

## Re-Opened Public Enquiry into Application PP/D2320/W/22/3295556 March 2024

This Submission covers the following two issues

- A581/Ulnes Walton Lane Mitigation
- Construction Phase Impacts

Response MoJ Submission using Headings of the documents

Section	Heading	Issue
A35 Garth Wymott 2 Transport Assessment		
General		The highways and active travel elements of the scheme, must comply with or provide evidence as to why they do not need to comply with the recommendations of the LTN1/20. Saying LTN 1/20 does not apply to schemes like this is to avoiding the appropriate mitigation being put in place. The MoJ and LCC should be adopting best practice at all times.
A35 Transport Assessment	Incident Data Tables 3-5 to 3-7	These reference incident data up to 2020 only. Surely the Appeal cannot be allowed based on data which is now 4 years out of date and does not account for increases in traffic levels up to 2024 and leisure and active travel use of Ulnes Walton land and School Lane and respective junctions with Dunkirk Lane, Slater Lane, and A581
	Traffic Model	The traffic data is based on a model dated 2021. References are made a various points to 2019 data and 'validation' against 2013 data. It appears that the Appeal is being made without the benefit of a fully validated traffic model for the scheme, and one which does not rely on any measurements older than 5 years at the time of construction of the highways aspects of the scheme.
		The Traffic Model only extends to 2025 which will barely cover the start of the construction period for the new Prison, so existing growth in traffic volumes during the construction period through to the full opening of the Prison is understated. This invalidates the mitigation measures proposed by the MoJ.
		For a highways scheme, a proper model for making an informed decision would normally cover a 25 year period. This would ensure that the highways elements are adequate for the foreseeable future and would be consistent with best practice
		A Statement is made by the MoJ's advisors that the there is no clash with peak traffic from the Test track Development. This appears to be more of an assumption rather than founded in recent data. It has to be accepted that in November 2023 LCC gave notice to local residents that it intends to install extensive traffic calming measures along Longmeanygate, including speed bumps and alternating priority long the entire length approaching the Junction with Dunkirk Lane. Longmeanygate forms the southern access to the Test Track Development and as at March 2024 the Test Track

		Development is far from complete. This invalidates the model presented in support of the Prison Development as it does not consider the additional traffic calming and increasing Traffic volumes already evident.
	Section 2.2	This Section References the hierarchy of pedestrian and cyclist. There is no detail on how the current design proposals presented by the MoJ fulfil this hierarchy.
		In particular the proposals for the new mini-roundabout at the junction of Ulnes Walton Lane and the A581, although apparently agreed by LCC make no provision for cyclists to turn into or out of Ulnes Walton Lane or pass the junction. The solution should be compliant with LTN 1/20 which covers all aspect including space for cyclists and junctions and crossing.
		This is not a minor issue as the southern stretch of Ulnes Walton Lane also forms a critical link between two national cycle routes (Nrs 62 and 55). Data has previously been presented on the use of Ulnes Walton Lane by cyclists
		It is not understand why the MoJ has not conducted extensive liaison with Sustrans, British Cycling, Equestrian Bodies or Walking groups and gained their support for the Highways proposals
	Section 2.3.1	It is not clear how the MoJ scheme fulfil the seven transport priorities and is not in accordance with good practice or indeed sustainable.
	Section 2.3.2 -	It is not demonstrated how the proposed scheme fulfils the "Improving pedestrian facilities - with safe and secure urban and rural footways and paths linking with public transport and other services" or indeed any of the other listed objectives. Section 2.3.4 - Please clarify why the assessment details improving "the quality of pedestrian facilities", but does not present how this will be implemented on the current Section. Figure 3.1 shows an incorrect site boundary. Please clarify how the transport assessment fulfils the recommendations LTN 1-20 for the consideration of cycling infrastructure Please clarify how the transport assessment fulfils the recommendations of CD195 for pedestrian crossings and safe infrastructure Table 5-2 - Please clarify how 1.3% of Staff will be able to attend the prison via train, given there is no train station in the vicinity. Section 5.3.6 - The modal split is noted to be distributed as per the 2011 Census. As noted in the NTS, the Covid-19 has impacted the way people travel. Therefore, why has a more appropriate modal split not been applied, considering the specific aspects of the site itself. Section 7.3 There is a clear assumption that the AM Peak Occurs between 7am and 8am. This has been assumed for all nodes, however Leyland St James Primary School, located on

