



Your ref:

Our ref:

Helen Hockenhull BA(Hons) B.PI MRTPI
c/o Tony Blackburn
Programme Officer – Hyndburn Local Plan
15 Ottawa Close
Blackburn
BB2 7EB

9th Floor
Piccadilly Gate
Store Street
Manchester M1 2WD

17th July 2025

Sent Via Email

Dear Helen

HYNDBURN LOCAL PLAN TO 2040 EXAMINATION

NATIONAL HIGHWAYS' COMMENTS ON HYNDBURN BOROUGH COUNCIL'S RESPONSE TO INSPECTOR'S INITIAL QUESTIONS OF 12.05.25

National Highways has been appointed by the Secretary of State for Transport as 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. It is an ambition to ensure that major roads are more dependable, durable, and most importantly – safe.

National Highways' approach to engaging with the planning system is governed by the advice and guidance set out in:

- The Strategic Road Network Planning for the Future - A Guide to Working with National Highways on Planning Matters (October 2023).

The document is written in the context of statutory responsibilities as set out in National Highways' licence, and in the light of government policy and regulation, including the:

- National Planning Policy Framework (NPPF);

- Town and Country Planning Development Management (Procedure) Order (England) 2015 (DMPO); and
- DfT Circular 01/2022 The Strategic Road Network and the Delivery of Sustainable Development ('The Circular').

In recognition of these policies and guidance, National Highways has worked collaboratively with Hyndburn Borough Council (HBC) throughout the development of the Local Plan with the aim of ensuring that the requirements of DfT Circular 01/2022 are met. In practical terms, this means ensuring that the Plan is sound by being able to demonstrate that planned development growth can come forward without detriment to the safety of the SRN.

It is accepted by HBC that a significant highway infrastructure improvements will be needed at both the A6068 / A678 Shuttleworth Mead crossroads junction (operated by Lancashire County Council) and at the M65 Junction 8 roundabout (operated by National Highways) in order for the M65 motorway at Junction 8 to safely accommodate the additional traffic forecast to be generated by the proposed Local Plan; in particular that arising from Huncoat Garden Village. This is demonstrated within the Local Plan evidence base and comprehensive traffic modelling work carried out by National Highways.

In this regard, feasibility work remains ongoing by National Highways and Lancashire County Council (with the involvement of HBC) to identify possible improvement schemes and whether they are viable and achievable. These undertakings will inform the infrastructure requirements as set out within the Infrastructure Development Plan with a view to evidence deliverability whilst ensuring that the SRN can safely accommodate the additional Local Plan traffic.

This letter contains our comments on document H002 HBC Response to Inspector's Initial Questions 12.05.2025 in relation to traffic impacts of the emerging Local Plan at Junction 8. These are explained below, with the relevant sections of HBC's response underlined:

Question IQ7

The Local Plan Transport Study 2022 (HBC7.001a) aims to assess the impact of Local Plan growth on the highway network over the Plan period to 2036/7. Does it provide a robust assessment of the likely traffic implications of development proposed in the Local Plan now that the Plan period has been extended to 2040?

HBC Response:

The Local Plan Transport Study 2022 (HBC7.001a) provides a robust assessment for assessing the traffic implications of development proposed in the Local Plan, even with the extension of the plan period to 2040. The study was developed using up-to-date modelling techniques and traffic data, and it considers the cumulative impacts of planned growth across the network to 2036/37. This includes all site allocations proposed. This encompasses the majority of the plan's development trajectory.

While the extension to 2040 introduced an additional three years, it is not anticipated that this would significantly alter the conclusions within the study. This is particularly due to the levels of distribution of housing remaining consistent through the final years of the plan period and not introducing any new or untested impacts to the modelling.

Furthermore, later development in the plan period is significantly set around the Huncoat Garden Village, which has separate modelling and proposed work to Junction 8 of the M65 which is ongoing. Therefore, any impacts that are being modelled here are expected to be mitigated through work alongside the Huncoat Garden Village Development.

HBC is also committed to reviewing the plan every 5 years. Therefore, we would expect to review the transport implications in light of ongoing development and mitigate any potential future impacts later within the plan period.

Therefore, taking a pragmatic and proportionate approach to the evidence base, HBC consider that any potential risk to the robustness of the Local Plan Transport Study is extremely limited and mitigated through future plan review period to 2040.

National Highways Comment:

It should be first noted that traffic modelling carried out for the Local Plan transport evidence base indicates that M65 Junction 8 does not have peak hour capacity to accommodate further traffic growth from the Huncoat Garden Village site whilst remaining safe in operation. This problem primarily centres on the ability of traffic to enter the roundabout at Junction 8 from the eastbound M65 exit slip road, which results in extensive traffic queuing on the slip road to the motorway mainline, which is a safety concern.

National Highways has a microsimulation VISSIM traffic model of the road network consisting of M65 Junction 8 (including all approaches) and the A6068 up to and including the A6068/A678 Shuttleworth Mead junction to the north. This modelling work is more up to date than the model used to inform the Local Plan M65 Junction 8 Transport Study and we have made HBC aware of this model and its findings.

