

**ULNES WALTON ACTION GROUP**

**APP/D2320/W/3295556**

**APPEAL BY THE MINISTRY OF JUSTICE  
LAND ADJACENT TO HMP GARTH AND HMP WYMOTT**

**PROOF OF EVIDENCE OF**

**PAUL PARKER**

**Addressing: LOGISTICS AND CONSTRUCTION ROUTES**

## **INTRODUCTION**

1. I, Paul Parker, of the Ulnes Walton Action Group (“UWAG”) provide this proof of evidence in relation to the re-opened appeal brought by the Ministry of Justice (“the MoJ”) concerning the proposal to develop a new prison on the site to which this appeal relates. UWAG comprises local residents who came together in October 2021 following an open public meeting attended by many local people who were unanimous in their objections to the proposal to build a third prison in this locality.
2. I am a retired Quality Control professional, who has applied transferable skills across a number of industries. Before retirement I was Head of Testing for a major software house based in Stockport. I was responsible for the tactical and strategic activities of a team of fifty software testers, five test managers, delivering software solutions to the Insurance industry.
3. Following the Inquiry into the above proposals and the Report to the Secretary of State of the appointed Inspector, this Proof of Evidence is produced in response to the invitation by the Secretary of State to provide further evidence as to the highways implications of the proposals. It should be read in conjunction with the evidence already submitted by UWAG on that topic in Core Documents G3 (including G3a-f), and O2-O21.
4. UWAG respectfully agree with the original conclusions reached by the Inspector (and adopted by the Secretary of State) as to the evidence put forward by the MoJ at the Inquiry that the proposals would exacerbate existing hazards and risks within the local road network and overall, that, following examination of the evidence, the proposals would give rise to an unacceptable effect on highway safety in the area.
5. UWAG note that the Secretary of State accepts the Inspector’s conclusions (essentially adopting the position advanced by UWAG at the Inquiry) that there are at least two potential alternative sites for a new prison in the North West. In particular, both of these alternative sites are *better* served by the proximity of motorway and A-road infrastructure, permitting easier access for construction and operational traffic and both sites also have better options for sustainable travel by rail and public bus services.
6. My evidence will relate solely to the issue of construction traffic and proposed logistics routes’ caused by this proposed development and is based on the real world, lived experience of local residents. That lived experience should be read alongside the technical evidence of Mr Graham Eves, and the Highway and Safety evidence of Mrs Lynette Morrissey and is intended to complement their findings. Most notably, Mr Eves concludes that there would be an unacceptable impact on highway safety, and the residual cumulative impacts

on the road network would be severe such that planning permission should not be granted.

7. I append to this proof of evidence the following documents:
  - Appendix 1 - Logistics Route 1 - Video of driven route
  - Appendix 2a - Logistics Route 2 start - Video of driven route
  - Appendix 2b - Logistics Route 2 cntd - Video of driven route
  - Appendix 3 - Logistics Route 3 - Video of driven route
  - Appendix 4 - Logistics Route 4 - Video of driven route
  - Appendix 5 - Logistics Route 5 - Video of driven route
  - Appendix 6 - Logistics Routes Compared

Videos will available in the Inquiry at the Planning Inspectors discretion.

## General Comments

8. UWAG contends there has to be a road safety and transport consideration of proposing significant increases in HGV and contractor traffic on routes involving densely populated residential areas, and on an already congested road network. The only consideration of the Explore logistics survey ("the survey") appears to be that a "HGV was able to carry out the above route, keeping to the road and without impacting or over running any kerb line". This is the same statement for all five proposed routes.
9. The survey had set out to prove that the routes could be negotiated by a single HGV. It does not consider driving the routes under scheduling circumstances and does not evidence the extent of the effects of up to 200 HGVs and 750 contractor vehicles per day from 0700hrs to 1745hrs on the local road network, let alone issues around road safety when travelling through densely populated residential areas.
10. The survey also does not indicate relevant information - for example the time of day, the road conditions, was it in school term-time or at school opening or closing, weather conditions.
11. Included in the evidence with the survey is an email from Sam Siddorn of Laing O'Rourke to Rick Bell of Explore (Documents Issued Following Inquiry/Additional Highways Evidence/Appendix N - Construction Route Assessment).

