



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

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To: Folkestone & Hythe District Council (Planning Validation Team)
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CC: transportplanning@dft.gov.uk
spatialplanning@nationalhighways.co.uk

Council's Reference: 25/2010/FH

Location: Land at the Junction of Aerodrome Road & Spitfire way, Hawkinge

Proposal: Outline planning application with all matters reserved (except access from Spitfire Way) for the erection of up to 110 homes and 500sqm of commercial retail uses (Class E) with associated access, landscaping, public open space, drainage, infrastructure and engineering works.

National Highways Ref: NH/25/13717

Referring to the consultation on a planning application dated 31 October 2025 referenced above, in the vicinity of the A20 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 transportplanning@dft.gov.uk 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 PlanningSE@nationalhighways.co.uk.

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: 	Date: 01 December 2025
Name: Bidur Rajbhandari	Position: Assistant Spatial Planner
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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.

¹ Where relevant, further information will be provided within Annex A.

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 **2 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 A20 at Junction A20/A260.

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:

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

Policy Context

The TA includes reference to National Planning Policy Framework [NPPF] (Ministry of Housing Communities and Local Government, December 2024). **The TA should include specific reference to paragraph 118 of NPPF which highlights the requirement for developments which generate significant amounts of traffic to be provided with a Travel Plan and to be vision-led.**

The TA should also refer to and adhere to Department for Transport (DfT) Circular 01/2022

Transport Vision

The TA should include a vision statement which notes the key transport related outcomes which the development is seeking to achieve, including reducing the need to travel and encouraging transport by sustainable transport modes.

The TA should state how the aims of the transport vision align with the requirements of DfT Circular 01/2022.

The TA should include details of measures which are proposed to achieve the aims of the vision.

Personal Injury Accident Data

The TA does not contain any Personal Injury Collision (PIC) for any locations on the SRN. **There is a requirement for collision analysis to be undertaken at the A20 / A260 junction, with the coverage including the A20 eastbound off-slip together with the A260 Spitfire Way / White Horse Hill / A20 eastbound on/off slips roundabout.**

Existing Traffic Data

The typical traffic conditions from Google Maps indicate that the north roundabout at the A20 / A260 junction experiences queueing during the AM and PM peak hours. The resulting queueing on the A20 eastbound off-slip is seen to extend near to the mainline during both AM and PM peak periods.

Capacity assessment is required at the A260 Spitfire Way / White Horse Hill / A20 eastbound on/off slips roundabout. The TA does not contain existing traffic data at any SRN junction, there is a requirement for PM peak hour traffic turning count and queue data to be collected at the A260 Spitfire Way / White Horse Hill / A20 eastbound on/off slips roundabout.

The queue survey should accurately record the back of the queue on each arm of the roundabout, noting that slow moving traffic on the approach to the roundabout is classed as a queue in accordance with Junctions outputs. Given the sensitivity of the A20 off-slip queueing location, we would expect a video survey to be undertaken and the video files should be provided to National Highways for review.

Trips Rates and Trip Generation

TRICS data associated with the residential development is concluded to be acceptable as pre-vision trip rate data. **In accordance with the requirements of NPPF and Circular 01/22, the assessment should be vision-led and therefore the assessment trip rates should reflect the impact of those measures which are proposed to achieve the aims of the vision.**

The commercial unit trip rates have been obtained from the TRICS database version 8.25.6, however we note that the trip rates presented in TA Table do not align with the trip rates contained within Appendix F of the TA. We also note the trip generation calculation shown has been undertaken based on 400sqm of commercial retail rather than 500sqm as stated in the planning application details.

We do not expect primary trips associated with the commercial unit to travel on the SRN. Therefore, in terms of the SRN the anomalies are immaterial.

Trip Distribution/Assignment

We acknowledge we previously accepted the residential trip distribution and assignment contained within TS (Application 23/1972/FH) and the TA has provided a consistent distribution and assignment.

