



## 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  
[REDACTED]

To: Arun District Council (FAO Emma Sheppard)  
[planning.responses@arun.gov.uk](mailto:planning.responses@arun.gov.uk)

CC: [REDACTED]  
[REDACTED]

**Council's Reference:** F/19/25/OUT

**Location:** Land to the South of Ford Lane, Arundel BN18 0DF

**Proposal:** Outline planning application with all matters reserved (except access proposed along Ford Lane) for development of up to 400 No dwellings, a 8-10 form entry secondary school with associated sports pitches and facilities, a community hub building of up to 600 sqm, new pedestrian and cycle routes, Public Open Space, sustainable urban drainage system, landscaping and associated infrastructure. This application lies within the parish of Ford and Yapton, affects the setting of listed buildings, affects a Public Right of Way and is a Departure from the Development Plan. This is a CIL liable development.

**National Highways Ref:** NH/25/11844

Referring to the consultation on a planning application dated 30 June 2025 referenced above, in the vicinity of the A27 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 [REDACTED] 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 [REDACTED].

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 [REDACTED].

**Signature:** [REDACTED]

**Date:** 17 July 2025

**Name:** Nigel De Wit

**Position:** Spatial Planner

**National Highways**

**Bridge House, 1 Walnut Tree Close, Guildford, Surrey, GU1 4LZ**

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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 the application should not be determined for a period of three months until **17 October 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 A27.

We have reviewed the application with our focus on the submitted Transport Assessment (TA) (Revision 3, 20 June 2025).

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

### **Policy Context**

The TA includes reference to National Planning Policy Framework [NPPF] (December 2024). The TA includes reference to paragraph 118 of NPPF which highlights the requirement for developments which generate significant amounts of traffic to be provided with a Travel Plan and to be vision-led.

**The TA should also refer to and adhere to Department for Transport (DfT) Circular 01/2022 which is the policy for the SRN.**

### **Development Vision**

**The TA should include a vision-led approach to the development which notes the key transport related outcomes which the development is seeking to achieve, including reducing the need to travel and encouraging transport by sustainable transport modes.**

**The TA should state how the aims of the transport vision align with the requirements of DfT Circular 01/2022.**

**The TA should include details of measures which are proposed to achieve the aims of the vision.**

### **Existing Traffic Data**

The TA notes that traffic surveys have been undertaken on Tuesday 1 April 2025 at a number of locations in the locality of the development site. The locations which have been surveyed which are of relevance to the SRN are as follows:

- A27 Arundel Road / Yapton Lane priority junction; and
- A27 Ford Roundabout.

The TA notes that across the network peak the AM peak hour is 07:30-08:30 and the PM peak hour is 16:15-17:15. The observed traffic flows are shown on traffic flow diagrams contained within Appendix K of the TA and the traffic survey data is contained within Appendix L of the TA. **The video files associated with the SRN traffic surveys should be provided for review. We note there is no queue data presented, this is required for model calibration and validation.**

### **Collision Analysis**

The TA presented Personal Injury Collision (PIC) data for the five-year period to 28 February 2025 which has been sourced from West Sussex County Council (WSCC), however no data is presented for the SRN. **The collision data should be extended to include the SRN assessment junctions for the latest 5-year period data is available; the specific assessment locations will be confirmed following finalisation of the trip generation and trip distribution/assignment.**

### **Trip Rates and Trip Generation - Residential**

We have undertaken an independent assessment of the presented TRICS data associated with the residential development (TA, Table 5.1) and this is concluded to be acceptable as pre-vision trip rate data. **However, the trip rates to be used within the TA should reflect the observed AM and PM highway peak hours.**

**In addition, in accordance with the requirements of the NPPF and Circular 01/2022, the assessment should be vision-led and therefore the assessment trip rates should reflect the impact of those measures which are proposed to achieve the vision.**

The residential trip purposes have been assessed based on 2023 National Travel Survey (NTS) Table NTS0502a and this is confirmed to be acceptable in principle. We acknowledge that the NTS notes that the trip purposes are coded 'according to the main reason why the trips were made'. The trip purposes by start time are included within Appendix G of the TA and are concluded to be in alignment with the NTS. **As**

**noted above, there is a need for the trip purposes to be revised to reflect the observed AM and PM peak hours.**

**The residential vehicle trips by purpose are shown in Table 5.2 in the TA (see below) and indicate 108 education related trips during the AM peak hour; this is required to be revised considering the above comments.**