*"Thanks Rick, looks good. We have received the attached assessment from the client which at first look suggests that there are a number of improvement works required on local roads to prevent clashes with kerbs/central res. Could you have a quick review and let us know if you think these are actual risks or just the tracking software being too thorough? Thanks, Sam".*

12. The attached "assessment from the client" referred to in the above email exchange is not included in the Appellant's evidence, so we are not aware of what "improvements works" were thought to be required, what the client's concerns were, or how "the survey" addressed these.
13. "The survey" does not represent the complete picture, because each HGV will have to make two journeys, one to the site and one away from site.
14. Road safety issues and transport issues can be different dependent upon the direction of travel. For example, turning left into a junction can present different challenges to turning right out of a junction, particularly for HGVs. The routes away from the site have not been considered fully.
15. There is no evidence of road safety or transport impact considerations having been taken into account by the Appellant along any of the proposed Routes 1-5 bearing in mind the projected volumes of construction HGV and contractor traffic.
16. The Appellant has not evidenced any investigation of PIA statistics along any of the proposed Routes 1-5.

## **Routes 1-5**

17. The initial Planning Inquiry conducted in July 2022 identified two legitimate alternative sites. Whilst the merits of these sites are not part of this re-opened Inquiry, it is worth noting the differences in road network access to the respective sites illustrated in Appendix 6 - Logistics Routes Compared spreadsheet.
18. In simple terms, the shorter the distance from major arterial routes to site, such as motorways, typically represent the easiest routes to access for HGVs and additional contractor traffic. Where a motorway is exited, the road network is typically supported by major and minor A roads.
19. Setting these alternative sites aside for this re-opened Inquiry, we can see from the table at Appendix 6, the five logistics routes identified to access the HMP Wymott and Garth estate. All routes exit the motorway network between 5.4 miles and 9.4 miles (around 14 to 22 minutes) away from the HMP Wymott and Garth estate on Ulnes Walton Lane (C195). All distances and journey times have been derived from Google Maps.

20. All five of the proposed routes have been driven and video'd with commentary in real-time by UWAG and are at Appendices 1-5. Videos will be available in the Inquiry at the Planning Inspectors' discretion.
21. All five routes identified in the survey traverse minor A roads, B roads and C roads, and include residential areas with a range of light and dense population, reflected by semi-rural and urban environments.

### **Preferred Routes 4 and 5**

22. Routes 4 and 5 are identified as "preferred routes" because they "keep primarily to larger A and B roads with lesser impact on residential areas". This statement implies that this is a consideration that the Appellant should take account of.
23. Route 5 is suggested for 'abnormal loads' (large plant, concrete structural modules), with Route 4 for standard HGV loads.
24. Route 5 would require "renewed movement orders for abnormal loads" according to the survey. Although how many would be required is not stated.
25. Both Routes 4 and 5 also utilise the A581 Southport Road, a busy commuter/transport route. Because of the volume and speed of traffic, coupled with driving behaviours, it is subject to average speed restriction cameras along the stretches proposed in the survey route. The installation of such cameras by the highway authority is recognition of road safety concerns with the A581.
26. Route 4 (20 minutes, 9.4 miles) has to negotiate urban residential areas, containing local shopping areas and school crossings, notably on Balshaw Lane, Euxton (A581). This is obviously a busy community hub because the short stretch of road is regulated with a series of traffic islands and mini-roundabouts. Each of these presents a narrowing of the roadway to regulate and amend driving behaviour and help provide safe pedestrian crossing points over a busy arterial route (A581).
27. The existing design of the road at Balshaw Lane, Euxton (A581) (ie traffic islands, deflections, mini-roundabouts, and pedestrian crossings) indicates that current road safety is a concern and that road usage has informed existing design. However the potential effects of additional scheduled HGV traffic has not been considered. All the Appellant can say with any certainty is that under the standardised, controlled conditions of the survey a "HGV was able to carry out the above route, keeping to the road and without impacting or over running any kerb line".

