



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 Ms. Emma Sheppard)
planning.responses@arun.gov.uk

CC: [REDACTED]
[REDACTED]

Council's Reference: LU/93/25/PL

Location: Units 5-7 Watersmead Business Park Norway Lane/Worthing Road
Littlehampton BN17 6LS

Proposal: Part demolition, conversion, refurbishment and re-elevation of Units 5 and 6 and construction of retail (food and non-food), leisure and food & beverage units (Use Class E), together with associated car parking, access, loading areas, landscaping and associated works. This application is in CIL Zone 2 and is CIL Liable.

National Highways Ref: NH/25/11385

Referring to the consultation on a planning application dated 29 May 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 [REDACTED].

Signature: [REDACTED]

Date: 4 September 2025

Name: Darren Kirkman

Position: Assistant Spatial Planner

National Highways

Bridge House, 1 Walnut Tree Close, Guildford GU1 4LZ
[REDACTED]

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.

Recommended Non-Approval

It is recommended that the application should not be approved until 4 December 2025; to allow the applicant to address the points set out below.

Reasons

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 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 strategic road network. In particular, the following comments should be passed onto the applicant:

We have reviewed the submitted Technical Note 2.0 'Response to National Highways – Trips & Distribution' (TN2.0). We have reviewed this in the context of our National Highways' Planning Response (NHPR) of 4 June 2025. Please find our comments below:

Proposed Vehicle Trip Generation

Our previous NHPR highlighted that we do not consider the proposed retail vehicle trip rates as appropriate. We (JSJV on behalf of National Highways) found significant variation in the figures compared to those presented by the applicant's consultant. Within TN2.0, the consultant assessed the variation in vehicle trip generation by investigating the differences between their own and our (the JSJV's) TRICS selection parameters.

The main difference in TRICS selection parameters identified by the consultant was the gross floor area range. For ease, the JSJV (on behalf of National Highways) has presented the difference in selection parameters in Table 1 below:

Table 1: TRICS Selection Parameter Comparison

Retail Food Store		
	CC	JSJV
Land Use	Retail / Food superstore (01/A)	Retail / Food superstore (01/A)
Regions	England excluding Greater London	England, Wales and Scotland excluding Greater London
Floor area actual range (Weekday)	1,260 to 14,000 sqm	1,260 to 5,600 sqm
Floor area actual range (Saturday)	850 to 15,950 sqm	1,515 to 4,644 sqm
Location	Edge of Town, Suburban Area, Neighbourhood Centre	Edge of Town, Suburban Area
Surveys (Weekday / Saturday)	10 / 13	4 / 5
Retail Excluding Food		
	CC	JSJV
Land Use	Retail / Retail Park Excluding Food (01/K)	Retail / Retail Park Excluding Food (01/K)
Regions	England excluding Greater London	England, Wales and Scotland excluding Greater London
Floor area actual range (Weekday)	6,790 to 22,300 sqm	6,790 to 11,000 sqm
Floor area actual range (Saturday)	2,809 to 110,000 sqm	1,968 to 4,600 sqm
Location	Edge of Town Centre, Edge of Town, Suburban Area	Edge of Town, Suburban Area
Surveys (Weekday / Saturday)	5 / 12	3 / 4

The main difference between our and the consultant's selection parameters is that we have filtered the floor area, whereas the applicant's consultant has left the floor area at the default value, which includes all surveys regardless of the development size.

We agree that filtering has resulted in a smaller number of surveys included in our analysis; however, we consider these sites to more closely resemble the size of the

proposed development. For example, the consultant's analysis included a survey of a retail park (excluding food) that is 110,000 sqm—102,126 sqm larger than the development proposed as part of the application. We suggest that a site that much larger than the proposal is unlikely to be representative of the trip rate for the proposed development. We do not consider it to be good practice to include all surveyed sites, irrespective of their size, in order to maximise the number of surveys; particularly, the 'TRICS Good Practice Guide 2025' states: "*It is considered better practice to have a lower yet practical number of surveys acceptable to the selection criteria than to have a larger data set that is not*".

We therefore maintain our position that **we do not consider the proposed retail trip rates to be appropriate; they should be revised, or further evidence should be provided to justify the trip rates presented, especially during the Saturday peak period.**

TRICS Filtering

We have reviewed the TRICS summary sheet provided in Appendix 2 of TN2.0 and note that the difference in vehicle trip rates and generation between the consultant's and our analyses is due to the consultant including a survey from Connaught and Ulster in the Republic of Ireland; the selection parameters are otherwise the same.

Consequently, we maintain that the **net traffic generation figures should be amended once the proposed vehicle trip generation has been revised and agreed for all time periods.** In particular, we are mindful that there are no vehicle trips associated with the existing development during the weekend peak periods.

Vehicle Trip Distribution

Our previous response highlighted that the applicant should provide evidence to quantify the impact on the SRN during the weekday and weekend peak periods through appropriate trip distribution and assignment analysis.

The applicant's consultant notes with five existing food stores already serving Littlehampton and Worthing, most food store trips to the new site are expected to substitute trips to existing stores. Additionally, the consultant notes that trips to the non-food elements are expected to originate mainly from within the Littlehampton/Worthing area.

We would reiterate that it is important to understand the potential impact on any part of the SRN. Transferred trips and new trips have the potential to change movement patterns and affect traffic volumes at junctions. Therefore, **it is important for the applicant to provide evidence quantifying the impact on the SRN during both weekday and weekend peak periods through appropriate trip distribution and assignment analysis. Such evidence related to transferred trips particularly, should be supported by the Retail Impact Assessment (RIA).**

Until such time that this information is agreed it will not be possible for us to advise on the need for and form of any analysis relating to the SRN.

Recommendation: that planning permission is not granted for a specified Period

National Highways recommend that the application should not be granted permission for a period extending until **4 December 2025**. This does not fetter the Council's ability, if they so wish, to either refuse the application or agree an extension of time beyond 4 December.

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.

[REDACTED]

National Highways response



Arun District Council, Civic Centre, Maltravers Rd
Littlehampton, West Sussex, BN17 5LF
www.arun.gov.uk

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From: Darren Kirkman [REDACTED]
Sent: 04 September 2025 09:24
To: Emma Sheppard <Emma.Sheppard@arun.gov.uk>
Cc: Planning.Responses <Planning.Responses@arun.gov.uk>; Planning SE
[REDACTED] Spatial Planning [REDACTED]

Subject: National Highways response re (our ref NH/25/11385) LU/93/25/PL Units 5-7 Watersmead Business Park Norway Lane/Worthing Road Littlehampton BN17 6LS

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Dear Emma,

Thank you for your email regarding the above-named application.

We have carried out a review of the information provided, and our comments are set out in the NHPR attached. Our recommendation is that we request the planning authority does not determine the application for a period of three months (until 4 December 2025) to allow the applicant time to address the outstanding issues raised in the attached NHPR.

Thank you for consulting National Highways, please continue to do so via our inbox at
[REDACTED]

Kind regards,

Darren Kirkman, Assistant Spatial Planner
South East Region, Operations Directorate
National Highways

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