TA Table 5.2: Vehicle Trips by Purpose - Residential

Journey Purpose	AM Peak (0800 – 0900)			PM Peak (1700 – 1800)		
	Arrivals	Departures	Total	Arrivals	Departures	Total
Commuting	10	28	38	41	18	58
Primary Education	15	43	58	4	2	6
Secondary Education	13	37	50	3	1	5
Leisure	5	15	21	46	20	66
Retail	2	7	9	19	8	28
Other	7	20	27	28	13	41
<b>Total</b>	<b>52</b>	<b>150</b>	<b>203</b>	<b>141</b>	<b>62</b>	<b>203</b>

As it is proposed to include a secondary school within the development site, an internalisation factor of 95% has been assumed for the residential trips travelling to and from secondary education. **The assumed internalisation factor should be based on an agreement with the local education authority and evidence should be provided to support the proposed internalisation factor.** The currently presented residential trip generation by purpose and the reflecting the secondary education internalisation is shown in Table 5.3 in the TA (see below), indicating 155 two-way vehicle trips during the AM peak and 199 two-way vehicle trips during the PM peak.

TA Table 5.3: External Vehicle Trips by Purpose - Residential

Journey Purpose	AM Peak (0800 – 0900)			PM Peak (1700 – 1800)		
	Arrivals	Departures	Total	Arrivals	Departures	Total
Commuting	10	28	38	41	18	58
Primary Education	15	43	58	4	2	6
Secondary Education	1	2	2	0	0	0
Leisure	5	15	21	46	20	66
Retail	2	7	9	19	8	28
Other	7	20	27	28	13	41
<b>Total</b>	<b>40</b>	<b>115</b>	<b>155</b>	<b>138</b>	<b>61</b>	<b>199</b>

### **Trip Rates and Trip Generation – Civic Centre**

The TA has identified the expected floor area within the 0.3ha civic centre site as being 1,038m<sup>2</sup> gross floor area (GFA). In addition, the trip rates for office which have been adopted are stated to be consistent with the Ford Airfield Transport Assessment. The

office trip rates and trip generation are contained within the TA, Table 5.6, and they highlight six two-way vehicle trips during the AM peak and five two-way vehicle trips during the PM peak.

We have undertaken an assessment of the office trip rates using TRICS version 7.11.4. The assessment parameters adopted were land use employment, category office, regions England excluding Greater London, GFA range 500-2,000m<sup>2</sup>, survey days weekdays and locations suburban and edge of town. **The trip rates we have achieved are significantly higher than those shown above. The presented office trip rates should therefore be reviewed using the latest version of TRICS, the parameters noted above and considering the observed peak hours.**

### **Trip Rates and Trip Generation – Secondary School**

The secondary school trip rates contained within the TA, Table 5.9, have been obtained from the TRICS database version 7.8.4. The trip generation has been undertaken based on 1,500 pupils and it is seen that there are forecast to be 1,319 two-way person trips during the AM peak and 141 two-way person trips during the PM peak.

We have undertaken an assessment of the secondary school trip rates using TRICS version 7.11.4. The assessment parameters adopted were land use education, category secondary, regions England excluding Greater London, range 600-1913 pupils, survey days weekdays and locations suburban and edge of town. **The trip rates which we have achieved are significantly higher than those shown above. The presented office trip rates should therefore be reviewed using the latest version of TRICS, the parameters noted above and considering the observed peak hours.**

The assumptions related to the school catchment contained within Appendix J of the TA are noted to impact on mode share and resulting vehicle trips. **These assumptions are required to be agreed with the local education authority and evidence provided. The currently presented vehicle trip generation associated with the secondary school is shown in Table 6 and is required to be reviewed as noted above.**

### **Trip Distribution/Assignment - Residential**

The trip distribution/assignment diagrams for each residential trip purpose are contained within Appendix I of the TA. The residential trip purposes are noted to have been distributed as follows:

- *‘Work based trips have been distributed onto the local highway network in accordance with data extracted from the NOMIS website;*

- *Education based trips have been distributed having regard to the proximity of primary and secondary schools to the site, and typical journey times extracted from on-line travel planning tools; and*
- *Leisure and retail-based trips have been based on the proximity of local centres and typical journey times extracted from on-line travel planning tools.'*

