

**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**

**LYNETTE MORRISSEY MA JP**

**Addressing: HIGHWAY SAFETY  
and**

**VULNERABILITY OF RESIDENTS AND ROAD USERS**

## **A. INTRODUCTION**

1. I, Lynette Morrissey 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. Although I am happy that this proof of evidence comprises my own evidence, and I am prepared to be cross-examined on its contents, the preparation of it has been undertaken together with my two colleagues and fellow UWAG members, Emma Curtis and Paul Parker. 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 Local Government Officer with a Master of Arts degree in Tourism, Leisure and Service Management. The final years of my working life involved managing and transforming a small tourism enterprise into an expanding and successful business by reviewing its operating practices, procedures and financial control systems, recruiting qualified staff, and establishing good practice regimes within the team.
3. As a resident of Ulnes Walton for 39 years, I have been actively involved in UWAG since its inception in 2021.
4. 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, and the evidence of our highways consultant Mr. Graham Eves, PFA Consulting.
5. UWAG respectfully agree with the initial conclusions reached by the Inspector (and adopted by the Secretary of State) as to the evidence put forward by the MoJ at the original Inquiry which took place in July 2022. Those conclusions were, in effect, 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.
6. UWAG note that the Secretary of State appeared to accept 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.

7. My evidence will relate solely to the issue of the safety and increased vulnerability of residents and road users 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 is intended to complement his findings.
8. I append to this proof of evidence the following documents:
  - Appendix 1 - Summary of Highway Issues identified in Core Document O2
  - Appendix 2 - Schedule and Evidence of Incidents since March 2023
  - Appendix 3 - Schedule and Evidence of Accidents since March 2023
  - Appendix 4 - Schedule and Evidence of Traffic Usage since March 2023
  - Appendix 5 - Equestrian Usage In and Around Ulmes Walton
  - Appendix 6 - Cyclist Usage In and Around Ulmes Walton
  - Appendix 7 - Highway Safety - School Lane
  - Appendix 8 - Statements from School Crossing Patrol staff
  - Appendix 9 - Emergency Call-Outs

## **B. HIGHWAY SAFETY**

9. Highway safety is a topic which has exercised the minds of local residents for 20 years. In a document published by Ulmes Walton Parish Council in May 2004, entitled “Towards our Future - Ulmes Walton - A Plan for the Parish”, road safety issues were highlighted as a major area of concern for residents. The following statements are extracted from that report:
  - “Until recently a quiet country byway, the traffic volumes on Ulmes Walton Lane have increased dramatically following the building of the prisons at Wymott and Garth and substantial housing development to the north of this area.”
  - “Speeding traffic is of great concern to nearly 78% of the residents who replied to the questionnaire.”
  - “The volume and speed of traffic also results in noise, vibration and air pollution. Many of the houses in the Parish are in the region of 300 years old, built on foundations designed to cope with nothing more than the cart tracks which then ran past their doors.”

- “Figures provided by HM Prisons show that of the 2500 vehicles using Ulnes Walton Lane each day, approximately 1500 are bound to and from the prisons. No upgrading of the road system or consideration of alternative routes to the prisons has been actively pursued by the County Council.”
- “Traffic problems are not solely related to motor vehicles. The needs of cyclists, pedestrians, and horse riders must also be considered. This is a rural community and should provide a safe environment for those enjoying the countryside.”
- “84% of those replying to the questionnaire identified specific danger spots in the Parish. Based on the views of residents expressed during the collection of data ..... the following areas of concern have been identified:
  - Southport Road/New Lane junction - serious parking and visibility problems
  - Ulnes Walton Lane/Moss Lane junction - speeding and lack of driver care
  - Ulnes Walton Lane in general - excessive volume of traffic, speeding and lack of driver care on blind bends, lack of footpaths
  - Ulnes Walton Lane -Lostock Bridge - dangerous bend
  - Moss Lane - speeding
  - Leyland Lane - speeding
  - Holker Lane - Flag Lane - speeding and lack of care
  - Lydiate Lane/Southport Road junction - traffic build-up
  - Wymott Estate - speeding.”

