



**Appeal by Ministry of Justice
Land adjacent to HMP Garth and HMP
Wymott, Leyland Appeal Ref:
APP/D2320/W/22/3295556**

Summary Proof of Evidence of Kevin Riley

on behalf of Chorley Council



Contents

1	INTRODUCTION	1
1.1	APPOINTMENT	1
1.2	QUALIFICATIONS	1
1.3	RELEVANT EXPERIENCE	1
1.4	PROPOSALS	2
1.5	BACKGROUND	2
1.6	SUMMARY OF EVIDENCE	2
	Ulnes Walton Lane carriageway markings and traffic calming	2
	The proposed footway between Ulnes Walton Lane and Moss Lane	2
	Moss Lane traffic calming	2
	A581/Ulnes Walton Lane Mitigation	3
	Construction traffic routing	3
1.7	CONCLUSION	3

1 INTRODUCTION

1.1 APPOINTMENT

1.1.1 My name is Kevin George Riley. I am Director at WSP, based in our Liverpool Office, regularly working across the North West of England. I was appointed by Chorley Council to advise on transport matters in relation to a proposed development on the appeal site. The appeal site is on land adjacent to HMP Wymott and HMP Garth. With regards to this planning appeal, I will be providing evidence in relation to transport on behalf of Chorley Council.

1.2 QUALIFICATIONS

1.2.1 I hold a Bachelor of Science (with Honours) in Geography with Environmental Studies from Manchester Polytechnic (now Manchester Metropolitan University) and a Masters Degree in Transport Engineering and Planning from the University of Salford. I am a guest lecturer on that MSc course and have been for around 19 years. I have been a member of the Chartered Institute of Logistics and Transport and the Transport Planning Society. At the latter I was National Secretary. I regularly prepare and present papers on transport matters and their relationship with development.

1.3 RELEVANT EXPERIENCE

1.3.1 I have 30 years Transport Planning and Engineering experience within both the public and private sector where I have been involved in both design and strategy projects across the UK, including many development and regeneration related projects. I also have significant experience in considering non-car modes in both urban and rural environments.

1.3.2 I have worked for WSP as a Director for nearly 5 years. Prior to that I worked for Mott MacDonald as Projects Director for 5 years, including various projects related to major development proposals of all types. Prior to that I led AECOM's Northwest Development Planning team and Liverpool Office Transportation Team for 10 years. I have also worked for a local authority, (Manchester City Council), London Transport, and another consultancy (PBA).

1.3.3 Throughout my career my role has focused on providing access to regeneration and development sites across the UK working on both design and strategy, including scheme design matters. I have extensive experience across Lancashire, working on projects for both public and private sector clients in the County. I understand the context that this proposal lies within well, having worked in this geography numerous times over the last 15-20 years.

1.3.4 I was the transport witness at the first Inquiry and am therefore familiar with the background to this appeal.

1.3.5 I have not elaborated on matters which are contained within a Statement of Common Ground between Chorley Council and Cushman and Wakefield.

1.3.6 The focus of my proof is on the new evidence for which this Inquiry relates, however I will pay due cognisance to all previous evidence and the Inspector's report. I will refer to the documents by the core document reference number and the pdf page number for ease.

1.3.7 I will review the merits of the proposals and provide my expert opinion on outstanding transport matters related to the site.

1.3.8 In providing this evidence I am aware that my duty is to the Inquiry to provide my professional view irrespective of by whom I am instructed. Accordingly, I can confirm that my Proof of Evidence which I have prepared in respect of this Inquiry has been prepared and is given in accordance with the guidance of my professional Institutions and I confirm that the opinions expressed are my true and professional opinions.

1.3.9 I have visited the site and surrounding area for the purposes of this Inquiry and regularly travel through the Chorley and South Ribble area in both a professional and private capacity. I regularly liaise with Lancashire County Council (LCC) Highways Development Control team on a range of commissions that I am involved in and understand their remit to respond to developments across the county as Local Highway Authority (LHA).

