ATKINS

Member of the SNC-Lavalin Group

Transport Proof of Evidence Application 21/01028/OUTMAJ

HMP Garth and HMP Wymott, Moss Lane, Ulnes Walton, Leyland

Ministry of Justice

June 2022

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Transport Proof of Evidence – Volume 1

TOWN AND COUNTRY PLANNING ACT 1990
APPEAL BY THE MINISTRY OF JUSTICE
PROOF OF EVIDENCE ON BEHALF OF THE MINISTRY OF JUSTICE

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1. Introduction

1.1. The Witness

1.1.1. My name is Stephen Yeates BSc (Hons), MSc, CMILT. I am a Chartered Member of the Institute of Logistics and Transport. I hold an Honours Degree in Geography and a Masters Degree in Transport Policy and Business Management. I am a Senior Managing Consultant with Atkins Limited and I have over 18 years' experience in the field of transport planning.

1.1.2. Atkins Limited is an international design, engineering and project management consultancy working in a wide range of sectors including infrastructure, transportation, nuclear and power, oil and gas, engineering, and design.

1.1.3. The Ministry of Justice (MoJ) and the National Offender Management Service (NOMS) appointed consultants to prepare the documents required for the submission of a Hybrid Planning Application seeking outline planning permission for a new prison (referred to as Garth Wymott 2). Mace Group, (on behalf of the MoJ) appointed Atkins to produce a Transport Assessment (TA) (Core Document A35) and an Outline Travel Plan (OTP) (Core Document A36).

1.1.4. As Project Director at Atkins Limited, I was responsible for the submission of the transportation documents which supported the Hybrid Planning Application (Application Reference: 21/01028/OUTMAJ).

1.1.5. I have prepared my Proof of Evidence (PoE) for this appeal. I confirm that the opinions expressed are my true and professional opinions.

1.1.6. I appear at this Inquiry on behalf of the MoJ to give evidence on transport planning matters.

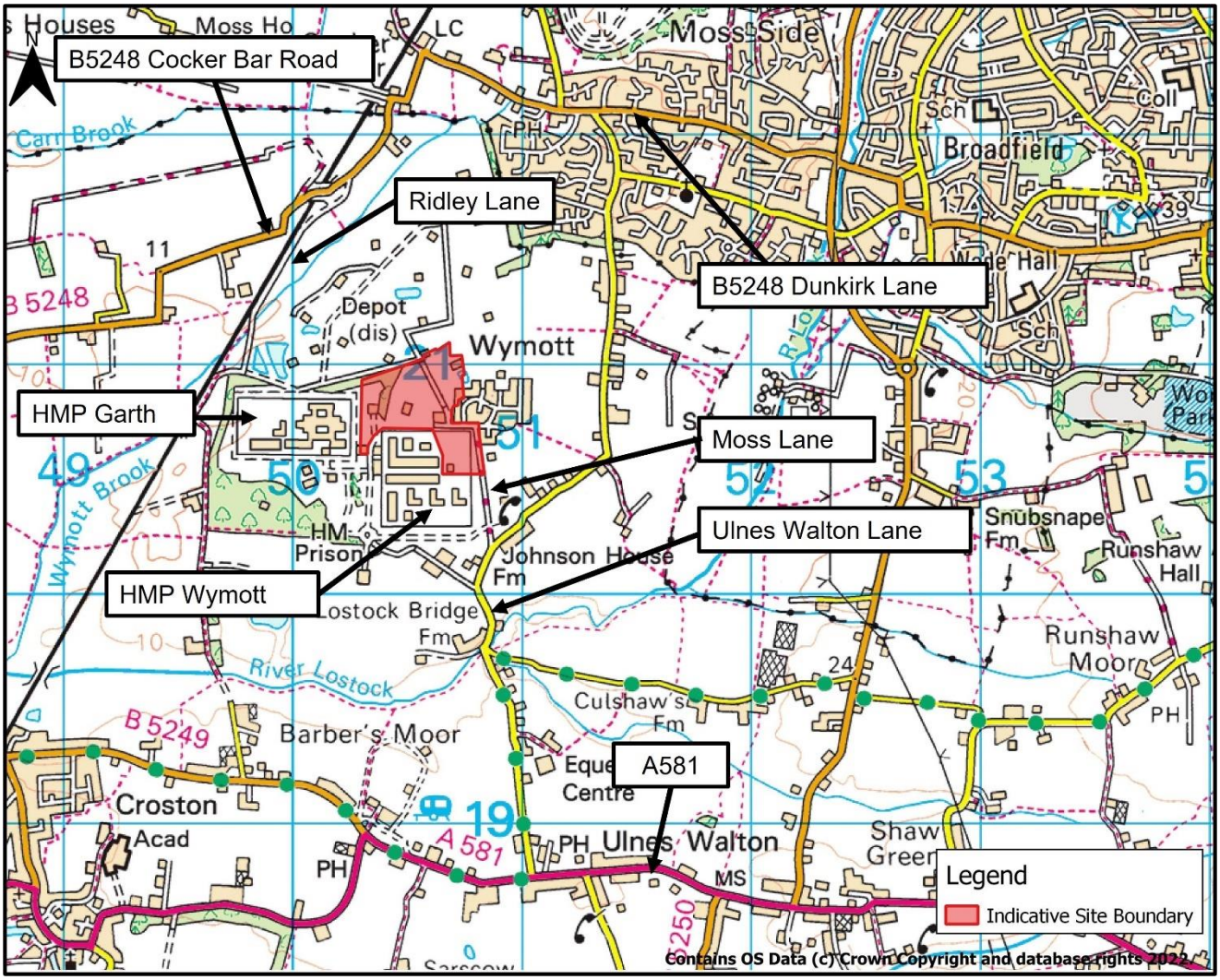
1.2. Background

1.2.1. This appeal concerns the decision by Chorley Council to refuse planning permission for a new prison (up to 74,531.71 sqm GEA) (Class C2A) within a secure perimeter fence following the demolition of existing buildings and structures and together with associated engineering works; a replacement boiler house (with all matters reserved except for access); and a replacement bowling green and club house (Class F2(c)) on land adjacent to HMP Garth and HMP Wymott, Leyland.

1.3. Site context

1.3.1. The development site is in a rural location in Lancashire to the southwest of the town of Leyland. Garth Wymott 2 (GW2) is proposed to be located on land to the north of HMP Wymott. HMP Wymott is a Category C men's prison with a capacity of approximately 1,000 inmates. HMP Garth is located adjacent to HMP Wymott. HMP Garth is a Category B men's prison with a capacity of approximately 800 inmates. The site location is shown on Figure 1-1 (overleaf).

Figure 1-1 - Site location plan



1.3.2. HMP Garth and HMP Wymott are accessed via Moss Lane, a single carriageway road subject to a 30mph speed limit. Moss Lane also provides access to Wymott, a small residential area to the north of HMP Garth and HMP Wymott. It is proposed to access GW2 from Moss Lane.

1.3.3. Moss Lane is accessed from the south via Ulnes Walton Lane. The junction between Moss Lane and Ulnes Walton Lane is a priority-controlled T-junction, with vehicles on Moss Lane giving way to vehicles on Ulnes Walton lane.

1.3.4. Ulnes Walton Lane is a single carriageway road subject to a 40mph speed limit (within the vicinity of the junction with Moss Lane) which provides access between the B5248 Dunkirk Lane to the north and the A581 to the south. As Ulnes Walton Lane enters the urban area of Leyland (to the north) the speed limit is reduced to 30mph.

1.3.5. The B5248 Dunkirk Lane is a single carriageway road subject to a 30mph speed limit. It is the main route between Leyland to the east and Bretherton to the west.

1.3.6. The A581 is located 1.9km south of HMP Garth and HMP Wymott. The A581 is a single carriageway road which provides access to Croston and the A59 to the west, and the A49 near Chorley to the east. The A581 has lighting provision on both sides of the carriageway and a footway going westbound. The A581 is subject to a speed limit of 30mph (within the vicinity of Ulnes Walton) and is accessed from Ulnes Walton Lane via a priority-controlled junction.

1.3.7. Table 1-1 provides a summary of the baseline traffic flows on the immediate highway network using observed traffic data from the Transport Assessment (traffic surveys were undertaken in March 2021). The baseline traffic flows presented represent the Annual Average Daily Traffic (AADT). Table 1-1 also provides a summary of the daily number of cyclists on the immediate highway network for context.

