



**Appeal by Ministry of Justice  
Land adjacent to HMP Garth and HMP  
Wymott, Leyland Appeal Ref:  
APP/D2320/W/22/3295556**

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## **Proof of Evidence of Kevin Riley**

on behalf of Chorley Borough Council



Appeal by Ministry of Justice Land  
adjacent to HMP Garth and HMP Wymott, Leyland  
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# 1 INTRODUCTION

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## 1.1 APPOINTMENT

1.1.1 My name is Kevin George Riley. I am Director at WSP, based in our Liverpool Office, regularly working across the North West of England. I was appointed by Chorley Borough Council to advise on transport matters in relation to a proposed development on the appeal site. The appeal site is on land adjacent to HMP Wymott and HMP Garth. With regards to this planning appeal, I will be providing evidence in relation to transport on behalf of Chorley Borough Council.

## 1.2 QUALIFICATIONS

1.2.1 I hold a Bachelor of Science (with Honours) in Geography with Environmental Studies from Manchester Polytechnic (now Manchester Metropolitan University) and a Masters Degree in Transport Engineering and Planning from the University of Salford. I am a guest lecturer on that MSc course and have been for around 18 years. I am a member of the Chartered Institute of Logistics and Transport and the Transport Planning Society. At the latter I was National Secretary. I regularly prepare and present papers on transport matters and their relationship with development.

## 1.3 RELEVANT EXPERIENCE

1.3.1 I have 29 years Transport Planning and Engineering experience within both the public and private sector where I have been involved in both design and strategy projects across the UK, including many development and regeneration related projects. I also have significant experience in considering non-car modes in both urban and rural environments.

1.3.2 I have worked for WSP as a Director for nearly 4 years. Prior to that I worked for Mott MacDonald as Projects Director for 5 years, including various projects related to major development proposals of all types. Prior to that I led AECOM's North West Development Planning team and Liverpool Office Transportation Team for 10 years. I have also worked for a local authority, (Manchester City Council), London Transport, and another consultancy (PBA).

1.3.3 Throughout my career my role has focused on providing access to regeneration and development sites across the UK working on both design and strategy, including scheme design matters. I have extensive experience across Lancashire, working on projects for both public and private sector clients in the County. I understand the context that this proposal lies within well, having worked in this geography numerous times over the last 15-20 years. I will review the merits of the proposals and provide my expert opinion on outstanding transport matters related to the site. I have not elaborated on matters which are contained within a Statement of Common Ground between Chorley Borough Council and Cushman and Wakefield that I anticipate will be agreed before the Inquiry and which is being developed at the time of submission.

1.3.4 In providing this evidence I am aware that my duty is to the Inquiry to provide my professional view irrespective of by whom I am instructed. Accordingly, I can confirm that my Proof of Evidence which I have prepared in respect of this Inquiry has been prepared and is given in accordance with the guidance of my professional Institutions and I confirm that the opinions expressed are my true and professional opinions.

1.3.5 I have visited the site and surrounding area for the purposes of this Inquiry and regularly travel through the Chorley and South Ribble area in both a professional and private capacity. I regularly liaise with Lancashire County Council Highways Development Control team on a range of commissions that I am involved in and understand their remit to respond to developments across the county as Highway Authority.

## 1.4 SCOPE OF EVIDENCE

1.4.1 My proof of evidence is set out as follows:

- Section 1 – Outlines my qualifications and experience.
- Section 2 – Sets out the proposals and background to the planning application.
- Section 3 – Sets out the relevant national and local policy.
- Section 4 – Details the existing highway in the vicinity of the site.
- Section 5 – Describes the development proposals.
- Section 6 – Details the impact of the proposals on highway safety.
- Section 7 – Sets out my summary and conclusions.
- Section 8 – Is an appendix with supporting site photographs.

## 2 PROPOSAL AND BACKGROUND

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- 2.1.1 Planning application 21/01028/OUTMAJ is for a new prison adjacent to HMP Wymott and HMP Garth. The site is located off Moss Lane, Ulnes Walton, Leyland. It is a Hybrid application, with outline planning permission being sought for the new prison (with all matters reserved except for means of access, parking and landscaping), outline planning permission being sought for a new boiler house (with all matters reserved except for access), and full planning permission being sought for a replacement bowling green and club house.
- 2.1.2 The application was supported by multiple drawings, including the site masterplan, a Transport Assessment (hereby referred to as 'the TA') dated 12 August 2021 and an Outline Travel Plan (hereafter referred to as 'the OTP') dated 12 August 2021 produced by Atkins. These documents have been reviewed in producing this Proof of Evidence.
- 2.1.3 It is noted that the TA was subsequently reviewed by the Local Highway Authority, Lancashire County Council (LCC). It is understood that LCC provided comments during a virtual meeting on 3 November 2021 and summarised by Atkins in their Technical Addendum dated December 2021. The Technical Addendum presents Atkins summary of LCC's comments, followed by a response.
- 2.1.4 It is understood that the Technical Addendum was then reviewed by LCC with comments provided on the application in the response dated 8 December 2022.
- 2.1.5 The Planning Application was refused by Chorley Borough Council as the Local Planning Authority.
- 2.1.6 Three reasons for refusal were given; reason 2 related to highway and transport issues and is shown below:
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.*
- 2.1.7 I consider that this reason for refusal is reasonable and justified and I will demonstrate this in the subsequent sections of this Proof of Evidence.



## 3 RELATED TRANSPORT POLICY

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### 3.1 INTRODUCTION

3.1.1 I have reviewed the relevant national and local transport policies that directly relate to the reasons for refusal.

#### **NATIONAL PLANNING POLICY FRAMEWORK (NPPF), JULY 2021**

3.1.2 The latest version of the National Planning Policy Framework (NPPF) was published in July 2021. The Framework identifies that the purpose of the planning system is to contribute towards sustainable development. It maintains that plans and decisions should apply a presumption in favour of sustainable development.

3.1.3 Paragraph 110 of the NPPF states that:

*“In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:*

*(a) appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;*

*(b) safe and suitable access to the site can be achieved for all users;*

*(c) the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code 46 ; and*

*(d) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.”*

3.1.4 Paragraph 111 of the NPPF 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.’

3.1.5 Furthermore, paragraph 113 of the NPPF states:

*‘All developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be assessed.’*

#### **CHORLEY LOCAL PLAN 2012-2026**

3.1.6 The Chorley Local Plan was adopted in July 2015 and forms part of the statutory Development Plan for Chorley. The role of the Plan is to sets out how planning applications should be decided.