The TA has only presented turning movements at the site access. However, with reference to the trip distribution / assignment contained within the previous TS, it is seen that that 53% of residential trips would travel to and from the A20 west. This is estimated to result in 25 vehicles travelling from the A20 eastbound to the development during the PM peak hour. **Given the current performance of the A20 eastbound off-slip, this is considered to necessitate assessment at the A260 Spitfire Way / White Horse Hill / A20 eastbound on/off slips roundabout.**

The residential trip distribution and assignment should be presented to the SRN, demonstrating the trip generation forecast at each movement at the A20 / A260 junction.

Assessment of Proposed Development Impact

The TA currently contains site access assessment which is undertaken at 2030.

In accordance with the requirements of DfT Circular 01/2022, there is a requirement for SRN assessment to be undertaken at 2037 which is the end year of the Core Strategy Review.

Committed Development/Schemes

We acknowledge the TA has maintained the committed development assumptions which were contained within the earlier TS, as follows:

- Land off Aerodrome Road (Monks Farm) 110 dwellings – Plan Ref 21/2552/FH
- Otterpool Park Garden Village – Plan Ref 19/00257/FH 27

Given the passage of time, the committed development assumptions should be clarified with the LPA, with correspondence provided to National Highways for review.

Background Traffic Growth

The background traffic growth within the TA has been forecast using TEMPro version 8.1, with Shepway 002 mid-layer super output area (MSOA), the core scenario and factoring from 2023 to 2030. With the exception of the assessment year, this approach is confirmed to be acceptable. **The assessment year which National Highways requires in accordance with DfT Circular 01/2022 is 2037.**

Where committed development is located both within the Core Strategy Review and within Shepway 002 MSOA then 'alternative assumptions' may be considered subject to full justification of the assumptions adopted.

Traffic Flow Diagrams

The presented traffic flow diagrams should be extended to include the A20 / A260 junction.

Junction Assessment

The TA does not currently contain assessment of any SRN junction. As noted above, from consideration of the forecast impact at the A20 / A260 junction, there is a requirement for PM peak hour assessment at the A260 Spitfire Way / White Horse Hill / A20 eastbound on/off slips roundabout.

With regard to the junction modelling, we can advise the following:

- **assessment should be undertaken using Junctions software**
- **assessment scenarios are to be in accordance with DfT Circular 01/22**
- **model input geometry at each location should be justified via CAD PDF**
- **the 2025 base model should be calibrated against observed queues using the 'direct intercept' adjustment**
- **the calibration 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 the how the highest 15-minute average queue on each arm is calculated**
- **where necessary to achieve satisfactorily calibrated models, the model may be split to both AM and PM model**

Travel Plan Review

The TP includes the following stated objectives:

- To encourage lower car ownership at the development through the provision of sustainable travel information to residents.
- To maintain a high awareness of the sustainable transport options available amongst residents and visitors which will be maintained for the duration of the TP.
- To increase the health of all users of the site by increasing the proportion of active travel (i.e., walking and cycling).
- To encourage less reliance on the car, wherever practical, particularly for drive-alone journeys and short distance journeys, that could practically be undertaken by walking, cycling or public transport.
- To engage residents in critical thinking regarding their travel choices.

We note that the TP contains a target that there will be a 10% reduction in single occupancy car journeys mode share after five years when compared against the Census 2011 mode share.

The measures and initiatives include marketing of the TP, specific measures to reduce single occupancy car travel and measures to encourage travel by walking, cycling, lift sharing and public transport. It is noted the TP does not include additional physical measures off site, in particular walking or cycling infrastructure or public bus service improvements. **To achieve the target mode share we would expect off-site physical measures to be provided.**

The TP includes for monitoring to be undertaken annually, together with setting targets and identifying the needs for additional measures to be considered. **There is a need for firm financial commitments to support the objectives of the TP. This needs to be provided within the TP document.**

CTMP Requirements

Given the location of the proposed development site, we are likely to recommend that a Construction Traffic Management Plan (CTMP) be secured via planning condition at the appropriate stage of the planning process.

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 to 116 etc 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.