



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

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Sent Via Email

Dear Helen,

HYNDBURN LOCAL PLAN TO 2040 EXAMINATION

NATIONAL HIGHWAYS' SUBMISSION TO HYNDBURN LOCAL PLAN TO 2040 EXAMINATION IN PUBLIC : MATTERS ISSUES AND QUESTIONS

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').

INTRODUCTION

In 2021 National Highways (NH) undertook its own study of M65 Junction 8 that included traffic modelling of the junction. This work was commissioned by National Highways to inform the early stages of the emerging Local Plan as part of our role to assist in supporting growth. This work was also carried out to ensure that Hyndburn Borough Council (HBC) would have an understanding of the scale of the infrastructure requirement that would be needed to realise the growth set out in their emerging Plan.

The findings of NH's 2021 Junction 8 Study were incorporated by HBC into their wider Local Plan Transport Evidence Base Study that was carried out by WSP on behalf of HBC. This Local Plan Transport Study also incorporated studies of the impacts of the emerging Local Plan growth at M65 Junctions 6 and 7 (in the case of Junction 6, these impacts were assessed with the now adopted Blackburn with Darwen Local Plan).

It was identified in the Local Plan Transport Evidence Base Study that M65 Junction 8 was likely to experience operational issues from 2026 when traffic generated by the Local Plan growth was not included. It was noted that Huncoat Garden Village was identified as having the greatest traffic impacts at M65 Junction 8 on account of the scale of development and its proximity and that it would, therefore, not be possible to realise the delivery of this allocation without an improvement at the junction. The Local Plan Transport Evidence Base Study recommended that further work was to be undertaken jointly by HBC and National Highways.

In support of the development of the Local Plan, NH secured funding from its RIS2 (2020-25) budget to progress detailed feasibility work for an improvement at Junction 8. This subsequent work was commissioned to establish whether a scheme was needed to realise the Local Plan growth (in particular that from the proposed Huncoat Garden Village) and would be viable in terms of construction, performance and cost. Currently, this work is not expected to conclude until the end of 2025.

The results of traffic modelling by NH as part of the feasibility work for a scheme at Junction 8 revealed a linked need for the A6068 Shuttleworth Mead junction to the north to also be improved in order for Junction 8 to operate safely with the addition of the anticipated Local Plan traffic growth. This is due to existing extensive queuing on the northbound A6068 approach to the Shuttleworth Mead junction restricting the ability of traffic heading onto the A6068 to leave the Junction 8 roundabout. There is also regular weekday evening peak time queuing on the Junction 8 eastbound exit slip road, with queues already extending close to the mainline motorway - this problem is partially due to the current operation of the Shuttleworth Mead junction.

Consequently, this feasibility work has been undertaken alongside further study work by Lancashire County Council (LCC) to identify options and costings for the necessary improvement of this junction.

A Statement of Common Ground (SoCG) was prepared and agreed between National Highways and Hyndburn Borough Council in July 2025, which is Local Plan library reference H017. The SoCG provides a comprehensive overview of the position of National Highways at that time.

This written representation responds to the Inspector's Matters Issues and Questions (dated 25/07/25) that are considered to be of relevance to NH as the strategic highway's authority. It also takes account of some updates on NH's position since submission of the SoCG in July 2025.

INSPECTOR'S MATTERS ISSUES AND QUESTIONS

Matter 6

ACCESSIBILITY & TRANSPORT - GENERAL

- 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?"**

The Junction Monitoring Reports for M65 Junctions 6 and 7 are an agreed action within the SoCG between HBC and National Highways. The scope of this is to be agreed within 12 months of the Local Plan being adopted, with the programme of delivery to be subsequently agreed between the relevant parties quoted in 'Section 5 SRN Junction Capacity Assessments' within the SoCG.

- 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 IDP reflects the work undertaken for the Local Plan Transport Study. It will remain live to ensure it is kept up to date throughout the Plan period by HBC. Updates to the IDP will be informed by any new or refreshed work, including the Junction Monitoring Reports, noting the responsibility for these reports sits with HBC and will require input from National Highways.

