



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

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

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

CC: [REDACTED]

**Council's Reference:** Y/32/25/PL

**Location:** Land west of Bilsham Road, Yapton BN18 0LA

**Proposal:** Erection of 170 No. residential dwellings (30% affordable), parking spaces, internal site roads, public open space, children's play space, pumping station, surface water drainage features, landscaping and associated works. This application is a Departure from the Development Plan and is in CIL Zone 3 and is CIL Liable as new dwellings.

**National Highways Ref:** NH/25/11036

Referring to the consultation on a planning application dated 2 May 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 [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 0300 123 5000.

**Signature:** [REDACTED]

**Date:** 05 June 2025

**Name:** Nigel De Wit

**Position:** Spatial Planner

**National Highways**

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

[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.

We are mindful that in January 2023 Arun District Council granted planning permission for a residential development (reference Y/3/22/OUT) comprising 140 units at the site.

The permission includes the following planning condition:

*'No dwellings in the development hereby permitted shall be occupied until the completion and opening to the travelling public of the improvements to the A27/Yapton Lane junction shown on drawing number ITB11324-GA-014 Revision C "Proposed extension to A27 Yapton Lane right turn" dated 30/8/2017 (or such other scheme of works substantially to the same effect, as may be approved in writing by the local planning authority (who shall consult with National Highways))'.*

Full planning permission (application reference Y/52/23/PL) for the development of 170 dwellings at the site was granted at appeal (reference APP/C3810/W/24/3343922) in January 2025. The appeal decision includes a similar condition:

*'No dwellings hereby permitted shall be occupied until the improvements to the A27/Yapton Lane junction shown on drawing reference ITB11324-GA-014 Rev C dated 30 August 2017 have been completed and are open to the travelling public.'*

We understand that the improvement scheme at the A27/Yapton Lane junction referred to in the above quoted conditions (reference: ITB11324-GA-014 Revision C – "Proposed Extension to A27 Yapton Lane right turn") which was secured through the s.106 Agreement in association with planning permission WA/44/17/OUT will commence in September this year and be completed and open to traffic by late November 2025.

This context means that the principles of this type and scale of development at this location have been established. Our assessment is framed and informed by this context and by the submitted Transport Assessment (TA) (April 2025).

The submitted TA at para. 6.6.1 states (our emphasis):

*‘Although it is considered that junction analysis for the A27 / B2132 Yapton Lane junction is not required for this application, it is acknowledged that Condition 20 of the extant planning permission (reference Y/52/23/PL) reflected the need for the proposed works, as shown on Drawing ITB11324-GA-014 Rev C in Appendix G, to be completed and open prior to the first occupation of the development. It is expected that a similar condition would be set for this planning application, should permission be granted.’*

Given this context and the need for consistency, we have recommended a condition requiring the implementation of the improvement scheme for the A27/Yapton Lane junction prior to first occupation.

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 Y/32/25/PL, 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 conditions are imposed, reflecting DfT Circular 01/2022 and NPPF 2024 paras. 115-118.

1. A27/Yapton Lane Junction Improvement Scheme

No dwellings hereby permitted shall be occupied until the improvements to the A27/Yapton Lane junction shown on drawing reference ITB11324-GA-014 Rev C dated 30 August 2017 have been completed and are open to the travelling public.

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

2. 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 (in consultation with the Highway Authority for the A27). The plan shall include as a minimum:

- Construction phasing
- Construction routing plans
- Permitted construction traffic arrival and departure times
- Management of loose loads
- Cleaning of construction vehicles on-site

Thereafter all construction 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 in consultation with the Highway 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.

**From:** Nicola Oktay on behalf of Planning.Responses  
**Sent:** 06 June 2025 12:10  
**To:** Planning Scanning  
**Subject:** FW: NH/25/11036 - Y/32/25/PL - Land west of Bilsham Road - RC - NH response 05/06/25  
**Attachments:** NH2511036\_Y3225PL\_West\_Bilsham\_Road\_Yapton\_RC\_050625.pdf

National Highways response

**Nikki Oktay**  
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**From:** Nigel De Wit [REDACTED]  
**Sent:** 05 June 2025 15:50  
**To:** Planning.Responses <Planning.Responses@arun.gov.uk>  
**Cc:** Planning SE [REDACTED] Spatial Planning [REDACTED] transportplanning [REDACTED] SouthEast [REDACTED]  
**Subject:** NH/25/11036 - Y/32/25/PL - Land west of Bilsham Road - RC - NH response 05/06/25

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**For Attention of:** Simon Davis, Arun District Council

**Your Reference:** Y/32/25/PL - Land west of Bilsham Road, Yapton BN18 0LA

**Proposal:** Erection of 170 No. residential dwellings (30% affordable), parking spaces, internal site roads, public open space, children's play space, pumping station, surface water drainage features, landscaping and associated works. This application is a Departure from the Development Plan and is in CIL Zone 3 and is CIL Liable as new dwellings.

**Our Reference:** NH/25/11036

Dear Simon,

Thank you for your email of 2 May 2025 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 conditions (A27/Yapton Lane improvement scheme and Construction Traffic Management Plan) to 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 [planningse@nationalhighways.co.uk](mailto:planningse@nationalhighways.co.uk).

Kind regards,

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

National Highways

[Redacted]  
[Redacted]

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

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

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

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