10. In more recent times, the Parish Council minutes reveal the following incidents:

- 18/6/2016: Bollards damaged on Lostock Bridge
- 12/12/2016: Tanker in ditch on Holker Lane
- 13/3/2017: Contravention of weight limit on Ulnes Walton Lane  
Accident involving 5 cyclists on Holker Lane
- 18/4/2017: Railings at Holker Lane/Ulnes Walton Lane junction damaged
- 10/12/2018: Speeding on Ulnes Walton Lane
- 11/3/2019: 4 vehicle collision on A581 - vehicles exiting the petrol station
- 11/11/2019: Children struggling to cross A581 from school bus stops
- 14/9/2020: Serious RTA on A581 - extensive damage to property/vehicles
- 9/11/2020: Speeding on Ulnes Walton Lane
- 3/5/2021: Speed indicators to be installed on Ulnes Walton Lane
- 13/9/2021: Damaged and obscured road signs on Ulnes Walton Lane
- 11/4/2022: Damage to overhead telephone cables caused by HGV

11. All of the above amply illustrates and underlines the fact that there are already hazards facing residents and road users on a daily basis on the local road network. These will only be increased if the very significant amount of construction and operational traffic is allowed to be added to this inadequate road infrastructure.
12. Core Document O2, Proof of Evidence submitted by Emma Curtis of UWAG in relation to Highway Safety Issues, provided evidence submitted and recorded by local residents of at least 55 examples of accidents, incidents and concerning behaviour by motorists in recent years. A summary and map of those examples is at Appendix 1.
13. Since the submission of Core Document O2, a further 49 incidents have been submitted and recorded by local residents which are evidenced at Appendices 2, 3 and 4.

### **C. VULNERABLE USERS**

14. The Lancashire County Council Highways Traffic Survey undertaken in October 2019 illustrated the following average number of vehicles using Ulnes Walton Lane:

Monday - Sunday:	3,637
Monday - Friday:	4,125
Saturday - Sunday:	2,416.
15. In 2004, the Prison Service advised the Parish Council that 2,500 vehicles per day were using Ulnes Walton Lane at that time. By 2019, that had increased by 45% to 3,637. If you add to this the MoJ's projected additional 1,332 trips per day as a result of staff and visitor trips associated with this proposed development, the percentage increase from 2004 will be almost 100% on road infrastructure which has seen no improvement during the whole of that time.
16. As the aforementioned Parish Plan highlighted in 2004, a significant number of vulnerable road users frequent the local network, particularly cyclists and horse riders. UWAG has undertaken local surveys of these two groups. Questionnaires were devised by UWAG and copies distributed to the local equestrian centres/livery stables and to cycling clubs in the area. It is acknowledged these surveys were not commissioned pieces of qualitative research conducted by professional pollsters, but they do give an indication of the extent of cycling and equestrian activity in the area and the issues these groups experience on a daily basis. From the results of these two surveys, it is clear that the impact of the proposed prison development will affect people from up to 30 miles away who come to this locality to cycle or ride their horses.

17. In the survey of equestrians (Appendix 5), 10% of horse riders expressed their concerns about near misses/accidents in which they had been involved due to the behaviour of other road users. 59.6% of the 115 respondents were aged 41 or over, with 14.9% being over 60 years of age. Appendix 4 (C14) records the experience of one equestrian on 4 June 2023.
18. There are three livery stables on Ulnes Walton Lane - Eccleston Equestrian Centre, Earnshaw Shire Farm and Beconsall Chapel House Farm - providing stabling for 95 horses. A survey was undertaken by UWAG in June 2023 of the owners of these livery stables. The owner of Eccleston Equestrian Centre stated “We don’t offer hacking out as the road (Ulnes Walton Lane) is already so busy and the traffic on this road is constantly above the speed limit and have no regard for the horses. Any increase in the traffic down this road would pose a real danger to horse riders”.
19. The owner of Earnshaw’s Shire Farm commented: “In the 22 years our livery yard has been established in Ulnes Walton, we have seen a steady increase in the volume, speed and overall aggression of the general traffic on Ulnes Walton Lane and Moss Lane. So much so we have had to build an all-weather track on the farm so that our under-16 clients can safely hack their horse/s out as we feel it is no longer safe for a child to hack out on Ulnes Walton’s roads without being accompanied by an adult. Unfortunately, over the years we have been witness to driver/rider accidents and far too many near misses”.
20. The owners of Paul’s Farm on Dunkirk Lane informed UWAG that they also provide livery/stabling for 40 horses whose owners ride out on the local highways, including Ulnes Walton Lane, on a daily basis from 0600 hours until it is dark.
21. Equally, 9.2% of cyclists expressed similar concerns (Appendix 6). Of the 76 respondents to the survey, 81.5% were aged 41 and over, 27.6% being over 60 years of age. Over 58% of those cycling in the area revealed that they cycle in groups of 7-10 or more. A single cyclist can cause tailbacks of 10-12 vehicles within seconds due to the limited safe opportunities for vehicles to pass.