28. This community is also served by a rail station, access to which necessitates crossing a narrow Victorian bridge, regulated by a series of deflections and traffic islands and accessed by a mini- roundabout with its own 'deflections'. This mini-roundabout was the site of a head-on two-car collision in October 2022 which resulted in a road closure.
29. No evidence of PIAs has been submitted and no consideration of road safety has been included for the additional traffic proposed on Route 4 through the densely populated residential area of Balshaw Lane, Euxton (A581). However, based on PIA statistics obtained from '[crashmap.co.uk](https://www.crashmap.co.uk)' UWAG has ascertained that in the years 2017- 2021 inclusive, 13 incidents, slight in nature, have been recorded on Balshaw Lane, between the roundabout that meets the A49 Wigan Road, and the roundabout at the opposite end where the A581 meets the B5252 Westway.
30. Concerns have previously been raised by Euxton Parish Council and Euxton Residents Against Sand Extraction about additional HGV traffic which would have resulted from a proposed sand quarry development in the recent past.
31. **Route 5** (18 minutes, 8.4 miles) is arguably the 'best route', but has its own issues. It exits the M6 motorway at junction 29 and utilises the A582 Flensburg Way, a major A road. It then follows the B5253 Schleswig Way/Leyland Lane on to the A581 for a short distance and then on to Ulnes Walton Lane (C195).
32. The A582 Flensburg Way crosses the mainline rail network at Farington Road, Lostock Hall between the Lostock Hall signalled roundabout and the Lancashire Business Park on the other side of the rail bridge. The road is wide with some traffic islands.
33. The mainline rail bridge is congested in either direction, particularly at peak times on workdays. Between the signal-controlled roundabout at Lostock Hall and the roundabout at the Lancashire Business Park the road is single carriageway in both directions and is frequently gridlocked. This short stretch of road has 15 'Slight', and 2 'Serious' PIA's recorded for the period 2017-2021 inclusive.
34. On crossing the rail line, the large and busy Lancashire Business Park exits onto a double roundabout. This business park accommodates companies such as Amazon, Clive Hurt Plant Hire, Leyland Trucks and is utilised throughout the day, feeding traffic eastwards on to the A582 and M6/M65 and westwards towards Chorley/Leyland/Preston. A major plumbing and bathroom supplier will shortly be opening a North West distribution warehouse on this site which will add further HGV traffic.
35. Onwards from the Lancashire Business Park, is a third larger, signal-controlled roundabout. At this point Route 5 switches from A582 Flensburg Way to B5253 Schleswig Way