3.1.7 Policy BNE1: Design Criteria for New Development, part (d) states:

*“Planning permission will be granted for new development, including extensions, conversions and free standing structures, provided that, where relevant to the development:*

*d) 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;”*

3.1.8 Policy ST1: New Provision or Improvement of Footpaths, Cycleways, Bridleways and their associated facilities in existing networks and new development, states:



*“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. Proposals should provide for:*

- i) The retention or appropriate diversion of existing footpath and cycleway links;*
- ii) Facilities for pedestrians and cyclists to facilitate access on foot and by bicycle to nearby residential, commercial, retail, educational and leisure areas, where appropriate;*
- iii) Additional footpaths, bridleways and cycleway routes between the countryside and built up areas where appropriate.”*

## 4 EXISTING HIGHWAY

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- 4.1.1 The main roads surrounding the site are: Willow Road, Moss Lane, Ulnes Walton Lane, the A581 Southport Road, School Lane, and the B5248 Dunkirk Lane. I have included supporting photographs in the appendix.
- 4.1.2 Willow Road serves as access to the residential area to the north of Moss Lane. The road is a two-way, single carriageway road without road markings. There are footways along the full length on the northern side and south-eastern side. The footway on the south-western side ends west of Moss Lane, outside 5, Willow Road. The northern side connects to Pump House Lane and provides access to the bus stop to the west of Wray Crescent. There are no pedestrian crossing points on Willow Road. There is no provision of pedestrian drop curbs nor tactile paving.
- 4.1.3 Moss Lane connects to Willow Road at its northern end and Ulnes Walton Lane at its southern end. Moss Lane is a two-way, single carriageway road without road markings. The road surface is poor as shown in photograph 1. It has not been maintained, with cracks and potholes forming. There is only a footway along the western side of Moss Lane and only between the existing HMP Wymott and Garth access junction and Willow Road. The footway is also poorly maintained, it is uneven, with cracks and potholes forming. There is no footway south of the existing HMP Wymott and Garth access. There are no pedestrian crossing points, pedestrian drop curbs nor tactile paving, on Moss Lane nor at the Moss Lane/Willow Road junction.
- 4.1.4 Moss lane is subject to a 30mph speed restriction. However, it is a wide, straight section of road with the potential for drivers to gain speed. The Automatic Traffic Count (ATC) survey undertaken by the appellant in March 2021, indicates an 85<sup>th</sup> percentile speed of 39.0mph northbound and 41.4mph southbound (section 3.3.1 of the TA). It is likely that these recorded speeds are suppressed by the poor road condition, and that if the road surface was improved, speeds would be higher. There are signs on Moss Lane on the approach to Willow Road signalling to drivers to “watch your speed” and “children at play” as shown in photograph 2.
- 4.1.5 Ulnes Walton Lane runs from the A581 Southport Road in the south and becomes School Lane in the north at Hedgerows Road. It connects to Moss Lane via a priority-controlled T-junction approximately 1.5km north of its junction with the A581 Southport Road. The Ulnes Walton Lane/Moss Lane junction has a sweeping radius on the north-western side (as shown in photograph 3) which promotes fast speeds for left-turning traffic from Ulnes Walton Lane south into Moss Lane. The curvature of Ulnes Walton Lane on this section results in poor forward visibility for right-turning traffic from Ulnes Walton Lane north to Moss Lane. There are signs on Ulnes Walton Lane in close proximity to the Moss Lane junction indicating a sharp bend, however these were observed to be partially obscured by dense vegetation during the site visit as shown in photograph 4, which is a safety concern. A post box is located on the north-western side of Ulnes Walton Lane at the junction with Moss Lane as seen in photograph 3 and a bus stop is located on the north-eastern side as shown in photograph 5. There are further bus stops along Ulnes Walton Lane.
- 4.1.6 Ulnes Walton Lane is a two-way, single carriageway road with residential and farm accesses along its length. The road is subject to a 7.5 tonne weight restriction except for access. The carriageway has multiple bends in the road with poor forward visibility in places. The road is lined with dense hedges, which are overhanging in places.
- 4.1.7 There is no formal footway provision on Ulnes Walton Lane up until The Oaks bus stop on its most northern section where a narrow footway is introduced on the western side. On the section where there is no footway, pedestrians are required to walk on the road alongside traffic. There is hazard warning sign on Ulnes Walton Lane south (photograph 6) warning drivers of pedestrians in the road. Whilst there are narrow grass verges and drainage ditches adjacent to the carriageway, these are not suitable for pedestrians walking.

- 4.1.8 Ulnes Walton Lane forms part of the Lancashire Cycleway and multiple Public Rights of Way (PRoW) cross the road along its length. FP9 meets Ulnes Walton Lane south of Holker Lane, FP8 crosses Ulnes Walton lane south of the River Lostock; FP 7 crosses Ulnes Walton Lane north of Moss Lane; FP 6 and FP 13 which meet Ulnes Walton Lane north of the pumping station; and FP 5 which meet Ulnes Walton Lane north of The Oaks bus stops. There are also footpaths south of Hedgerows Road between the residential areas either side of Ulnes Walton Lane. There are no formal crossing facilities.
- 4.1.9 Ulnes Walton Lane is subject to a 40mph speed restriction from the A581 until The Oaks bus stop where a 30mph speed restriction starts. The TA does not present any recorded speed data for this link.
- 4.1.10 Ulnes Walton Lane joins the A581 Southport Road to the south via a priority-controlled junction. The A581 Southport Road is a two-way, single carriageway road and serves as a main route between the A59 and Croston to the west and Chorley in the east. The road provides direct access to residential properties and businesses, including a pub and a petrol station, and bus stops, in the vicinity of the junction with Ulnes Walton Lane. There is only a narrow footway on the south side of the A581 Southport Road on the approaches to the Ulnes Walton Lane, as shown in photograph 7.
- 4.1.11 Ulnes Walton Lane becomes School Lane to the north. School Lane is a two-way, single carriageway road that serves several residential streets. School Lane has a footway on the western side from Ulnes Walton Lane until its junction with Slater Lane. North of this junction, there are footways on both sides of the carriageway.
- 4.1.12 School Lane is subject to a 20mph speed restriction. However, it is noted that there is no additional infrastructure, such as chicanes or speed tables, that would support the 20mph speed restriction. Whilst there are some slight bends, there are numerous relatively straight sections of road with good forward visibility which is unlikely to prevent speeds in excess of the 20mph restriction. The TA does not present any recorded speed data for this link.
- 4.1.13 School Lane joins the B5248 Dunkirk Lane to the north. The B5248 Dunkirk Lane is a two-way, single carriageway road with footways on both sides of the carriageway.
- 4.1.14 The B5248 Dunkirk Lane is subject to a 30mph speed restriction. The Automatic Traffic Count (ATC) survey undertaken by the appellant in March 2021, indicates an 85<sup>th</sup> percentile speed of 32.0mph eastbound and 31.0mph westbound (section 3.3.3 of the TA).