Table 1-1 – Summary of baseline traffic flows and cyclists (AADT)

Location	2021 Daily Vehicles	2021 Daily Cyclists
Ulnes Walton Lane (north of Moss Lane)	4,207	165
Ulnes Walton Lane (south of Moss Lane)	4,092	163
Moss Lane (north of Ulnes Walton Lane)	2,340	34
A581 Southport Road (east of Ulnes Walton Lane)	12,028	214
A581 Southport Road (west of Ulnes Walton Lane)	9,195	182
Dunkirk Lane (east of School Lane)	7,500	96
Dunkirk Lane (west of School Lane)	7,225	197

1.4. Report structure

1.4.1. Volume 1 of my PoE uses the following structure:

a. Chapter 2 provides a summary of the transportation documents submitted as part of the Hybrid Planning Application and the consultation undertaken;
b. Chapter 3 outlines, the reasons for refusal, objections and scope of my proof;
c. Chapter 4 details the relevant policies, standards, and guidance;
d. Chapter 5 discusses the matters raised by Chorley Council in refusing the planning application;
e. Chapter 6 discusses the matters raised by specific objectors; and
f. Chapter 7 provides a summary and conclusion.

1.4.2. Volume 2 of my PoE includes the relevant appendices.

2. Assessment of proposal

2.1. Introduction

2.1.1. This chapter provides a summary of the transportation documents which were submitted as part of the Hybrid Planning Application. It also provides a summary of the consultation undertaken with Lancashire County Council (LCC), as the Local Highway Authority, during the pre-application stage and the Determination Period. I have also provided a summary of the planning contributions (agreed with LCC and included in the statutory consultee comments (Core Document B1).

2.2. Deliverables

2.2.1. Table 2-1 provides a summary of the transportation documents which were submitted as part of the Hybrid Planning Application.

Table 2-1 - Transport planning deliverables

Document title	Document reference	Document date	Document purpose
Transport Assessment (TA) – Core Document A35	608623-0000-ATK-GHX0000-XX-RP-X-0001	12 August 2021	To evaluate the transportation aspects of the development proposals.
Outline Travel Plan (OTP) – Core Document A36	608623-0000-ATK-GHX0000-XX-RP-X-0002	12 August 2021	To encourage travel by sustainable modes amongst staff and visitors.
Technical Addendum – Core Document A37	211207_Garth Wymott 2_Technical Addendum_Highways	7 December 2021	To provide additional information in response to the comments raised by LCC during the Determination Period.

2.3. Transport Assessment

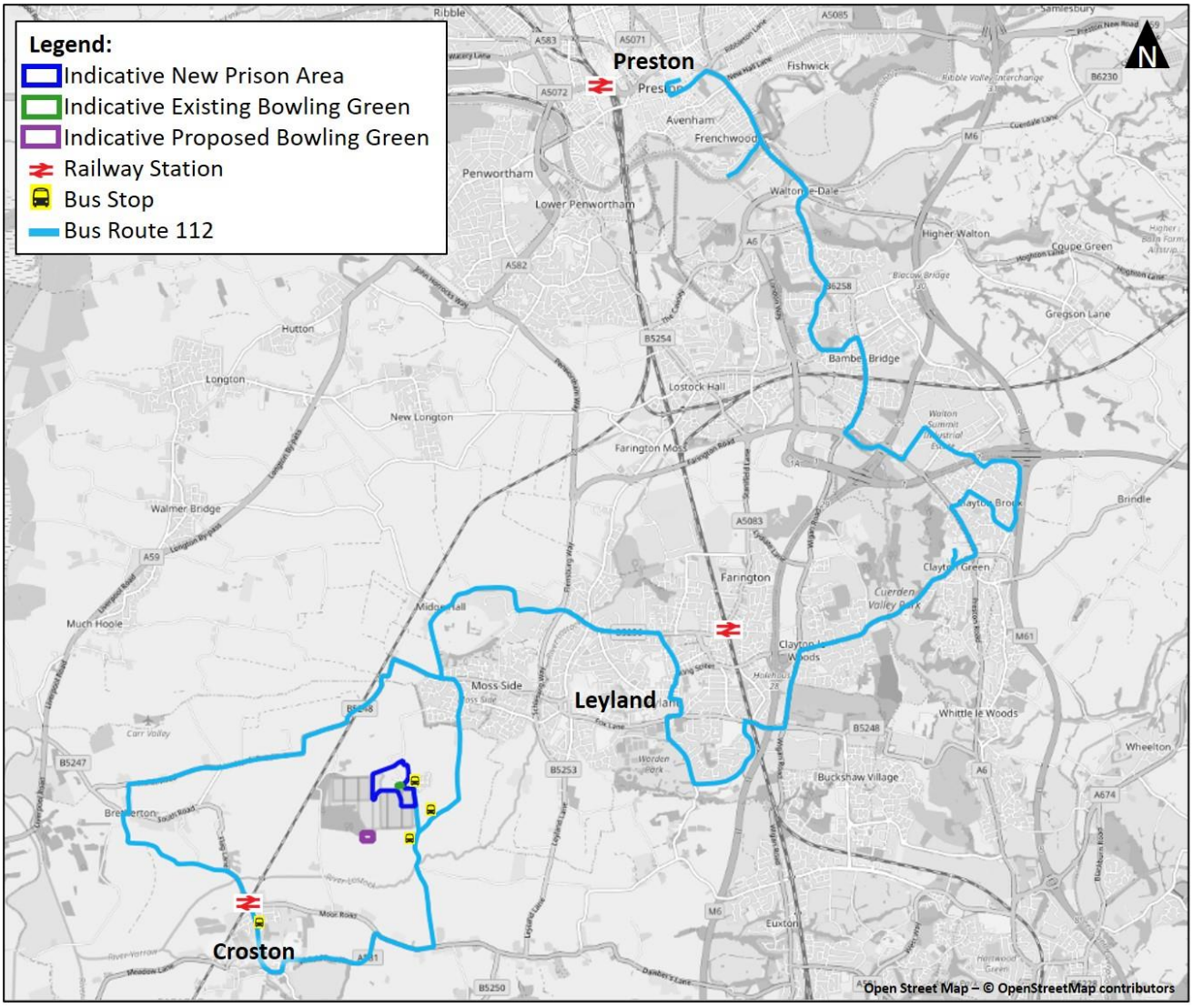
2.3.1. A TA (Core Document A35) was produced to accompany the Hybrid Planning Application for GW2. The most recent version of the TA is dated 12 August 2021.

2.3.2. The purpose of the TA was to evaluate the transportation aspects of the development proposals and consider the existing highway network and sustainable transport provision within the vicinity of GW2.

2.3.3. The TA was prepared in accordance with guidance from the Ministry of Housing, Communities & Local Government on ‘Travel Plans, Transport Assessments and Statements (Published on the 6 March 2014).

2.3.4. The TA provided a summary of the relevant transport policy and a review of the existing transport conditions within the vicinity of GW2. The review included an overview of the existing sustainable transport facilities, including pedestrian and cycle access, bus routes and nearby railway station facilities. A summary of the existing public transport provision is outlined on Figure 2-1

Figure 2-1 - Existing public transport provision



2.3.5. The TA included a summary of the existing traffic conditions based on traffic surveys undertaken in March 2021. The TA also included a review of historic traffic data to validate the 2021 traffic surveys, considering the potential changes in traffic flow patterns caused by the COVID-19 pandemic.

2.3.6. Personal Injury Accident (PIA) data was obtained for a five-year period (2016-2020).

2.3.7. The TA presented a preliminary highway layout for the proposed vehicular site access (off Moss Lane) as well as the proposal to relocate the existing Bowling Green to the land south of HMP Wymott.

2.3.8. The TA included vehicular trip generation to/from the site during the AM (07:00-08:00) and PM (17:00-18:00) peak hours, allowing for both staff and visitor travel.

2.3.9. The calculated trip generation is summarised in Table 2-2.

Table 2-2 - Trip generation for staff and visitors (vehicles) (values rounded)

	AM Peak (07:00 to 09:00)		PM Peak (17:00 to 18:00)		Daily	
	IN	OUT	IN	OUT	IN	OUT
Staff	202	21	0	236	531	531
Visitors	0	0	0	17	134	134
Total	**202**	**21**	**0**	**253**	**666**	**666**

2.3.10. The calculated traffic flows during the AM and PM peak hours were distributed onto the local highway network based on 2011 census Journey to Work data and online journey planning software.

