



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

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To: Adur & Worthing Councils (FAO Louise Prew)
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CC: transportplanning@dft.gov.uk
spatialplanning@nationalhighways.co.uk

Council's Reference: AWDM/1270/25

Location: Lyons Farm Retail Park, Lyons Way, Worthing, West Sussex

Proposal: Erection of a new retail unit (Class E)

National Highways Ref: NH/26/15763

Referring to the consultation on a planning application dated 08 April 2026 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

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

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: 29 April 2026

Name: Nigel De Wit

Position: Spatial Planner

National Highways

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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.

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 **29 July 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 the A27.

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

Structures – gabion wall

The proposed unit is in proximity of the SRN. It includes a gabion wall at the perimeter of the site adjacent to the boundary of the SRN.

We require further information from the applicant to demonstrate the structural integrity of the gabion wall and assurances of the safety risks.

The designer should refer to the Design Manual for Roads and Bridges (DMRB) CG 300 to determine whether any proposed structure on our network is within the scope of the standard, and to propose to National Highways the category of check: <https://www.standardsforhighways.co.uk/search/042f72af-d5e7-4b60-8229-eaeb7e36ab91>.

Based on the designer's proposals, National Highways safety team will then be able to further advise on the documentation required to confirm that the structures are structurally sound, present no risk to public safety, and have been designed in accordance with the appropriate standards.

Safety Risk Assessment

Based on the information provided we are not assured of the suitable and sufficient management of safety risks presented from the construction of a gabion wall in proximity to the SRN. These are primarily structural integrity and risk of collapse, and the likely change in an outcome of a road user collision with the proposed wall. There may also be a short-term traffic management impact on the SRN during construction activities.

Assurance of these safety risks should be fulfilled by the completion of a Safety Risk Assessment (SRA) in compliance with the requirements of DMRB GG 104: <https://www.standardsforhighways.co.uk/search/6393d1c9-31da-4675-b1b8-c43703409f1e>.

Further guidance on the role of SRAs and their preparation is available from our website: <https://nationalhighways.co.uk/suppliers/health-safety-and-wellbeing/home-safe-and-well/requirements-for-safety-risk-assessment/>.

Other matters (geotechnical, drainage, construction environmental management plan)

Given the proximity of the development proposal to the SRN, including the gabion wall, we are minded at the appropriate stage of the planning process to recommend conditions in respect of geotechnical works, drainage, and a construction environmental management plan. No surface water shall be allowed to run off from the development on to the SRN (A27) or into the highway drainage system in the interest of safety of the SRN, as required by the Department for Transport Circular 01/2022.

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 29 July 2026 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.