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On the Matter of the Central Lancashire Local Plan

Dear Inspectors,

I write to you in line with the deadline of submission of written statements of the 6th of November, as the Local Highway Authority (LHA) of Lancashire County Council, to set out broadly the matter of Transport and the concerns of significance the LHA currently has on this matter. The LHA and National Highways, who manage the adjoining Strategic network, share concerns, and we have been working with the CLLP Authorities and their appointed consultants on these matters. Please note, previous correspondence documented from Lancashire County Council was generally in its role as a Planning Authority.

For context, the Local Highway Authority developed guidance on Decide & Provide, to support the transition to vision-led planning in the December 2024 NPPF. This information was shared with the CLLP Authorities to assist their consultants. Our guidance can be found on our policies page at <https://www.lancashire.gov.uk/council/strategies-policies-plans/roads-parking-and-travel/>

Involvement and Statement of Common Ground

Whilst the Local Highway Authority have had a level of involvement in the development of the Local Plan, we have a number of concerns about the preparation. The LHA provided our advice directly to Jacobs regarding concerns, through workshops and via emails. The reports prepared by WSP on behalf of National Highways also set out these concerns. It was always envisaged that the LHA's formal comments on the Transport Assessment would be provided once Stage 2B was completed. The expected process is set out in the Statement of Common Ground (SoCG) between the CLLP Authorities and Lancashire County Council (September 2025).

The SoCG set out that the LHA had highlighted concerns with the assessment, particularly whether it sufficiently replicates operation of the network. This impacts on the suitability of proposed mitigation measures to support the Local Plan coming forward.

Paragraph 5.5 of the SoCG was envisioned to be met and facilitate full submission of comments in advance of examination. It was agreed that:

- All parties must be satisfied with the completed Transport Assessment.
- The completed Transport Assessment will need to be provided to parties incorporating modelled highway mitigation measures.
- The required infrastructure must be agreed by all parties (including the Local Highway Authority) in advance of the examination
- A final agreed iteration of the IDP will need to be prepared ahead of examination.

At the point of submission, it appears that not all transport-related concerns raised by the LHA had been fully addressed. We had anticipated further engagement to resolve these matters, enabling a more comprehensive and agreed position to be presented at Examination. The LHA anticipated that further discussion would be had addressing all concerns regarding the transport evidence, maximising areas of agreement to limit/negate matters of dispute. The LHA would then provide full comments and progress to agreeing the final iteration of the Infrastructure Delivery Plan (IDP). This would limit examination time at the hearing and make best use of the Inspector's time.

The Use of Strategic Modelling ('Coarse' Approach)

The LHA supports the use of a Strategic model as being the appropriate approach that offers a 'coarse' appraisal for the full Local Plan impacts. Unfortunately, a strategic model is not typically strong for the full network and does naturally incur weaknesses for discreet areas/corridors. This is acknowledged in the 2B Report (document reference IT07) which sets out at 2.4 that '*The strategic scope of this model does not eliminate the need for site-specific transport assessments, which can uncover localised impacts (e.g., junction congestion) that may require mitigation*'. The areas of weakness of a strategic model predominantly occur in Central Lancashire where there is intersection between the local and strategic network and generally results in impacts being underestimated when compared to existing conditions (where there are significant levels of congestion and delay). For example (not exhaustive):

- Junction 31a of the M6 including Bluebell Way (B6242)
- M61 Junction 8 including Hartwood Hall Roundabout and Hospital Roundabout

For the 'broader' details – and crucially – informing what infrastructure would be required, additional modelling is necessary (microsimulation). For the 'finer' details, we would expect junction modelling, and this would be required for critical junctions. While the 2B report concludes that there are no significant impacts, this conclusion is based on the strategic model (with its weaknesses). It would be helpful to all to acknowledge the known limitations of the approach taken forward and that complementary methods are required to strengthen the evidence base of the Local Plan and to ensure that in principle impacts can be mitigated (for the avoidance of doubt to support a reliable highway network including sustainable modes). This was raised with Jacobs on the 30th of January 2025 by National Highways and included in minutes. It was subsequently raised by LHA in the workshops held on the 3rd, 5th, and 7th of March, but unfortunately these were not minuted.

The Transport Assessment assumes a number of measures will reduce car trips and

impact on overall traffic levels. These assumed reductions result in most junctions operating within capacity (whilst in some cases removing capacity and/or impacting on public transport reliability), and then the model results are cited as evidence the proposed mitigation is effective. While the LHA supports the principle of a vision-led approach, it is suggested that these assumptions require further evidence to ensure they are realistic, deliverable, and the consequences are acceptable to the LHA (within a network that is already suffering the effects of congestion).