2.3.11. A range of future scenarios were considered, allowing for future growth and cumulative development on the highway network including:

a. 2021 (baseline);
b. 2025 (opening year); and
c. 2026 (five years post Hybrid Planning Application submission).

2.3.12. The forecast years were generated using the latest available data from the Department for Transport (DfT).

2.3.13. Junction capacity modelling was completed for nearby junctions, including:

a. The proposed site access junction (off Moss Lane);
b. The Ulnes Walton Lane / Moss Lane junction;
c. The B5248 Dunkirk Lane / School Lane junction; and
d. The A581 Southport Road / Ulnes Walton Lane junction.

2.3.14. The TA used operating/visiting times to determine the arrival and departure times of uniform staff, non-uniform staff, and visitors. This was used to determine the maximum parking accumulation. The methodology accounted for overlapping during shift changes and assumed that arrivals and departures will occur during the hour before and after the shifts starts or ends, based on evidence from other similar facilities. The parking accumulation was used to inform the parking strategy for GW2.

2.4. Outline Travel Plan

2.4.1. An OTP (Core Document A36) was produced to accompany the Hybrid Planning Application for GW2. The most recent version of the OTP is dated 12 August 2021.

2.4.2. The purpose of the OTP was to provide a strategy for GW2, including a range of outline measures to encourage travel by sustainable modes amongst staff and visitors to the prison. The OTP is a long-term management strategy for the development that aims to minimise travel to and from the site by single occupancy car.

2.4.3. The key objectives of the OTP are to:

a. Provide an Action Plan for the prison to encourage sustainable and safe travel to the site, whilst reducing single occupancy car use, where possible, amongst staff and visitors; and
b. Reduce traffic generated by the development, compared to that which would be generated without the implementation of the OTP, where possible.

2.4.4. The OTP outlines a range of measures including:

Car Parking Strategy

a. The car parking strategy (based on the parking accumulation undertaken within the TA) provides sufficient parking spaces to ensure that prison related parking does not overspill onto the surrounding highway network and/or car parking areas relating to other uses; and
b. To not over provide parking to ensure that sustainable transport options are not overlooked as viable alternatives.

Car Sharing Strategy

a. The car sharing strategy minimises single occupancy car travel to and from the site by developing a site-specific car sharing scheme to accommodate the multiple shift patterns; and
b. To allocate 5% of the total car parking capacity for car sharing in line with BREEAM Tra02.

Public Transport Strategy

a. The public transport strategy encourages staff and visitors to use public transport to access the prison by providing a public transport information system in a publicly accessible area;
b. Providing signposting from the site to key public transport services, walking and cycling routes, and local amenities; and
c. Investigating the possibility of providing bus ‘taster tickets’ for employees.

Cycling Strategy

a. The cycling strategy encourages staff and visitors to the prison to cycle by negotiating discounts for cycling and walking equipment with local retailers and promoting these to staff as part of the induction process;
b. Providing secure cycle parking spaces at the new development;

c. Investigating the possibility of introducing an interest free loan cycle purchase scheme for staff;
d. Investigating the feasibility of encouraging employees to undertake adult cycle training; and
e. Providing appropriate shower and changing facilities in accordance with BREEAM for use by staff. Locker facilities will also be provided so that uniformed officers can store their civilian clothes, personal items, and cycle equipment.

Single Occupancy Car Strategy

a. The single occupancy car strategy minimises the number of single occupancy car trips by encouraging the use of public transport for long distance staff trips; and
b. Encouraging remote working/ conferencing facilities for non-unformed staff to minimise the need to travel.

2.5. Technical Addendum

2.5.1. A Technical Addendum was produced in response to the comments provided by the Highway Development Control Officer at LCC in relation to the TA (Core Document A35) and OTP (Core Document A36) for GW2. The most recent version of the Technical Addendum is dated 7 December 2021 (Core Document A37).

2.5.2. The Technical Addendum was submitted to LCC during the Determination Period and includes technical evidence which was used to inform discussions relating to the agreed s278 and s106 agreements.

2.5.3. The Technical Addendum includes technical evidence relating to:

a. The validation of the trip distribution presented within the TA;
b. The assumptions made regarding the trip generation presented within the TA;
c. The approach to Committed Development within the TA;
d. The response to COVID-19 within the TA;
e. The observed traffic flow profile used within the junction modelling;
f. The s278 and s106 agreements;
g. The impact of GW2 on the existing Public Rights of Way (PRoW); and
h. The proposed construction access routes.

2.6. Consultation with the Local Highway Authority

2.6.1. LCC, as the Local Highway Authority, were consulted on the TA (Core Document A35) and OTP (Core Document A36) in advance of the Hybrid Planning Application submission to agree the scope of our assessment. Atkins continued to engage with LCC throughout the Determination Period. These discussions were used to finalise the s278 and s106 agreements. Table 2-3 provides a summary of the meetings held between Atkins and LCC.

Table 2-3 – Consultation summary

Date	Timeline	Meeting purpose/ items discussed
2 February 2021	Pre-Application	- Trip Generation / Assignment Methodology. - Data collection with regards to COVID-19.
21 May 2021	Pre-Application	- Assessment scenarios for the traffic modelling. - High-level traffic modelling results. - Off-site highways mitigation.
5 August 2021	Pre-Application	- Off-site highways mitigation. - Construction Traffic Management Plan. - Sustainable Transport.
1 September 2021	Determination Period	- Discuss initial statutory consultee comments.
6 October 2021	Determination Period	- Trip Generation and Distribution Assumptions.
28 October 2021	Determination Period	- Discuss suggested s278 works and s106 contributions.
3 November 2021	Determination Period	- Proposed mitigation along Ulnes Walton Lane.
11 November 2021	Determination Period	- Public Transport contributions.
29 November 2021	Determination Period	- Discuss final statutory consultee comments prior to Planning Committee.

2.6.2. Following the consultation during the pre-application stage and the Determination Period, LCC confirmed that they had no highways objections to the Hybrid Planning Application. In the statutory consultee comments (Core Document B1) LCC stated:

a. Lancashire County Council (LCC) as the Local Highway Authority has been in continuous discussions with Atkins as representative of the applicant, the Ministry of Justice (MOJ), since the pre application stage. I can conclude that with the further Technical Note provided, the Local Highway Authority is satisfied with the proposal and its impacts subject to all obligations being satisfied and being in line with the NPPF (National Planning Policy Framework).

2.6.3. A copy of Core Document B1 is included in Appendix A of Volume 2 of my Proof.

2.6.4. On the 14th June 2022, LCC confirmed in writing that there have been no material changes since the submission of the statutory consultee comments to Chorley Council. Therefore, the position of the Local Highway Authority remains unchanged. LCC also confirmed that as the Local Highway Authority, they are satisfied that the proposal and its impacts will not result in a severe highway impact, subject to the obligations and mitigation measures proposed being suitably secured.

2.6.5. A copy of the written confirmation from LCC is included in Appendix B of Volume 2 of my Proof.

2.7. Agreed contributions

2.7.1. The agreed s278 works and s106 contributions (relating to transport) are outlined in the statutory consultee comments issued by LCC (Core Document B1). For ease of reference the agreed contributions are summarised in Section 2.8 below. Several of the agreed contributions further improve the overall sustainability of the site.

2.7.2. LCC recommended that the trigger point for all s278 works and s106 contributions should be prior to the commencement of development.

2.8. Section 278 works

2.8.1. Provide traffic calming measures, as requested by LCC during the Determination Period, from Dunkirk Lane/School Lane to Ulnes Walton Lane/Moss Lane (Drawing Reference: GARTHULNES-ATK-HGN-DR-D-001). A copy of GARTHULNES-ATK-HGN-DR-D-001 (Core Document A37) is included in Appendix C of Volume 2 of my Proof.

2.8.2. Provide traffic calming measures similar to the above on the 130m section of Ulnes Walton Lane on its approach to Moss Lane from south as agreed and confirmed in an email on 3 December 2021 and indicated on the scheme plan.

2.8.3. Provide improved carriageway markings at Ulnes Walton Lane/Moss Lane for improved forward visibility and to facilitate safe right turns into Moss Lane.

2.8.4. Provide traffic calming measures on Moss Lane as shown on indicative drawing. It is agreed that in the detailed design the traffic calming features should be provided at 60m centres instead of the 90m shown on the plan (Drawing Reference: GARTHMOSS-DR-D-0002 rev P2). A copy of GARTHMOSS-DR-D-0002 rev P2 (Core Document A37) is included in Appendix D of Volume 2 of my Proof.