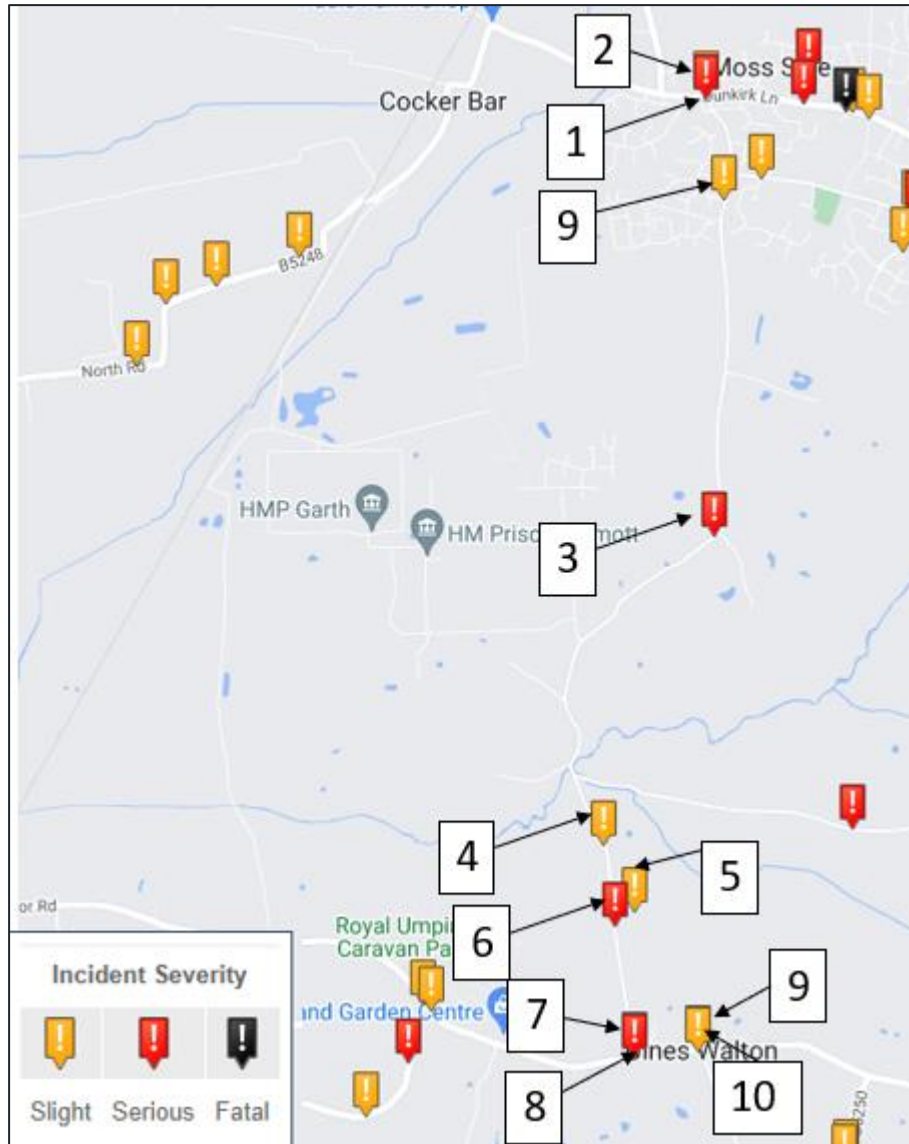
## **4.2 RECORDED PERSONAL INJURY ACCIDENTS**

- 4.2.1 I have considered the recorded Personal Injury Accident record over the most recent five-year period. These are solely road traffic accidents reported to the police that result in slight, serious, or fatal casualties. This does not include collisions where the police were not informed (unreported accidents) or near misses.
- 4.2.2 It is noted that Atkins analysis of PIAs in the original TA was incorrect and was also noted in LCC's response as being "deficient".
- 4.2.3 LCC's response includes analysis of PIAs over the most recent period which was 2016 to 2020 and indicated more PIAs than analysed in the TA.
- 4.2.4 The results of this analysis indicated the following accidents:

Reference	Location	Date	Severity	Vulnerable road user casualties
1	Dunkirk Lane/School Lane junction	2018	Serious	Pedal cyclist
2	Dunkirk Lane/School Lane junction	2018	Slight	-
3	Ulnes Walton Lane	2020	Serious	-
4	Ulnes Walton Lane	2017	Slight	-
5	Ulnes Walton Lane	2020	Slight	-
6	Ulnes Walton Lane	2020	Serious	-
7	A581 Southport Road/ Ulnes Walton Lane junction	2017	Slight	-
8	A581 Southport Road/ Ulnes Walton Lane junction	2020	Serious	Pedal cyclist
9	School Lane/Wheatfield Road	2016	Slight	Pedal cyclist

4.2.5 In addition to the accidents identified within the study area presented in the TA, it is worth noting there are also accidents immediately outside of the study area on roads and junctions where there are also predicted increases in traffic. Namely, the A581 Southport Road/New Lane junction east of the A581/Ulnes Walton Lane junction, where two slight accidents occurred over the same period, one in 2016 (reference 10) and one in 2018 (reference 11).

4.2.6 The map below presents the location of PIA accidents for context.



4.2.7 Whilst it is noted that the number of recorded PIAs do not imply an existing safety issue, for much of 2020 traffic levels were suppressed due to Covid so the number of reported PIAs will be lower than otherwise expected.

4.2.8 It is also my opinion that the proposals will lead to an increased risk and ultimately an increase in reported PIAs, non-reported accidents and near misses as a result of increased traffic on these roads, which I will set out in the following sections.