22. Paragraph 22 of Core document G3 - UWAG Proof of Evidence - Accessibility and Travel provided evidence of the poor conditions for cycling on surrounding roads, pointing out that the proposed £50,000 to improve cycle access by patch-repairing along Nixon Lane/Pump House Lane would be insufficient due to serious flooding issues. This view is reinforced by this photograph, taken on 24 July 2023 after two days of heavy rain. As can be seen, it is



impassable being knee-deep in water.

23. Rule 163 of The Highway Code advises motorists to give motorcyclists, cyclists, horse riders and horse-drawn vehicles at least as much room as they would when overtaking a car. As a guide, it states the following but on Ulnes Walton Lane it is not always possible to achieve these clearances:
- leave at least 1.5 metres when overtaking cyclists at speeds of up to 30mph, and give them more space when overtaking at higher speeds
  - pass horse riders and horse-drawn vehicles at speeds under 10 mph and allow at least 2 metres of space
  - allow at least 2 metres of space and keep to a low speed when passing a pedestrian who is walking in the road (for example, where there is no pavement)
  - take extra care and give more space when overtaking motorcyclists, cyclists, horse riders, horse drawn vehicles and pedestrians in bad weather (including high winds) and at night
  - you should wait behind the motorcyclist, cyclist, horse rider, horse drawn vehicle or pedestrian and not overtake if it is unsafe or not possible to meet these clearances.
24. The impact on pedestrians who have no option but to walk on the road due to the lack of footpaths is already significant. The limited amount of footpath provision being put forward by the Appellant will do little to mitigate the risks faced by pedestrians using Ulnes Walton Lane and School Lane. Video evidence at Appendix 4 (C8) illustrates a pedestrian pushing a pram along Ulnes Walton Lane on the dangerous bend at Lostock Bridge. During school holiday periods, children frequently walk along the Lane and will be put at increased risk if this development is allowed to proceed. Added to this is the video footage - submitted as Core Document O16, Appendix 13 - graphically illustrating the hazards faced by a pedestrian walking south along Ulnes Walton Lane the short distance from their home to the postbox at the junction with Moss Lane.
25. The health and social well-being of not only residents in the immediate vicinity of the proposed new prison but from a much wider area (e.g. up to 30 miles away in respect of equestrians and cyclists) who participate in leisure pursuits entirely appropriate in a rural area will be adversely affected. This especially applies to vulnerable users who are already choosing not to ride their horses along Ulnes Walton Lane. The development of a further prison could have a resulting adverse impact on the businesses and livelihoods of the owners of the three livery yards located on Ulnes Walton Lane.
26. The headteachers at St James' Primary School and Moss Side Primary School have provided the following letter outlining their concerns with regard to highway safety in the vicinity of their schools:



30.07.2023

Dear Emma, Lynette, Paul and fellow members of UWAG,

Following your email dated 12.07.2023, Mrs Chadwick and I met recently to consider the information that you had provided and create a response on behalf of the two primary schools in the Moss Side area.

In response to our current issues re. highway safety and future concerns, we discussed the following:

- There is a significant volume of traffic currently going through Slater Lane and Dunkirk Lane. At start and end of school day times, we rely on a traffic warden at each school to support the safe movement of pedestrians. Even with this, there have been numerous 'near misses' involving cars and pedestrians, especially school-aged children and their siblings. We would be eager, as local schools, to identify measures which would support greater control of the traffic speed.
- Recent closures (April-July 2023) for engineering work have resulted in pupils being late for school and staff not arriving on time. Congestion backs up quite quickly within the local area and late marks have significantly increased during the summer term as a consequence. Staff have reported doubling journey times at different points of the day.
- We would have concerns, from a school perspective, about the direction of traffic and heavy vehicles particularly at pick-up and drop-off times. During the recent engineering works, for example, vehicles regularly blocked access routes. During some swimming lessons, pupils needed to walk five minutes, down the main road with restricted pavements, to reach the bus as it was unable to make the full journey to school.
- There is already considerable additional traffic in the area (and, presumably, a further increase forecast) due to the housing development on the 'Test track' which is currently taking place.