The modelled and observed evidence is that a significant cause of vehicles not being able to leave the slip road due to significant traffic queuing on the northbound A6068 extending south towards the Junction 8 roundabout, which and restricts the ability of traffic to enter the A6068 northbound from the roundabout itself. This problem results from capacity problems at the A6068 / A678 Shuttleworth Mead crossroads junction to the north, which is part of the local highway network operated by Lancashire County Council (LCC). This congestion therefore interacts with the operation of the Junction 8 roundabout and is a significant cause of the safety-related congestion problems at Junction 8.

The evidence is therefore that it is imperative that both these junctions be improved so that the traffic impact of the additional Local Plan traffic can be accommodated safely at M65 Junction 8.

Further work is required, and full funding commitments agreed (as part of National Highways Road Investment Strategy cycle), before a presumption can be made. There can be no expectation at this time that the Local Plan transport impacts being modelled will be mitigated by improvement schemes delivered by National Highways and LCC. Work by National Highways and LCC to establish whether viable improvement schemes are possible at these respective junctions is ongoing and therefore has not been tested in the traffic modelling, including whether the modelling would support a phasing strategy in relation to the delivery of each scheme relative to growth within Huncoat Garden Village.

Furthermore, setting aside concerns relating to the future funding availability that may be required for schemes at these junctions, there is currently an inherent risk that the scheme solutions required at these junctions may not be feasible to deliver. There is however a shared purpose and commitment to identify a solution in this location as captured in the emerging Statement of Common Ground.

Given the evidence that the Junction 8 roundabout does not have capacity to safely accommodate the additional traffic generated by the Local Plan (in particular Huncoat Garden Village and the extension to Altham Business Park), it is therefore fundamental to ensure that improvements for both junctions have been identified and their viability understood in making a decision on the soundness of the Local Plan.

The statements relating to the 5-yearly Local Plan review process representing an appropriate management strategy are not contained within the emerging Statement of Common Ground that HBC has prepared for agreement with National Highways.

Question IQ11e

National Highways have raised concern about the impact of the development on J8 of the M65. Mitigation works are required which currently have no funding identified. I note that discussions with National Highways are ongoing and a SoCG is to be prepared. I would be grateful for an update on the position. Is there an understanding of how much development at the Garden Village could come forward before the M65 junction improvements are required?

The Council are in ongoing discussion with National Highways and Lancashire County Council (LCC) on the required mitigation for J8 of the M65. The council are preparing a SoCG which will set out the full agreements. Details of these recent discussions are set out in a correspondence from National Highways to HBC and this is available in Appendix 5 (Ref: H007).

HBC are in the process of signing a Section 274 agreement with National Highways which will see the Council transfer £2,192,500 to National Highways as a 50% contribution towards J8 improvements. This agreement will allow for this funding to be subsequently transferred to and used by LCC to support potential mitigation at the Shuttleworth Mead Junction to ensure that mitigation at J8 is effective. The date that this funding would need to be spent by is 2032.

National Highways are bidding for funding for the J8 improvements through the Road Investment

Strategy 3 and this is expected to be announced in December 2025 due to delays resulting from the government spending review.

National Highways are currently undertaking modelling work to see how many new homes can come forward before the junction improvements are required. We can provide an update on this when the modelling has been completed.

National Highways Comment:

Whilst it is correct that HBC is able to transfer the sum of £2,192,500 to National Highways as a funding contribution towards the cost of delivering a mitigation improvement to M65 Junction 8 designed to enable the junction to operate safely with the additional traffic expected to be generated by the Local Plan growth (in particular Huncoat Garden Village and the extension to Altham Business Park), it is incorrect to say that this would represent 50% of the cost of a scheme for this junction.

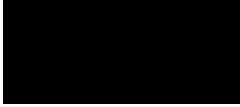
Although no detailed cost estimate for mitigation at the Junction 8 roundabout is currently available, it is deemed by us highly unlikely that this contribution would represent 50% of the cost of the construction cost of the mitigation improvement concept that national Highways has identified and that is currently being evaluated.

It must also be noted that the evidenced essential infrastructure requirement to ensure that the SRN operates safely at M65 Junction 8 with the addition of traffic from the proposed Local Plan (in particular Huncoat Garden Village and the extension to Altham Business Park) is that the A6068 / A678 Shuttleworth Mead junction must also be improved. This is due to the evidenced traffic flow interaction between the two junctions that occurs at peak times, which means that an improvement of the Junction 8 roundabout in isolation will not be expected to yield any material traffic flow benefits in safe support of Local Plan without improvement of the A6068 / A678 Shuttleworth Mead junction that adequately addresses traffic congestion on the northbound A6068 approach to the junction.

Consequently, this means that whilst the availability of a £2,192,500 is welcomed, the reality is that this funding may need to be shared between delivery of mitigations for both junctions, thus significantly further increasing the likely funding shortfall for any appropriate projects to be realised.

As recognised in the emerging Statement of Common Ground there is a shared purpose and understanding between NH and HBC in terms of the need to deliver highway improvements to realise the Local Plan and in particular Huncoat Garden Village. National Highways remains committed to working with respective partners (including LCC to identify and ultimately deliver the works). As identified, there are a number of dependencies which need to be overcome. It is hoped this letter clarifies these points but please do not hesitate to contact me if you require any further detail.

Kind Regards



Mrs Lindsay Alder
Spatial Planner
Planning and Development