## 5 DEVELOPMENT PROPOSALS

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### 5.1 MODE SHARE AND TRIP GENERATION

- 5.1.1 The TA states that, once operational, the prison will accommodate up to 1,715 adult male prisoners and will be designed and constructed to Category C working prison standard. Based on a prisoner to staff ratio of 0.5, there will be up to 858 staff employed at the site (uniformed and non-uniformed).
- 5.1.2 The TA states that the trip generation for the site has been based on information used in previous planning applications for HMP sites and reviewed to ensure it remains robust and up to date.
- 5.1.3 The 1,715 male prisoners are entitled to two visits per month. This equates to 3,430 visits per month.
- 5.1.4 The TA states that there will be 114 visits per day, which has been calculated based on a 30-day month. It should be noted that those 114 visits per day equates to 228 two-way vehicle movements, 114 visitors arriving and the same 114 visitors departing. However, it is noted that section 5.3.3.2 suggests visits only occur Monday to Saturday and therefore the assumption of a 30-day month is unrealistic and the visitor traffic flows derived are under-estimated. Based on a 26-day month, excluding Sundays, the number of daily visits would be 132 visits per day, equating to 264 two-way vehicle movements meaning a shortfall in the appellant's assessment of 36 two-way vehicle movements.
- 5.1.5 I also note that LCC have requested additional information to support the trip generation and distribution in the Technical Addendum, however the response states that this information is sensitive and even if data was available, staff requirements and shift patterns vary between Prisons (depending on age of Prison and Category of Prison) and visitor travel patterns vary between each prison and inmate therefore it would not necessarily be reflective of how the new Prison is going to operate. As such, it seems that there are numerous unknowns in the traffic forecasts, and I would question how realistic the trip generation and distribution provided is.
- 5.1.6 Notwithstanding my concerns regarding the accuracy of the forecasts, the number of trips presented in the TA are not insignificant. The initial trip generation presented in Table 5-4 of the TA indicates a total of 223 two-way vehicle trips in the AM peak, 253 two-way vehicle trips in the PM peak, and 1,332 two-way vehicle trips daily. Notwithstanding that visitor trips have been underestimated, the numbers in Table 5-4 do not align with the numbers presented later in Table 5-6 which disaggregates trips by mode. The discrepancies appear to be that Table 5-4 only includes cars and does not include taxi and motorcycle as vehicles.
- 5.1.7 Table 5-6 of the TA indicates total person trips as 267 two-way trips in the AM peak, 301 two-way trips in the PM peak and 1,530 two-way trips daily. Of these trips, there are 226 two-way vehicle trips in the AM peak, 256 two-way vehicle trips in the PM peak and 1,346 two-way vehicle trips.
- 5.1.8 Section 5.3.6 of the TA states "The trips by all modes generated by the development have also been forecast, and these reflect the existing limitations with opportunities for undertaking trips by sustainable transport modes at the site." Whilst I accept there are limitations to making trips by sustainable modes of walking, cycling and public transport, this does not mean that trips are not made by these modes.
- 5.1.9 The existing mode share in Table 5-2 of the TA indicates that 0.0% of employees will travel on foot. Arguably, those travelling by bus will also inevitably have to access the site on foot, as will those by train who will then travel by bus or taxi and then on foot. It is also my opinion that the development proposals will negatively contribute to the existing limitations to encourage employees to travel by sustainable modes due to the increased highway safety risk caused by the significant increase in vehicles.

- 5.1.10 The distribution of trips presented in Table 5-5 of the TA indicates 44% travelling north on Ulnes Walton Lane/School Lane to Dunkirk Lane, and 55% travelling south on Ulnes Walton Lane to the A581 Southport Road. Notwithstanding that these do not total 100%, it is noted that upon request from LCC, Atkins have undertaken a comparison against surveyed turning proportions at the Moss Lane/Ulnes Walton Lane junction in the Technical Addendum (Table-1). This comparison showed that the observed traffic flows travelling north on Ulnes Walton Lane were higher at 50.8% in the AM peak and 50.4% in the PM peak and travelling south were lower at 49.2% in the AM peak and 49.6% in the PM peak.
- 5.1.11 Atkins have undertaken a comparison of the two distributions in Table-2 of the Technical Addendum that shows a discrepancy in trips between the different distribution of between 13 and 16 trips. Whilst I would tend to agree with the conclusion that such a difference alone would not warrant further assessment, given the obvious errors and unknowns presented in the original trip generation as I have set out above, it is likely that the difference of 13 and 16 trips is an underestimation and there could be a material difference in the two distributions.
- 5.1.12 Notwithstanding, it is my view that whether the distribution is 55% south on Ulnes Walton Lane as set out in the TA, or 50.8% and 50.4% as shown by the traffic surveys, the impact on Ulnes Walton Lane has not been appropriately mitigated when over half of development traffic will travel via this sensitive route.

## 5.2 CONSTRUCTION TRAFFIC

- 5.2.1 The TA does not present any assessment of the road network during construction. Given the scale of development, I would anticipate there would be a significant number of construction vehicles, particularly Heavy Goods Vehicles (HGV), and workforce traffic accessing the site, however the TA does not present any indication of traffic flows during construction. Whilst the Technical Addendum makes reference to a Construction Traffic Management Plan (CTMP), I have not been able to review this document as it was not part of the suite of documents submitted as part of the application.
- 5.2.2 It is noted that the Technical Addendum makes reference to LCC challenging the proposed construction traffic routing via Moss Lane and Ulnes Walton Lane. LCC proposed routing via the B5248 Cocker Bar Road. The appellant's response does not confirm the construction routing and instead states it will be agreed with LCC through updates to the CTMP and secured by a suitable condition. If construction traffic is to be routed via Moss Lane and Ulnes Walton Lane, this will have a significant impact on the safety of these routes. The interaction of HGVs and other vehicles, pedestrians, cyclists and equestrians will be increased, which will increase risk of these types of accidents. In addition, the impact of HGVs on the already poor condition of Moss Lane will exacerbate potholes on this section, which will increase the risk of accidents for cyclists. Alternatively, if construction traffic is routed via the B5248, the appropriateness of this route has not been considered in terms of safety.

