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

From: Hermes Luli (Head of Planning & Development)
Operations Directorate
South East Region
National Highways
[redacted]

To: Arun District Council (FAO Mr S Davis)
planning.responses@arun.gov.uk

CC: [redacted]

Council's Reference: WA/18/26/PL

Location: Land off Arundel Road, Fontwell

Proposal: Erection of 64 residential dwellings with access off Arundel Road, together with associated parking, open space, play space, landscaping, drainage and infrastructure. This application is a Departure from the Development Plan, affects a Public Right of Way, may affect the setting of listed buildings and is in CIL Zone 3 and is CIL Liable as new dwellings.

National Highways Ref: NH/26/15548

Referring to the consultation on a planning application dated 24 March 2026 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:** 22 April 2026
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 **22 July 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.

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

Traffic impacts

We have reviewed the submitted Transport Assessment (TA) and Travel Plan (TP) dated March 2026.

Given the scale and location of the proposal and the likely trip generation and distribution, we are satisfied that this development, if permitted, would not have a material impact on the reliability and operational efficiency of the SRN.

Drainage

The government's policy for the SRN is the Department for Transport Circular 01/2022: https://www.gov.uk/government/publications/strategic-road-network-and-the-delivery-of-sustainable-development/strategic-road-network-and-the-delivery-of-sustainable-development.

Circular 01/2022 is clear that to ensure the integrity of the highway drainage systems, no new connections into those systems from third party development and proposed drainage schemes will be accepted [para.59]. Furthermore, no surface water shall be

allowed to run-off from developments on to the SRN in the interest of protecting the safety of the SRN and its users.

We have reviewed the Flood Risk Assessment and Drainage Strategy (ref: 33186/CS, March 2026).

The proposed drainage strategy is to utilise porous paving throughout the development leading to discharge to an infiltration basin at the southeastern limits of the site.

We require the Flood Risk Assessment and Drainage Strategy to include Overland Flow Exceedance Routes. This additional information is required to demonstrate that the SRN would not be at risk during severe storm events.

Other matters
Given the proximity of the site to the SRN, we are minded at the appropriate stage in the planning process to recommend conditions in respect of a Construction Environmental Management Plan and drainage.

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 22 July 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.

[redacted]

From: Elaine Walby on behalf of Planning.Responses
Sent: 22 April 2026 17:16
To: Planning Scanning
Subject: FW: NH/26/15548 - WA/18/26/PL - Land off Arundel Road - HR - NH response 22/04/26
Attachments: NH2615548_WA1826PL_Arundel_Road_Fontwell_HR_220426.pdf

PL- Consultation- National Highways response

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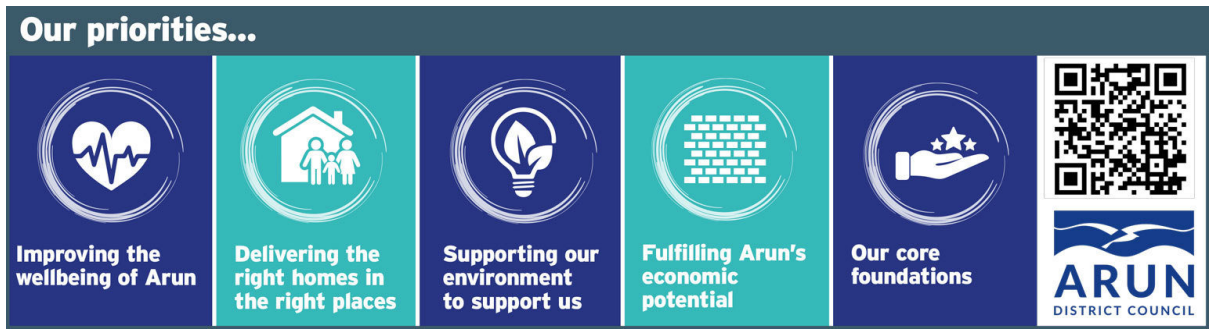

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From: Nigel De Wit [redacted]
Sent: 22 April 2026 15:05
To: Planning.Responses <Planning.Responses@arun.gov.uk>; Simon Davis <Simon.Davis@arun.gov.uk>
Cc: Planning SE [redacted] Spatial Planning <[redacted] PHILP Alan [redacted] SEDrainage [redacted]
Subject: NH/26/15548 - WA/18/26/PL - Land off Arundel Road - HR - NH response 22/04/26

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For Attention of: Mr S Davis, Arun District Council

Your Reference: WA/18/26/PL - Land off Arundel Road, Fontwell

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Our Reference: NH/26/15548

Dear Mr Davis,

Thank you for your email of 24 March 2026 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 22 July 2026**. This is to provide time for the applicant to resolve the action point in the NHPR.

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 matter.

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]
Web: http://www.nationalhighways.gov.uk

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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