

This matter is being dealt with by
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Tony Blackburn on behalf of Helen Hockenhill

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29th August 2025

Dear Helen Hockenhill (BA (Hons) B.PI MRTPI),

Examination of the Hyndburn 2040: Local Plan (Strategic Policies and Site Allocations)

Hearing Statements - Prepared by Caddick Land

Matter 6: Hearing Statement

Introduction

Marrons is instructed by Caddick Land (“Caddick”) to prepare evidence in respect of Land South of Altham Business Park. Caddick controls part of the proposed allocation, including all the land west of Altham Lane. We respond to relevant questions below.

Matter 6

Issue 6: Has the Plan been positively prepared and is it justified, effective and consistent with national policy in respect of its policies and proposals for transport and infrastructure?

Accessibility and Transport

Question 1: Paragraph 110 of the Framework states that it should be ensured that in assessing sites to be allocated for development in plans, any significant impacts from the development on the transport network (in terms of capacity and congestion) or on highway safety can be cost effectively mitigated to an acceptable degree. What evidence is there to demonstrate that this is the case for the growth proposed in the Hyndburn Local Plan?

Paragraph 5.18 of the HBC and National Highways SoCG (July 2025)(document H017) confirms that NH are of the view that ‘it is reasonable to assume that the Junction 8, M65 improvement would be able to cater for movements associated with the predicted cumulative Local Plan

growth (and in particular that related to the Huncoat Garden Village) and the National Highways will have sufficient funding, and the scheme have sufficient priority, for the improvement to be delivered by 2031.’

Additionally, paragraph 5.20 states ‘HBC is committed to continue working with National Highways and LCC in the meantime to ensure that the appropriate mitigation solution is identified.’

In HBC’s response to the Inspector’s initial questions from April 2025 (document H002), the Council confirm in their response to question IQ11e that: ‘HBC are in the process of signing at 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 [Lancashire County Council] 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.’

In terms of the impact at the Shuttleworth Mead Junction, the impact of the Huncoat Garden Village would be reasonably minimal. However, there is extensive adopted highway surrounding the junction, as shown below, to accommodate substantial physical highway improvements at the junction to (a) align with the J8 improvements, and (b) to ensure that the impact of the Altham Lane proposals can be mitigated to a level that would not be considered ‘severe’ in the context of NPPF paragraph 116.



Shuttleworth Mead Junction – Adopted Highway

Initial evidence confirms that the junction is at present approaching its capacity during peak hour periods. However, additional capacity improvements at the Burnley Road western approach and the two A6068 approaches can easily be delivered, if necessary, to provide the appropriate and cost-effective mitigation. For example, the two A6068 approach lanes could be widened to substantially increase capacity at the junction, as well as potentially along the left turn flare lengths.

Question 2: Does the Local Plan Transport Study (HBC7.001a) provide a robust assessment of the likely traffic implications of development proposed in the Plan? Can the impacts on the highway network be acceptably mitigated?

In their response to question IQ7 from the Inspector's initial questions in April 2025 (document H002), the Council confirmed that the Transport Study (HBC7.001a) does provide a robust assessment of the traffic implications of the development proposed in the Plan, inclusive of all proposed site allocations. Consideration has been given to the potential impacts of the extended plan period to 2040, and HBC concluded that they do not anticipate that the additional 3 years alter the conclusions within the study. The Council have also confirmed that separate modelling and proposed work to Junction 8 of the M65 is ongoing, and any impacts are expected to be primary mitigated through work alongside the Huncoat Garden Village Development (p.7 of H002).

The Council are committed to reviewing the Plan every 5 years, which will include re-evaluating transport implications resulting from ongoing development. This is supportive of the conclusions in the Transport Study, which recommends that at the mid-point of the Local Plan, assessments should be undertaken to provide an updated understanding of current traffic conditions, the impacts of improvement schemes, and of delivered development, to assist in the planning of future planned growth.

Moreover, Local Plan Policy SP23 (Sustainable and safe transport) states '2) Development which will generate a significant amount of movement should be accompanied by a Transport Assessment and Travel Plan'. This requirement is supported by the Transport Study's findings, will ensure that development proposals on site allocations are informed by up-to-date assessments, building on the Plan's evidence base, by using current data and identifying site-specific impacts and appropriate mitigation measures. Developers will therefore be required to demonstrate that the new development will not have adverse impacts on the highway network and highways safety, in line with both local and national policy.

As mentioned in our response to question 1 above, we believe that the impacts of proposed development at site allocation EMP3 on the surrounding highway network can be acceptably mitigated.

Question 3: A Junction Monitoring Report is proposed to be prepared to assess the implications of traffic growth on J6 and J7 of the M65. What is the anticipated programme for this work? How will any recommendations for highway improvements be funded and delivery ensured?