## 5.3 PROPOSED MITIGATION

- 5.3.1 It is noted in the formal LCC response that the following measures are to be delivered through S278 agreement:
- Provide traffic calming measures as shown on indicative drawing no. GARTH ULNES-ATK-HGN-DR-D-001 REV. P1 (20.10.21) from Dunkirk Lane/School Lane to Ulnes Walton Lane/Moss Lane.
  - Provide traffic calming measures similar to the above on the 130m section of Ulnes Walton Lane on its approach to Moss Lane from south.
  - Provide improved carriageway markings at Ulnes Walton Lane/Moss Lane for improved forward visibility and to facilitate safe right turns into Moss Lane.



- Provide traffic calming measures on Moss Lane as shown on drawing no. Garth Moss-DR-D-0002 rev P2) (30.03.21). 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 above quoted plan.
- 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.
- Carry out improvements to the existing bus stop at on Ulmes Walton Lane north east 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.
- Provision of the proposed temporary construction access and its subsequent alterations for permanent use.

5.3.2 It is also noted that the following measures are to be delivered through S106 agreement:

- 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 above.
- Provide s106 contribution of £50,000 for improvement of the surface condition of Nixon Lane and provision of signage to facilitate cyclists 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 need to be conditioned.
- Provide s106 Planning Contribution of £18,000 to enable LCC to provide the following services in relation to travel plan.
  - Appraise the Workplace Travel Plan submitted to the Council pursuant to the planning permission and provide constructive feedback.
  - Oversee the progression from Interim to Full Workplace Travel Plan in line with agreed timescales.
  - Monitor the development, implementation and review of the Workplace Travel Plan for a period of up to 5 years.
- Provide S106 contribution to mitigate the impact of the proposed development at A581 southport Road/Ulmes Walton Lane. LCC would request the S106 contribution to help support the development of a wider corridor scheme along the A581 to be delivered by LCC. 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. This cost is currently being reviewed by LCC. The current estimated cost at 2021 levels is £485,834.

5.3.3 The appropriateness of these schemes in mitigating the impacts of the proposals is discussed in the following sections.

## 6 IMPACT ON HIGHWAY SAFETY

### 6.1 TRAFFIC IMPACT ASSESSMENT

6.1.1 Notwithstanding the errors in the proposed vehicle flows and distribution, I have undertaken an assessment of the percentage change in traffic on the links in the study area based on the appellants traffic survey data in the TA Appendix A and trip generation and distribution presented in the TA Appendix H. This comparison is shown in the table below.

#### Development percentage impact in traffic

Link section	2021 Observed Traffic Count (Baseline)	Additional Traffic (Development)	Total Traffic (Baseline + Development)	% change
<b>Moss Lane</b>				
Moss Lane (north of existing HMP Wymott and Garth access and south of new prison access)	414	1,332	1,746	+322%
Moss Lane (south of existing HMP Wymott and Garth access)	2,758	1,332	4,090	+48%
<b>North of Moss Lane</b>				
Ulnes Walton Lane (north of Moss Lane)	3,324	586	3,910	+18%
School Lane	4,008	586	4,594	+15%
Dunkirk Lane (east of School Lane)	6,626	414	7,040	+6%
Dunkirk Lane (west of School Lane)	6,638	172	6,810	+3%
<b>South of Moss Lane</b>				
Ulnes Walton Lane (north of Holker Lane)	3,118	744	3,862	+24%
Ulnes Walton Lane (south of Holker Lane)	3,221	744	3,965	+23%
A581 Southport Road (east of Ulnes Walton Lane)	12,028	500	12,528	+1%
A581 Southport Road (west of Ulnes Walton Lane)	9,195	246	9,441	+1%

- 6.1.2 The increases shown in the table above range from 1% to 322% daily, with the greatest impact on Moss Lane north of the existing HMP Wymott and Garth access, south of the new prison access where traffic flows will increase considerably from 414 two-way vehicle movements to 1,746 two-way vehicle movements, which indeed could be greater given the appellant's underestimation of development traffic flows. For context, a change in traffic flow of +/- 10% is considered to be within day-to-day variations of traffic flow.
- 6.1.3 Moss Lane and Ulnes Walton Lane are both particularly sensitive links for pedestrians, cyclists and equestrians given the lack of facilities and the existing road layouts and design and increases in traffic of 24%, 48% and 322% are notable and could exacerbate the existing safety issues on these links.
- 6.1.4 The TA does not present any assessment of the road network during construction. Given the scale of development, I would anticipate there would be a significant number of construction vehicles, particularly Heavy Goods Vehicles (HGV), and workforce traffic accessing the site, however the TA does not present any indication of traffic flows during construction. Any increase in HGVs during construction is likely to alter the vehicle mix and the total number of vehicles on construction routes and therefore these should also be considered with regard to risk of accidents.

## 6.2 IMPACT ON KEY ROUTES

### Moss Lane

- 6.2.1 The 322% daily increase in traffic on the northern section of Moss Lane (south of the new prison access) and the 48% daily increase in traffic on the southern section of this road (south of the existing HMP Wymott and Garth access) will impact on both existing and new users of Moss Lane. Whilst there are currently no recorded PIAs on Moss Lane, such an increase of traffic will increase the risk of vehicle-to-vehicle interactions, particularly at the time of shift changeover. There will also be an increase of vehicle-to-pedestrian, vehicle-to-cyclist and cyclist-to-pedestrian interactions.
- 6.2.2 It is noted that the appellant has proposed a traffic calming scheme on Moss Lane in Appendix C of the Technical Addendum. The proposals introduce "SLOW" markings and narrowing of the carriageway to 5.5m and 5.0m either side of the new access junction. However, the carriageway will remain wide along the rest of the road. This is likely to still facilitate excessive speeds, particularly as the road will be resurfaced to introduce these measures, and it is the existing poor quality of the road surface, unevenness, and potholes, which are currently a significant factor in controlling existing speeds which still exceed the restriction.
- 6.2.3 There is no provision for pedestrians or cyclists on this route. Table 5-6 of the TA states the development will generate 20 two-way cycle trips, which will be exposed to vehicles on this route. Despite the assumptions in the TA of 0 pedestrian trips on Moss Lane, it is likely there will be some pedestrians generated by the proposals. There are also existing cyclists and pedestrians on Moss Lane, including those attending the existing HMP Wymott and Garth and the residential area to the north of Moss Lane, who will be exposed to a 48% increase in traffic and the associated risk of accidents. The southern section of Moss Lane provides access to the bus stop on Ulnes Walton Lane and a post box which are important community services.
- 6.2.4 It is noted in the Technical Addendum that LCC request a footway to be installed on Moss Lane, however the position adopted by the appellant is that the existing bus stop serves HMP Wymott and Garth only and would not be used by the new prison staff or visitors who would use the upgraded Willow Road stop which is closer to the new prison. The appellant has stated that only members of the relocated bowling club would need to use the bus stop on Ulnes Walton Lane and therefore the appellant has agreed to pay S106 contributions to reroute the bus service into the prison grounds, which would also benefit the existing HMP Wymott and Garth users.

