

**ULNES WALTON ACTION GROUP
APP/D2320/W/3295556**

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

**SUMMARY
PROOF OF EVIDENCE OF**

PAULPARKER

Addressing: LOGISTICS AND CONSTRUCTION ROUTES

1. I, Paul Parker, 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.
2. The main proof of evidence examines the proposed Logistics Routes 1-5, as set out in the 'Explore Logistics Survey', and the projected addition to existing traffic volumes, as a result of the construction phase of the proposed HMP Garth and Wymott 2.
3. UWAG contends that the road safety and transport impact of projected construction traffic has not been properly considered on Routes 1-5 as identified in the Explore Logistics Survey.
4. The proof will provide an illustration of distances from the motorway network to the existing site of HMP Wymott and Garth (Routes 1-5), compared to the distances from the motorway network to the two alternative sites identified in the previous Inquiry session. This is not to seek to introduce the alternative sites into the re-opened inquiry, but to demonstrate that the HMP Wymott and Garth estate is further from the elected motorway exit points for construction traffic and comparatively less well served by the road network.
5. On exiting the motorway network, Routes 1-5 will have to negotiate roads of diminishing classification from A to B to C. This will have the effect of concentrating hazard (from the projected volumes of construction traffic), and increasing risk along the chosen routes.
6. The proof and supporting material will illustrate Routes 1-5 from a road user's perspective, with real-time videos of these routes, with driver commentary.
7. The proof will describe the routes in detail as travelled, and highlight the issues likely to be encountered by HGV and lighter contractor vehicles, should the application be granted. Routes 1-5 as indicated in the Explore Logistics Survey, appear to have been driven in one direction only. The return journey of a HGV from the site is not commented upon. The negotiation of roadways are different dependent on the direction of travel and the proof discusses this aspect; evidence for which appears absent from consideration in the survey.
8. The proof will provide evidence of the PIA statistics for Routes 1-5, including categories, 'Slight', 'Serious', and 'Fatal'. In summary for the period 2017-2021, Routes 1-5 recorded a total of 321 PIA's of which 'Slight' = 254, 'Severe' = 65, "Fatal" = 2.
9. The proof will illustrate inconsistencies in the advice supplied in the Explore Logistics Survey.
10. The additional evidence put forward in this proof indicates that road safety and transport impacts of construction traffic have not been a consideration to date for Routes 1-5, in the Appellants evidence.
11. In conclusion, this evidence, read together with the evidence of Mrs Emma Curtis in March 2023, and that of Mrs Lynette Morrissey, in this reopened inquiry and the technical evidence of Mr Graham Eves; supports the recommendation, previously made by the Planning Inspector (and adopted by the Secretary of State), that the MoJ's proposals would exacerbate existing hazards and risks within the local road network and give rise to an unacceptable effect on highway safety, should be upheld, and this Appeal should be dismissed.