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

The DfT Circular 01/2022 sets out National Highways' approach to engaging with the planning system which is to conform to the principles of sustainable development of encouraging economic growth while protecting the environment and improving safety and quality of life for current and future generations. A key element of this is ensuring new development facilitates a reduction in the need to travel by private car and promoting development in locations that can be made sustainable. Therefore, National Highways would support the

need for sustainable transport measures to be delivered to realise a vision for sustainable development and expect this to be secured through suitable conditions on planning permission as applications for allocated sites emerge.

- 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?”**

NH has been progressing with modelling and feasibility appraisal work to test the viability of an outline design concept that will have been identified against cost, benefits and design standards. This work is continuing with the expectation that scheme cost estimates will be ready by the end of 2025. Establishing the likely cost of a preferred option is critical to informing the ability to fund delivery within the overall RIS3 funding announcement, which is not anticipated to be confirmed by DfT until Quarter 4 of the 2025/26 financial year. It is reasonable to assume from the feasibility work completed so far that the improvement being assessed would be able to cater for movements associated with the forecast Local Plan growth (and in particular that related to Huncoat Garden Village and the proposed employment allocation at Altham Business Park). In addition to this, NH has identified this project at regional level as a high priority to be delivered before 2031.

The need for highway improvements on the adjacent local road network, including the Shuttleworth Mead junction, is considered to be interlinked with the delivery of an improvement scheme at M65 Junction 8. Therefore, NH is committed to working with Homes England, HBC and LCC to assist in establishing a funding strategy to realise the necessary works at the Shuttleworth Mead junction.

Recent joint study work between National Highways and LCC has identified two improvement options at the Shuttleworth Mead junction. These are outlined within the written submission by LCC (Shuttleworth Mead Junction Capacity Improvements, Stage 0 Summary Report, August 2025) and in HBC’s own response to the Inspector’s latest Matters Issues and Questions. NH is therefore willing to continue to work collaboratively with LCC and HBC in working to finalise the feasibility of both options. Given the modelled evidence that an improvement of the A6068 / A678 Shuttleworth Mead junction is needed for the SRN to continue to safely accommodate the additional traffic generated by the emerging Local Plan, it is the position of NH that it is now essential for HBC and LCC to also be able to demonstrate that a viable and achievable scheme will be delivered at this junction in coordination with improvement to the Junction 8 roundabout by NH.

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?”

As demonstrated in the Inspector’s question, the A6068/A678 Shuttleworth Mead Crossroads junction is on the local road network and it is, therefore, the responsibility of LCC to proceed with feasibility work for a junction improvement scheme. However, an improvement scheme at this junction is considered to be intertwined with the delivery of an improvement at M65 Junction 8 as the operational safety benefits to the SRN junction will not be realised without a capacity enhancement at the Shuttleworth Mead.

It is the position of National Highways that it is essential that further feasibility work is carried out by LCC and HBC to demonstrate that scheme delivery at Shuttleworth Mead is viable and achievable. Noting the comments in the section above regarding recent joint feasibility work, National Highways are keen to continue to support this where appropriate in relation to the work being undertaken at M65 Junction 8.

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?”

The two schemes for M65 Junction 8 and Shuttleworth Mead Crossroads Junction are interlinked. The safety and capacity benefits that would be expected to be realised by an improvement scheme for the SRN junction would not be realised without a separate enhancement scheme at Shuttleworth Mead. Therefore, National Highways have been proactive in engaging with LCC and HBC where appropriate to reflect the interconnected nature of these schemes to make the best efforts to deliver improvements at both junctions.

It is reasonable to assume from the feasibility work completed so far that the improvement being assessed would be able to cater for movements associated with the forecast Local Plan growth (and in particular that related to Huncoat Garden Village and the proposed employment allocation at Altham Industrial Estate). In addition to this, whilst NH has identified this project at regional level as a high priority to be delivered before 2031, this remains subject to confirmation on the completion of the feasibility work and the RIS3 funding announcement by DfT.