The Infrastructure Delivery Plan

Accurate transport modelling is essential to underpin the reasonableness of the Infrastructure Delivery Plan to ensure that the interventions are evidence-based and successfully manage the impact of development on the highway network.

The success of vision-led development depends on the infrastructure it relies on or provides – which influences and expands over time. The effectiveness of this approach depends on a range of interrelated factors, such as:

- Local Plan policy (impacting upon new development which then in turn for consistency should influence the existing built environment);
- site layout and how that site operates and integrates into the existing built environment;
- socioeconomic considerations and opportunities;
- topography, geography, and rurality;
- land ownership and highway boundary;
- travel behaviour change;
- the timing and phasing of development;
- infrastructure delivery; and,
- the ability to control and monitor outcomes (linking back to further necessary travel behaviour changes (circular)).

With this, for a significant time, infrastructure to support active travel and modal shift will have disconnections and other influences that will limit the uptake of sustainable travel, not providing the expected level of change at that moment in time.

The LHA has an important role in helping to provide certainty across all stages and phases of development. For example, to suggest what infrastructure is needed, where and when it should be delivered, and ensuring that development does not proceed prematurely (without that infrastructure being in place), so that the network does not operate unacceptably in the interim period before all necessary measures. Additional modelling using microsimulation ('broad') or junction modelling ('fine') together with a spreadsheet approach should be able to assist in identifying areas currently missing from the IDP and provide a more evidence-based approach to help maximise modal shift.

Ensuring the Infrastructure Delivery Plan (IDP) is deliverable and aligned with the transport evidence is critical to the overall success of the Local Plan. Refinement and clarity in the IDP would help provide greater confidence in its implementation.

Some of the issues in the IDP (aside from the evidence base upon which it relies) include:

- Reference to the M61 Junction 8 and Hartwood Roundabout Improvements. These improvements deliver changes to support a development already granted permission. It is not to support the Local Plan nor is it capable of doing so.
- The estimated costs are very broad-brush (the same figures occur repeatedly). They do not appear to have been considered in the necessary detail. The actual costs are likely to be significantly different to the assumed costs, which is a risk when it comes to reliance on the infrastructure to promote the Local Plan. The Cross Borough Link Road (CBLR) bridge, for example, is underestimated at £3m and there is still a level of uncertainty it will be delivered - as it goes over third-party land (Network Rail). Notwithstanding the existing roundabout on Bee Lane/Leyland Road/The Cawsey which suffers from congestion with current levels of usage and would need to be included.

The NPPF sets out at paragraph 16b, that plans should be prepared positively, in a way that is aspirational but deliverable. At this stage the LHA (and I am informed National Highways) retain concerns, and from the LHA's perspective it is considered further work is needed to be completed to positively conclude matters, including the necessary, agreed, viable and deliverable IDP.

The issue of necessary infrastructure, deliverability, and the appropriate level of detail for a Transport Assessment arose with the Pickering's Farm application, which was the subject of Public Inquiry. In the decision notice (APP/F2360/W/22/3295498 & APP/F2360/W/22/3295502), the Inspector relied on the inclusion of a site in the Local Plan, and the Local Plan transport evidence, as one of the bases for their decision (without all elements of the CBLR being delivered). The decision stated in paragraph 307:

*Even if the residual cumulative impacts on the highways could be described as severe, this does not necessarily lead to a conclusion that the appeal proposal should be refused, particularly **bearing in mind that the appeal site is an allocated site in the adopted local plan**. I return to this point in the planning balance.*

With this, it becomes increasingly important that the transport evidence base, and proposed mitigation underpinning the Local Plan is adequate and agreed by both the Local Highway Authority and National Highways. Doing so will help ensure that site allocations are appropriate and that future decisions include deliverable transport strategies (when needed).

Next Steps

The LHA is keen to maximise the level of sustainable growth in Central Lancashire and see development opportunities taken up, with an efficient and safe highway network supporting it.

To progress matters, the parties have met on several occasions and discussed many concerns at that time. A further meeting is agreed between all parties on the 13th of November, as the LHA is keen and willing to resolve outstanding matters. This meeting will include likely contents of an updated Statement of Common Ground on highways and

transport, in addition to providing an opportunity to discuss a practical way forward on areas of disagreement prior to the hearing (of transport matters) in January.

With this letter, I would kindly request an extension to provide a detailed Statement from the LHA, to the close of play on Monday the 17th of November. This will set out all outstanding concerns in the requisite detail but also the outcome of the meeting of the 13th on the way forward.

Kind Regards,



Neil Stevens
Highways Development Control Manager
Lancashire County Council