



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

From: Michelle Berrington (Head of Planning & Development)  
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To: Adur & Worthing Councils (FAO Peter Barnett)  
[planning@adur-worthing.gov.uk](mailto:planning@adur-worthing.gov.uk)

CC: [transportplanning@dft.gov.uk](mailto:transportplanning@dft.gov.uk)  
[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 August 2025

**Name:** Nigel De Wit

**Position:** Spatial Planner

**National Highways**

**Bridge House, 1 Walnut Tree Close, Guildford, Surrey, GU1 4LZ**

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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 three months until **11 November 2025**.

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.

At the time of our review of this application no Transport Statement had been submitted. The Design & Access Statement includes limited information in relation to transport matters.

We have noted that the Transport Statement (TS) (July 2025) was only uploaded to the planning application webpage on 6 August 2025.

We have no record of being consulted on the TS.

We have had insufficient time to review and process the TS. As such, our comments below do not take account of the TS.

### **Site Access**

The applicant should confirm as part of the planning application as to why access cannot be obtained via Marsh Barn Lane on the local road network.

The applicant is required to provide detailed information of the proposed highway arrangement that will serve the development. The proposal needs to be in accordance with the Design Manual for Roads and Bridges (DMRB) CD 123 requirements.

The applicant shall demonstrate that service and emergency vehicles can access and egress the new access safely from the A27. Thus, a swept path analysis shall be undertaken to the proposed development access with the service and emergency vehicles.

The RSA Stage 1 process will need to be satisfactorily completed in accordance with DMRB GG119.

A Walking, Cycling, and Horse-Riding Assessment and Review (WCHAR) is required in accordance with DMRB GG 142.

## **Transport Statement**

Our review of the submitted TS will focus on:

- Compliance with the Department for Transport (DfT) Circular 01/2022.
- Existing site information, including but not necessarily limited to site location plan, existing use/consent for the site, existing site access arrangements.
- Baseline traffic data, including but not necessarily limited to accident analysis for the latest 5-year period for which data is available; details of existing road, pedestrian and cyclist movements/provision; existing public transport provision.
- Proposed development information, including but not necessarily limited to development land use/quanta, means of access; vehicle and person trip generation forecast, vehicle trip distribution/assignment, proposed improvements in relation to sustainable modes, parking and servicing.

## **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 11 November 2025 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.