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20 November 2026

Dear Inspectors Anne Jordan and Ben Johnson,

OLDHAM LOCAL PLAN EXAMINATION

NATIONAL HIGHWAYS' SUBMISSION TO OLDHAM LOCAL PLAN 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) (Plan 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').

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This letter sets out National Highways' written response to the Matters, Issues and Questions (MIQs) submitted for the Oldham Local Plan (OLP) as set out in Examination Document EL1.004b, dated 20th October 2026.

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

- **Matter 7 - Transport policies**
- **Issue 11**: Does the Plan set out a positively prepared strategy and policies (Policies T1 to T5) for transport which is justified, effective and consistent with national policy?

Background

A chronological summary is provided below of previous study work and engagement between Oldham Council and National Highways on matters affecting the Local Plan.

- **2019 – SYSTRA Strategic Road Network Report:** This was commissioned by TfGM to assess the cumulative effects of PfE allocations on the SRN across Greater Manchester. It used strategic modelling, targeted junction assessments and merge/diverge assessments, primarily based on a 2040 "Policy Off" scenario that excluded the anticipated benefits of the Greater Manchester 2040 Transport Strategy. The study identified locations where mitigation, monitoring or further investigation could be required. Relevant measures included A627(M) J1 improvements, Slattocks Roundabout improvements and upgrades to the slip roads at A627(M) J2, together with controlled motorway measures on the A627(M) J1–J2 northbound. It also highlighted physical constraints to further capacity improvements, particularly on the M60, and recommended a Monitoring Strategy between National Highways, the districts and TfGM to monitor PfE growth and delivery of the transport strategy.

- **2022 – PfE Statement of Common Ground:** The PfE SoCG recorded the agreed position between National Highways and GMCA on behalf of the nine PfE authorities. National Highways accepted that the strategic transport evidence provided a sound and proportionate basis for PfE, reflecting the strategic and long-term nature of the Plan, and confirmed that it was not seeking modifications to the proposed allocations. However, it was agreed that the need, form, timing and

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phasing of SRN interventions would require more focused assessment as proposals developed. This would consider the cumulative effects of existing land supply and PfE allocations and could be undertaken through Local Plans, masterplans, SPDs, planning applications and other studies. The GM authorities also committed to continued engagement with National Highways. The PfE was adopted in March 2024, becoming part of the statutory development plan for Oldham and the other participating authorities and establishing the strategic framework for growth to 2039.

- **February 2024 – National Highways Regulation 18 response to the Draft Oldham Local Plan:** National Highways was broadly supportive of the Draft Local Plan, particularly its emphasis on sustainable locations, active travel, public transport and reducing reliance on private cars. However, it considered that a more robust transport evidence base is required to demonstrate the individual and cumulative impacts of planned growth on the SRN, including the M60, A627(M), A663 (Broadway) and nearby M62. The key requirements from National Highways' perspective included an assessment of the combined impacts of Local Plan and PfE allocations, including cross-boundary development and employment/freight movements; details of how impacts on SRN capacity, operation and safety will be mitigated, phased and funded. This approach is in line with paragraph 29 of the DfT Circular 01/2022, which states that 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 and to identify appropriate mechanisms for the delivery of strategic highway infrastructure.

- **March 2026 – National Highways Regulation 19 response to the Oldham Local Plan:** National Highways was broadly supportive of the Plan's vision-led approach, including its emphasis on sustainable development, active travel, public transport accessibility and early engagement where development could affect the SRN. It also recognised that a number of its earlier Regulation 18 comments had been addressed, including explicit references to National Highways in Policies T1 and T5. However, National Highways' view was that the evidence relied heavily on the earlier PfE evidence base and strategic allocations and did not clearly demonstrate the cumulative impacts of all Local Plan housing and employment growth on the M60, A627(M) and wider SRN. The consultation response therefore concluded that further evidence and continued engagement regarding the potential effects of development on the SRN was required.

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The technical work and consultation responses referred to above have informed a draft Statement of Common Ground (SoCG) between National Highways and Oldham Council. The SoCG sets out areas of common ground and areas for further collaboration and assessment. The draft SoCG was provided by National Highways to Oldham Council for agreement on 17 November 2026. A signed copy of the agreed SoCG will be provided to you by Oldham Council once it is available.

Matter 7 - Transport policies

Issue 11: Does the Plan set out a positively prepared strategy and policies (Policies T1 to T5) for transport which is justified, effective and consistent with national policy?