2.8.5. Carry out improvements to the existing bus stop on Willow Road to high quality disability compliant standard to include provision of a raised kerb, boarding platform, new shelter, and the required carriageway markings.

2.8.6. Carry out improvements to the existing bus stop on Ulnes Walton Lane, to the northeast of its junction with Moss Lane to high quality disability compliant standard to include provision of a raised kerb, boarding platform, new shelter, and the required carriageway markings.

2.8.7. Provision of the proposed temporary construction access and its subsequent alterations for permanent use.

2.9. Section 106 contributions

2.9.1. Provide s106 contribution of £100,000 per annum for a period of 5 years to fund the enhancement of existing bus service provision as described below:

a. Improve the existing daytime service frequency between Leyland and Croston (Monday to Saturday) from the current hourly service to every 30 minutes; and
b. Extend the existing period of operation between Leyland and Croston (Monday to Saturday) to approximately 20:30 in the evening.

2.9.2. Provide s106 contribution of £50,000 for improvement of the surface condition of Nixon Lane and provision of signage to facilitate cycle access from School Lane to the proposed site. Further changes are required, not forming part of this contribution, as indicated earlier to ensure that a developer delivered route is delivered to enable the improved cycle route to be integrated within the site environment. This has not yet been agreed and needs to be conditioned.

2.9.3. Provide s106 contribution of £18,000 to enable LCC to provide the following services in relation to the OTP:

a. Appraise the OTP submitted to the Council pursuant to the planning permission and provide constructive feedback;
b. Oversee the progression from Interim to Full OTP in line with agreed timescales; and
c. Monitor the development, implementation, and review of the OTP for a period of up to 5 years.

2.9.4. Provide s106 contribution to mitigate the impact of GW2 at the A581 Southport Road/Ulnes Walton Lane junction. LCC would request the s106 contribution to help support the development of a wider corridor scheme along the A581 to be delivered by LCC (A581 Rufford to Euxton Safety Improvements). The value of the s106 contribution is to be determined by the level of funding required to deliver the signalised mitigation option proposed by Atkins. The current estimated cost at 2021 levels is £485,834.

2.10. Committee Report

2.10.1. Within the Officer report to Planning Committee (Core Document A97) the viability of the public transport (post 5 year funding period) is raised in addition to the request made by LCC for the MoJ to deliver a footway along Moss Lane (refer to Paragraph(s) 219 – 222).

2.10.2. During the Determination Period, the MoJ made it clear to LCC that they would be willing to consider any Public Transport Improvements which may be required to facilitate the proposed development in line with the National Planning Policy Framework.

2.10.3. LCC made the request for the MoJ to provide a s106 contribution of £100,000 per annum for a period of 5 years to improve the service frequency of the existing 112 service. It is therefore assumed that LCC considered this to be an appropriate level of funding to support the viability of the additional services until they become financially viable as a result of the additional patronage associated with GW2. This request was accepted by the MoJ.

2.10.4. In addition, LCC requested that any revenue received from additional patronage should be utilised to sustainably maintain the service levels beyond the contribution period. As the 112 is an existing service which already routes via Moss Lane and serves the Wymott residents, it is considered reasonable to assume that GW2 would generate additional patronage above and beyond the existing demand for the service and therefore the agreed contribution period would be prolonged.

2.10.5. The Technical Addendum submitted to LCC (Core Document A37) included a response to the request to deliver a footway along Moss Lane. In summary, it is not considered that this request is required to make the Prison development acceptable in planning terms because it is not directly related to GW2. Any trips associated with GW2 would use the existing bus stop located along Willow Road.

2.10.6. Atkins did present an alternative solution within the Technical Addendum. It was instead proposed that the enhanced bus service (delivered via a S106 contribution of £100,000 per annum) is used to extend the 112 bus service so that it calls at the (currently) redundant bus stop outside HMP Wymott. This bus stop would be more attractive and accessible than the bus stop on Ulnes Walton Lane as it is within closer proximity to the relocated Bowling Green and Club House, whilst it would also enhance the existing public transport access to HMP Garth and HMP Wymott. LCC confirmed that they did not want this proposal.

2.10.7. Despite this, LCC confirmed that the agreed contributions are acceptable and compliant with the NPPF, and that they are satisfied with the proposal and its impacts subject to all obligations being satisfied.

2.11. Summary

2.11.1. This chapter demonstrates that the proposed planning application was discussed extensively with LCC, as the local highway authority. The submitted reports and findings were thoroughly reviewed by the County Council. The outcome of the discussions was a recommended package of measures which improves road safety on the surrounding roads, and measures to enhance the sustainable transport options.

3. Reasons for refusal and objections

3.1. Reason for refusal

3.1.1. The Hybrid Planning Application was refused by the Chorley Council Planning Committee (CCPC), based on the issues set out in the published Reason for Refusal (Core Document A100). For ease of reference the reasons for refusal relevant to my Proof are outlined below.

Reason for Refusal 2

3.1.2. The proposed development would have an unacceptable impact on highway safety by virtue of the increased traffic movements and inadequate highway infrastructure, contrary to paragraph 109 of the National Planning Policy Framework and policy BNE1 of the Chorley Local Plan 2012 - 2026.

Reason for Refusal 3

3.1.3. The potential noise nuisance and disturbance associated with the vehicular traffic movements that would be generated throughout the use of the development would result in a harmful impact on the amenity of residents in the locality contrary to policy BNE1 of the Chorley Local Plan 2012-2026.

3.2. Scope of my proof

3.2.1. I note Reason for Refusal 2 (RfR2) references paragraph 109 within the NPPF. In the July 2021 version of NPPF, Paragraph 109 relates to overnight lorry parking facilities. I have therefore assumed that CCPC instead wished to reference Paragraph 111, and therefore for the remainder of my Proof I refer to paragraph 111.

3.2.2. NPPF Paragraph 111 states that:

> *Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.*

3.2.3. Paragraph D within Policy BNE1 (Design Criteria for New Development) from the Chorley Local Plan states that planning permission for new development will be granted, providing:

> *The residual cumulative highways impact of the development is not severe and it would not prejudice highway safety, pedestrian safety, the free flow of traffic, and would not reduce the number of on-site parking spaces to below the standards stated in Site Allocations Policy – Parking Standards, unless there are other material considerations which justify the reduction.*

3.2.4. The scope of my Proof is to demonstrate that GW2 would not have an unacceptable impact on highway safety. Whilst Reason for Refusal 3 (RfR3) refers to the noise and disturbance associated with vehicular traffic movements, this will be addressed within the Appellant's Planning (Core Document E2) and Noise (Core Document E5) Proofs.

3.2.5. I am aware that numerous parties have also raised formal objections to the proposals, including the Ulnes Walton Action Group (UWAG) and Katherine Fletcher MP.

3.2.6. Matters raised by UWAG include:

a. Sustainable transport;
b. Vehicular generation and trip distribution;
c. Construction traffic; and
d. Road safety.

3.2.7. Matters raised by Katherine Fletcher MP relate to:

a. The current proposals;
b. Public transport; and
c. Vehicular access.

3.2.8. Therefore, in addition to responding to RfR2 I will also provide a response to these specific objections (please refer to Chapter 6).

4. Relevant policy, standards, and guidance

4.1. Policy documents

National Planning Policy Framework

4.1.1. The NPPF (Core Document H1) sets out the Government's planning policies for England and how these are expected to be applied. The purpose of the planning system is to contribute to the achievement of sustainable development in three mutually dependent dimensions: economic, social and environmental. It is recognised that transport policies have an important role to play in facilitating sustainable development.

4.1.2. The following parts of the NPPF are material to my evidence:

a. paragraph 110, a), b) c) and d);
b. paragraph 111; and
c. Annex 2: Glossary.

4.1.3. It should be noted that sustainable transport is a defined term within the NPPF (refer to Annex 2 within the NPPF 2021). The NPPF defines sustainable transport as:

> *Any efficient, safe and accessible means of transport with overall low impact on the environment, including walking and cycling, ultra-low and zero emission vehicles, car sharing and public transport.*

4.1.4. The NPPF also states that when assessing specific applications for development, it should be ensured that appropriate opportunities to promote sustainable transport modes can be or have been taken up, given the type of development and its location (refer to Paragraph 110 (a) within the NPPF 2021).