We hope that this information answers the request that was previously made.

Yours sincerely,

Mr Wright and Mrs Chadwick

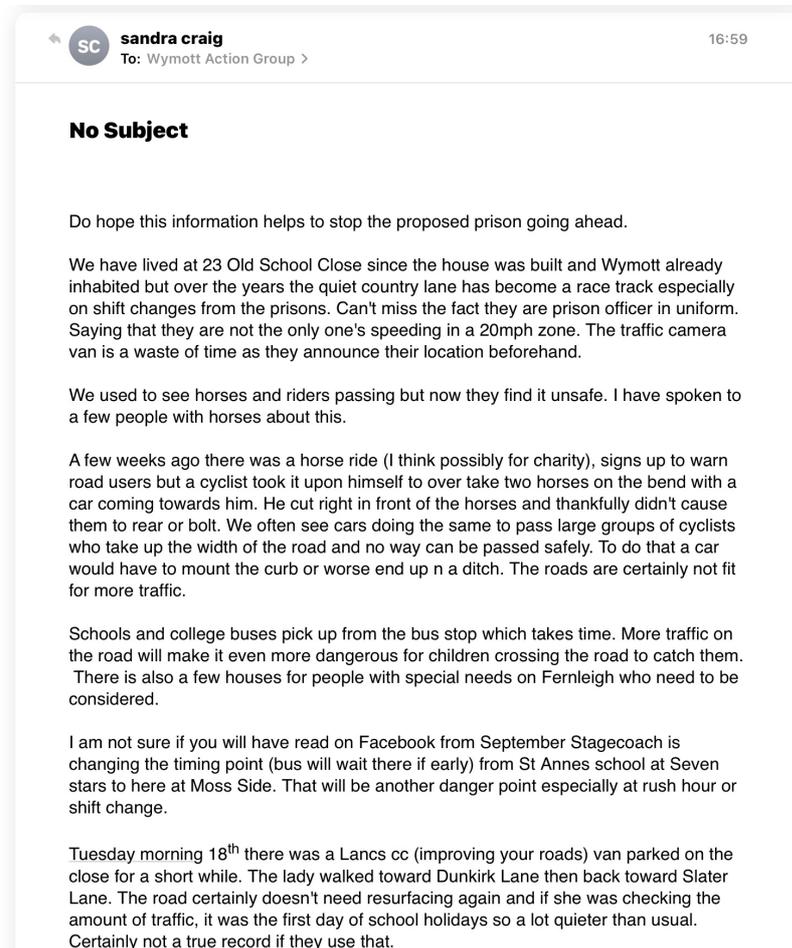
(Headteacher Moss Side Primary School and St James' Primary School)

27. Where they exist, the footpaths on School Lane are also inadequate, being very narrow, overgrown by hedgerows and obstructed by street furniture. In places, the footpath is not wide enough to permit two people to pass each other or to accommodate a push chair, mobility scooter or wheelchair, thereby placing vulnerable users at risk as they have to step out into the roadway.

28. This photograph illustrates the dilemma faced by this vulnerable user on School Lane who chose to drive the mobility scooter on the roadway as the footpath on the eastern side of the Lane is impassable due to it being too narrow and obstructed by street furniture. Whilst the footpath on the western side is wider, the mobility scooter would then have to negotiate crossing to the eastern side at the busy junction with School Lane.