Policy T1

7.1. Is Policy T1 effective, justified and consistent with national policy? Is it consistent with PFE [PW09]?

National Highways is broadly supportive of Policy T1 and considers that its overall approach is consistent with the principles of sustainable and vision-led transport planning established through national policy and PfE. In particular, National Highways supports the policy's emphasis on active travel, public transport, reducing reliance on private car travel, maintaining safe and suitable access, and mitigating significant impacts on the transport network. National Highways also welcomes the specific requirement for developments that may affect the SRN to engage with National Highways at the earliest opportunity. This amendment responds positively to comments previously made by National Highways at Regulation 18 stage.

National Highways considers that the effectiveness of Policy T1 should also be considered in the context of the available transport evidence. DfT Circular 01/2022 establishes that plan-making should ensure that growth does not compromise the SRN's prime function of enabling the long-distance movement of people and goods and that, where new connections or capacity enhancements are necessary to deliver strategic growth, these should be identified through the plan-making process alongside appropriate delivery and funding mechanisms.

While the PfE transport evidence provides a useful strategic overview, the PfE Statement of Common Ground recognised that more focused assessment would subsequently be required as proposals were refined. National Highways therefore considers that further proportionate assessment is required to provide a sufficiently detailed understanding of the implications of planned growth for the SRN.

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National Highways therefore considers Policy T1 to be broadly consistent with national policy and PfE in its policy approach, but considers that further work is necessary to demonstrate how the policy will operate effectively alongside the evidence and infrastructure necessary to accommodate planned growth.

7.2. Is Policy T1 positively prepared with regard to impacts on the Strategic Road Network (SRN)? Is it supported by evidence relating to the individual and cumulative impacts of development on the SRN? What consideration has been given to potential mitigation of impacts?

National Highways considers that Policy T1 contains positive provisions in relation to the SRN, notably its requirement for early engagement with National Highways where development may affect the SRN.

The PfE Statement of Common Ground established that the strategic evidence provided a sound and proportionate basis for that PfE, while recognising that more focused assessment would subsequently be required as proposals were refined. It was National Highways' expectation that this would be completed as part of the Local Plan transport evidence base for each PfE borough as individual Local Plans came forward. This approach is in line with paragraph 29 of the DfT Circular 01/2022, which highlights the plan-making process as the best opportunity to consider the cumulative impacts of development and to identify appropriate mechanisms for the delivery of strategic highway infrastructure.

Notwithstanding, National Highways has proactively undertaken its own in-house study work to better understand the potential impacts on the SRN arising from planned growth across Greater Manchester. This work includes a collation of the transport evidence undertaken to date for each borough, a review of relevant changes in network conditions, infrastructure, development activity and the wider planning context, identification of evidence gaps and matters requiring further consideration.

Through this study work, National Highways has identified the following locations in Oldham where future traffic impacts may necessitate the identification and delivery of mitigation measures:

- A627(M) Junction 1
- M60 Junction 21
- M60 Junction 22
- A663 Broadway

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In addition to the above, locations have been identified in adjacent boroughs where cross-boundary impacts from Oldham would be expected to contribute to the overall cumulative impact.

National Highways would welcome further collaborative study work with Oldham Council to build on the work undertaken to date, assess future traffic impacts at the above locations in more detail, and to identify appropriate mitigation, with a joint plan for funding and delivery of these throughout the Plan period.

To ensure a robust approach to future assessment work, the parties will seek to establish an agreed schedule of development assumptions, including existing land supply sites, PfE allocations, committed development and other major schemes, so that it is clear which developments are represented in future transport assessments. This should include consideration of Oldham Town Centre regeneration, SportsTown, Broadway Green, Hollinwood Junction and relevant cross-boundary growth.

Where further assessment demonstrates that mitigation is required to accommodate Local Plan growth, such measures should be included in the IDP including details of the form, timing, phasing, delivery responsibility and funding route for such measures.

National Highways will work proactively with Oldham Council to ensure completion of this additional assessment work within 5 years post-adoption of the Local Plan.

7.3. Can the Council demonstrate evidence of effective cooperation with National Highways with regard to Policy T1?

National Highways considers that there has been effective and ongoing cooperation with Oldham Council in relation to strategic transport matters and Policy T1.

National Highways has engaged with the development of the Local Plan at both Regulation 18 and Regulation 19 stages. Amendments have been made following that engagement, including the explicit requirement within Policy T1 for early engagement with National Highways where development may affect the SRN. National Highways welcomes this change.

