



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

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[spatialplanning@nationalhighways.co.uk](mailto:spatialplanning@nationalhighways.co.uk)

**Council's Reference:** AWDM/0706/25

**Location:** 74 Old Shoreham Road and land South of 72 to 88A Old Shoreham Road, Lancing, West Sussex

**Proposal:** Demolition of existing bungalow at 74 Old Shoreham Road to enable access to land to the rear for the construction of nine dwellings along with associated infrastructure

**National Highways Ref:** NH/25/12134

Referring to the consultation on a planning application dated 21 July 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 [transportplanning@dft.gov.uk](mailto: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](mailto: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:** 11 December 2025

**Name:** Nigel De Wit

**Position:** Spatial Planner

**National Highways**

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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.

### **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 one month until **12 January 2026**.

This recommendation can be replaced, renewed, or reviewed during the one-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.

Since our response dated 11 September 2025, we have reviewed further submissions from the applicant including in relation to the Road Safety Audit and Departure from Standards.

The key SRN matters relate to the proposed new access off the service road and the intensification of use of the service road/A27 access/egress points.

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

The key issues in this case relate to the proposed new access off the service road and the intensification of use of the service road/A27 access/egress points.

### **Collision Analysis**

As highlighted in our previous response, there are no further matters to be addressed in this regard.

### **Service Road**

#### *Traffic Regulation Order (TRO)*

The proposal includes formalising the service road to allow only one-way movements. The western access is intended to serve vehicles accessing the A27 Old Shoreham Road, while the eastern access will accommodate vehicles entering the service road. We acknowledge that appropriate traffic signs and road markings will be implemented to facilitate this arrangement.

Nonetheless, a TRO will be required to establish a one-way street and restrict parking. We can confirm that the TRO process may be carried out post determination of the application. However, failure of the TRO process for any reason (e.g. a valid objection during the TRO consultation) could lead to mitigation works being undeliverable and access to the proposed development unachievable. At the appropriate stage in the planning process, we will recommend a condition requiring the completion of the TRO process prior to the commencement of development.

#### *Departure from Standards*

The A27 Old Shoreham is subject to a 40 mph speed limit, which, according to DMRB CD 109 Table 2.5 results in a 70 kph design speed. CD 109 Table 2.10, highlights that the 70 kph design speed has a desirable minimum Stopping Sight Distance (SSD) of 120m. As requested by National Highways, a speed survey has been undertaken by the applicant and included within Appendix E of the Transport Statement (TS), concluding that the A27 westbound 85<sup>th</sup> percentile speed is 45 mph. Visibility splay based on the 85% speed is acceptable for direct accesses and priority junctions that do not form part of a through route on existing major roads (clause 3.5 (3) DMRB CD 123).

The TS highlights that the observed speed of 45 mph equates to a desirable minimum SSD of 140m in accordance with Table 2.10 of CD 109. Drawing 2023/7464/001 Rev P7 illustrates the visibility splay to the right, with a set-back of 2.4m and a 'Y' distance of 128m following vegetation clearance. The TS notes that while the 128m falls short of the 140m, it is in excess of the 'one step below desirable minimum' of 105m. However, CD 109 para. 2.13 states that relaxations below desirable minimum SSD shall not be used on immediate approaches to junctions.

A departure application submitted in relation to the above has been reviewed by National Highways and has been given Provisional Agreement. The principle of the departure is acceptable and is likely to be approvable if supported by sufficient justification as part of a full departure application. Provisional Agreement does not preclude later return for rework or even rejection where the departure does not include sufficient justification.

## **Site Access**

As highlighted in our previous response, there are no further matters to be addressed in this regard on the proviso that parking restrictions are required to ensure manoeuvres can be undertaken.

## **Stage 1 Road Safety Audit (RSA)**

Whilst the RSA Stage 1 process is largely complete, additional time is required for National Highways to finalise certain procedural matters. This is expected to be carried out imminently.

## **Walking, Cycling and Horse-riding Assessment and Review (WCHAR)**

An updated Walking, Cycling and Horse-riding Assessment and Review (WCHAR) undertaken in accordance with DMRB GG142 has been reviewed.

**As required by DMRB GG 142, the WCHAR needs to be amended to include an explanation of why the study area has not been extended by 1 km from the site.**

## **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 one-month until 12 January 2026 to allow the applicant to resolve the outstanding matters.**

This recommendation can be replaced, renewed, or reviewed during the one-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.