29. Many parents will have more than one child with them when taking children to school, including infants in push chairs.
30. There is no footpath access to the school bus stop on the eastern side of School Lane. (Photographs at Appendix 7).
31. Buses and large vehicles wishing to turn left from Dunkirk Lane into School Lane have to wait for traffic to exit the School Lane junction in order to execute the turn as illustrated at Appendix 4 (C15). Having negotiated the turn, the Old Orchard Place bus stop is located 75 metres from the junction on a bend which causes a back-up of traffic to the Dunkirk Lane junction and leads to drivers taking risks to overtake stationary buses when there is limited forward visibility to do so safely. The bus route then turns left into Slater Lane and cannot be negotiated by buses or large vehicles until traffic exiting the Slater Lane/School Lane junction has cleared. Video footage at Appendix 4 (C15) illustrates this point.
32. There are 9 residential driveways and 7 public footpaths exiting directly on to School Lane, along with a further 23 properties located on Old School Close and 9 on Old Orchard Place whose only exit to the local road network is on to School Lane. One resident of Old Orchard Place has provided the following statement by email:



33. In addition, there are two housing estates (259 properties) on the western side of School Lane whose vehicle access to the local road network is on to School Lane via Hedgerows Road, Nixon Lane and Wheatfield. Pedestrians from these properties have to cross School Lane/Ulnes Walton Lane in order to access the bus stop on the eastern side of School Lane, the Moss Side shops on Dunkirk Lane (comprising small supermarket, pharmacy, fast food outlets, veterinary surgery, community hub, children's play area, and access to Poplars Nursery) and Moss Side Medical Centre at the junction of Slater Lane and Moss Side Way. Any increase in traffic will impact on the safety of their users. The school bus to and from Croston also picks up and drops off just south of the School Lane/Slater Lane junction. There is no footpath at the location of that bus stop on the eastern side of School Lane.
34. Other housing developments in the immediate vicinity to the north and west of the School Lane/Dunkirk Lane junction total over 500 properties. Pedestrians from these properties have to negotiate the junction to access the two Primary Schools and the Moss Side shops, Poplars Nursery and Moss Side Medical Centre.
35. One of these properties, located at the junction of Fernleigh and Dunkirk Lane, is Fernleigh House which provides specialist care and supported living for six adults with autism, learning disabilities and epilepsy. These residents are regularly seen out in the community using local services, sometimes independently but also with assistance from carers. They have to cross the already busy junction of Dunkirk Lane and School Lane in order to access the bus service.
36. At the northern end of Ulnes Walton Lane there are 15 properties in close proximity where vehicles park on the roadway. One of the properties houses a number of vulnerable disabled residents who have carers living-in or visiting the property throughout the day and who park on the road. A collision between two vehicles occurred at this point on 24 July 2023.
37. The Appellant's Core Document A37, Appendix B, Proposed Traffic Calming Scheme - Dunkirk Lane/School Lane states that the existing pedestrian crossing at the junction of School Lane and Dunkirk Lane will be retained. It should be pointed out that there is not (and never has been) a pedestrian crossing at that point. The only controlled pedestrian crossing in the locality is a Pelican crossing on Dunkirk Lane close to the access road to the Moss Side shops mentioned above (approximately 0.3 mile away).

38. At the southern end of Ulmes Walton Lane, Marsh House Care Home provides residential care for 33 vulnerable and/or elderly adults with memory issues.
39. School Lane is subject to a 20mph speed limit for its entire length but this is rarely enforced. Lancashire Constabulary state that any concerns about speeding must first be reported to the Lancashire Road Safety Partnership. In July 2023, the Lancashire Road Safety Partnership announced that *“Due to the unprecedented number of speeding concerns we continue to receive relating to 20mph limits, we have made the difficult decision to pause the assessment of newly received 20mph limit concerns from the 1st July 2023 onwards, in order to concentrate on properly assessing and appropriately responding to existing 20mph limit concerns”*. Following a public outcry, this decision was reversed on 8 August 2023 but it does demonstrate a reluctance to monitor and enforce 20mph speed limits throughout Lancashire.