- at Farington Moss. Exiting on to this roundabout is a large and expanding residential development, adding further traffic.
36. Once past Farington Moss and the widest stretch of Schleswig Way (B5253), HGVs will have to negotiate entry to Southport Road (A581) at the mini-roundabout at the end of Leyland Lane (B5253) where they are likely to over-run the raised central island and obscure the path of traffic travelling west to east on the A581.
  37. Schleswig Way is a wide, major B road utilised by HGVs accessing industrial and shopping areas along its length. It leads on to Leyland Lane (B5253), which connects with Southport Road (A581) at a mini-roundabout at its southern end.
  38. The A581 is restricted to 30mph on approach to, and through, Ulnes Walton. This is a residential area which has seen several recorded road traffic collisions, as well as numerous 'vehicular incidents' as indicated in Mrs Morrissey's Proof of Evidence ( Appendix 2 - Incidents Evidence).
  39. Traffic on the A581 behaves as a "priority route" for any junction with it. The Junctions 10 software warned as such when the proposed mini-roundabout for Ulnes Walton Lane and the A581 was modelled ( e.g. Documents Submitted After Inquiry/Additional Highways Evidence/Appendix K - Junctions 10 Outputs/ A581-Ulnes Walton Lane Operational/2025 Opening Year with Development, AM)
  40. Route 5 then turns onto Ulnes Walton Lane (C195).
  41. All HGVs on Routes 4 and 5 will have to negotiate the "narrow width" of Ulnes Walton Lane, recognised in "the survey".
  42. The C195 Ulnes Walton Lane, has a weight-limited traffic restriction order of 7.5 tons except for access. It also has a 40 mph speed restriction along its length (up to School Lane where the speed restriction drops to 20mph) to protect vulnerable road users (eg pedestrians, cyclists, mobility scooters and equestrians) and encourage vehicles in excess of 7.5 tons to utilise the major B5253 Leyland Lane connection to Schleswig Way and the wider road network to Preston and the motorway network.
  43. The UWAG measurements of road width for Ulnes Walton Lane are evidenced at Core Document G3c - Appendix 3 Ulnes Walton Lane Road Width (2).

### Routes 1, 2 and 3

44. UWAG agree with "the survey" statement in regard to Routes 1 and 3 whereby they "would not advise this route be used due to large parts navigating heavy residential areas. Parts of the route require the HGV to travel across the oncoming lane". This must be a recognition of a road safety concern.
45. "The survey" summary recognises that "HGVs should pass with care during two-way traffic on Walton Ulnes Lane (sic) although is suitable. An alternate consideration would be to make exiting HGVs travel north along Walton Ulnes Ln (sic) to the B5248". (The incorrect appellation of Ulnes Walton Lane has not been altered, this is as it appears in "the survey" at several points.)
46. This statement just appears to alleviate logistics difficulties of HGVs passing each other on the southern exit of C195 Ulnes Walton Lane and leaves open the possibility of using a route northwards to B5248 Dunkirk Lane. This conflicts with "the survey" where it advises against using the route for the reason above (para 43).
47. In addition to this, UWAG have evidenced ( In Mrs Morrissey's Proof of Evidence) the existing road safety concerns and experiences of school crossings and headteachers of the two primary schools that have to cross B5248 Dunkirk Lane and C195 Ulnes Walton Lane.
48. **Route 1** (14 minutes, 5.4 miles) is not advised to be used by the survey, "due to large parts navigating heavy residential areas. Parts of the route require the HGV to travel across the oncoming lane".
49. This route follows primarily the B5248 across the southern end of Leyland and continues as the B5248 along Dunkirk Lane.
50. At the eastern end of the B5248 (Church Road), the route passes Balshaw's CE High School which is located at the busy junction with Canberra Road which is controlled by a mini-roundabout. At school opening and closing times, traffic is very heavy and parents park both to the east and west of the school in order to drop-off and pick-up, causing congestion.
51. In 2006, a 17-year-old was knocked off his motor scooter by a car at this junction and died at the scene.