Ensuring the Local Plan is sound by demonstrating that development growth can come forward without detriment to the safety of the SRN is ultimately the responsibility of the Local Planning Authority. This includes evidencing the necessary infrastructure requirements identified in the Infrastructure Delivery Plan are appropriate and will be funded and delivered at the appropriate time thus ensuring the requirements of the DfT Circular 01/2022 are met.

9. “Is a phasing strategy for Huncoat Garden Village and other developments planned, eg the extension to Altham Business Park EMP3, being investigated?”

With the highway capacity and safety concerns that have been raised with the current operation of M65 Junction 8, and the evidence on its forecast operation currently available, it is expected that improvement measures for the junction would be required to be operational from the outset of any development that will impact M65 Junction 8 and/or the Shuttleworth Mead junction proposed in the local plan coming forwards.

POLICY SP23 SUSTAINABLE AND SAFE TRANSPORT

10. d) Part 2 of the policy requires a Transport Assessment and Travel Plan for schemes that generate a significant amount of movement. Is it clear from the Plan where the threshold lies?”

National Highways are a statutory consultee in the planning system. Applicants and Local Planning Authorities are encouraged to seek early advice from National Highways if a development proposal:

- is likely to result in an adverse impact on the safety of, or queuing, on the strategic road network (SRN)
- is likely to prejudice the improvement, construction or maintenance of the SRN
- consists of or includes the construction, formation or laying out of access to or from the SRN

Where NH is consulted on a planning application it would be expected that a Transport Assessment and Travel Plan are prepared to demonstrate the impacts of the proposed development on the surrounding road network, including the SRN. The extent of the assessment required to align with National Highways’ policy is dependent on the status of the proposed development in an up-to-date plan or strategy. For sites that are allocated in the Hyndburn Local Plan, the following would apply:

- Paragraph 48: Where a transport assessment is required, this should start with a vision of what the development is seeking to achieve and then test a set of scenarios to determine the optimum design and transport infrastructure to realise this vision.
- Paragraph 49: A transport assessment for consideration by the company must also consider existing and forecast levels of traffic on the SRN, alongside any additional trips from committed developments that would impact on the same sections (link or junction) as the proposed development...Planned improvements to the SRN or local road network should also be considered in any assessment where there is a high degree of certainty that this will be delivered.
- Footnote 21: Where development proposals are consistent with an up-to-date plan or strategy (or where there is no up-to-date plan or strategy), this should include all relevant development that is consented or allocated where there is a reasonable degree of certainty will proceed within the next 3 years and include the full amount of development to be built.
- Paragraph 50: An opening year assessment to include trips generated by the proposed development, forecasted growth and committed development shall be carried out to establish the residual transport

impacts of a proposed development. For multi-phase developments, additional assessments shall be provided based on the opening of each phase.

Where reference is made to relevant development, appropriate consideration should be made for development or growth proposals in neighbouring authorities.

Matter 7

POLICY EP1 LAND TO THE SOUTH OF ALTHAM BUSINESS PARK (EMP3)

- 10. “The allocation is likely to have an impact on the strategic road network, namely J8 of the M65. Should a requirement for a Transport Assessment be added to the Policy in the interest of clarity?”**

For clarity, the inclusion of the requirement of a Transport Assessment and Travel Plan is considered essential to understanding the traffic impact of any development proposal on this scale. A Transport Assessment is also needed to satisfy the policy requirements of DfT Circular 01/2022, particularly paragraphs 48 to 50 and Footnote 21.

- 11. “The development of the site requires contributions to significant highway infrastructure improvements. What consideration has been given to viability?”**

It is NH’s view that in understanding whether it is viable to allocate a given site in a Local Plan, it is essential that the local planning authority is able to establish the scope, likely cost a viability of any highway infrastructure improvements that may be needed. This includes demonstrating how any infrastructure is actually going to be funded and delivered at the appropriate time in the timeframe of the Local Plan. Consequently, this is a consideration for HBC.

To provide clarity, it may be appropriate for the reference to ‘significant highway infrastructure’ to be updated to refer to the improvement schemes at M65 Junction 8 and Shuttleworth Mead.