Chorley Local Plan

4.1.5. The Chorley Local Plan 2012-2026 (Core Document I1) forms part of the statutory Development Plan for Chorley. The role of the Plan is:

a. To identify the scale of development in each settlement and allocate sites to meet the development needs of Chorley over a 15 year period in order to achieve the vision for growth as outlined in the Central Lancashire Core Strategy; and
b. To identify key local issues and provide a set of policies to manage change which will be used by decision makers to determine planning applications. These are known as Development Management (DM) Policies.

4.1.6. The following parts of the Chorley Local Plan are material to my evidence:

a. Policy ST1: New development and highway and traffic management schemes will not be permitted unless they include appropriate facilities for pedestrians, cycle parking facilities, and/or cycle routes.

b. Paragraph 4.8: Chorley Council has identified a number of local bus schemes for consideration, which would be prioritised and then implemented using a phased approach including improvements to the bus service to Garth and Wymott Prison, Ulnes Walton.
c. Policy BNE1: The residual cumulative highways impact of the development is not severe, and it would not prejudice highway safety, pedestrian safety, the free flow of traffic, and would not reduce the number of on-site parking spaces to below the standards stated in Site Allocations Policy – Parking Standards.

4.2. Applicable Standards and Guidance

Design Manual for Roads and Bridges

4.2.1. DMRB contains the current standards relating to the design, assessment and operation of motorway and all-purpose roads in the United Kingdom and is published by the DfT. The following documents are relevant to the surface access infrastructure:

a. CD109 – Highway Link Design; and
b. CD123 – Geometric design of at-grade priority and signal-controlled crossings.

5. Matters raised by Chorley Council

5.1. Introduction

5.1.1. The scope of my Proof is to demonstrate that GW2 would not have an unacceptable impact on highway safety in relation to RfR2.

5.2. Context

5.2.1. As per Paragraph 1.3.4, Ulnes Walton Lane is a single carriageway road subject to a 40mph speed limit (within the vicinity of the junction with Moss Lane) which provides access between the B5248 Dunkirk Lane to the north and the A581 to the south. As Ulnes Walton Lane enters the urban area of Leyland (to the north) the speed limit is reduced to 30mph.

5.2.2. The typical carriageway width of Ulnes Walton Lane varies between approximately 5.0m and 7.5m with some localised pinch points.

5.2.3. Ulnes Walton Lane has satisfactorily provided the primary access route to HMP Wymott since 1979 and HMP Garth since 1988.

5.3. Traffic flows

5.3.1. As outlined in Table 2-1, the TA (Core Document A35) forecast an additional 1,332 trips per day on the local highway network as a result of staff and visitor trips associated with GW2. The TA distributed the forecast trip generation on the local highway network using Census 2011 Journey to Work data for journeys to MSOA Chorley 007 (refer to Section 5.3.4 within the TA). The Journey to Work data provides an accurate representation of the proposed staff distribution because the existing HMP Garth and HMP Wymott are located in Chorley 007.

5.3.2. Table 5-1 presents the AADT flow along Ulnes Walton Lane in 2025 (forecast opening year) with and without GW2. Section 7.2 within the TA (Traffic Assessment Methodology) provided a summary of the traffic data used to inform the analysis, the traffic growth factors used, and the approach to Committed Development.

5.3.3. LCC, as the Local Highway Authority, were consulted on the TA (Core Document A35) in advance of the Hybrid Planning Application submission to agree the scope of the assessment. Atkins continued to engage with LCC throughout the Determination Period (refer to Table 2-3). During, the consultation with LCC, Atkins presented a Technical Note (refer to Appendix E within the TA) which outlined the trip generation assumptions used to inform the TA. It should be noted that LCC requested additional information in relation to the trip generation assumptions (including visitor trips), the trip distribution assumptions and the traffic flow profile used to inform the junction capacity modelling.

5.3.4. Atkins provided technical evidence within the Technical Addendum (Core Document A37) in response to each of these points. LCC confirmed that they were satisfied with the additional evidence within the statutory consultee comments (Core Document B1).

Table 5-1 - AADT along Ulnes Walton Lane (Two-Way)

Location	2025 AADT (without GW2)	2025 AADT (with GW2)	Difference	% Difference
Ulnes Walton Lane (North of Moss Lane)	4,290	4,877	+587	+12%
Ulnes Walton Lane (South of Moss Lane)	4,175	4,920	+745	+15%

5.3.5. Table 5-2 demonstrates that GW2 will generate an additional 587 trips per day (+12%) along Ulnes Walton Lane to the north of Moss Lane and an additional 745 trips per day (+15%) along Ulnes Walton Lane to the south of Moss Lane.

5.4. Baseline assessment

Personal Injury Accident (PIA) analysis

5.4.1. Section 3.6 within the TA for GW2 provides a review of historic PIA data from the DfT. The PIA data covers a five-year analysis period (2016-2020) and includes the following roads (referred to as the study area):

a. Moss Lane;
b. Willow Road;
c. Ulnes Walton Lane; and
d. School Lane.

5.4.2. The PIA analysis indicates that there have been no recorded fatalities within the study area during the five-year analysis period, however, there has been one serious accident and three slight accidents (a total of 4 PIAs).

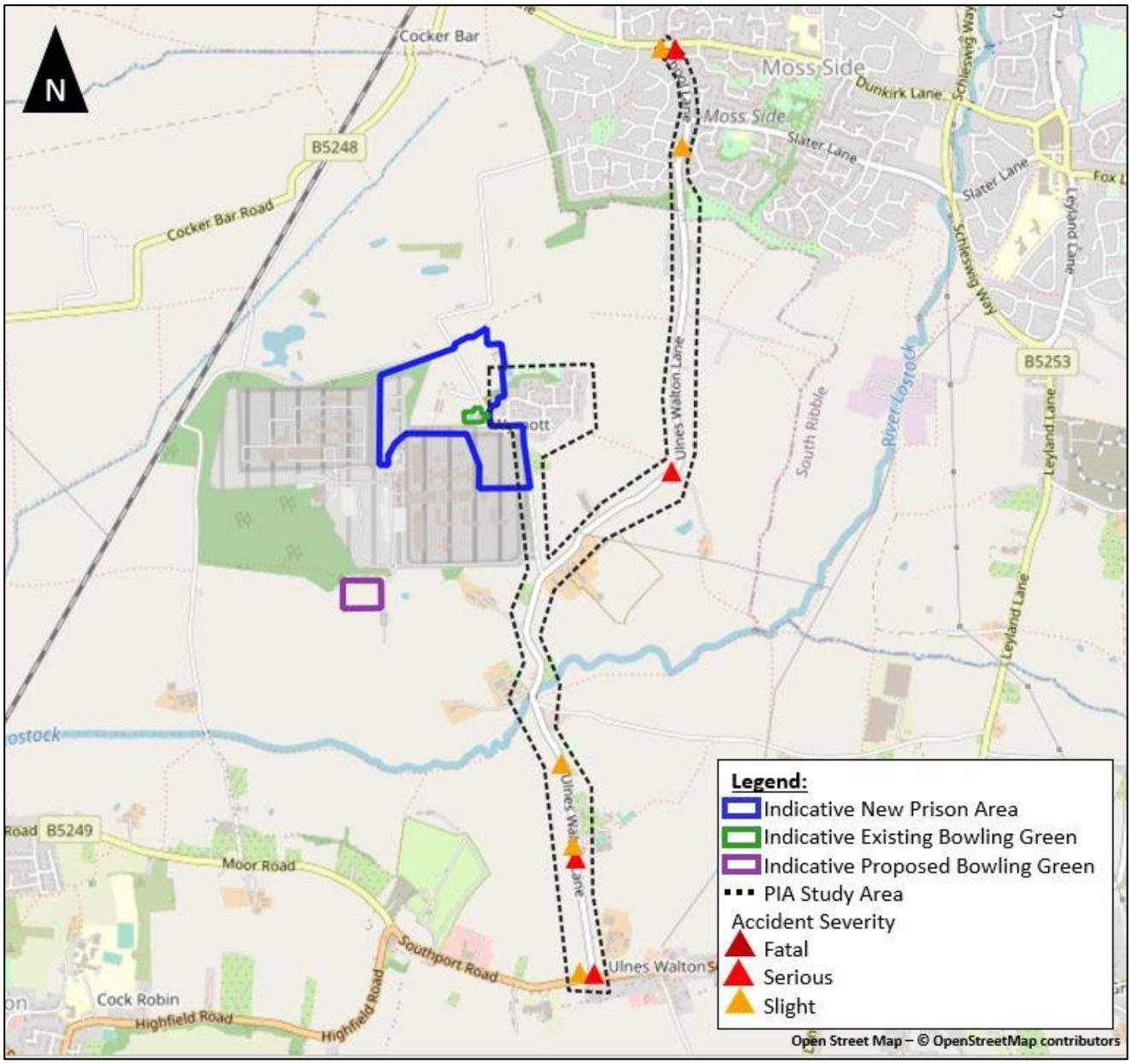
5.4.3. Within the statutory consultee comments issued by the Local Highway Authority (Core Document B1), LCC identified a further 5 PIAs. I have reviewed the additional 5 PIAs and I can confirm that they were not reported within the TA because the incident either occurred in the final two months of 2020 (and therefore there was a reporting lag) or the incident occurred on a minor road outside of the original study area.

