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Sent Via email

Dear Anne Jordan and Alison Partington (Inspectors),

## **CENTRAL LANCASHIRE LOCAL PLAN TO 2041 EXAMINATION**

### **NATIONAL HIGHWAYS' SUBMISSION TO CENTRAL LANCASHIRE LOCAL PLAN TO 2041 EXAMINATION IN PUBLIC: MATTERS ISSUES AND QUESTIONS**

#### **Introduction**

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) (Planning for the Future).

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').

This letter sets out National Highways' written response to the Matters, Issues and Questions (MIQs) submitted for the Central Lancashire Local Plan (CLLP) as set out in Examination Document ID03, dated 9<sup>th</sup> October 2025.

The MIQs considered relevant to National Highways as strategic highway authority is:

- Matter 14 – Sustainable Travel, Infrastructure and Delivery, and Monitoring.

### **Background**

In March 2025, National Highways were consulted by the Central Lancashire authorities of Chorley, Preston and South Ribble – in partnership with Lancashire County Council (LCC) – to comment on their new Local Plan for the area (**CD1 Central Lancashire Local Plan 2023-2041 Publication Version**).

It should be noted that the Local Plan was then submitted ahead of the completion and agreement of the Transport Evidence base which in National Highways view is not consistent with the National Guidance 'Transport evidence bases in plan making and decision taking' (March 2015), Paragraph: 004 Reference ID: 54-004-20141010, '*The last of these stages should highlight the scale of and priorities for investment requirements and support infrastructure spending plans. Like a sustainability appraisal, it will be an iterative process and become more refined and detailed as the process draws to a conclusion.*'

Following our Regulation 19 Consultation response in March 2025, National Highways (and our transport consultant, WSP) have continued to engage positively with the Central Lancashire Local Plan Team (CLLP Team), Lancashire County Council Highways and their transport consultant Jacobs, including commenting on information and analysis provided as part of the transport evidence base.

The key documents prepared by Jacobs to inform the transport evidence base are:

- IT06: Stage 1A & B - CLLP Transport Evidence Stage 1 Reports (hereafter referred to as IT06: Stage 1A & B)
- IT07: Stage 2A & B - CLLP Transport Evidence Stage 2 Reports(hereafter referred to as IT07: Stage 2A & B)

As part of the early engagement, and to support the development of the transport evidence base, National Highways has provided access to relevant transport models and associated survey data.

Whilst Statements of Common Ground (SoCG) have been prepared and signed by other interested parties, National Highways has yet to agree a SoCG with the Central Lancashire Local Plan team. The following provides a key timeline of the most recent activities:

- National Highways were informed by e-mail from Jacobs on Friday 28th August that the transport assessment work for the CLLP was complete and noted that the Final Stage 2B Report (IT07: Stage 2A & B) had been uploaded to the CLLP's consultation website.

- Following the submission of the Final Stage 2B Report (IT07: Stage 2A & B), National Highways received a draft SoCG from LCC on Thursday 4th September asking for agreement to its contents by the end of Friday 5th September.
- National Highways note that the SoCG, drafted by LCC, included a series of outstanding queries that have been raised by National Highways throughout the process. Those queries were considered fundamental to understanding the impact of the CLLP allocations on the SRN and therefore any infrastructure requirements, however they were written ahead of National Highways review of the Final Stage 2B Review (IT07: Stage 2A & B).
- National Highways formally responded to the Final Stage 2B Report (IT07: Stage 2A & B) on Monday 27th October and met with the CLLP Team, Jacobs and LCC Highways on Wednesday 29th October to discuss the Final Stage 2B Report (IT07: Stage 2A & B) review by National Highways.
- Key outcomes of that meeting included an agreement that all parties wished to work towards an agreed SoCG. From this meeting Chorley took the action to provide a timetable for next steps identifying any outstanding issues and working towards resolutions. It was agreed that all parties would meet again on Thursday 13th November 2025.

Going forward, National Highways are seeking agreement on how the outstanding details, with regards to the transport evidence base mentioned further in the document, can be resolved and by what mechanism, by whom and importantly when. National Highways are keen to have sight of this to be able to provide comment to the Inspectors on the soundness of the plan and the forward approach.

**This written representation responds to the Inspector's Matters Issues and Questions (dated 09/10/25) that are considered to be of relevance to NH as the strategic highway's authority.**

**Matter 14 – Sustainable Travel, Infrastructure and Delivery, and Monitoring (Policies ST1-ST3 and ID1-ID3) Issue 14: Does the Plan set out a positively prepared strategy and policies for sustainable travel, infrastructure, delivery and monitoring which is justified, effective and consistent with national policy?**

***Issue 14.1: Do policies ST1-ST3 provide clear direction as to how a decision maker should react to a development proposal? Would these policies be effective? In particular***

- ***b – In relation to criteria 5b) is the requirement to mitigate any detrimental impact reasonable? How should cumulative impacts be taken into account?***

National Highways note that the wording of the criteria set out in 5b states that, 'Any detrimental impacts (in terms of capacity and congestion) upon the highway network are mitigated to the satisfaction of the relevant Highway Authority'.

For development affecting the strategic highway, National Highways makes its decisions in accordance with Policy and Guidance set out in:

- DfT Circular 01/2022 The Strategic Road Network and the Delivery of Sustainable Development ('The Circular'); and
- The Strategic Road Network Planning for the Future - A Guide to Working with National Highways on Planning Matters (October 2023) (Planning for the Future).