- 6.2.5 Nonetheless, the LCC formal response states that improvements will be made to the bus stop on Ulmes Walton Lane to upgrade the stop to be high quality disability compliant standard, to include provision of a raised kerb, boarding platform, new shelter, and the required carriageway markings. I would therefore question why upgrades to a bus stop are being provided if the appellant has stated it will not be used by the new prison or bowling club. If the bus stop is to be used by prison staff, visitors or the bowling club members, then as set out above, this will exacerbate an existing safety issue on the routes to the bus stop which have no footways.
- 6.2.6 In addition, the proposals do not mitigate the impact on users of the post box at the junction of Moss Lane/Ulmes Walton Lane, which is also an important local service for residents at the north of Moss Lane who will be exposed to a significant increase in traffic on a section of road without footways.

### **Ulmes Walton Lane**

- 6.2.7 The increase in traffic of 24% on Ulmes Walton Lane south of Moss Lane will also impact on existing residents who need to cross Ulmes Walton Lane to access both the bus stops either side of the junction with Moss Lane and the post box. The existing Moss Lane/Ulmes Walton Lane junction is particularly difficult to cross due to the lack of pedestrian crossing facilities and lack of visibility due to the curvature of this section of the road.
- 6.2.8 The lack of visibility is also an issue for vehicles on Ulmes Walton Lane affected by vehicles turning right into Moss Lane potentially colliding with oncoming vehicles. This will be exacerbated for existing vehicles who will be impacted by increased traffic, and for vehicles accessing the new prison. This is likely to create a more frequent safety issue. In addition, the increase in turning traffic both into and out of Moss Lane at this junction is likely to cause impatience for vehicles, which can lead to greater risk taking and unsafe manoeuvres. It is noted that LCC have requested traffic calming measures akin to those shown for Dunkirk Lane/School Lane for 130m south of Moss Lane and “improvements to carriageway markings for improved forward visibility and to facilitate safe right turns into Moss Lane.”
- 6.2.9 However, the Technical Addendum does not include drawings to demonstrate what these measures are or how they would be implemented but it would be my view that simple re-painting the white lines alone is not going to mitigate the increased risk caused by the proposals, and a 130m mitigation scheme will not mitigate the impact of a 24% increase in traffic along the 1.5km southern section of Ulmes Walton Lane. Notably, the mitigation proposed does not align with the three recorded PIAs that occurred on Ulmes Walton Lane, with no recorded PIAs at the junction with Moss Lane, and no recorded PIAs within 130m south of the junction. All three recorded PIAs on Ulmes Walton Lane south of Moss Lane (references 4, 5 and 6) occurred much further south than the proposed mitigation, which would lead me to question on what basis the mitigation proposals have been developed and it confirms that the development is likely to contribute to an existing safety issue at the junction and this section of Ulmes Walton Lane despite there being no recorded PIAs.
- 6.2.10 The increases in traffic along Ulmes Walton Lane south will also impact on pedestrians, cyclists and equestrians who are all on road along this section and will be exposed to increased risk of accidents due to the increase in development traffic. Ulmes Walton Lane is part of the Lancashire Cycleway, and is signed as such, although it is not LTN1/20 compliant. Numerous cyclists were seen using this route during the site visit. Whilst there are no formal footways, pedestrians are walking along roads, and there are warning signs indicating pedestrians in the road as a hazard. There are also signs to warn of equestrians.
- 6.2.11 The increase in traffic of 24% on Ulmes Walton Lane south of Moss Lane will also impact on PRoW routes FP9 and FP8. The combined lack of formal crossing facilities at these locations and the forecast increases in traffic will expose PRoW users to a greater number of vehicles and will increase waiting time to cross the road. This often leads to impatience and risk-taking behaviour, ultimately increasing the risk of accidents.

### **Ulmes Walton Lane North/School Lane/Dunkirk Lane**

- 6.2.12 It is noted that the appellant has proposed a traffic calming scheme on Ulnes Walton Lane north, School Lane and Dunkirk Lane in Appendix B of the Technical Addendum. The proposals introduce two coloured surface treatments on Ulnes Walton Lane north of Moss Lane, and seven flat-top speed humps and multiple new road signs and markings on School Lane and at its junction with Dunkirk Lane. Whilst it is acknowledged that these proposals have been produced in an attempt to mitigate the safety impact of increased traffic on these sections, comparatively, these sections see the lowest development impact with an 18% increase in traffic on Ulnes Walton Lane and a 15% increase in traffic on School Lane.
- 6.2.13 Whilst these too are notable increases in traffic, this highlights the disproportionate approach to mitigation provided by the appellant.
- 6.2.14 The recorded accidents on this section are also not dissimilar to the other roads in the study area. There was one recorded PIA on Ulnes Walton Lane north (reference 3), which was a serious accident, and three recorded PIA along School Lane, one at the junction with Wheatfield Road (reference 9) and two at the junction with Dunkirk Lane (references 1 and 2), one of which was serious. This would also lead me to question why similar mitigation measures have not been considered for Moss Lane, Ulnes Walton Lane south and the A581 Southport Road.
- 6.2.15 In addition, the provision of coloured surface treatment and signage on Ulnes Walton Lane north, does not address the exposure of pedestrians to increased traffic on this route. The increase in traffic of 18% will impact on PRow routes FP7, FP6, FP13 and the footpaths south of Hedgerows Road. The combined lack of formal crossing facilities at these locations will expose PRow users to a greater number of vehicles and will increase waiting time to cross the road. This often leads to impatience and risk-taking behaviour, ultimately increasing the risk of accidents.