This engagement builds upon earlier cooperation through the preparation and examination of PfE. The PfE Statement of Common Ground established an agreed position between National Highways and the Greater Manchester authorities on the strategic transport evidence while recognising that more focused assessment would be necessary as proposals were developed.

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There is also continuing joint working in relation to the cross-boundary Stakehill allocation. National Highways is working with Oldham Council, Rochdale Council and TfGM as the Stakehill Transport Framework progresses, including assessment of M62 Junction 20, A664 Slattocks Roundabout and A627(M) Junction 1 and the subsequent intended preparation of a Transport Infrastructure Delivery Plan and Funding Plan.

The SoCG between National Highways and Oldham Council records the areas of agreement and establishes areas of further collaborative work including the undertaking of focused traffic assessments, identification of mitigation including a plan for funding and delivery, and collaboration with TfGM and GMCA over sustainable transport, SRN monitoring and the emerging Greater Manchester Highways Strategy Board.

National Highways therefore considers that there is clear evidence of constructive and ongoing cooperation with Oldham Council, while recognising that this cooperation needs to continue, to further develop the transport evidence base and ensure there is a robust plan to deliver mitigation measures which are required to support the planned growth.

Policy T5

7.11. Is Policy T5 effective, justified and consistent with national policy? Is it consistent with PFE [PW09]?

National Highways is broadly supportive of Policy T5. The policy adopts a vision-led approach and seeks to maximise opportunities for walking, wheeling, cycling and public transport, while requiring proportionate Transport Statements, Transport Assessments and Travel Plans where development is likely to generate significant movement. It also requires consideration of cumulative impacts and whether trips generated by development can be adequately accommodated by both the local highway network and the SRN.

National Highways particularly welcomes the inclusion of the SRN within the policy and the requirement for applicants to engage with National Highways where applications affect the SRN. These provisions respond positively to National Highways' earlier representations, and its Regulation 19 review was broadly supportive of the Plan's vision-led approach.

The policy should, however, be distinguished from the strategic assessment required through plan-making. Policy T5 principally establishes requirements for assessing individual development proposals at the development-management stage. While such assessments can consider cumulative impacts, they do not remove the need for proportionate plan-level consideration of the combined effects of planned growth on the SRN. DfT Circular 01/2022 identifies plan-making as the best opportunity to consider

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cumulative development impacts and identify necessary strategic highway infrastructure and delivery mechanisms.

National Highways therefore considers that the broad approach of Policy T5 is consistent with national policy and PfE, subject to recognition that development-management assessments undertaken under T5 complement, rather than substitute for, the further focused assessment identified in the SoCG between the two parties.

7.12. Does the policy clearly distinguish the role and purpose of each document, and does it set out clear triggers where the different documents would be required?
National Highways supports the principle of requiring proportionate Transport Statements, Transport Assessments and Travel Plans according to the scale, nature and transport implications of development. Policy T5 identifies relevant considerations including the scale and type of development, potential trip generation, public transport accessibility, cumulative impacts and known transport issues in the surrounding area.

From a National Highways perspective, the important requirement is that the level of assessment should be proportionate to the scale and nature of development and sufficiently robust to understand impacts on the safe and efficient operation of the SRN. Policy T5 already provides for National Highways to be involved where the SRN may be affected so that the appropriate scope and level of assessment can be agreed.

Overall position

As set out in the SoCG, National Highways does not consider any of the Local Plan policies to be fundamentally unsound. Our Regulation 19 response was broadly supportive, recognised that earlier comments had been addressed, and did not identify a requirement for significant policy modification. Notwithstanding, the following points summarise our current position on the MIQs raised on Policies T1 and T5, which are the policies of greatest relevance to National Highways:

- **Policy T1** provides a broadly acceptable policy framework, but further detailed evidence supporting it would be beneficial, particularly in relation to cumulative SRN impacts at key locations and identification/delivery of mitigation. National Highways is committed to working collaboratively with Oldham Council on the production of this additional, more detailed transport evidence.
- **Policy T5** sets out a broadly acceptable development-management mechanism, but this is not a substitute for the more detailed strategic evidence referred to above.

As stated in the SoCG, National Highways would welcome further collaborative study work with Oldham Council to build on the work undertaken to date, assess future traffic

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impacts in more detail and identify appropriate mitigation, with a joint plan for funding and delivery throughout the Plan period. National Highways will work proactively with Oldham Council to ensure completion of this additional assessment work within 5 years post-adoption of the Local Plan.

Yours sincerely

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