5.4.4. To provide clarification, the baseline assessment of the PIA analysis has been updated to include the 9 PIAs referenced by LCC within the statutory consultee comments (refer to Table 5-2 and Figure 5-1 overleaf).

Table 5-2 – PIA severity by year (2016-2020)

Severity	2016	2017	2018	2019	2020	Total
Fatal	0	0	0	0	0	0
Serious	0	0	1	0	3	4
Slight	1	2	1	0	1	5
Total	1	2	2	0	4	9

Figure 5-1 - Recorded PIAs (2016-2020)



5.4.5. To determine if the baseline number of PIAs observed is higher or lower than the forecast number of PIAs, considering the existing network characteristics and traffic volumes, I have undertaken an assessment using COBALT (COst and Benefit to Accidents – Light Touch).

5.5. COBALT assessment

5.5.1. COBALT is the DfT's software tool for forecasting road accident impacts. The DfT Transport Analysis Guidance (TAG) Unit A4.1 Social Impact Appraisal recommends its use in road scheme appraisals.

5.5.2. COBALT forecasts road accidents using detailed inputs relating to specific links and junctions. The assessment is based on a comparison of accidents by severity across an identified network using details of link and junction characteristics, relevant accident rates and traffic volumes.

5.5.3. COBALT has been used to forecast the anticipated number of PIAs within the study area between 2016 and 2020 to determine if the baseline number of PIAs observed (refer to Paragraph 5.4.4) is higher or lower than the forecast number of PIAs considering the existing network characteristics and traffic volumes.

5.5.4. The COBALT assessment forecast a total of 19.4 PIAs across the study area between 2016 and 2020. This is considerably higher than the 9 PIAs which occurred.

5.5.5. In my expert opinion, the increase in traffic along Ulnes Walton Lane would not have a material impact on road safety. In any effect, the MoJ has agreed to provide traffic calming measures along Moss Lane and Ulnes Walton Lane to offset any impacts (refer to Paragraph(s) 2.8.1 and 2.8.4). The agreed traffic calming measures would reduce vehicle speeds along Moss Lane and Ulnes Walton Lane, and this will provide a road safety benefit.

5.6. Junction performance and mitigation

5.6.1. Section 7.3 within the TA (Core Document A35) for GW2 provides details of the Standalone Junction Capacity Assessment undertaken for the following junctions:

a. A581 Southport Road / Ulnes Walton Lane;
b. B5248 Dunkirk Lane / School Lane junction;
c. Ulnes Walton Lane /Moss Lane junction; and
d. The Proposed Site Access / Moss Lane junction.

5.6.2. For ease of reference, a summary of the Standalone Junction Capacity Assessment undertaken for the above junctions is provided below.

A581 Southport Road / Ulnes Walton Lane

5.6.3. The standalone junction capacity modelling demonstrates that GW2 would have an impact on the capacity A581 Southport Road / Ulnes Walton Lane junction.

5.6.4. During the consultation undertaken with LCC, the MoJ agreed to provide a s106 contribution to help support the development of a wider corridor scheme along the A581 to be delivered by LCC (refer to Paragraph 2.9.4).

5.6.5. The wider corridor scheme along the A581 is referred to as the 'A581 Rufford to Euxton Safety Improvements' scheme.

5.6.6. The aim of the 'A581 Rufford to Euxton Safety Improvements' scheme is to provide safety engineering measures and to improve highway capacity on the A581 between the junction with the A59 near Rufford, and the junctions with the A49 at Euxton.

5.6.7. The scheme description includes the provision of:

a. Average Speed Cameras provided over 11.4km;
b. Solar powered road studs, enhanced visibility centre lines and edge of carriageway rumble strips provided over 6.5km of unlit carriageway;
c. Mini roundabouts at four existing priority junctions (including the A581 Southport Road / Ulnes Walton Lane junction);
d. A school warning zone;
e. Centre hatching to the west of Croston and improved delineation on 3 bends; and
f. Extension of the Ulnes Walton 30mph zone.

5.6.8. I agree with LCC that the Appellant's s106 contribution to help deliver the 'A581 Rufford to Euxton Safety Improvements' scheme would sufficiently mitigate the impact of GW2 at the A581 Southport Road / Ulnes Walton Lane junction.

B5248 Dunkirk Lane / School Lane

5.6.9. The standalone junction capacity modelling demonstrates that the B5248 Dunkirk Lane / School Lane junction would operate within capacity in all the assessment scenarios. Therefore, the impact of the additional traffic at this location would be acceptable and would not be 'severe' in the terms of the NPPF.

Ulnes Walton Lane / Moss Lane

5.6.10. The standalone junction capacity modelling demonstrates that the Ulnes Walton Lane / Moss Lane junction would operate within capacity in all the assessment scenarios. Therefore, the impact of the additional traffic at this location would be acceptable and would not be 'severe' in the terms of the NPPF.

Proposed Site Access / Moss Lane

5.6.11. The standalone junction capacity modelling demonstrates that the Proposed Site Access / Moss Lane junction would operate within capacity in all the assessment scenarios. The layout of this junction is acceptable, and its introduction would not generate an impact which would be 'severe' in terms of the NPPF.

5.7. Traffic calming schemes

5.7.1. The MoJ has agreed to provide traffic calming measures along Moss Lane and Ulnes Walton Lane following a request from LCC during the Determination Period (refer to Paragraph(s) 2.8.1 and 2.8.4). A copy of the proposed traffic calming schemes along Moss Lane (Drawing Reference: GARTHMOSS-ATK-HGN-DR-D-0002 rev P2) and Ulnes Walton Lane (Drawing Reference: GARTHULNES-ATK-HGN-DR-D-001) is included in Appendix C and Appendix D of Volume 2 of my Proof (Core Document A37).

5.7.2. Within the statutory consultee comments issued by the Local Highway Authority (Core Document B1), LCC stated:

> *It is considered that the proposed mitigation measures shown on indicative drawing referenced, GARTH ULNES-ATK-HGN-DR-D-001 REV.P1 (20.10.21) included in the Technical Note are adequate to improve conditions for users (as a consequence of the additional impacts that the development will have). As such, no additional measures other than those agreed (in principle) will be required on this corridor.*

5.8. Summary

5.8.1. Chorley Council refused the planning application for the proposed development on the basis that it would have an unacceptable impact on road safety. I have presented evidence which demonstrates that:

a. Ulnes Walton Lane has satisfactorily provided access to two existing prisons for over 30 years;
b. The current road safety record for Ulnes Walton Lane is better than would be expected at this type of location;
c. The increase in vehicle flows from GW2 are relatively modest given the background traffic flows;
d. In my expert opinion, the increase in traffic along Ulnes Walton Lane would not have a material impact on road safety; and
e. A comprehensive package of measures has been agreed with LCC which will improve the existing highway and enhance road safety.

5.8.2. I do not consider that the increase in traffic associated with GW2 would have a severe residual cumulative impact, nor do I consider that the development proposals would have an adverse impact on highway safety, pedestrian safety, or the free flow of traffic in line with the NPPF (refer to Paragraph 4.1.2 (b)) and Chorley Local Plan (refer to Paragraph 4.1.6 (c)).

6. Matters raised by specific objectors

6.1. Introduction

6.1.1. This section considers the matters raised by specific objectors including UWAG and Katherine Fletcher MP as discussed in Section 3.2.

