4.6	0.53	1.0	3.67	0.5
2 - A2300	0.9	3.26	0.48	0.7	2.74	0.4
4 - Flyover Bridge	0.4	3.66	0.26	0.2	3.19	0.18
	2039 Do Minimum					
1 - A23 Off-Slip	4.1	11.16	0.81	2.5	6.3	0.71
2 - A2300	8.0	14.96	0.9	3.9	7.72	0.8
4 - Flyover Bridge	0.5	4.43	0.35	0.3	3.48	0.21
	2039 Do Something					
1 - A23 Off-Slip	2.5	6.61	0.72	2.2	5.69	0.69
2 - A2300	8.8	15.5	0.91	3.3	6.48	0.77
4 - Flyover Bridge	0.5	4.06	0.33	0.3	3.31	0.21

Table 3 : A23 / A2300 eastern roundabout - Junctions 10 Assessment
Source: TAA Appendix D Table 2.8 (Ardent, November 2024)

The model geometry should be reviewed as noted above, following which the 2019 modelled queues should be compared against Google Maps to assess if this is a satisfactory representation of queues occurring on site.

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 74 and 109

prescribing that significant development should offer a genuine choice of transport modes, while paragraphs 108 and 114 advise that appropriate opportunities to promote walking, cycling and public transport should be taken up.

Moreover, the build clever and build efficiently criteria as set out in clause 6.1.4 of PAS2080 promote the use of low carbon materials and products, innovative design solutions and construction methods to minimise resource consumption.

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.