POLICY EP2 LAND BETWEEN BLACKBURN ROAD AND THE M65 SLIPWAY (EMP4), POLICY EP3 LAND BETWEEN BLACKBURN ROAD, SIDEBEET LANE, LEEDS AND LIVERPOOL CANAL AND RAILWAY (EMP5) AND POLICY EP4 LAND NORTH OF THE RAILWAY LINE BETWEEN SIDEBEET LANE AND LEEDS AND LIVERPOOL CANAL (EMP6)

21. “The allocations are likely to have an impact on the strategic road network, namely J6 of the M65. Should a requirement for a Transport Assessment be added to the policies in the interest of clarity?”

For clarity, the inclusion of the requirement of a Transport Assessment and Travel Plan is considered essential to understanding the traffic impact of any development proposal on this scale. A Transport Assessment is also needed to satisfy the policy requirements of DfT Circular 01/2022, particularly paragraphs 48 to 50 and Footnote 21.

As these sites are in proximity to M65 Junction 6 (which also serves allocations within neighbouring Blackburn with Darwen and is the responsibility of three highway authorities), NH suggests that for consistency any future Transport Assessments for these sites make use of NH’s microsimulation traffic model of the junction. This would provide a consistent basis for assessment of traffic impacts for these developments given the complexities of the junction and follows the approach taken by both HBC and Blackburn with Darwen in the development of their respective Local Plan transport evidence bases.

Any Transport Assessment modelling needs to take account of current transport and development conditions in the area at the time of submission of an associated planning application. We recommend that any policy should include a requirement for the neighbouring planning and highway authorities to be consulted when preparing transport evidence to support a planning application.

NATIONAL HIGHWAYS’ CONCLUDING COMMENTS

National Highways and Hyndburn Borough Council have worked collaboratively on assessing and planning necessary transport improvements to support the Local Plan growth, focusing especially on the M65 junctions.

A Statement of Common Ground was agreed in July 2025 outlining National Highways’ position and ongoing updates related to the Local Plan and transport implications.

Separate Junction Monitoring Reports for M65 Junctions 6 and 7 will be developed within 12 months of plan adoption, with funding and delivery strategies to be agreed among Hyndburn Borough Council, Lancashire County Council, and National Highways as referred to in paragraphs 5.1 and 5.5 of the Statement of Common Ground.

In relation to M65 Junction 8, it has already been evidenced through detailed traffic modelling that significant improvement of the junction (and the Shuttleworth Mead junction to the north) is required for it to operate safely with the addition of traffic generated by the proposed Local Plan; in particular that from the Huncoat Garden Village and Altham Business Park allocations. NH has therefore worked closely with HBC and LCC in working towards a shared understanding of the scope and form of the road improvements needed at these junctions to facilitate the safe delivery of the Local Plan from a transport perspective.

Notwithstanding this, it should be noted that feasibility work has not yet concluded with respect to identifying the final improvement scheme at Junction 8 and its associated cost to deliver. Consequently, this information will not be available before to the actual Examination in Public Hearings but is expected to be by late 2025. However, it must also be noted that confirmation of funding availability is reliant on the Road Investment Strategy 3 funding announcement by DfT which is anticipated in Quarter 4 of the 2025-26 financial year. We would ask therefore that the timing of the decision on the adoption of the Hyndburn Local Plan to 2040 takes account of these factors.

In respect of the Shuttleworth Mead junction, the improvement of which is interlinked with M65 Junction 8 enhancements, LCC is responsible for the conclusion of their feasibility work, sourcing of funding and the delivery of a suitable scheme.

In general, National Highways supports the sustainable transport initiatives recommended in the Local Plan to reduce private car travel and expects these measures to be secured through planning conditions.

As stated above, it is recommended that policies require Transport Assessments and Travel Plans for significant developments, aligned with DfT Circular 01/2022, to evaluate impacts on the strategic road network and ensure appropriate mitigation.

We hope that you find this letter useful and that it provides clarification in response to the relevant Matters Issues and Questions. Please do not hesitate to contact us if you have any further queries or require any further information before the commencement of the Local Plan examination hearings.

Yours sincerely,

Mrs Lindsay Alder
Spatial Planner
Planning and Development