### **A581 Southport Road/Ulnes Walton Lane junction**

- 6.2.16 A mitigation scheme is proposed in Appendix D of the Technical Addendum for the A81 Southport Road/Ulnes Walton Lane junction. The TA demonstrated that the existing junction would have an adverse impact on this junction in terms of capacity by increasing queues from 10 Passenger Car Units (PCU) to 46 PCU in the AM peak on the A581 Southport Road east.
- 6.2.17 A PCU is commonly used as a measure of traffic flow and queuing in capacity assessment as it converts the different sized vehicles found in traffic flows (cars, vans, HGVs) which take up different road space, into a single unit of measurement that is the equivalent of an average car length plus a headway gap between vehicles, with 1 PCU being the equivalent of 6m of road space. A queue of 46 PCU therefore equates to a queue of 276m which would result in blocking back through the Barlows Trailer access junction and past the junction with New Lane which is 230m east of the Ulnes Walton Lane junction.
- 6.2.18 Notably, in the AM peak on the A581 Southport Road East, delays were also forecast to increase from 45.36s to 198.2s and delays on Ulnes Walton Lane in the PM peak were forecast to increase from 21.51s to 58.16s.
- 6.2.19 Both queuing and delays cause driver frustration and can lead to risk-taking behaviour and potentially accidents.
- 6.2.20 The TA and Technical Addendum did not comment on the impact of safety at this junction nor at the Barlow Trailers access or New Lane junctions, despite there being two recorded PIAs at the A581 Southport Road/Ulnes Walton Lane junction (references 7 and 8), one of which being serious, and two recorded PIAs at the A581 Southport Road/New Lane junction (references 9 and 10). The review of the junction assessment was focussed on capacity and concluded that to mitigate the capacity impact, the junction would need to be upgraded from a priority-controlled junction to a signal-controlled junction and includes widening of the carriageway to provide a right-turn pocket on the A581 Southport Road east.

6.2.21 It is noted that the LCC formal response states:

*“LCC would request the S106 contribution to help support the development of a wider corridor scheme along the A581 to be delivered by LCC. 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. This cost is currently being reviewed by LCC. The current estimated cost at 2021 levels is £485,834.”*

6.2.22 Whilst it is understood that the scheme may not be the final scheme implemented by LCC, this scheme has been proposed with the aim of mitigating the impact of the development and for deriving S106 contributions towards a corridor scheme. However, the proposed mitigation has not been appropriately assessed. It is highly unusual for a scheme to be proposed to mitigate a capacity impact without a modelling assessment to justify it is an appropriate solution.

6.2.23 The modelled assessment of the existing junction indicates a queue along the A581 Southport Road of 46 PCU (276m) which would block back through the adjacent Barlow Trailer access junction and back to the New Lane junction, which would impact on businesses and residents accesses along this section of road. It is unclear if the proposals would mitigate the impact of the additional traffic as there has been no capacity or safety assessment of the scheme.

6.2.24 The scheme proposed also has numerous issues that would affect its deliverability:

- The scheme does not incorporate the residential access on the southern side of the A581 Southport Road opposite Ulmes Walton Lane. These would need to be signal controlled to allow safe operation of the junction.
- The current proposals also indicate a proposed reduction in visibility to the right for the Barlows Trailer access, reducing it from 2.4m x 90m to 2.4m x 29m. The proposed visibility of 2.4 x 29m is acceptable only for speeds of between 20mph and 25mph. At this location however the speed limit of the road is 30mph and the 85<sup>th</sup> percentile speed is greater than this, which presents an unacceptable safety issue.
- The design does not include provision for pedestrians or cyclists. In particular, there are no advanced stoplines which would assist cyclists through the junction, particular given that cyclists will be using Ulmes Walton Lane as part of the Lancashire Cycleway.
- The position of the signal head on the southern side of the junction is not feasible as currently shown as it would block the footway.
- The position of the signal head on the north-eastern side of the junction is not feasible as currently shown and would require additional land take on this side of the junction. Additional third-party land would significantly increase the cost of the scheme.
- The lane widths proposed are narrow. Although they comply with the Design Manual for Road and Bridges standards, which are accepted standards for highway design, they are unlikely to provide the movement of traffic flow and ultimately the capacity required to mitigate the capacity impact. An increase in lane widths would require land outside of the highway boundary. Additional third-party land would significantly increase the cost of the scheme.
- The proposed north-eastern kerbline cannot be physically constructed without land outside of the highway boundary. It leaves no verge width which presents an issue for both construction and future maintenance. It is noted that no mitigation is proposed by the appellant anywhere along Ulmes Walton Lane, despite the increased risk caused by the proposals. Additional third-party land would significantly increase the cost of the scheme.

- The junction intervisibility zone is also outside of the highway boundary. DMRB CD123 Clause 7.6 and 7.6.1 states that no substantial fixed obstructions should be located within the junction intervisibility zone of new or existing junctions. Since the intervisibility zone is outside of highway boundary as currently shown, there is no control of keeping this area clear. In addition, fence lines and hedgerows currently run through that zone compromise visibility. Additional third-party land would significantly increase the cost of the scheme and it is unclear whether this has been accounted for in the cost estimate.

6.2.25 In summary, the appropriateness of the scheme to mitigate the capacity issues has not been demonstrated. There are potential safety implications associated with the proposed signalisation scheme including omission of pedestrian and cyclist facilities, reduced visibility for the adjacent Barlow Trailers access and the incorporation of the three residential accesses into the junction without signalisation. It is also unclear how the cost estimate has been derived and whether it reflects the requirement for third-party land to provide a junction that mitigates the proposals in terms of safety and capacity.

