



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

CC: [REDACTED]

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

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

Proposal: Outline planning application with some matters reserved (except access) for up to 400 no. dwellings, an 8-10 form entry secondary school with associated sports pitches and facilities, a community hub of up to 600 sqm, new pedestrian, cycle and vehicular access point onto from Ford Lane with additional secondary pedestrian/cycle access points will be provided throughout the site, allotments/community growing space, an orchard, country park, a sustainable urban drainage system and other formal public open space, landscaping and associated infrastructure. This application also lies within the parish of Yapton, affects the setting of listed buildings, affects a Public Right of Way and is a Departure from the Development Plan at Land to the South of Ford Lane, Arundel.

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.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 [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 0300 123 5000.

Signature:

[REDACTED]

Date: 17 December 2025

Name: Nigel De Wit

Position: Spatial Planner

National Highways

Ground Floor, Building 1000, Cathedral Square, Guildford, GU2 7YL

www.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.

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 March 2026**.

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 Addendum (TAA) (27 November 2025).

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

Existing Traffic Data

The TAA outlines that the previously requested video files for the surveyed SRN junctions would be provided to National Highways via email. At the time of writing these have not yet been provided. **We reiterate that the video files associated with the SRN traffic surveys should be provided for review.**

The requested queue length data has been provided in Appendix I of the TAA, noting that the queue is referred to as being 'stationary vehicles'. However, in accordance with requirements of Junctions the queue should include slow moving vehicles. **The presented queue data will be reviewed once we receive the video files.**

Trip Rates and Trip Generation – Secondary School

It was previously highlighted that we had obtained higher trip rates than those presented in the TA (20 June 2025). Given the approach for residential trip rates,

however, we are willing to accept the proposal with unchanged Secondary School Trip Rates.

The TA also presented the school catchment information in Appendix J, which we requested to be agreed with the local education authority and evidence of this provided. The TAA notes that this is subject to ongoing discussions with the local education authority. **We maintain that there is a requirement for the school catchment to be agreed with the local education authority and evidence provided.**

Trip Distribution/Assignment

We previously requested that trip distribution/ assignment be extended to include:

- A27 Fontwell West Roundabout
- A27 Fontwell East Roundabout
- A27 Causeway Roundabout
- A27 Crossbush Roundabout

We also asked for the calculations supporting trip distribution/ assignment for each land use be provided.

The TAA states trip distribution / assignment has not been extended to adjacent junctions, with the applicant referring to the forecast impact as included within the traffic flow diagrams. The calculations supporting the trip distribution / assignment for each of the three land uses have been reviewed and we note the following:

Residential commuting distribution:

- **We require additional information to understand the source of the percentages for each destination**
- **We require additional information to understand the percentages for each route**

Civic centre distribution:

- **We require additional information to understand the source of the percentages for each destination**
- **We require additional information to understand the percentages for each route**

We also require the trip distribution / assignment to be extended to A27 Fontwell West Roundabout, A27 Fontwell East Roundabout, A27 Causeway Roundabout and A27 Crossbush Roundabout as previously requested.

Committed Development

We previously noted that documentation should be provided from the LPA confirming the committed development to be considered. **This has not been provided within the TAA and should be provided.**

Background Traffic Growth

We previously noted that 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 therefore suggested basing TEMPro assessment on the entire Arun District.

The TAA contains the observed 2018 traffic flows as contained within the Ford Airfield TA (planning reference F/4/20/OUT) and compares those against the observed 2025 traffic flows collected in association with the current planning application.

We have reviewed the specific traffic data presented and note the following:

- The 2018 traffic surveys were undertaken between 2 July and 8 July – it is unclear on which specific day the two SRN junctions were surveyed
- The 2025 traffic surveys were undertaken on Tuesday 1 April
- Our understanding from available data is that April experiences traffic flows below the average and July experiences traffic flows above the average, as shown in the below table obtained from the Ford Airfield TA

Table 1: Average Peak Hour Flows

	Jan	Feb	Mar	April	May	June	July	Aug	Sept	Oct	Nov	Dec	Ave.
AM	547	552	546	326	559	577	592	320	534	562	561	490	514
	106%	107%	106%	63%	109%	112%	115%	62%	104%	109%	109%	95%	
PM	327	322	350	348	349	359	360	364	365	374	329	331	348
	94%	92%	101%	100%	100%	103%	103%	105%	105%	107%	94%	95%	
Daily	4,931	5,035	5,042	4,775	5,382	5,382	5,411	4,954	5,260	5,236	5,266	5,204	5,157
	96%	98%	98%	93%	104%	104%	105%	96%	102%	102%	102%	101%	

Source: WSOC Traffic Data Website

Source: Ford Airfield TA Table 2.1 (i-Transport, October 2018)

We therefore do not concur that it is acceptable or representative to compare the 2018 data with the 2025 data and conclude there has been a reduction in traffic flows.

With reference to the presented data, we also reiterate that we require TEMPro growth factors to be based on the entire Arun District.

Junction Assessment

Based on the presented information we previously noted that 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 TAA does not contain SRN junction assessment. However, the following is presented:

- **A comparison of the Ford Airfield TA traffic flows against the current traffic flows, noting that the current flows are lower and SRN junction**

assessment was not undertaken as part of the Ford Airfield TA – this is not relevant for reasons noted above related to the traffic flows and also considering the implementation of DfT Circular 01/2022

- Reference to observed queue lengths, which refer only to stationary vehicles - we require slow moving vehicles also and require the video files to corroborate this

The finalised SRN assessment locations will be advised following the 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 how the highest 15-minute average queue on each arm is calculated.

At A27 / Yapton Lane priority junction we note there is an improvement 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, with a scheduled completion date of 29 November 2025. The scheme comprises lengthening of the right-turn lane by 110m providing a total length of 220m.

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 March 2026 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.

From: Nicola Spencer on behalf of Planning.Responses
Sent: 18 December 2025 18:46
To: Planning Scanning
Subject: FW: #26151, NH/25/11844 - F/19/25/OUT - Land to the South of Ford Lane - HR - NH response 17/12/25
Attachments: NH2511844_F1925OUT_South_Ford_Lane_HR_171225.pdf

Pl- Consultation- National Highways response

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Improving the wellbeing of Arun

Delivering the right homes in the right places

Supporting our environment to support us

Fulfilling Arun's economic potential

From: Nigel De Wit [REDACTED]
Sent: 17 December 2025 15:38
To: Planning.Responses <Planning.Responses@arun.gov.uk>; Emma Sheppard <Emma.Sheppard@arun.gov.uk>
Cc: Planning SE [REDACTED] Spatial Planning [REDACTED]
[REDACTED] SouthEast_HESPA [REDACTED]
Subject: #26151, NH/25/11844 - F/19/25/OUT - Land to the South of Ford Lane - HR - NH response 17/12/25

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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: #26151, NH/25/11844

Dear Emma,

Since our response dated 16 October 2025, National Highways has been consulted on additional information submitted in support of the above referenced application.

The additional information comprises the Transport Assessment Addendum (27 November 2025) which was shared with National Highways on 2 December 2025.

We have reviewed the additional information in the context of our earlier response.

Please find attached our updated formal National Highways' Planning Response (NHPR) **recommending that planning permission not be granted for a period of three months until 17 March 2026**. 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]

For information about our engagement with the planning system please visit <https://highwaysengland.co.uk/our-work/planning-and-the-strategic-road-network-in-england/>

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