National Highways Planning Response (NHPR 24-02)
Formal Recommendation to an Application for Planning Permission

From: Christine Allen (Regional Director)
Operations Directorate
South East Region
National Highways
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To: Adur & Worthing Councils (FAO Gary Peck)
planning@adur-worthing.gov.uk

CC: transportplanning@dft.gov.uk
spatialplanning@nationalhighways.co.uk

Council's Reference: AWDM/1482/24

Location: 6 Old Shoreham Road, Lancing, West Sussex BN15 0QT

Proposal: Full Planning Application following on from approved application reference AWDM/0337/18 (Demolition of fire damaged dwelling and erection of a replacement 5-bedroom dwelling at 4 Old Shoreham Road, retention of existing dwelling at 6 Old Shoreham Road and erection of 2 no. 4-bedroom dwellings. Closure of existing site access from A27 roundabout and creation of a new access road from Old Shoreham access road and associated vehicle parking and landscaping) for the erection of 2no 4-bedroom semi-detached replacement dwellings instead of the consented 1no 5-bedroom detached dwelling at 4 Old Shoreham Road.

Application to vary Condition 4 of approved AWDM/1802/19 to read:

> No part of the development hereby permitted, shall be occupied until the necessary traffic regulation order to implement the waiting restrictions at the junction Old Shoreham Road with Manor Way shown on Civil Engineering Practice's Drawing No. 120 "Proposed Site Access Arrangement and A27 Access Alterations" dated April 2018 has been made and approved and the local planning authority have obtained confirmation in writing from the local highways authority that they are in a position to implement the waiting restriction.

National Highways' Ref: NH/24/08894

Referring to the consultation on a planning application dated 21 November 2024 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 not propose 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.

Signature: [redacted]	**Date:** 10 December 2024
Name: Elizabeth Cleaver	**Position:** Assistant Spatial Planner
National Highways: Bridge House, 1 Walnut Tree Close, Guildford, GU1 4LZ	

[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.

We will therefore be concerned with proposals and policies that have the potential to impact the safe and efficient operation of the SRN, in the case of this proposal, particularly the A27.

Recommended Non-Approval

National Highways recommend that the application should not be granted for a specified period expiring **10 March 2025**.

Reason

This application seeks to vary the trigger point of Condition 4 of approved AWDM/1802/19 which requires confirmation in writing that the Local Highway Authority is in a position to implement waiting restrictions at the junction of Old Shoreham Road with Manor Way shown on Civil Engineering Practice's Drawing No. 120 "Proposed Site Assess Arrangement and A27 Access Alterations" dated April 2018. Condition 4 requires this confirmation prior to commencement of any part of the development, except for the demolition of the existing dwelling. The application wishes to amend the trigger point for the confirmation to prior to occupation of the development. However, Condition 5 of approved AWDM/1802/19 requires that prior to occupation, the waiting restriction is implemented.

The waiting restriction was required as a result of a Stage 1 Road Safety Audit. National Highways needs to have confidence that the waiting restriction will be implemented prior to occupation of the development, and in order to have this confidence, we require confirmation from the Local Highway Authority that there is no impediment to the necessary Traffic Regulation Order being approved and implemented.

Accordingly, we would be prepared to accept amended wording requiring that the Local Highway Authority confirm in writing that the necessary Traffic Regulation Order has been applied for and they are not aware of any reason why the TRO will not be approved prior to commencement of any part of the development except for the demolition of the existing dwelling. For example -

No part of the development hereby permitted, except for the demolition of the existing dwelling, shall commence until the local planning authority have obtained confirmation in writing from the local highway authority that the necessary traffic regulation order to implement the waiting restrictions at the junction Old Shoreham Road with Manor Way shown on Civil Engineering Practice's Drawing No. 120 "Proposed Site Access Arrangement and A27 Access Alternations" dated April 2018, has been submitted for approval and the local highway authority are not aware of any reason why the necessary traffic regulation order for the waiting restriction will not be approved.

Please can you advise whether your Planning Authority and the applicant would accept our proposed alternative wording?

National Highways recommend that the application should not be granted permission for a period extending until **10 March 2025** unless in the meantime all queries 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 either refuse the application or agree an extension of time beyond 10 March 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 74 and 109 prescribing that significant development should offer a genuine choice of transport modes, while paragraphs 108 and 114 advise that appropriate opportunities to promote walking, cycling and public transport should be taken up.

Moreover, the build clever and build efficiently criteria as set out in clause 6.1.4 of PAS2080 promote the use of low carbon materials and products, innovative design solutions and construction methods to minimise resource consumption.

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.