



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

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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 September 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 three months until **11 December 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.

Since the submission of our response dated 11 August 2025, we have reviewed the submitted Transport Statement (TS) (ref: 2023/7464/TS02, July 2025).

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**

The TS contains personal injury accident (PIA) data which has been obtained from Sussex Safer Roads Partnership (SSRP) for the five-year period up till the end of 2024. The collision analysis has concluded that there is no existing significant safety concern with the existing road layout, we agree with this conclusion.

### **Service Road**

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 **Traffic Regulation Order (TRO) will be needed to establish a one-way street and restrict parking.**

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 a stopping sight distance (SSD) of 120 meters. As requested by NH, a speed survey has been undertaken by the applicant and included within Appendix E of the 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 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 2.4 meters and a 'Y' distance of 128 meters 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. **Therefore, in association with this there will be a requirement to apply for approval for departure from standards.**

### **Site Access**

The access to the proposed development is planned to be from the service road adjacent to the site, passing through the site of the existing 74 Old Shoreham Road bungalow. Measurements taken from the earlier provided CAD file indicate that the service road has a width of 4.7 meters, while the proposed access will be 5.5 meters wide.

The TS includes sweptpaths for fire tender, refuse vehicle and standard car, highlighting the manoeuvre from the A27 being particularly tight for both the fire tender and the refuse vehicle. While the manoeuvres can be undertaken there is minimum clearance from the kerb and the full width of the service road is required to be used. We accept this but note that parking restrictions are required to ensure the manoeuvres can be undertaken.

### **Stage 1 Road Safety Audit**

The Stage 1 Road Safety Audit has been provided, and we note the following:

- It is recommended to introduce and enforce double yellow line parking restrictions along the Service Road, for the purpose of ensuring both the fire tender and refuse truck can access the new site access – this is shown on the latest drawing

- It is recommended to provide a sign on the service road to instruct drivers to turn left – this is shown on the latest drawing
- It is recommended to provide a cycle route ahead sign on the approach to the service road – this is shown on the latest drawing
- It is recommended to provide a visibility splay which reflects the 85<sup>th</sup> percentile speed on the A27 westbound carriageway – the desirable minimum as required by DMRB has not been achieved

As noted above, a TRO will be needed in order to restrict parking. There is a requirement for the RSA1 process to be satisfactorily completed.

## WCHAR

The Walking, Cycling and Horse-riding Assessment and Review (WCHAR) undertaken in accordance with GG 142 and included within Appendix D of the TS has been reviewed and we note the following:

- The study area has been reviewed – this is seen to not be centred on the site – study area should be extended to the east of the site along the A27
- The site access is stated to be ‘where the road transitions from a single two-way carriageway to a dual carriageway’ - this should be clarified as the A27 is dual carriageway at the site access
- The single carriageway is stated to be 60m to the west from the site access, our understanding is that it is approximately 450m to the west
- Speed limit at site access is stated to be 60mph, our understanding is that it is 40mph
- Text under ‘surrounding highway network’ heading should be fully reviewed and updated as this does not refer to the site, it appears to refer to another site location
- Reference is made to the A27 toucan crossing, please include reference to this being 350m west of the site access
- We note the unofficial linkages between the Leisure Centre car park and the A27
- We note the encroachment of organic material onto the footway
- We note the bus stop access issues and the uncontrolled crossing
- We note the potential lack of clarity regarding cycle and pedestrian signage
- We note the concern with the existing uncontrolled crossing of A2025 Grinstead Lane
- A number of measures are proposed to improve pedestrian and cycle facilities around the site and these will be considered as part of the design process.

## 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 December 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.