National Highways consider that the Policy wording could be modified to reflect the above by replacing 'to the satisfaction of the relevant Highway Authority' with 'in line with the relevant highway authorities policy and guidance'.

***Issue 14.2 – Does the Transport Assessment of the Plan (Docs IT06 and IT07) provide a robust and comprehensive assessment of the transport impacts of the development proposed in the Plan? Would the recommended measures within the policy provide effective mitigation for its identified effects?***

National Highways consider that IT06 and IT07 provide an assessment of the transport impacts (at the SRN) of the development proposed in the Local Plan; however, further work and analysis will be required to provide a more detailed understanding of the impacts of development at the SRN (and adjacent local highway network) as development proposals come forward in each of the individual LPA geographies over the Plan period. Such work will need to consider phasing and the effectiveness of intervention (and options) to allow the development of preferred 'cost effective' solutions. This is a currently matter of on-going discussion as part of the of the SoCG.

Notwithstanding this, a number of highway interventions have been identified at the SRN to support the Local Plan growth at the following locations which are accepted by National Highways as being required:

- M61 Junction 8 – Further Highway Upgrades;
- M6 Junction 28 & A49/B5256;
- M55 Junction 2;
- M6 Junction 31a Improvements; and
- Clayton Brook Interchange (M61 / M65).

***Issue 14.3b – Are the policies requirements supported by up-to-date evidence? How will the requirements of the policies be kept up to date?***

National Highways acknowledge that the transport evidence prepared to support the Local Plan is based on information and data sets readily available at the time of the preparation of the transport evidence; and will therefore only be a capture of a 'moment in time'. National Highways consider that a 'development plan' should be treated as a live document once adopted and that it will be updated with new evidence and supporting transport studies when appropriate.

***Issue 14.3c – Have the implications of policies ID1 and ID2 in relation to viability been appropriately tested? Are the assumptions in the Local Plan Viability Report (Doc IT05) reasonable and up to date and do they adequately reflect the scale and cost of***

**infrastructure requirements for development in the Borough as set out in the revised Infrastructure Delivery Plan?**

National Highways have not undertaken a detailed review of the viability implications of Policies ID1 & ID2 or carried out an independent costing of the interventions identified as this is beyond the scope of our input to the Local Plan review process at this time. However, it is noted that documents within the transport evidence base (ID08 and ID09) provided some indicative cost estimates which total £16.5 million across the various interventions identified at the SRN listed in Table 1 below. For clarification, National Highways were not party to the costing of the identified interventions and have not commented on the adopted methodology or findings.

SRN Intervention Location	Lead Authority	Cost	Comment
M61 Junction 8 Further Highway Upgrades	National Highways	£7,500,000	Need for intervention accepted by NH
Wigan Road and M6 Junction 28	Lancashire County Council	£3,000,000	Need for intervention accepted by NH
M55 Junction 2 Capacity Upgrade	National Highways	£3,000,000	Need for intervention accepted by NH
M6 Junction 31a Improvements	National Highways	£3,000,000	Need for intervention accepted by NH
Clayton Brook Interchange (M61/M65)	National Highways	£0	Need for intervention accepted by NH, however see note below.

**Table 1: SRN Interventions and Indicative IDP Costs**

It is noted that that Clayton Brook Interchange (M61/M65) intervention has not been costed. It is stated in Final Stage 2B Report (IT07: Stage 2A & B) that, “as National Highways have identified an existing issue at Junction 31a, that Policy allocation EC3 should consider the operation of the junction; however, the scale of impact may not justify the cost of mitigation intervention and that National Highways may need to explore alternative funding routes such as RIS3 or RIS4 program to address the safety issue as part of broader maintenance or safety upgrade.”

With respect to potential funding of a future scheme at the Clayton Brook Interchange (M61/M65) or any SRN location to address the impact of planned growth, National Policy as set out in the DfT Circular 01/2022 (Paragraph 29) states:

*29. New connections and capacity enhancements to the SRN which are necessary to deliver strategic growth should be identified as part of the plan-making process, as this provides the best opportunity to consider the cumulative impacts of development (including planned growth in adjoining authorities) and to identify appropriate mechanisms for the delivery of strategic highway infrastructure. **However, there cannot be any presumption that such infrastructure will be funded through a future RIS.***

**The company will therefore work with local authorities in their strategic policy-making functions in identifying realistic alternative funding mechanisms, to include other public funding programmes and developer contribution strategies to be secured by a policy in a local plan or spatial development strategy.**



National Highways therefore recommends that the Clayton Brook Interchange (M61/M65) be costed alongside the other identified SRN intervention, and that all identified SRN interventions be appropriately considered as part of the viability assessment of the Local Plan.

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.

**Issue 14.4 – In relation to Appendix 2 is the plan sufficiently clear as to how its implementation will be monitored?**

National Highways consider that the Monitor and Manage Strategy set out in Final Stage 2B Report (IT07: Stage 2A & B) has very limited detail with respect to commitments to the specific areas to be monitored, lead organisations and funding mechanisms. Furthermore, phasing of interventions at the SRN has not been appropriately considered with the transport evidence base which would lead to complexities with monitoring the interventions effectiveness.

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 faithfully



Lindsay Alder

North West Spatial Planning Team

