



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 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 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: 	Date: 16 October 2024
Name: Matt Lewis	Position: Assistant 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.

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.

National Highways received a Technical Note from the applicant on 13 June 2024 to address the issues raised in our previous response. A response was issued 03 July 2024 setting out further work to be carried out to address the remaining issues. As of this time, no further information has been received.

As a summary, the following actions are outstanding:

Policy Context

National Highways previously requested that the vision for the development should be provided, in line with the requirements of DfT Circular 01/2022 paragraph 48. TTN10 does contain at paragraph 2.3 the vision for the development and National Highways considers this to be acceptable.

National Highways has previously acknowledged the measures to support the aims of the vision, in particular quality broadband, improvements to off-site walking and cycling infrastructure and a public transport strategy.

Collision Analysis

Collision data from crashmap.co.uk has been presented for the period 2015 to 2022. **STATS 19 analysis should be presented to provide detailed assessment of collisions at the assessed junctions. Our requirement is for only the most recent five years of STATS 19 data.**

Trip Rates and Trip Generation

National Highways previously requested additional information to justify the trip reduction assumptions as documented in our comments dated 18 January 2024. TTN10 highlights that trip reduction assumptions are consistent with the Mid Sussex Strategic Highway Model (MSSHM) Scenario 5 report produced on behalf of MSDC

(reported to be available under the Mid Sussex District Plan 2021-2039 evidence base) and also additional trip reduction assumptions agreed with WSCC.

The statement within the TA related to the 25% assumption agreed with WSCC is unclear, as it refers to modal shift (e.g. active travel and public transport) and also refers to home working. TTN10 then states that the 25% is solely associated with home working and internalisation. **In combination with the comments below, we request that this apparent contradiction is clarified.**

National Highways previously noted that the trip reduction forecasts contained within the TA did not align with the assumptions contained within the FTP. TTN10 has noted that the trip reduction forecasts contained within the FTP are '*in addition*' to those contained within the TA. This amounts to a total trip reduction of circa 30%. This is a material overall forecast reduction in vehicular trip generation for the site.

We suggest that in order to progress matters site specific justification is needed. In addition, in terms of the degree of traffic impact on the SRN a comparative exercise is requested for a less ambitious mode shift scenario (which will need to be defined and agreed). The associated impacts at each of the SRN junctions will need to be established to identify the materiality of the difference in vehicular trip impacts. This is requested in the spirit of seeking to make timely progress on resolving the outstanding matters and when this exercise is completed, it will be possible to advise on next steps.

National Highways previously highlighted the trip generation in the TA, shown in **Table 1** and noted the arrival and departure figures during the PM appear to be reversed.

Table 1 - Trip Generation at SRN Junctions

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	190	427	617

The trip generation for the development should be clarified, noting the above points. In addition, we request that a table or graphic is provided 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.

Committed Development

National Highways previously requested clarification regarding the committed development assumptions considering the requirements of DfT Circular 01/2022. In our previous comments we noted the 8,039 additional households and 6,500

additional jobs which have been included in the model, consistent with the assumptions included within the existing MSSHM 2039 Reference Case model.

TTN10 has highlighted that the committed development assumptions are the latest which were available from MSSHM and were agreed with WSCC. National Highways has no further comment on this issue.

Background Traffic Growth

National Highways previously requested additional detail with regard to the undertaking of assessment at 2039 and also the use of TEMPro. TTN10 has advised that 2039 was adopted at the request of WSCC as this aligns with the emerging draft Mid Sussex District Plan 2031-2039. We have previously noted that this is in excess of the needs of DfT Circular 01/2022 (which requires assessment only at end of adopted Local Plan), however we have no objection to the adopted approach.

The use of TEMPro has been agreed with WSCC, with documentation provided within Appendix A of TTN10. This has been reviewed and we have no objection to the approach adopted.

Strategic Modelling

National Highways previously requested details with regard to the calibration and validation of MSSHM. TTN10 has highlighted that the report prepared is contained under the Mid Sussex District Plan 2031-2039 evidence base and that the version of the model was also approved by WSCC. National Highways has no further comment on this issue.

Traffic Flow Diagrams

National Highways previously requested that the traffic flow diagrams are expanded to include the following junctions:

- A23 / B2115 Sloughgreen Lane / B2115 Cuckfield Lane junction
- A23 / Broxmead Lane junction
- A23 / A2300 junction

Appendix B of TTN10 contains the traffic flow diagrams expanded to include the above locations.

We have reviewed the traffic flows, we note 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

Junction Assessment

National Highways previously requested that the study area is expanded to include the above three locations. TTN10 has been reviewed and **Table 2** has been included which highlights the impact at each of the additional identified assessment locations.

Table 2 - Trip Generation at SRN Junctions

Junction	Absolute Effect		Percentage Effect (vs Do Nothing)		>30 Absolute & >5% Relative?	
	AM	PM	AM	PM	AM	PM
Junction AC - A23 / B2115 Sloughgreen Lane Junction	-3	44	-0.2%	2.9%	NO	NO
Junction AD - A23 / B2115 Cuckfield Lane	10	5	1.0%	0.5%	NO	NO
Junction AE - A23 / Broxmead Lane	0	0	0.0%	0.0%	NO	NO
Junction AF - A23 / Broxmead Lane / London Road	0	0	0.0%	0.0%	NO	NO
Junction AG - A23 / A2300 Eastern Roundabout	122	28	3.5%	0.9%	NO	NO
Junction AH - A23 / Hickstead Lane	17	14	1.2%	1.1%	NO	NO

Source: TTN10 (Ardent, June 2024)

National Highways reiterate that we do not accept the 30 trips or 5% increase thresholds as the determining factor for junction assessment. National Highways consider the forecast increase in traffic flows, existing operation, and any safety concerns at the junctions.

National Highways currently conclude that based on the information shown above (which is likely to be subject to change), there is a need to undertake junction assessment at Junction AG. In the event the above point related to the traffic flow diagrams results in a revision to the traffic flow diagrams, we will further review the junction assessment requirements.

With regard to our previous comments on Junctions O, P and Q, we have noted in our 18 January 2024 comments that the impact at each of these junctions is sufficient to require junction assessment to be undertaken.

We note that our previous junction assessment comments provided in our 18 January 2024 response have not been addressed and that this will be provided to National Highways separately. We will not therefore repeat those points.

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 acknowledge this.

The above represents our initial requirements. As the analysis progresses, it is possible that further requirements may emerge.

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 (the tests set out in DfT Circular 01/2022 and DLUHC NPPF December 2023 [particularly paras 114 to 117]). This response details the steps that need to be taken in order to resolve this issue.

Recommended Non-Approval

National Highways would recommend that planning permission not be granted for a specified period of 6 months from the date of this response (until 16 April 2025).

Reason: to allow the applicant sufficient time to address the above issues raised.

Thank you again for consulting with National Highways and please continue to consult on other planning applications via our inbox planningse@nationalhighways.co.uk.

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.