1.4 PROPOSALS

1.4.1 Planning application 21/01028/OUTMAJ is for a new prison adjacent to HMP Wymott and HMP Garth. The site is located off Moss Lane, Ulnes Walton, Leyland. It is a Hybrid application, with outline planning permission being sought for the new prison (with all matters reserved except for means of access, parking and landscaping), outline planning permission being sought for a new boiler house (with all matters reserved except for access), and full planning permission being sought for a replacement bowling green and club house.

1.5 BACKGROUND

1.5.1 Following the 'minded to grant' decision by the Secretary of State (SoS) (Core Document L1) and the subsequent submission of additional highways evidence by the Appellant (CD M3 and M3a), Chorley Council and Ulnes Walton Action Group (UWAG) requested the re-opening of the Inquiry.

1.5.2 Whilst it is acknowledged that LCC, as the LHA, has not objected to the proposals, the LHA similarly did not object at the time of the first Inquiry where the Inspector agreed with Chorley Council in his recommendation that the appeal be dismissed.

1.5.3 Similar to the previous Inquiry, I will set out in my Proof of Evidence the reasoning why the additional information and revised mitigation proposals put forward by the Appellant is still insufficient to mitigate the safety impacts of the proposed scheme.

1.6 SUMMARY OF EVIDENCE

1.6.1 My Proof has demonstrated why the Appellant's proposed mitigation measures do not mitigate the impact of the proposals.

Ulnes Walton Lane carriageway markings and traffic calming

1.6.2 The proposals do not mitigate the full impact of the development proposals and does not fully address the safety concerns raised by the Council, particularly with regard to the visibility. The mitigation is focused on the junction with Moss Lane and there is also no mitigation proposed along a large section of Ulnes Walton Lane south of the junction despite it being the HGV construction traffic route and the main route for 55% of staff trips during construction and operation.

The proposed footway between Ulnes Walton Lane and Moss Lane

1.6.3 Whilst the proposals do address part of the safety concerns raised by the Council by providing access to the northbound bus stop, it does not address the impact for other local users of Ulnes Walton Lane and Moss Lane including those travelling to the bus stop to the south of the Moss Lane junction and accessing the postbox on the north-western side of the Moss Lane junction. Both of which will still require pedestrians to walk in the road.

Moss Lane traffic calming

1.6.4 The proposals have not changed much from the initial proposal put before the previous Inquiry, it does not address the safety concerns and it does not fully mitigate the impact of the proposals at this location.

A581/Ulnes Walton Lane Mitigation

1.6.5 There are clear deficiencies in the current design and the concerns raised by myself, the Council, and the Inspector at the previous Inquiry, have not been effectively mitigated. The mini roundabout has substandard junction visibility, the swept path analysis demonstrates it will lead to unsafe manoeuvres for heavy vehicles and those accessing from the driveways to the south. It has also not considered non-motorised users and I have concerns with the capacity modelling, which has flagged warnings of unbalanced flows.

Construction traffic routing

1.6.6 The assessment of construction traffic routes is flawed and does not take into account weight restrictions on Ulnes Walton Lane. The numbers have no evidence base and even if I were to accept that the assumptions are appropriate, the volumes over a five-year construction period are of notable concern. Particularly, when these additional vehicles will be on movements where visibility is poor and where the swept path analysis has shown them to be unsafe. There is also no consideration of parking for construction personnel, which could lead to nuisance parking on nearby roads and have safety implications for pedestrians, cyclists and equestrians.

1.7 CONCLUSION

1.7.1 On that basis, it is my view that the proposed mitigation put forward by the Appellant has not been properly developed, nor does it fully address the original concerns raised at the previous Inquiry.

1.7.2 It is therefore my overall conclusion that the appellant has yet to demonstrate that the proposals will avoid problems of safety across the study network and is therefore contrary to paragraph 110 and 111 of the National Planning Policy Framework, policy BNE1 and policy ST1 of the Chorley Local Plan 2012 - 2026.



8 First Street
Manchester
M15 4RP

wsp.com

WSP UK Limited makes no warranties or guarantees, actual or implied, in relation to this report, or the ultimate commercial, technical, economic, or financial effect on the project to which it relates, and bears no responsibility or liability related to its use other than as set out in the contract under which it was supplied.