6.2. UWAG

Sustainable transport

6.2.1. The SoC issued by UWAG (Core Document C5) included two objections to the Hybrid Planning Application referring to the sustainability of GW2:

> *UWAG will demonstrate that the proposed travel plan will not result in the real uptake of sustainable modes of transport either by staff, visitors or services, because of the location of the proposed site. UWAG will argue that the aspirational transport assessment and travel plan are unrealistic as use of sustainable modes of transport can only be encouraged, not enforced. (HMP Wymott Travel Plan Position Statement,2007, Lambert Smith Hampton.)*
>
> *UWAG will argue that the proposed financial contributions in relation to the enhanced public transport system and creation of an improved cycle access via Nixon Lane, will not achieve any meaningful outcomes.*

6.2.2. As per Section 4.1, sustainable transport is a defined term within the NPPF and when assessing specific applications for development, it should be ensured that appropriate opportunities to promote sustainable transport modes can be or have been taken up, given the type of development and its location.

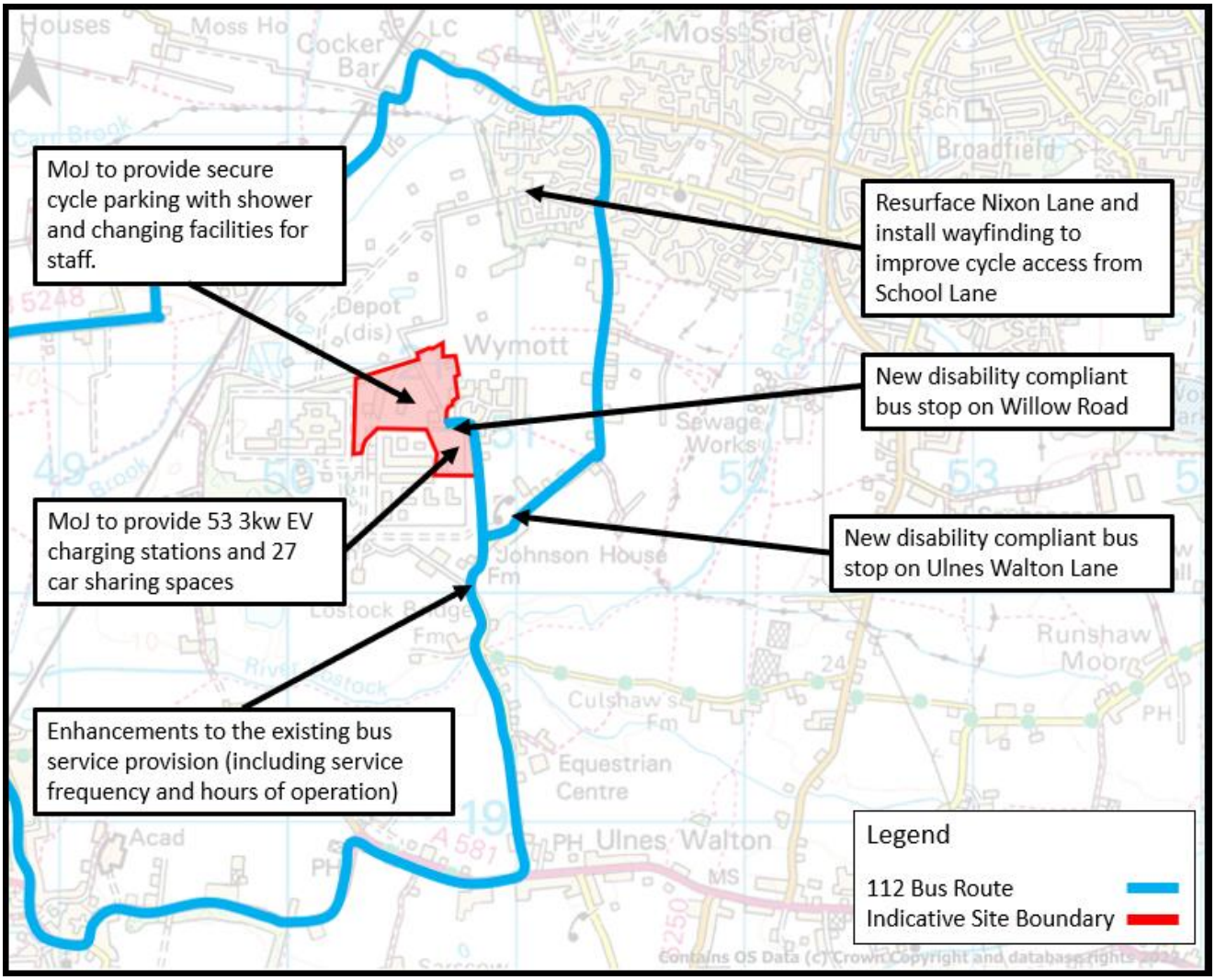
6.2.3. Section 6.3 within the TA for GW2 outlines the proposals to provide 53 3kw Electric Vehicle (EV) charging stations and 27 car sharing spaces as part of the development (in line with BREEAM Tra 02).

6.2.4. During the consultation undertaken with LCC, the MoJ agreed to improve the existing sustainable transport provision by upgrading the existing bus stop infrastructure on Willow Road and Ulnes Walton Lane (refer to Paragraph(s) 2.8.5 and 2.8.6 within this Proof), funding enhancements to the existing bus service provision (refer to Paragraph 2.9.1 within this Proof) and improving access for cyclists via improvements to Nixon Lane and School Lane (refer to Paragraph 2.9.2 within this Proof).

6.2.5. Section 3.4.1 within the TA (Core Document A35) demonstrates that it is possible for pedestrians to walk to the existing bus stops located on Willow Road and Ulnes Walton Lane. The stop on Willow Road is located within close proximity of GW2, whilst the stop on Ulnes Walton Lane is within a 10-minute walk of the proposed GW2 site access. Therefore, the proposed upgrades to the existing bus stop infrastructure would provide a benefit to staff and visitors associated with GW2.

6.2.6. Figure 6-1 outlines all the sustainable transport measures agreed with LCC. It should be noted that the agreed measures are in line with Policy ST1 and Paragraph 4.8 within the Chorley Local Plan (refer to Paragraph(s) 4.1.6 (a) and (b)) which sets out the objective of improving the bus service to Garth and Wymott Prison, Ulnes Walton.

Figure 6-1 – Sustainable transport measures agreed with LCC



6.2.7. As part of the Hybrid Planning Application, the MoJ also submitted an OTP which included a range of measures to encourage travel by sustainable modes amongst staff and visitors to the prison. The MoJ has also agreed to provide a s106 contribution to enable LCC to implement and review the OTP for a period of up to 5 years (refer to Paragraph 2.9.3 within this Proof).

6.2.8. I consider that appropriate opportunities to promote sustainable transport have been taken up, given the type of development and its location, and that the site would be accessible by a genuine choice of sustainable transport modes in line with the NPPF (Paragraph(s) 110 (a), 112 (a) and 112 (e)).

Traffic generation

6.2.9. The SoC issued by UWAG also included an objection to the Hybrid Planning Application based on the number of additional vehicles along Ulnes Walton Lane:

> *UWAG will evidence that the MoJ's projected 50% increase in prison-generated traffic has serious potential to impact safety and noise disturbance.*

6.2.10. As demonstrated in Table 5-2, GW2 will generate an additional 587 trips per day (+12%) along Ulnes Walton Lane to the north of Moss Lane and an additional 745 trips per day (+15%) along Ulnes Walton Lane to the south of Moss Lane. This increase in traffic is considerably lower than the value identified by UWAG, and I do not consider this increase to be significant.

Construction traffic

6.2.11. The SoC issued by UWAG included an objection to the Hybrid Planning Application because the existing highway infrastructure is inadequate for access by contractors, service providers, staff, and visitors:

> *UWAG considers that the site is unsuitable for the requisite access by contractors, service providers, staff and visitors due to the inadequacy of the highway infrastructure.*

6.2.12. The construction phase of the development would have a temporary impact (36 months) on the local highway network which would be mitigated through a Construction Traffic Management Plan (CTMP). The contents of which would be agreed with LCC, as the Local Highway Authority, and a CTMP would be secured via a planning contribution if planning permission is obtained.

6.2.13. As a minimum, a CTMP would outline the hours of operation, volume of traffic associated with the construction phase, designated construction access routes and the procedures required to mitigate the temporary impact including the control of dust and dirt. It would also outline the measures required to facilitate access for Abnormal Indivisible Loads (AILs) including escort vehicles.

6.2.14. As outlined, the construction phase of the development would only have a temporary impact on the local highway network and appropriate mitigation measures would be delivered via a CTMP. Therefore, the impacts would not be 'severe' in terms of the NPPF.