The trip distribution/assignment diagrams currently show the A27 Arundel Road/Yapton Lane priority junction and A27 Ford Roundabout. **The trip distribution/assignment diagrams should be extended to include the following additional SRN junctions:**

- A27 Arundel Bypass/Arundel Road/A29 Fontwell Avenue Roundabout (A27 Fontwell West Roundabout);
- A27 Arundel Bypass/A29 Roundabout (A27 Fontwell East Roundabout);
- A27 Arundel Bypass/The Causeway/A27 The Causeway Roundabout (A27 Causeway Roundabout); and
- A27 The Causeway/A27 Arundel Road/Lyminster Road Roundabout (A27 Crossbush Roundabout).

**The calculations which support each of the trip distribution diagrams contained within Appendix I of the TA should be provided.**

#### **Trip Distribution/Assignment – Civic Centre**

**As with the residential trip distribution / assignment, the civic centre distribution/assignment should be extended to include the above junctions and the supporting calculations should be provided.**

#### **Trip Distribution/Assignment – Secondary School**

**The secondary school distribution / assignment should be extended to include the above junctions, assumptions regarding catchment should be clarified as noted above and the supporting calculations should be provided.**

#### **Assessment Scenarios**

**Whilst we would assume that the proposed opening year of the development is no later than 2031, this should be confirmed by the applicant.**

In accordance with the requirements of DfT Circular 01/2022, on the assumption that the planned opening year of the development is no later than 2031, there is a requirement for assessment to be undertaken at 2031 which is the end year of the adopted Local Plan. We acknowledge that the TA currently contains assessment which has been undertaken at 2031.

## **Committed Development**

The TA has noted that WSCC has advised during pre-application discussions that the following committed developments are required to be considered.

- Ford Airfield (F/4/20/OUT);
- Church Road, Climping (CL/1/17/OUT);
- West of Bilsham Road (Y/3/22/OUT);
- West of Bilsham Road (Y/52/23/PL);
- Drove Lane (Y/92/17/OUT); and
- Drove Lane (Y/91/17/OUT).

**Documentation should be provided from the LPA which confirms the committed development to be considered.**

## **Background Traffic Growth**

The background traffic growth within the TA has been forecast using TEMPro version 8.1, with the core scenario and factoring from 2025 to 2031. The assessment year which National Highways requires in accordance with DfT Circular 01/2022, is expected to be 2031 (subject to the aforementioned confirmation by the applicant).

The TEMPro assessment is based on Arun 006 mid-layer super output area (MSOA). **However, Arun 006 MSOA is both sparsely populated and remote from the SRN and therefore not representative of growth on the SRN. In this instance, we suggested basing TEMPro assessment on the entire Arun District.**

## **Traffic Flow Diagrams**

The presented traffic flow diagrams are noted and will be fully reviewed once the above requested information related to existing traffic flows, trip generation, trip distribution/assignment and committed development is provided.

## **Junction Assessment**

The TA does not currently contain assessment of any SRN junctions.

**While we acknowledge that approval of the trip distribution/assignment is subject to the provision of additional information, based on the presented information it is apparent that as a minimum assessment is required in accordance with Circular 01/22 at the following SRN junction locations:**

- **A27 Arundel Road/Yapton Lane priority junction; and**
- **A27 Ford Roundabout.**

**The finalised SRN assessment locations will be advised by JSJV following the trip generation and trip distribution / assignment comments highlighted above being addressed.**



**The Junctions model input geometry at each location should be justified via CAD PDF.**

**The junction assessment should ensure that the base model is calibrated and validated against observed queues. The calibration should be undertaken using the 'direct intercept' adjustment. The validation should be against the highest 15-minute average queues observed on each arm. The observed queue data should be clearly summarised within the TA, clearly demonstrating the how the highest 15-minute average queue on each arm is calculated.**

**Where necessary to achieve satisfactorily calibrated and validated models, the model may be split to both AM and PM models.**

**At A27/Yapton Lane priority junction we note there is a committed scheme associated with several residential planning applications, one of which is planning application WA/44/17/OUT for 175 dwellings at Land East of Tye Lane. The committed scheme comprises lengthening of the right-turn lane by 110m providing a total length of 220m.**

#### **Travel Plan Review – Residential Travel Plan**

The Residential Travel Plan (RTP) is contained within Appendix O of the TA and includes the following stated objectives:

- *To increase awareness of the use of sustainable modes of travel and to encourage their use;*
- *To increase awareness of the environmental impacts of travel by the private car;*
- *To promote walking and cycling as a health benefit to residents; and,*
- *To reduce the perceived safety risks associated with active travel.*

We note that the RTP contains a target that there will be a 10% reduction in single occupancy car journeys mode share after five years when compared against the Census 2011 mode share.