		School Lane, demonstrably exhibits a peak between 8:30am and 9am, due to cars and buses for the school and transport to other schools. It is noted that neither ATCs CTCs or turning surveys were completed at the intersection between Ulnes Walton Lane and Slater Lane.
	Section 2.3.4	- Please clarify why the assessment details improving "the quality of pedestrian facilities", but does not present how this will be implemented.
		<p>In respect of encouraging Active travel and use of public transport, no provision is proposed for safe access to the Bus Stop on the A581 (Close to Rose and Crown Public House) or the Bus stop on Ulnes Walton Lane which serves the Old School, Care Home and Equestrian Centre, as well as residential properties on this stretch of Road south of the River Lostock Bridge.</p> <p>Appendix B shows a photo of the Bus stop location and the adjacent Public footpath which starts on the East side of Ulnes Walton Lane. No provision is offered by the MoJ to protect walkers and commuters using public transport from conflict with increased volumes of traffic.</p> <p>As recognised by all parties there is no footpath on Ulnes Walton Lane and anyone using the Bus Stop will necessarily have to walk in the road and this is unchanged despite the increased traffic volume and no mitigations</p>
		The risk to pedestrians existing or accessing Ulnes Walton Lane in respect of conflict with Cars and HGVs at the junction with the A581 has not been addressed. As shown in the photograph in Appendix C, Ulnes Walton Lane is narrow with no footpaths. In the event of queuing of vehicles waiting to exit Ulnes Walton Lane (As forecast in the MoJ model), pedestrians will have no choice to approach the Junction in the face of traffic turning into Ulnes Walton Lane and will have to fling themselves into the hawthorn hedge on the west side of the road to avoid a life threatening conflict with on-coming vehicles. Surely this is not a matter to be overlooked in granting the MOJs Appeal.
		This conflict between vehicles and pedestrian is not a minimal risk, as Ulnes Walton Lane and the paths across the fields linked to it are popular walking routes as evidenced by the example of a recommended walking route shown in the Ordnance Survey Maps App – a screen shot is shown at Appendix D
	Table 5-2	There is no basis for the modelled figure that 1.3% of Staff will be able to attend the prison via train, given there is no train station in the vicinity and the additional buses proposed to be

		timetabled will cease as soon as the additional funding ceases
	Section 5.3.6	The modal split is noted to be distributed as per the 2011 Census. As noted in the NTS, Covid-19 has impacted the way people travel. A more appropriate modal split should have been applied, considering the specific aspects of the site itself. This further invalidates the MOJ Model.
	Section 7.3	<p>There is a clear assumption that the AM Peak Occurs between 7am and 8am. This has been assumed for all nodes, however, Leyland St James Primary School (Located on Slater Lane adjacent to the Junction with School Lane), demonstrably exhibits a peak between 8:30am and 9am, due to cars and buses for the school and transport to other schools. Again this invalidates the model.</p> <p>It is noted that neither ATCs CTCs or turning surveys were completed at the intersection between Ulnes Walton Lane and Slater Lane. All service buses turning at this point cross the centre of the carriageway and have to wait in the event of on-coming traffic</p>
	Overall	<p>There is no demonstration that the transport assessment fulfils the recommendations LTN 1/20 for the consideration of cycling infrastructure.</p> <p>In addition there is no demonstration of how the transport assessment fulfils the recommendations of CD195 for pedestrian crossings and safe infrastructure</p>
	Appendix H	<p>The Appendix Demonstrates that the traffic modelling has not accounted for any journeys that would be completed down Slater Lane. Slater Lane is a major Bus route and has a narrow access at the junction with B5248 School Lane, requiring Service buses to block traffic travelling in the opposite direction. Slater Lane has a large primary school close to the Junction with B5248 School Lane and the road is subject to significant on road parking in both sides of the carriageway. In addition, there are School crossing patrols both on School Lane and Slater Lane.</p> <p>It also demonstrates that the model has not accounted for perceived "rat-running" along the B5248 School Lane, between Slater Lane and Dunkirk Lane.</p> <p>Overlooking these factors renders any modelling invalid.</p>
	A36 Outline Travel Plan	The document does not reference the correct site Red Line Boundary

		7.2 - The Travel Plan measures do not provide any consideration for physical assets that would promote active travel. No measures were considered
HMP Garth Wymott 2 Additional Highways Evidence March 2023		
	General	Refer above points
		It is noted that the additional evidence still does not address the requirements of LTN1/20 indeed there is no mention in the document at all.
		It is also noted that there is no attempt to resolve the obvious conflict between equestrian users of Ulnes Walton Lane and the increased traffic volumes. There are at least 6 stables on or accessing Ulnes Walton Lane as well as a network of bridleways. The MoJ assessment does not consider these at all. There are no proposals for Pegasus crossings.
		The Southern bus stop on Ulnes Walton Lane is not addressed despite all the text about the North Bound Bus Stop
General		
		No consideration is given to the service life remaining of the carriageway in Ulnes Walton Lane or School lane or the junction with Dunkirk Lane.  As a minimum all the mitigation on traffic should be in place ahead of the Construction phase of the Development to maintain safety.