52. The carriageway width of the B5248 varies considerably along its length but is characterised by on-street parking. Sometimes this is "half-on half-off" the road to facilitate traffic movement wherever the B5248 is constrained in much narrower sections.
53. One such on-street parking section is Fox Lane, travelling east to west. It is immediately approached by a sharp left-hand turn at the historic market cross in Towngate. This is quickly followed by a mini-roundabout where the route turns sharp right into Fox Lane, a historic Conservation Area. This right turn is difficult for large vehicles to negotiate due to the narrowness of the roadway and delays occur at this point on a daily basis. Fox Lane has permitted parking on one side of the road only and necessitates traffic stopping in order to allow PSV/HGV traffic to negotiate the parked cars and vans. There is also a bus stop along this narrow stretch of Fox Lane, a school crossing patrol serving Woodlea County Primary School and First Footsteps Nursery catering for 85 children, all of which leads to traffic build-ups at peak times.
54. The route then proceeds along Slater Lane passing St Anne's RC Primary School which is served by a school crossing patrol.
55. The Dunkirk Lane section of B5248 is also subject to designated on-street parking as well as informal "half-on half-off" parking by visitors and deliveries.
56. In June 2018, a three-vehicle collision resulted in a fatality on Dunkirk Lane at the access to the shopping area. A further 'serious' PIA occurred in this locality on the 7th August 2023.
57. In order to access the (C195) School Lane/Ulnes Walton Lane from Dunkirk Lane, HGVs will have to make a sharp left turn into School Lane, necessitating the HGV to cross over to the other side of the carriageway during the turn. This is evidenced in Mrs Morrissey's Proof of Evidence addressing - Highway Safety and Vulnerability of Residents and Road Users.
58. Traffic has to stop short of this junction to allow PSVs and HGVs access to the opposite carriageway, necessary in order to negotiate the tight turn without running over kerbs.
59. Alternatively, the PSV/HGV has to wait at the junction for traffic to exit School Lane/Ulnes Walton Lane (C195) in order to access the opposite carriageway.
60. **Route 2** (22 minutes, 9 miles) is advised as a "a suitable alternate route for HGVs if any motorway closures/incidents occur enroute to junction 28". "The survey" states "There were no areas of great concern using this route and would advise it is a suitable alternate route for HGVs if any motorway closures/ incidents occur enroute to junction 28. Route

passes through numerous residential areas with schools but the road is suitable for heavier traffic”.

61. **Route 2** has a mix of urban and semi-rural settlements which blend into each other with little distance between them. It could be regarded as a continuous linear settlement. The 30 mph speed restriction along the majority length of the B5250 implies a recognition of road safety concerns and adverse driving behaviours.
62. On-street parking for residents and deliveries is evident along the entire length of the B5250.
63. There are three primary schools on narrow sections of this route, characteristic of B class roads, where parents pick-up and drop-off during term time.
64. The B5250 passes through the village of Eccleston, the largest settlement along the route. The B5250 is the main street of the village and is wide.
65. At its northern end is Eccleston Bridge crossing the River Yarrow. This is a Grade 2 listed structure, with a severe humpback with sharp entry and exit points which "the survey" makes note of - "There is a small hump back bridge north of Eccleston that could affect heavier loads/lower trailers but would advise abnormal loads not use this route as first option".
66. Adding a significant volume of HGV traffic to this route will not improve road safety, because of its urban like characteristics.
67. **Route 3** (14 minutes, 7 miles) primarily follows **Route 5** from the M6 Junction 29 and then picks up the B5248 Dunkirk Lane off the B5253 Schleswig Way and encounters the same issues as **Route 1** above.
68. The issues above for **Route 5** will also be the same for **Route 3**.
69. **Route 3** is described in the survey as "acceptable for HGVs although continues on route 1 which is heavily residential before turning into School Lane with the same issues". This is in contradiction to the Assessment of **Route 1** in "the survey", where this part of the route is "not advised".

## Accident Statistics

70. UWAG provides PIA statistics below for each of routes 1-5. These are derived from the online application 'crashmap.co.uk'. The application utilises the official Department for Transport accident statistics (as reported from UK Police forces) to UK mapping. All statistics are for the period 2017-21.