The measures and initiatives include marketing of the RTP, specific measures to reduce single occupancy car travel and measures to encourage travel by walking, cycling, lift sharing and public transport. We note that TA highlights proposed improved pedestrian crossing facilities on both Burndell Road and North End Road. It is noted the RTP does not include additional physical measures off site, in particular walking or cycling infrastructure or public bus service improvements. **To achieve the target mode share there is a need for additional off-site physical measures to be provided.**

The RTP includes for monitoring to be undertaken at three-year intervals, together with setting targets and identifying the needs for additional measures to be considered. **The three-year interval is deemed too long and should be revised to annually. There is a need for firm financial commitments to support the objectives of the RTP. This needs to be provided within the RTP document.**

### **Travel Plan Review – School Travel Plan**

The School Travel Plan (STP) is contained within Appendix P of the TA and includes the following stated objectives:

- *To increase awareness of the use of sustainable modes of travel and to encourage their use;*
- *To increase awareness of the environmental impacts of travel by the private car;*
- *To promote walking and cycling as a health benefit to pupils, staff and parents; and,*
- *To reduce the perceived safety risks associated with active travel.*

We note that the STP does not contain a target mode share reduction.

The measures and initiatives include marketing of the STP, specific measures to reduce single occupancy car travel and measures to encourage travel by walking, cycling, lift sharing and public transport. It is noted the STP does not include physical measures, in particular walking or cycling infrastructure or public bus service improvements. **The proposed secondary school should include the provision of associated off-site physical measures.**

The STP includes for monitoring to be undertaken annually, together with setting targets and identifying the needs for additional measures to be considered. **There is a need for firm financial commitments to support the objectives of the STP. This needs to be provided within the STP document.**

### **Construction Traffic Management Plan**

At the appropriate stage of the planning process, we are minded to recommend a suitable planning condition in relation to the preparation, agreement, and adherence to a Construction Traffic Management Plan (CTMP).

### **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 17 October 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.

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**From:** Nigel De Wit [REDACTED]  
**Sent:** 17 July 2025 09:09  
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**Cc:** Planning SE [REDACTED] [REDACTED] Spatial Planning  
[REDACTED] transportplanning [REDACTED]  
**Subject:** NH/25/11844, #25334 - F/19/25/OUT - Land to the South of Ford Lane, Arundel - HR - NH  
response 17/07/25

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**For Attention of:** Emma Sheppard, Arun District Council

**Your Reference:** F/19/25/OUT - Land to the South of Ford Lane, Arundel BN18 0DF

**Proposal:** Outline planning application with all matters reserved (except access proposed along Ford Lane) for development of up to 400 No dwellings, a 8-10 form entry secondary school with associated sports pitches and facilities, a community hub building of up to 600 sqm, new pedestrian and cycle routes, Public Open Space, sustainable urban drainage system, landscaping and associated infrastructure. This application lies within the parish of Ford and Yapton, affects the setting of listed buildings, affects a Public Right of Way and is a Departure from the Development Plan. This is a CIL liable development.

**Our Reference:** NH/25/11844, #25334

Dear Emma,

Thank you for your email of 30 June 2025 consulting National Highways regarding the above referenced application.

We are concerned about the safety, reliability, and operational efficiency of the Strategic Road Network (SRN), in this case the A27 in the vicinity of the site.

We have reviewed the application and submitted documents.

Please find attached our formal National Highways' Planning Response (NHPR) **recommending that planning permission not be granted for a period of three months until 17 October 2025**. This is to provide sufficient time for 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.

Should you or any others have any queries regarding our response, please contact us via [REDACTED]

Kind regards,

**Nigel De Wit MRTPI**, Spatial Planner  
South East Region, Operations Directorate  
National Highways

[REDACTED]  
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**Web:** [www.nationalhighways.co.uk](http://www.nationalhighways.co.uk)

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