

From: **Nigel De Wit** <Nigel.DeWit@nationalhighways.co.uk>
Date: Fri, 25 Jul 2025 at 17:36
Subject: NH/25/12055 - AWDM/0761/25 - Unit 1 Red Square Retail Park 194 Sompting Road Worthing - HC - NH response 25/07/25
To: Planning - <planning@adur-worthing.gov.uk>
Cc: Planning SE <planningse@nationalhighways.co.uk>, Spatial Planning <SpatialPlanning@nationalhighways.co.uk>, transportplanning <transportplanning@dft.gov.uk>

For Attention of: Louise Prew, Adur & Worthing Councils

Your Reference: AWDM/0761/25 - Unit 1 Red Square Retail Park 194 Sompting Road Worthing

Proposal: Advertisement Consent for freestanding internally illuminated digital billboard

Our Reference: NH/25/12055

Dear Louise,

Thank you for your email of 15 July 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.

In terms of advertisements, our focus is on the impact of the proposal on the safety of the users of the SRN. This is made very clear in the [Department for Transport Circular 01/2022](#) (Strategic road network and the delivery of sustainable development) at para.61, which states (our emphasis):

*61. The company will not object to proposals for advertising consent for displays outside of the highway boundary of the SRN **unless it has specific reason to consider that a road safety hazard resulting from driver distraction would be a direct consequence of the advertisement.** The company will particularly **consider whether distraction is heightened owing to factors such as size, luminance and the accumulation of advertisements.** These factors could present a safety concern for advertisements that are located where particular attention should be given to the driving task, or where the advertisement incorporates elements of traffic sign design, such as directional arrows.*

This policy position also features in the National Planning Policy Framework (NPPF) (December 2024) at para.141.

We would also refer you to the [Planning Practice Guidance \(PPG\) on advertisements](#), which highlights the risks associated with illuminated signs:

What are the main types of advertisement which may cause danger to road users?

The main types of advertisement which may cause danger to road users are:

(d) those externally or internally illuminated signs (incorporating either flashing or static lights) including those utilising light emitting diode technology:

- i. where the means of illumination is directly visible from any part of the road;*
- ii. which, because of their colour, could be mistaken for, or confused with, traffic lights or any other authorised signals;*
- iii. which, because of their size or brightness, could result in glare and dazzle, or distract road-users, particularly in misty or wet weather; or*
- iv. which are subject to frequent changes of the display.*

The PPG also highlights the types of advertisement which may cause danger to road users:

What are the main types of advertisement which may cause danger to road users?

The main types of advertisement which may cause danger to road users are:

(d) those externally or internally illuminated signs (incorporating either flashing or static lights) including those utilising light emitting diode technology:

- i. where the means of illumination is directly visible from any part of the road;*
- iii. which, because of their size or brightness, could result in glare and dazzle, or distract road-users, particularly in misty or wet weather; or*
- iv. which are subject to frequent changes of the display;*

(e) those which incorporate moving or apparently moving elements in their display, or successive individual advertisements which do not display the whole message;”

We understand that the applicant is seeking advertisement consent for a freestanding internally illuminated digital billboard.

We have reviewed the submitted details in the context of national policy and practice guidance. We are mindful of the proximity of the sign to the SRN (A27) and the light-controlled junction.

At present, insufficient information has been submitted for us to assess the impact of the proposal on the safety of the users of the SRN.

We require the applicant to submit the following information to the council for consultation with National Highways as the highway authority for the A27:

- **Technical approval certification in accordance with the Design Manual for Roads and Bridges (DMRB) document CG 300.** This is necessary to demonstrate that the proposed structure has been designed to appropriate standards by a qualified designer.
- **Safety Risk Assessment (SRA) in accordance with DMRB document GG 104.** There are reasonably foreseeable safety risks associated with the provision of the sign specified and therefore we require a completed GG 104 safety risk assessment to assure that these risks are being managed suitably and sufficiently for the continued safe operation of the A27 at this location. Further guidance on SRAs is available from our website: <https://nationalhighways.co.uk/suppliers/health-safety-and-wellbeing/home-safe-and-well/requirements-for-safety-risk-assessment/>. We have attached a template report that could be used to prepare the SRA.
- **STATS 19 Collision Analysis for the most recent five-year period.** This is required to understand the extent to which collisions have occurred at this location.

Given the size and proximity of the proposed advertisement sign to the A27, we would expect the applicant to follow the 'Managing Geotechnical Risk' process set out in the DMRB document CD 622. This is a matter that could be dealt with through an appropriately worded pre-construction condition, subject to the outcome of our review of the additional information requested above.

We **recommend that the application is not determined for a period of three months until 24 October 2025**. This is to allow time for the applicant to submit the additional information outlined in this email and for National Highways to review the information and assess the impact of the proposal on the safety of the users of the SRN (A27).

Should you or any others have any queries regarding our response, please contact us via planningse@nationalhighways.co.uk.

Kind regards,

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