



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

From: Hermes Luli (Head of Planning & Development)  
Operations Directorate  
South East Region  
National Highways  
[REDACTED]

To: Arun District Council (FAO Mr S Davis)  
[planning.responses@arun.gov.uk](mailto:planning.responses@arun.gov.uk)

CC: [REDACTED]  
[REDACTED]

**Council's Reference:** P/31/26/OUT

**Location:** Land north of Summer Lane, Pagham

**Proposal:** Outline application with some matters reserved, except access, for up to 130 no. residential dwellings including means of access into the site (not internal roads). This application is a Departure from the Development and affects a Public Right of Way.

**National Highways Ref:** NH/26/15544

Referring to the consultation on a planning application dated 23 March 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.<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 [REDACTED] 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 [REDACTED].

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 [REDACTED].

**Signature:** [REDACTED]

**Date:** 22 April 2026

**Name:** Nigel De Wit

**Position:** Spatial Planner

**National Highways**

**Ground Floor, Building 1000, Cathedral Square, Guildford, GU2 7YL**

[www.nationalhighways.co.uk](http://www.nationalhighways.co.uk)

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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 conditions should be attached to any planning permission that may be granted: Reasons**

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.

Given the scale and location of the proposal and the likely trip generation and distribution, we are satisfied that this development, if permitted, would not have a material impact on the SRN.

We envisage the SRN being a likely route for construction traffic and we have therefore recommended a condition for a Construction Traffic Management Plan be attached to any planning consent granted at the site.

Having assessed application P/31/26/OUT, we are content that the proposal, if permitted, would not have an unacceptable impact on the safety, reliability, and/or operational efficiency of the Strategic Road Network in the vicinity of the site (A27) provided that the following condition is imposed, reflecting DfT Circular 01/2022 and NPPF 2024 paras. 115-118.

#### **1.      Construction Traffic Management Plan**

**Condition:** Prior to the commencement of the development hereby permitted a comprehensive Construction Traffic Management Plan (CTMP) shall be submitted to and approved in writing by the Local Planning Authority. The CTMP shall include as a minimum:

- Routing plans for construction and delivery vehicles
- Construction traffic arrival and departure times – avoiding network peaks where possible
- Management of loose loads
- Cleaning of construction vehicles on-site

Thereafter all construction traffic activity in respect of the development shall be undertaken in full accordance with such approved details unless otherwise approved in writing by the Local Planning Authority.

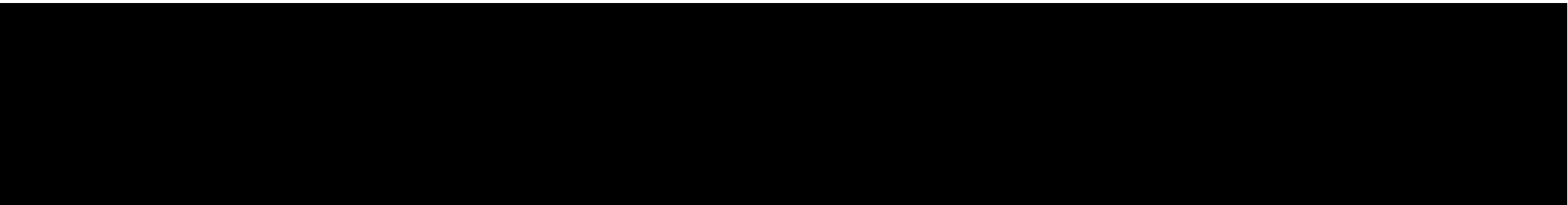
**Reason:** To mitigate any adverse impact from the development on the A27 in accordance with DfT Circular 01/2022.

### **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.

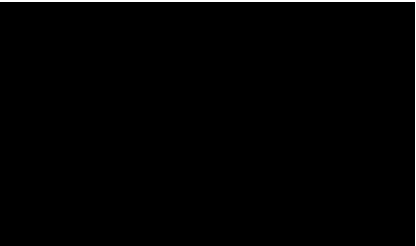
Moreover, the carbon reduction hierarchy (avoid-switch-improve) as set out in clause 4.3 of PAS2080:2023 promotes approaches and measures to minimise resource consumption and thereby reduce carbon emissions.

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.



PL- Consultation- National Highways response

P/31/26/OUT



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**From:** Nigel De Wit [REDACTED]  
**Sent:** 22 April 2026 09:55  
**To:** Planning.Responses <Planning.Responses@arun.gov.uk>; Simon Davis <Simon.Davis@arun.gov.uk>  
**Cc:** Planning SE [REDACTED] Spatial Planning [REDACTED] [REDACTED]  
[REDACTED] JONES Derek [REDACTED]  
**Subject:** NH/26/15544 - P/31/26/OUT - Land north of Summer Lane - RC - NH response 22/04/26

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**For Attention of:** Mr S Davis, Arun District Council

**Your Reference:** P/31/26/OUT - Land north of Summer Lane, Pagham

**Proposal:** Outline application with some matters reserved, except access, for up to 130 no. residential dwellings including means of access into the site (not internal roads). This application is a Departure from the Development and affects a Public Right of Way.

**Our Reference:** NH/26/15544

Dear Mr Davis,

Thank you for your email of 23 March 2026 consulting National Highways regarding the above referenced application.

We are concerned about the safety, reliability, and operational efficiency of the Strategic Road Network (SRN), in this case the A27 in the vicinity of the site.

We have reviewed the application and submitted documents.

Please find attached our formal National Highways' Planning Response (NHPR) **recommending a condition (Construction Traffic Management Plan) be attached to any planning permission that may be granted.**

Should you or any others have any queries regarding our response, please contact us via [REDACTED]

Kind regards,

**Nigel De Wit MRTPI**, Spatial Planner  
South East Region, Operations Directorate  
National Highways



**Web:** <http://www.nationalhighways.gov.uk>

For information about our engagement with the planning system please visit <https://highwaysengland.co.uk/our-work/planning-and-the-strategic-road-network-in-england/>

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**National Highways Limited** | [REDACTED] | **National Traffic Operations Centre, 3 Ridgeway, Quinton Business Park, Birmingham B32 1AF** | <https://nationalhighways.co.uk> | [REDACTED]

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