



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

From: Michelle Berrington (Head of Planning & Development)  
Operations Directorate  
South East Region  
National Highways

To: Horsham District Council (FAO Jason Hawkes)  
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**Council's Reference:** DC/25/1312

**Location:** Land West of Ifield, Charlwood Road, Ifield, West Sussex

**Proposal:** Hybrid planning application (part outline and part full planning application) for a phased, mixed use development comprising: A full element covering enabling infrastructure including the Crawley Western Multi-Modal Corridor (Phase 1, including access from Charlwood Road and crossing points) and access infrastructure to enable servicing and delivery of secondary school site and future development, including access to Rusper Road, supported by associated infrastructure, utilities and works, alongside: An outline element (with all matters reserved) including up to 3,000 residential homes (Class C2 and C3), commercial, business and service (Class E), general industrial (Class B2), storage or distribution (Class B8), hotel (Class C1), community and education facilities (Use Classes F1 and F2), gypsy and traveller pitches (sui generis), public open space with sports pitches, recreation, play and ancillary facilities, landscaping, water abstraction boreholes and associated infrastructure, utilities and works, including pedestrian and cycle routes and enabling demolition.

**National Highways Ref:** NH/25/12748

Referring to the consultation on a planning application dated 4 September 2025 referenced above, in the vicinity of the M23 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.<sup>1</sup>

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](mailto: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](mailto: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:** 24 September 2025

**Name:** Nigel De Wit

**Position:** Spatial Planner

**National Highways**

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<sup>1</sup> 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 this application should not be determined until **23 December 2025**

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 M23.

We require further information to be provided by the applicant on this application in order that an informed decision can be made in relation to the potential impacts of the development on the SRN.

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

#### **Background**

National Highways (NH) were consulted on 10th June 2020 in regard to an initial Proposed Scheme and Strategic Modelling Note, however no further direct consultation has taken place with National Highways as this scheme has developed.

The site is a draft allocation in the submitted Local Plan. National Highways has engaged previously with Horsham District Council (HDC) with regard to the preparation of the evidence base for the emerging Local Plan. No part of the SRN lies directly within the district, however the A23 corridor (running north-south to the east of the district) and the A27 corridor (running east-west to the south of the district) are major SRN routes which serve large areas of West Sussex. The A23 becomes the M23 to the north-east of the district in the vicinity of Crawley. The A24 and A272 are managed by West Sussex County Council (WSCC) as the local highway authority.

For the purposes of assessing this planning application, it is recognised that the wider assessments of the impacts of the emerging Local Plan (which are referenced and summarised in the Local Plan Statement of Common Ground (SoCG) between HDC and NH) have not identified any specific requirement for mitigation measures on the SRN, with the exception of optimisation of signal timings at the M23 Junction 11.

However, the agreements made within the SoCG are based on a stated acceptance that the wider proposed transport strategy for the district (which is further described in the Infrastructure Delivery Plan) will be implemented, as stated at Paragraph 5.1 of the SoCG.

As this application is being made ahead of the adoption of the emerging Local Plan, National Highways is required to assess the proposals on their own merits and without reliance on other aspects of the emerging Plan which is at the examination stage and has not been fully examined because of conclusions of the Inspector on the legal matter of the Duty to Cooperate.

### **Trip Rates and Trip Generation**

The trip rates and trip generation information for the proposed development which are reported in the Transport Assessment (TA) address three different scenarios. Of these, Scenario 2 is stated to be most in line with the transport vision for the site as it is considered to reflect the intended outcomes of the site's Sustainable Transport Strategy (STS). It is stated that the assumptions relating to internal and external trips and corresponding mode shares have been arrived at through discussions with WSCC.

The TA states that evidence of the analysis supporting the vision is contained in Appendix A of the Transport Assessment. The West of Ifield Transport Strategy dated March 2023 (Appendix A of the TA) includes its own appendices. Of these, Appendix C (Mode Share Strategy and Evidence) is stated to contain the detailed evidence of how the internal and external mode shares are to be delivered in practical terms. **However, Appendix C of the Transport Strategy has not been included within the files received and is not available on the planning portal, therefore this evidence referenced at Appendix C of Appendix A needs to be provided for review.**

**It is considered that the external mode shares (which are of direct relevance to trips which would potentially use the SRN) as currently presented in the TA report are very ambitious with the overall mode share for external car trips (drivers and passengers) low at 56% of all trips. As such, the extent of supporting information which will be required to demonstrate that this mode split is achievable is considerable. It will need to include both the initial phase and the end state of the development.**

Additionally, the applicant has provided a Trip Generation and Scenario Planning Scoping Note, included as Appendix B of the Transport Assessment, dated December 2021. Scenario 2 known as the “Sustainable” scenario is described in this document and has been taken forward for inclusion in Chapter 8 of the Transport Assessment. **As the initial scoping note and therefore the development of this scenario predates the adoption of the DfT circular 01/2022, further explanation is required to demonstrate how the scenario specifically addresses the requirements of the circular, particularly the need for “residual” demand for car travel to be identified.**

**The applicant acknowledges the need for a vision-led approach and refers to “mitigate and manage” approaches within Chapter 12 of the Transport Assessment. However, at present there is very limited information on how this approach would be applied in practice, and which specific transport mitigation measures it would relate to. Further clarification should therefore be provided on this point.**

Table 8.4 and Table 8.5 appear to reflect the numbers as per the Scoping Note (based on 3,250 units) and has not been revised to reflect the proposed 3,000 units. **Clarification on these tables is required for consistency throughout the report.**

Table 8.36 and Table 8.37 shows a 20% modal split for buses for both the residential and the employment external trips. The Trip Generation scoping note (Appendix B of the TA) states the bus modal split included is higher than what was previously presented at the Bus Strategy Meeting. **Further evidence is requested to review whether the external bus trips assumption is realistic. Additionally, further evidence is required to show that WSCC are in agreement with the approach used to obtain the modal split.**

### **Car Parking**

The applicant has put forward a two-fold parking strategy which provides an interim parking ratio and a legacy parking ratio for both the residential and non-residential aspects of the Site. It is acknowledged that the applicant has based both parking phases on a 10% and 30% reduction of the council's parking standards respectively.