	Slight	Serious	Fatal	Total
Route 1	37	10	1	48
Route 2	25	13	0	38
Route 3	56	16	1	73
Route 4	66	10	0	76
Route 5	70	16	0	86
Total	254	65	2	321

PIA statistics for Logistics Routes 1-5 (courtesy of '[crashmap.co.uk](https://crashmap.co.uk)')

## Conclusion

71. UWAG does not claim to have professional qualification/expertise in road safety or road transport. However, even to a lay person, factors affecting road safety and road transport are self-evident, such as road design and design of road features, volume and speed of traffic, peak periods of road usage, use of roads by local community (school crossings, shopping areas), PIA statistics, non personal injury accidents reported by local papers, Parish Councils and residents. As local residents, UWAG are in a unique position to provide qualitative evidence as to the safety issues set out above.
72. The Appellant's construction traffic projections are not insignificant (Additional Highways Evidence Appendices/HMP Wymott and Garth 2 - Additional Highways Evidence/Page30, Figure 6-3 - Daily Forecast Construction Vehicles Across Construction Programme).
- Each vehicle will make two trips per day, to and from site.
  - HGV vehicles from June 2025 to December 2027 will be a minimum of 100 per day (200 trips)
  - HGV vehicles from July 2026 to January 2027 will peak at 210 per day (420 trips)
  - Contractor vehicles from August 2026 to November 2028 will be a minimum of 100 per day (200 trips).
  - Contractor vehicles in April 2028 will peak at 750 per day (1500 trips).
73. UWAG contends that the projected construction traffic will not be diluted across the road network, which is implicit in the Appellant's lack of evidence as to existing road safety and effects on transport on Routes 1-5.
74. UWAG contends that the projected construction will have a significant, protracted and disruptive effect on the normal operation of the road network; this effect becoming more concentrated the closer to site, and for a construction period spanning 5 years, with peak construction traffic occurring from June 2025 to November 2028.
75. UWAG does not accept that Routes 1-4 are all acceptable routes, as determined by the survey. Indeed there is contradictory evidence within the survey. For example Route 1 - which is not acceptable on the inbound HGV journey, because of "heavy residential areas", but is acceptable on the outbound, should two way HGV movements prove difficult on the southern end of Ulnes Walton Lane (C195). In fact only Route 5 avoids significant residential areas, until on the A581 after the Leyland Lane ( B5253) mini-roundabout.

76. The motorway entry and exit points for Routes 1-5 of the survey are some distance from the HMP Wymott and Garth site. This will maximise the disruptive effect of construction traffic across a broader area of the road network.
77. It is self-evident that a such an additional increase in traffic on an already busy road network will add further hazard and increase risk, particularly through urban areas, busy commercial and commuter routes, and smaller B and C class roads.
78. The Appellant has not fully evidenced consideration of the cumulative effects on road safety, road congestion of recent and proposed infrastructure developments in the area, eg residential developments at the former Leyland Test Track, Farington Moss and near Altcar Lane on the B5253. These are significant developments and will impact Routes 1-5 in the survey.
79. Although not fully explained UWAG has to assume "the survey" has been conducted under controlled/standardised methodology and it is unclear as to whether this takes into account road conditions, weather, HGV drivers placed under delivery time constraints, early morning and late afternoon wintertime conditions . The principal point of the survey appears to have been to demonstrate that a standard articulated "HGV was able to carry out the above route keeping to the road and without impacting or over running any kerb line" .
80. The "assessment of the client" indicated in the included email with the survey is not in the evidence to date. (Documents Issued Following Inquiry/Additional Highways Evidence/ Appendix N - Construction Route Assessment). It is therefore not clear what "improvements works" the client might have thought necessary;"the survey" is not explicit if these were addressed or not.
81. The "Local Infrastructure inc Local School/Time Restrictions" map included the Explore logistics survey fails to identify all schools on the routes, eg Balshaw's High School and St Anne's RC Primary School in Leyland. (Documents Issued Following Inquiry/Additional Highways Evidence/Appendix N - Construction Route Assessment).
82. In conclusion, UWAG do not accept that the additional construction traffic projected by the Appellant, the additional hazard it introduces, and its effect on road safety, has been thoroughly assessed or evidenced. The testimony contained within this proof of evidence should be read alongside the technical evidence of Mr Graham Eves. His evidence is that there would be an unacceptable impact on highway safety, and the residual cumulative impacts on the road network would be severe. Accordingly, planning permission should not be granted in this case.