



## 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. Kathryn Welch)  
[planning.responses@arun.gov.uk](mailto: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.<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: D.Kirkman**

**Date: 4 June 2025**

**Name: Darren Kirkman**

**Position: Assistant Spatial Planner**

**National Highways**

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

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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.

### **Recommended Non-Approval**

It is recommended that the application should not be approved until 4 September 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:

#### **Proposed Vehicle Trip Generation**

**The Transport Assessment should include a vision for the site prepared in accordance with the requirements of DfT Circular 01/2022 and also set out how the vision will be realised.**

#### **Traffic Generation**

A brief Travel Plan has been submitted with focuses on staff trips. The TRICS selection parameters for retail as are follows:

- Land use category: Retail / Food superstore (01/A);
- Location: Edge of Town, Suburban Area; and
- Actual range: 800 to 3500 sqm.

The proposed development is forecast to generate 318 two-way vehicle trips in the AM peak, 647 two-way vehicle trips in the PM peak and 801 trips in the Saturday peak period.

We have reviewed the proposed trip rates and generation. We believe that the more appropriate retail parameters are as follows:

- Land use category: Retail / Food superstore (01/A);
- Location: Edge of Town, Suburban Area; and
- Actual range: 1260-5600 sqm.

In our forecast the total proposed development generates significantly more vehicle trips compared to the submitted figures, especially in the Saturday peak period. Consequently, we do not consider that proposed retail vehicle trip rates as appropriate, and they should be revised.

**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**

We note that the evidence has not considered the SRN when distributing and assigning vehicle trips from the development onto the network. We have forecast the proposed development to generate 1,320 two-way vehicle trips during the Saturday peak (519 more than the applicant).

**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. This should include showing the development's traffic flows at key SRN junctions: Crossbush Roundabout, A27/Arundel Road junction, and Clapham Interchange.** At such time this information is agreed, it will be possible to advise on the need for and form of any analysis relating to the SRN.

### **Construction Traffic Management Plan**

It can reasonably be expected that construction traffic will impact on the SRN (A27). At an appropriate stage of the planning process, we suggest that National Highways recommends a suitable planning condition in relation to the preparation, approval and adherence to a construction Traffic Management Plan

### **Recommendation: that planning permission is not granted for a specific period**

It is recommended that the application should not be approved until 4 September 2025; unless in the meantime all concerns and requirements raised by National Highways are fully resolved and this Holding Recommendation is replaced. This does not fetter the Council's ability, if they so wish, to refuse the application or agree an extension of time beyond 4 September 2025.

### **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.

Arun District Council, Civic Centre, Maltravers Rd  
Littlehampton, West Sussex, BN17 5LF  
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**From:** Darren Kirkman [REDACTED]  
**Sent:** 04 June 2025 12:10  
**To:** Planning.Responses <Planning.Responses@arun.gov.uk>  
[REDACTED]

**Subject:** National Highways Response re (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 Ms. Welch

Thank you for your email of 29 May 2025 regarding the above-named application.

We have carried out a review of the additional information 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 September 2025) to allow the applicant time to address the outstanding issues raised in the attached NHPR.

Thank you for consulting with National Highways and please continue to consult on other planning applications via our inbox [REDACTED]

Kind regards,

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

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**National Highways Limited** | **General enquiries:** [REDACTED] | **National Traffic Operations Centre, 3 Ridgeway, Quinton Business Park, Birmingham B32 1AF** | <https://nationalhighways.co.uk> | [REDACTED]

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