Cumulative impact

6.2.15. The SoC issued by UWAG included an objection to the Hybrid Planning Application because the Transport Assessment has not considered the cumulative impact of committed development:

> *UWAG will argue that the proposed development has not considered the cumulative impact of local development sites.*

6.2.16. The Technical Addendum submitted to LCC (Core Document A37) included a response to LCC outlining the approach taken towards Committed Development within the Hybrid Planning Application.

6.2.17. The TA used TEMPro (Trip End Model Presentation Program) to extract traffic growth factors for Chorley. TEMPro is an industry standard software programme maintained by the DfT which uses planning data at a local authority level to forecast traffic growth associated with Committed Development.

Road safety

6.2.18. Section 5 (Matters raised by Chorley Council) considers road safety in response to RfR2 raised by CCPC. It is acknowledged that UWAG has also included an objection within their SoC relating to road safety:

> *UWAG will argue that the very limited mitigation measures proposed by the MoJ will not alleviate the ever-present road safety dangers already encountered by residents on a daily basis. Indeed, those dangers will be exacerbated if this development proceeds.*

6.2.19. Please refer to Section 5 with regards to this matter.

6.3. Matters raised by Katherine Fletcher MP

Current Plans – Context and Background

6.3.1. Katherine Fletcher MP has provided the following objections within her letter (Core Document D44-D46):

> *The transport links in the surrounding area are not sufficient to support such large-scale increase on current traffic volumes, which already create difficulties for neighbouring communities.*
>
> *The proposed site entrance to the South-East on Moss Lane is unsuitable for use due to the impacts it would have on the wider traffic area. Specifically, to the North of the site increased traffic would severely impact local communities in Leyland such as those around the already very busy Dunkirk Lane. To the South of the site traffic flows would pass through key pinch on poorly equipped roads. For example, traffic would have to pass through the small town of Croston where bends in the road are extremely tight, one being at a near ninety-degree angle.*
>
> *The current plan's road proposals present very localised traffic mitigations. The assessment of traffic implications needs to be wider than just the very nearby roads.*

6.3.2. As outlined within Section 2.4.1, LCC, as the Local Highway Authority, were consulted on the TA and OTP in advance of the Hybrid Planning Application submission to agree the scope of our assessment. This included the extent of the study area which was first determined by the proposed trip distribution and assignment exercise, and second by input from LCC based on their experience of where the effects of GW2 would be most detectable. Beyond the extent of the study area, it is unlikely that the effects of GW2 would be noticeable because the concentration of vehicles reduces as traffic disperses. Therefore, the residual impact of additional trips through areas such as Croston would not be considered severe.

6.3.3. Atkins continued to engage with LCC throughout the Determination Period (refer to Table 2.2). As a result of the consultation undertaken, LCC confirmed that they were satisfied with the proposal and its impacts, subject to the agreed contributions being delivered (refer to Section 2.5).

6.3.4. In addition, the TA and the subsequent Technical Addendum provide a review of the local highway network (including a review of the existing highway safety record) and the technical evidence to support the proposed trip generation and distribution, the traffic impact assessment (including standalone junction capacity modelling), and the agreed s278 works and s106 contributions in line with the NPPF (Paragraph 110).

Lack of public transport

6.3.5. Section 6.2 considers sustainable transport (including public transport) in response to the matters raised by UWAG. It is acknowledged that Katherine Fletcher MP has also included an objection relating to sustainable transport within her letter:

> *The only public transport option that is currently available is the 112 bus service which is currently; using the same roads as described above, one way, hourly and not available on a Sunday. The lack of appropriate public transport options would mean that residents would reportedly see an increase of up to 2000 daily journeys to and from the new prison. This is not sustainable.*
>
> *The current plan does not do enough to mitigate the impact that the development will have. The proposal does not adequately consider the transport link deficiencies of the area.*

6.3.6. Please refer to Section 6.2 with regards to this matter.

Alternative proposal

6.3.7. Katherine Fletcher MP has indicated within her objection letter that an alternative vehicular site access located to the northwest (via Ridley Lane) would be feasible and would reduce existing as well as future traffic volumes:

> *The plan in its current form should be rejected during your assessment. 65% of respondents, raised concerns about the lack of public transport options and 89% of respondents noted concerns about increased road traffic, any future plans should seek to address these issues.*
>
> *This could be done through a different point of road access, ideally from the North-West of the site which would not direct traffic through unsuitable residential streets. For public transport options would be much improved by reopening the existing, but closed, Midge Hall station with pedestrian and cycle access to the North-West of the site. Access to the North-West of the site is feasible and would reduce existing as well as future traffic volumes. The Ministry of Justice owns Ridley Lane located to the North-West. This access point is reported by the community to have been used during previous site construction.*

6.3.8. As per Figure 1-1, Ridley Lane (the minor road) is currently accessed from the B5248 Cocker Bar Road (the major road) via a priority-controlled T-junction.

6.3.9. As per Paragraph 3.4 within CD 123 (Geometric design of at-grade priority and signal-controlled junctions), unobstructed visibility shall be provided at all priority junctions and direct accesses by a visibility splay comprising of three points, X, Y and W.

6.3.10. Point Y is measured along the edge of the major road carriageway, corresponding to the desirable minimum SSD (Stopping Sight Distance) for the speed of the major road. In this instance, the speed of the major road is 60mph. Therefore, the desirable minimum SSD, as per Table 2.10 (Design speed related parameters) in CD 109 (Highway link design) would be 215m.

6.3.11. To demonstrate if safe and suitable access can be achieved at this location (in line with Paragraph 110 (b) in the NPPF), the maximum unobstructed visibility which can be achieved has been outlined on DWG GARTH_ATK_VIS_RIDL_DR_D_0001 (please refer to Appendix E in Volume 2 of my Proof). The analysis demonstrates that you can only achieve a maximum unobstructed visibility of 103m to the west and 101m to the east. Therefore, using Ridley Lane as an alternative vehicular access would not satisfy the requirements outlined within NPPF.

6.3.12. Katherine Fletcher MP has also indicated within her objection letter that reopening Midge Hall Railway Station should be considered alongside the alternative vehicular site access to the northwest.

6.3.13. Table 5-5 within Section 5 of the TA (Core Document A35) for GW2 outlines the proposed multi-modal trip generation for staff and visitors derived using Census 2011 Journey to Work data for journeys to MSOA Chorley 007. The analysis indicates that there would only be 7 arrivals and 7 departures per day via Rail.

6.3.14. In line with Paragraph 110 (d) in the NPPF, the development is not proposed to generate a significant number of additional Rail trips and therefore reopening Midge Hall Railway Station would not be considered a cost-effective or proportionate to the scale of the development.

7. Summary and conclusion

7.1. Summary of findings

7.1.1. This Appeal Statement has sought to demonstrate that:

a. Ulnes Walton Lane has satisfactorily provided access to two existing prisons for over 30 years;
b. The current road safety record for Ulnes Walton Lane is better than expected;
c. The increase in vehicle flows from GW2 are relatively modest given the background traffic flows;
d. A comprehensive package of measures has been agreed with the LCC which will improve the existing highway and enhance road safety;
e. Appropriate opportunities to promote sustainable transport have been taken up, given the type of development and its location, and that the site would be accessible by a genuine choice of sustainable transport modes in line with the NPPF.
f. The agreed sustainable transport measures are in line with Policy ST1 and Paragraph 4.8 within the Chorley Local Plan which set out the objective of improving the bus service to HMP Garth and HMP Wymott;
g. The cumulative impact of nearby development has been considered; and
h. A review of alternative access options has been completed, concluding that the Ridley Lane proposal from Katherine Fletcher MP would be unsafe.

7.2. Conclusion

7.2.1. In relation to transport and highways, the planning application for GW2 was refused on the single ground (RfR2) that:

> *The proposed development would have an unacceptable impact on highway safety by virtue of the increased traffic movements and inadequate highway infrastructure, contrary to paragraph [111] of the National Planning Policy Framework and policy BNE1 of the Chorley Local Plan 2012 - 2026.*

7.2.2. In my opinion, there is no evidence that GW2 would prejudice highway safety, pedestrian safety, or the free flow of traffic and therefore the proposals comply fully with the NPPF and BNE1 of the Chorley Local Plan 2012 - 2026. Furthermore, the development proposals would not have an adverse impact on highway safety, let alone an impact which could reasonably be described as “unacceptable”.

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