#### **D. SCHOOL CROSSING PATROLS**

40. At the northern end of Ulmes Walton Lane, School Lane already poses risks to pedestrians who have to cross the road from the western side in order to access St James' Primary School on Slater Lane and Moss Side Primary School on Paradise Lane, off Dunkirk Lane. There are two school crossing patrols ('lollipops') - one immediately south of the junction of School Lane and Slater Lane, and the other at the junction of Dunkirk Lane (B5248) and Paradise Lane, both assisting not only Primary School children but also adult pedestrians and even equestrians.
41. The school crossings operate twice every working weekday, and do not operate during school holidays. Morning patrols typically operate from 0835 - 0905hrs and afternoon patrols operate from 1535 - 1605hrs. In reality, staff wait for 'late arrivals' and 'late leavers' and also have to switch on and switch off school crossing warning lights and put on high-visibility coats and hats, so arrive earlier and leave later than these times. All staff receive road safety training enabling them to anticipate potentially dangerous situations. In fact the School Crossing patrols also assist adult pedestrians to cross the road as well as school children.
42. Statements given to UWAG by each of these staff are included at Appendix 8. These bring into sharp focus the highway safety issues currently facing these staff in attempting to mitigate the dangers faced by very vulnerable pedestrians and equestrians when crossing busy roads. Indeed, their very existence indicates that road safety is a concern.

43. Both School Crossing Patrol staff have commented on the increase in traffic since the opening of the Test Track development. This indicates that traffic generated by the development corresponds with the morning shift changes for the existing HMPs Wymott and Garth. Both staff would welcome mitigations to reduce traffic speed and believe speed cameras are necessary to adjust driver behaviour.
44. There are no traffic mitigations planned for Dunkirk Lane B5248. Yet, if planning permission is granted, both construction and operational traffic will add further hazards and risks to an already widely-used and busy roadway.
45. Route 3, in the Explore Logistics Report, Appendix N, page 11 (Additional Highways Evidence submitted by the Appellant) has been validated as a legitimate route to exit from the prison site if the southern exit proves difficult to maintain HGV schedules. It is recognised from the Proposed Logistics Summary that Ulnes Walton Lane is narrow and 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" - which is Route 3.
46. If Route 3 is used, then projected HGV traffic and light vehicle contractor traffic will encounter the School Crossing Patrols at both the above locations.
47. The School Crossing patrol staff have already identified 'impatience' and 'drivers rushing' as risk factors in their everyday work, as well as volume of traffic. Add to these existing factors the increased presence of HGVs and contractors on scheduled start and finish times, and it is self-evident that further risk is being added to the immediate and wider road network.

## **E. VEHICLE USAGE**

48. Emergency Vehicles - Appendix 9 shows the number of emergency call-outs to HMPs Wymott and Garth between May 2021 and June 2023. This information was obtained through Freedom of Information requests. The first period represents data affected by lockdown periods in which the opening-up regimes were restricted to prevent wider inmate interactions. The second period is probably more representative of normal regimes operated in the current prison estate.
49. HMP Garth (Cat B) attracts significantly more emergency service call-outs than HMP Wymott (Cat C). However, HMP Wymott has seen a 56% increase in emergency service calls since the end of the Covid lockdowns. In order to project the number of call-outs for

each service for the proposed new prison, the population of the existing HMP Wymott was used to determine the factor of increase. This was simply determined by dividing the population of the proposed new prison by the current population of HMP Wymott, ie 1715 divided by 1176 = 1.46.

50. In summary, that calculation suggests that the proposed increase in inmate population will result in a 54% increase in calls to emergency services. The figures in Appendix 9 illustrate that emergency service vehicles currently attend the site of HMPs Wymott and Garth at least once per day. Whilst these are relatively broad-brush projections, they do give a tangible indication of the nature and potential extent of the issues associated with the introduction of a further substantial prison development in this rural locality.
51. Emergency call-outs may typically require more than one vehicle to attend, depending on the seriousness of the incident, e.g. the Fire Service typically provide four fire appliances and a service delivery manager in a car for multi-occupancy buildings. Each call to the Ambulance Service will result in a minimum attendance by one ambulance but, typically, also an emergency response vehicle with a paramedic. If the call is to attend the victims of an aggravated assault, multiple ambulances will be required to separate the antagonists.
52. Marsh House Care Home at the southern end of Ulnes Walton Lane attracts numerous call-outs to the Ambulance Service.
53. Emergency service vehicles travel at speed and add greater risk to vulnerable road users.
54. Agricultural Vehicles - Being a rural area, tractors, trailers, and combine harvesters variously traverse Ulnes Walton Lane on a daily and seasonal basis, sometimes from very early morning to very late at night during harvest times. These are increasingly large and fast-moving vehicles which straddle the centre line of the highway, particularly on the many bends in the road. An increase in other road users associated with the development and operation of a third prison, will inevitably increase the risk of encounters with these agricultural vehicles which are also often driven by younger drivers. Photographic evidence is included at Appendix 2 (A15).
55. HGVs - Large HGVs visit premises in the area other than HMPs Wymott and Garth on a daily basis. Matthews and Leigh is a civil engineering company with a base at Lostock Bridge on Ulnes Walton Lane. It has its own fleet of HGVs and receives deliveries from other companies using large articulated vehicles which have to access and exit the premises from the dangerous bend on Lostock Bridge. The video at Appendix 2 (A10)