D N Websdell

21 March 24

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**Appendix A**

**LLC Notice of Traffic Calming Measures on Longmeanygate A**

**LANCASHIRE COUNTY COUNCIL  
(LONGMEANYGATE AND MIDGE HALL LANE,  
LEYLAND, SOUTH RIBBLE BOROUGH)  
(ROAD HUMPS AND JUNCTION TABLE)**

County  
Council



**NOTICE IS HEREBY GIVEN** that in accordance with Section 90A of the Highways Act 1980, Lancashire County Council propose the following:

1. Introduce road humps in the following locations:

- a) Longmeanygate, Moss Side, Leyland, from a point 155 metres north of its junction with the centreline of The Laund for a distance of 2.5 metres in a northerly direction.
- b) Longmeanygate, Moss Side, Leyland, from a point 224 metres north of its junction with the centreline of The Laund for a distance of 2.5 metres in a northerly direction.
- c) Longmeanygate, Moss Side, Leyland, from a point 105 metres south of its roundabout junction with Roadtrain Avenue for a distance of 2.5 metres in a southerly direction.
- d) Longmeanygate, Moss Side, Leyland, from a point 227 metres south of its roundabout junction with Roadtrain Avenue for a distance of 2.5 metres in a southerly direction.

The road humps will have a maximum height not exceeding 65mm.

2. Introduce a junction table in the following lengths road:

- a) Longmeanygate, Moss Side, Leyland, from the intersection of the centreline of Longmeanygate and Midge Hall Lane for a distance of 12.8 metres in a north easterly direction;
- b) Longmeanygate, Moss Side, Leyland, from the intersection of the centreline of Longmeanygate and Midge Hall Lane for a distance of 16.7 metres in a south westerly direction;
- c) Midge Hall Lane, Midge Hall, Leyland, from the intersection of the centreline of Midge Hall Lane and Longmeanygate for a distance of 17.5 metres in a north westerly direction.

The junction table will have a maximum height not exceeding 65mm.

**Statement of Reasons**

The purpose of the junction table at the junction with Midge Hall Lane and the speed cushions with associated buildouts along Longmeanygate are to enforce the proposed changes in the speed limit, in the interest of highway safety for all users.

A copy of the relevant notice and plan, indicating the proposal may be inspected during normal office hours at the offices of the South Ribble Borough Council, Civic Centre, West Paddock, Leyland, PR25 1DH, and at the offices of The Director of Law and Governance, Lancashire County Council, County Hall, Fishergate, Preston PR1 8XJ, and on Lancashire County Councils Website <http://www.lancashire.gov.uk/roads-parking-and-travel/roads/roadworks-and-traffic-regulation-orders/permanent.aspx>. Any representations or objections (specifying the grounds on which they are made) relating to the proposal must be made in writing and should be sent to The Director of Law and Governance, Lancashire County Council, P O Box 100, County Hall, Preston PR1 0LD or by e-mail to [trouconsultation@lancashire.gov.uk](mailto:trouconsultation@lancashire.gov.uk) quoting ref: LSG4.AFR.894.17488 before 08 December 2023.

**Heloise MacAndrew, Director of Law and Governance**  
10 November 2023



## Appendix B

### South Bound Bus Stop on Ulnes Walton Lane by Care Home



Photograph looking North (Opposite Care Home) ,Showing Bus Stop on east side and Public Footpath sign. No protection for Pedestrians is proposed

## Appendix C

### Southern end of Ulnes Walton Lane looking toward junction with A581



Note no footpaths or significant verge for Pedestrians to Escape on-coming traffic. The MoJ Mini-roundabout proposal does not address this situation.

## Appendix D

### Typical Recommended Walking Route including Ulnes Walton Lane

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Screenshot from Ordnance Survey Maps App March 2023 Using Ulnes Walton Lane and Paths accessed from Ulnes Walton Lane