However, the proposed car parking strategy does not appear to be aligned with the proposed modal split approach in regard to the uptake of sustainable transport. In the interim parking ratio, the Site is proposed to provide 4,501 car parking spaces for 3,000 units, which equates to an average of 1.5 spaces per dwelling. In the legacy parking ratios, a total of 3,527 spaces is proposed for the 3,000 units which equates to 1.18 parking spaces per dwelling. It is stated that the final reduction in car parking will be determined through monitor and manage approaches as vehicular trip rates respond to changes in modal share; this approach risks undermining efforts to make sustainable travel options more attractive than car travel.

**Further information is therefore required on how the legacy and interim parking ratios have influenced the modal split assumptions later used in the trip generation and highway modelling.**

### **Trip Distribution and Assignment**

It is understood that the Traffic and Highway Assessment (Chapter 9 of the Transport Assessment) utilised the Crawley Transport Model for actions such as trip distribution and assignment. This approach is considered reasonable in principle since although the site lies in Horsham district (and is included in the previously referenced strategic modelling work supporting the current Local Plan submission), the site lies directly adjacent to Crawley and a significant proportion of external trips would be expected to be to and from the Crawley area. **However, this also risks a “disconnect” with the emerging Horsham Local Plan technical work and further commentary is therefore required in terms of a comparison between the work cited in the TA and the emerging Horsham Local Plan assessments.**

**Additionally, for a site-specific planning application, trip distribution diagrams should be provided showing how development trips are expected to impact upon the SRN junctions. The distribution diagrams should cover (at a minimum) the SRN locations identified in the June 2024 SoCG between HDC and National Highways.**

### **Capacity Assessment / Junction Modelling**

The Transport Assessment makes reference in its earlier chapters of the connections the Site has to the A23 and M23 junctions 10 and 11. As has been summarised above, it is assumed that no separate analysis of the SRN has been undertaken due to the outcomes of the technical work undertaken in connection with the emerging Local Plan, and the positions set out in the current SoCG.

Whilst this approach is acceptable in principle, it is reliant on appropriate information being provided to demonstrate that the “sustainable” scenario trip rates and mode splits can be achieved for this site specifically. Further work is required as set out above before this matter can be agreed.

As such, we are not currently in a position to be able to confirm whether the geographical extent of the traffic modelling is appropriate, as additional local testing may be required if the proposed mode splits and corresponding trip generation figures are not substantiated.

In particular, the first phase assessment is not clear on the differences in the trip rates and mode split assumptions compared to the end state assessment. **Section 9.34 within the Transport Assessment outlines the assumptions that are being considered within the 2029 opening year modelling due to the staging of development, but how this has been reflected in changes to the model trip rates is not clear; this should be clarified.**

The applicant additionally states that Committed Developments have been extracted from the Crawley Town Model plus the addition of consideration of the Gatwick Airport Limited Development Consent Order (GAL DCO); this work is understood to have taken place after the main Local Plan strategic modelling work was completed. **Clarification should therefore be provided on how information from GAL has been applied to any relevant assessments within the TA report.**

As has been discussed within the Transport Assessment, travel behaviour is anticipated to change over time with individuals leaning towards sustainable modes in the future. **This is reflected in the car parking strategy with the interim and legacy car parking ratios, and a similar approach should be applied to the modal split between the opening stages and the future year.**

**It is noted that, should a need for local modelling of any SRN junctions be identified as a result of the actions set out above, a full detailed review of this modelling will be undertaken, and any related comments will be provided as necessary.**

### **Infrastructure**

It is noted that the proposal includes the Phase 1 of the Crawley Western Multi-Modal Corridor (CWMMC), and the Transport Assessment has outlined that Homes England are responsible for the delivery of the “middle section” of the CWMMC. It is therefore assumed that other developers / sources of funding will be required to take responsibility for the remaining sections as part of the wider Local Plan transport strategy. **Given that the emerging Local Plan is currently at the examination stage, further explanation is required as to what impacts would be expected to the mode shift strategy if delivery of the remaining sections of the CWMMC were to be delayed or did not happen, and what further measures by the applicant would be feasible to address these impacts.**

### **Framework Travel Plan**

**A Framework Travel Plan is provided as part of the planning application package (DC/25/1312). However, as identified earlier within this response, supporting information relating to the development modal split vision is missing. Upon receipt and review of this information, we will be in a position to provide substantive comment on the submitted FTP.**

### **Other Matters**

It is recognised that this application has been produced over a number of years and in the time changes in guidance has occurred. The Transport Assessment refers to the Draft Crawley Local Plan, however it is noted that this has now been formally adopted October 2024.

## **Construction Environmental Management Plan**

Given the location of the application site, it is anticipated that a Construction Environmental Management Plan (CEMP) will need to be prepared, agreed, and implemented. National Highways will need to be involved with the preparation and approval of those aspects of the CEMP relating to Construction Logistics. At the appropriate stage of the planning process, we are minded to recommend a suitable planning condition to the above effect.

The above represents our *current* 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 operational efficiency of the SRN. This response details the steps that need to be taken in order to resolve these issues.

**Considering the above, 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 23 December 2025 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.