

**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**

LYNETTE MORRISSEY MA JP

**Addressing: HIGHWAY SAFETY
and
VULNERABILITY OF RESIDENTS AND ROAD USERS**

1. 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.
2. As a resident of Ulnes Walton for 39 years, I have been actively involved in UWAG since its inception in 2021.
3. This Proof of Evidence concentrates on Highway Safety and the Vulnerability of Residents and Road Users.
4. It outlines how highway safety has been a matter of serious concern to local residents for 20 years and how Ulnes Walton Parish Council has documented incidents and canvassed the views of the community as long ago as 2004. The concerns being expressed at that time still remain today as traffic has increased over the intervening years and, according to the Appellant's evidence, if this development is allowed to proceed will represent a doubling of vehicle movements over that period.
5. This Proof of Evidence outlines the lived experience of cyclists, equestrians, pedestrians, school crossing patrols and motorists, and provides graphic evidence in the form of photographs, written statements and videos submitted to UWAG by members of the local community.
6. Evidence is also provided of the type of vehicle usage that occurs on the local highway network that currently serves HMP Garth and HMP Wymott, along with other businesses in the immediate area. These include emergency vehicles attending, on a daily basis, not only the two existing prisons but also Marsh House Care Home on Ulnes Walton Lane. These vehicles necessarily travel at high speed and our evidence demonstrates the difficulty which Fire Service vehicles can face at 'pinch points' on Ulnes Walton Lane.
7. Being a rural area, agricultural vehicles traverse Ulnes Walton Lane on a daily basis, from very early morning until very late at night during harvest times. These large and fast-moving vehicles frequently have to straddle the centre line, and are often driven by younger drivers.
8. Evidence is also presented regarding large HGVs visiting premises in the area other than the two existing prisons. A civil engineering company has a base at Lostock Bridge on Ulnes Walton Lane with its own fleet of HGVs and receives deliveries from other

companies using large articulated vehicles which have difficulty negotiating the access to and from their premises.

9. The inadequate highway infrastructure is highlighted with photographic evidence of narrow, obstructed and/or non-existent footpaths along Ulmes Walton Lane and School Lane which force pedestrians and mobility scooters on to the roadway. Children using the school bus service also have to access the bus stops which don't have the benefit of footpath access.
10. Flooding in the local area also limits access for pedestrians and cyclists. As our evidence shows, the Appellant's proposed pedestrian/cycle access via Pump House Lane is frequently impassable due to flooding,
11. In the light of the additional evidence put forward by UWAG in this Proof of Evidence and that of Mr Paul Parker, along the technical evidence of Mr Graham Eves, and that of Mrs Emma Curtis in March 2023, UWAG's conclusion remains that highway safety has not been satisfactorily addressed by the Appellant in any of the evidence presented to the Local Planning Authority in 2021, the original Inquiry in 2022 or to this re-opened Inquiry. We, therefore, submit that the recommendation 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.