graphically illustrates what happens when delivery vehicles take the wrong access road and have to reverse out on to Ulnes Walton Lane. Neighbours advise that this is not an infrequent occurrence.

56. School Buses - The school bus serving Bishop Rawstorne Church of England Academy in Croston picks up and drops off at various bus stops along Ulnes Walton Lane, most of which can only be accessed by walking in the roadway.
57. Large vehicles, including fire engines have difficulty safely negotiating the bend on Lostock Bridge as evidenced in the video at Appendix 2 (A17).

## **F. CONCLUSIONS**

58. UWAG submit that the additional evidence submitted in this Proof of Evidence only serves to strengthen and reinforce the validity of their case in relation to highway safety which was accepted by both the Planning Inspector and the Secretary of State following the original Inquiry in July 2022. The Appellant has submitted no further evidence which satisfactorily addresses and mitigates the highway safety issues which were first highlighted to them during the 2021 public consultation exercise prior to the planning application first being submitted to Chorley Borough Council.
59. The conclusions reached by UWAG in Emma Curtis's Proof of Evidence, Core Document O2, paragraphs 41-50, submitted in March 2023 remain unchanged and are, for ease of reference and completeness, repeated below:
60. *The road network and the options for sustainable transport around the proposed site are worse than at the two alternative sites, both of which are served by motorway and A-road connectivity, as well as access to better sustainable transport options.*
61. *The recorded PIAs in Core Document A35 - Transport Assessment issue PO5, 12/08/2021, Section 3.6, do not reflect the number of unrecorded accidents and incidents, examples of which have been documented in this proof of evidence. Each of these accidents and incidents has the potential to develop into a recorded PIA.*
62. *Road safety has been a topic of concern for local residents for a long period of time.*

63. *The two current prisons have brought increased traffic, adding to the concerns and leading to measures/restrictions that are either ignored by road users or not enforced by authorities. The situation is already problematic, even under current conditions.*
64. *Th prospect of a third prison, with the imposition of high volumes of construction delivery traffic, will obviously exacerbate risk and hazard (as found by the Inspector and accepted by the Secretary of State).*
65. *Safety concerns are not only about speed but the road width of Ulnes Walton Lane. The roadway is on average 5.5 metres wide. Existing farm traffic, HGVs and PSVs already straddle the central line in order to negotiate bends and narrower section of Ulnes Walton Lane. It is not clear from the existing CTMP how specific traffic movements are going to be managed at peak times.*
66. *Parking at the two existing prisons is already an issue, with deliberate parking away from the existing prison car parks. This will not ease with the development of a new prison, or without active enforcement, and the new prison would bring with it further demand for parking and an inadequate proposed car park.*
67. *The A581 Southport Road is already a busy and congested pinch-point throughout the day, but particularly during peak times. The road is particularly dangerous at the junction-head where it meets Ulnes Walton Lane. There are connecting roads from Croston and Eccleston that all converge in the vicinity of the junction-head with Ulnes Walton Lane. The effect of adding a significantly increased volume of traffic to this already busy stretch is technically unknown (because of the deficiencies of the Ministry of Justice's work on this aspect to date, as described by the Inspector), but common sense indicates that wait times are going to increase, potentially leading to greater risk-taking by frustrated motorists further on from whatever mitigations are put in place.*
68. *Existing risks and hazards on the local road network generate many accidents and incidents, many of which go unrecorded, as evidenced with the examples given in this proof of evidence. Each unrecorded incident has the potential to develop into a PIA. Unrecorded incidents, like recorded incidents, illustrate a pattern that (without the local knowledge set out in the Proof) will not be available to any transport expert, unless they are a resident of the area.*

69. *UWAG remain firmly of the view that the highway implications of the proposed new prison would be disastrous for the local area.*