In recent years, works have been undertaken to improve the capacity of Junction 6 and Junction 7 of the M65. The SoCG between the Council and National Highways (July 2025) recommends J6

and J7 of the M65, as well as the A678 / A6178 junction, undergo continued monitoring as part of an agreed 'Junction Monitoring Report' (see 5.1 and 5.5 in document H017). HBC and NH are best placed to answer questions about monitoring and the funding and delivery of associated highway improvements at these locations.

Question 4: Does the Infrastructure Delivery Plan (IDP) reflect the findings of the Local Transport Study? How will the IDP be kept up to date?

The Local Plan Transport Study (2022) (document HBC7.001a) assesses the impacts of the Council's proposed growth strategy on the efficient operation of the local and strategic highway networks and provides recommendations for effective mitigation measures. Overall, the study demonstrates that the proposed development will not be constrained, and impacts can be mitigated to an acceptable degree, and as such the Local Plan is 'deliverable in a sustainable manner in transport terms, in accordance with the NPPF' (para 11.1.6).

One of the key findings of the Local Transport Study is that 'for junctions where mitigation has been identified, the findings of the assessments should be verified and, where required, updated using up-to-date traffic counts to confirm the need for the mitigation scheme identified prior to progressing design works' (para 11.1.3). This recommendation has been incorporated into Policy SP23 (Sustainable and safe transport) under requirement 2.

At 11.1.5, the Transport Study recommends continued collaborative working with NH and the Council have confirmed that this is ongoing in the SoCG (H017) and HBC's previous response to the Inspector's questions (H002).

The Transport Study identified a number of mitigation measures and their estimated costs which are presented in Table 10-1 (pp.109-110). As recommended in the study's conclusion, these measures have been included in the Council's Infrastructure Delivery Plan (2025) in Table 2 (pp.15-17 in document HBC2.011).

In reference to our client's site, EMP3, paragraph 3.5 of the IDP notes potential capacity constraints associated with the extension of Altham Business Park. The IDP reflects the findings of the Transport Study by committing HBC to working with NH and LCC to ensure the capacity of the strategic road network, with is recognised as a 'fundamental priority in bringing about transformational change in the sub region'. Additionally, the need for improvements at J8 of the M65 identified in the Transport Study have also been recognised in the IDP at paragraph 4.2.

Ultimately, we agree that the IDP does reflect the findings of the Local Transport Study. HBC are better placed to provide further detail on how the IDP will be kept up to date. However, the Transport Assessments and Travel Plans submitted for key site allocations will help build on the existing evidence base and can be used to help inform updates to the IDP.

Question 5: How will the site-specific sustainable transport measures recommended in the Transport Study in Table 7-3 be taken forward and secured?

Table 7-3 (Site-Specific Sustainable Transport Mitigation Measures) in the Transport Study identifies a wide variety of potential measures across a range of sites. The potential mitigations identified for site allocation EMP3 ('site 60 - Land lying to the west of Altham Lane, south of Barnfield Way' in the study) include improved footways along Altham, bus provisions and cycle

infrastructure. For example, a potential cycle route between Altham Business Park and the Hapton train station, as well as towpath improvements on the Leeds-Liverpool canal to provide cycle route.

We can confirm our client is already designing in footpath connectivity and sustainable transport measures which are an integral part of the design process. The Council will be able to secure these measures through the development control process when granting permission, including any necessary offsite highways improvements.

Junction 8 M65

Question 6: The evidence demonstrates that J8 of the M65 will require improvement to enable the Local Plan growth to proceed, in particular the Huncoat Garden Village. The Statement of Common Ground with National Highways states that work is ongoing to progress modelling and feasibility appraisal work for the junction. This will feed into an assessment of whether a scheme is deliverable and whether it can be justified for funding to be allocated through the Road Investment Strategy (RIS3) for the scheme. What is the current progress with this work and what are the timescales involved?

The Council have previously explained in their response to the Inspector's initial questions in April 2025 (document H002, ref: IQ11e) that discussions between HBC, LCC and NH are ongoing regarding the required mitigation at J8 of the M65. HBC's SoCG with NH was agreed in July 2025 and demonstrates progress on this matter. Nonetheless, HBC, NH and LLC are best placed to provide further information on the progress and timescales of this work.

Question 7: Significant highway improvements will be needed to the A6068/A678 Shuttleworth Mead Crossroads junction due to traffic queuing at this junction affecting vehicles seeking to exit the motorway, resulting in queuing on the motorway slip road. These Improvements will be necessary alongside those at J8. What is the progress with the feasibility work in respect of this junction currently being undertaken by Lancashire County Council?

It is our understanding that this matter has been discussed between NH and LCC, and continues to be progressed by WSP on behalf of NH, with assistance from NH and LCC.

In addition, the Infrastructure Delivery Schedule within the Local Plan's IDP (HBC2.011) provides the following in terms of potential improvements to Shuttleworth Mead, which would offer some initial improvements at the junction:

Project	Estimated Cost	Committed Funding	Funding Gap	Funding Sources	Responsible for Delivery	Timescale	Comments
Transport							
Highways							
Transport Study 2022 * These dates were based on an assumption that the Local Plan was adopted around 2023. Assumption that dates can be projected forward from the actual adoption date assuming there are no other significant material changes to the baseline.							
The indicative cost estimates include allowances for risk (20%), statutory undertakers (10%) and contingency (10%) but exclude any land acquisition and associated legal costs.							
A678 Blackburn Road / B6535 Harwood Road - comprises amendments to the signal arrangements, and associated amendments to road markings	£10,000 to £15,000			S106 contribution			May be required in advance of Local Plan build-out Lifespan of scheme identified is up to 2026*
A678 Blackburn Road / A6068 Shuttleworth Mead - amendments to the signal arrangements, and associated amendments to road markings	£10,000 to £15,000			S106 contribution			May be required in advance of Local Plan build-out Lifespan of schemes identified is up to 2026*

Extract from the Infrastructure Delivery Schedule in the Hyndburn Local Plan Infrastructure Delivery Plan (January 2025)

Question 8: If it is shown that the necessary highway improvements to J8 and or the Shuttleworth Mead Crossroads Junction are not technically feasible to deliver or that funding cannot be secured, what are the implications for the soundness of the Plan?

As detailed in our response to question 1, in terms of the impact at the Shuttleworth Mead Crossroads Junction, the impact of the Huncoat Garden Village would be reasonably minimal. However, there is extensive adopted highway surrounding the junction, as shown below, to accommodate substantial physical highway improvements at the junction to (a) align with the J8 improvements, and (b) to ensure that the impact of the Altham Lane proposals can be mitigated to a level that would not be considered 'severe' in the context of the NPPF (para 116).

Our initial evidence confirms that the junction is at present approaching its capacity when operating during peak hour periods. However, additional capacity improvements at the Burnley Road western approach and the two A6068 approaches can easily be provided, if necessary, to provide the necessary mitigation.

This is much the same as at Junction 8 of the M65. Below is an extract showing the LCC adopted highway at the junction. This does not show the additional adopted highway under the control of National Highways, which would cover each of the slip roads. Nonetheless, it is clear that the extent of adopted highway at the junction offers the opportunity to provide substantial physical improvements at the junction to sufficiently mitigate additional traffic resulting from the proposed development within Local Plan.

This can be supplemented by implementation of signal control at some or all of the approaches to J8 which will assist in the distribution of capacity enhancements at the junction. The circulating carriageway has sufficient width for an additional lane with simple white lining improvements which would provide additional capacity if signal control is implemented at any of the junctions around the J8 roundabout.

The two M65 off slip roads also has substantial adopted highway on either side which offers the potential for widened approaches for additional capacity improvements at the junction.

None of the above would require any major earthworks to implement and all can be provided within the current limit of adopted highway.

Our internal analysis suggests that substantial and cost-efficient highway improvements can be delivered at the junction to ensure that mitigation can be provided for the Local Plan development traffic, including the extension to the Altham Business Park (EMP3) site. Thus, we do not perceive the need for highway improvements to undermine the soundness of the Local Plan.



Illustration of Adopted Highway (LCC only) at M65 Junction 8

Question 9: Is a phasing strategy for Huncoat Garden Village and other developments planned, e.g. the extension to Altham Business Park EMP3, being investigated?

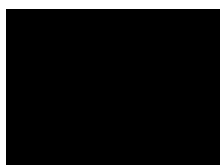
See our response to Question 8 above.

In addition, paragraph 3.5 of the Infrastructure Delivery Plan (IDP) (HBC2.011) states that: ‘The potential extension of Altham Business Park has the potential to increase vehicular traffic on A6068, J8 of M65 and A56/M66, there is a need to ensure that capacity does not constrain planned growth. Addressing this issue is a fundamental priority in bringing about transformational change in the sub region and local authorities will work with National Highways and Lancashire County Council to ensure that the capacity of the strategic road network does not act as a barrier to growth and development.’

It is our firm view that there are cost-effective, off-site highway works that can be provided at Shuttleworth Mead and at J8 of the M65 within the currently adopted highway to provide sufficient mitigation for the extension to the Altham Business Park.



Yours sincerely,



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Partner

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