### Summary

- 6.2.26 Notwithstanding the errors in the appellant's proposed vehicle flows and distribution, I have undertaken an assessment of the percentage change in traffic on the links in the study area based on the appellants traffic survey data. This comparison indicates a range in traffic flows on roads of 1% to 322% daily, with the greatest impact on Moss Lane north of the existing HMP Wymott and Garth access, south of the new prison access, where traffic flows will increase considerably from 414 two-way vehicle movements to 1,746 two-way vehicle movements flows.
- 6.2.27 Moss Lane south of the existing HMP Wymott and Garth access will also see an increase in traffic flow of 48%, whilst Ulnes Walton Lane (south of Moss Lane) will see an increase in traffic of 24%. Both links are particularly sensitive links for pedestrians, cyclists and equestrians given the lack of facilities and the existing road layouts and design and increases in traffic of 24%, 48% and 322% are notable and could exacerbate the existing safety issues on these links.
- 6.2.28 Ulnes Walton Lane (north of Moss Lane) and School Lane will also see notable increases in traffic of 18% and 15%, respectively.
- 6.2.29 Whilst the proposed traffic calming schemes on Moss Lane and Ulnes Walton Lane north, School Lane and Dunkirk Lane have been intended to mitigate safety impacts of the development it is my opinion that the mitigation proposed is disproportionate to the percentage impacts and ultimately the likely safety impacts given recorded PIAs on these sections are not dissimilar to Moss Lane, Ulnes Walton Lane south or the A581 Southport Road.
- 6.2.30 The proposed mitigation on Moss Lane is minimal despite being one of the most sensitive links to increases in traffic and the development having the greatest impact. The mitigation for Ulnes Walton Lane referenced in LCCs formal response lacks detail. Based on the description provided, a 130m scheme on a 1.5km section of road and re-painting of white lines at the junction with Moss Lane, is insufficient and not proportionate to the increase in traffic on this route, particularly given the sensitivities of this route to increases in traffic.
- 6.2.31 The proposed mitigation at the A581 Southport Road/Ulnes Walton Lane is intended to mitigate capacity impacts and has not been considered in terms of safety nor capacity as there is no assessment of either. The scheme is also unlikely to be deliverable and therefore the derivation of contributions for any improvements at this junction are questionable.
- 6.2.32 It is therefore my conclusion that the Appellant has yet to demonstrate that the proposals will avoid problems of safety across the study network and is therefore contrary to paragraph 110 and 111 of the National Planning Policy Framework, policy BNE1 and policy ST1 of the Chorley Local Plan 2012 - 2026.





## 7 SUMMARY AND CONCLUSIONS

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- 7.1.1 Planning application 21/01028/OUTMAJ is for a new prison adjacent to HMP Wymott and HMP Garth. The site is located off Moss Lane, Ulnes Walton, Leyland. It is a Hybrid application, with outline planning permission being sought for the new prison (with all matters reserved except for means of access, parking and landscaping), outline planning permission being sought for a new boiler house (with all matters reserved except for access), and full planning permission being sought for a replacement bowling green and club house.
- 7.1.2 The Planning Application was refused by Chorley Borough Council as the Local Planning Authority.
- 7.1.3 Three reasons for refusal were given; reason 2 related to highway and transport issues:
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.*
- 7.1.4 I consider that this reason for refusal is reasonable and justified.
- 7.1.5 Whilst it is noted that the number of recorded PIAs (those reported to the police) do not imply an existing safety issue, for much of 2020, traffic levels were suppressed due to Covid so the number of reported PIAs will be lower than otherwise expected.
- 7.1.6 It is also my opinion that the proposals will lead to an increased risk and ultimately an increase in reported PIAs, non-reported accidents and near misses as a result of increased traffic on these roads.
- 7.1.7 I have identified flaws in the appellant's calculations which demonstrate the traffic flows in their assessment were underestimated. I also the TA does not present any assessment of the road network during construction. Given the scale of development, I would anticipate there would be a significant number of construction vehicles, particularly Heavy Goods Vehicles (HGV), and workforce traffic accessing the site, however the TA does not present any indication of traffic flows during construction. Any increase in HGVs during construction is likely to alter the vehicle mix and the total number of vehicles on construction routes and therefore these should also be considered with regard to risk of accidents.
- 7.1.8 Notwithstanding this underestimation of traffic flows, the numbers presented in the TA are not insignificant with 1,332 additional two-way trips per day. Resulting in a percentage impact of between 1% and 322% on the roads surrounding the site. The greatest percentage increases coincide with a lack of pedestrian and cyclist facilities, no crossing points, drop curbs nor tactile paving, despite there being residential properties and businesses along these roads. On Moss Lane and Ulnes Walton Lane in particular, pedestrians are required to walk on road due to a lack of footways.
- 7.1.9 The greatest percentage impact is on Moss Lane given that this is the location of the new prison access, with an increase in traffic on this road of at least 1,332 two-way vehicles daily, an increase of between 48% and 322% along its length. Speed is an issue on Moss Lane, with recorded 85th percentile speeds of 39.0mph and 41.4mph, significantly over the 30mph speed restriction, despite the poor road condition. If the road surface was improved, as it would be to introduce the proposed mitigation, then speeds would be higher.
- 7.1.10 Mitigation has been proposed on this link which would introduce "SLOW" markings and narrowing of the carriageway to 5.5m and 5.0m either side of the new access junction. However, the carriageway will remain wide along the rest of the road and is likely to still facilitate excessive speeds, particularly as the road will be resurfaced to introduce these measures.

- 7.1.11 There is no provision for pedestrians or cyclists on this route. Table 5-6 of the TA states the development will generate 20 two-way cycle trips, which will be exposed to vehicles on this route. Despite the assumptions in the TA of 0 pedestrian trips on Moss Lane, it is likely there will be some pedestrians generated by the proposals. There are also existing cyclists and pedestrians on Moss Lane, including those attending the existing HMP Wymott and Garth and the residential area to the north of Moss Lane, who will be exposed to a 48% increase in traffic and the associated risk of accidents.
- 7.1.12 Given that there is no footway south of the existing HMP Wymott and Garth access, residents on Willow Road accessing the post box on Ulnes Walton Lane at the junction with Moss Lane will be exposed to an increased risk of accidents given the increase in traffic. The proposed mitigation on Moss Lane does not address this.
- 7.1.13 Given the increase in traffic on this road and the existing safety issues, the mitigation proposed is not considered proportionate to the impact of the development nor the existing safety issue.
- 7.1.14 The increase in traffic of 24% on Ulnes Walton Lane south of Moss Lane will also impact on existing residents who need to cross Ulnes Walton Lane to access both the bus stops either side of the junction with Moss Lane and the post box. The existing Moss Lane/Ulnes Walton Lane junction is particularly difficult to cross due to the lack of pedestrian crossing facilities and lack of visibility due to the curvature of this section of the road.
- 7.1.15 The lack of visibility is also an issue for vehicles on Ulnes Walton Lane affected by vehicles turning right into Moss Lane potentially colliding with oncoming vehicles. This will be exacerbated for existing vehicles who will be impacted by increased traffic, and for vehicles accessing the new prison. This is likely to create a more frequent safety issue. It is noted that LCC have requested traffic calming measures akin to those shown for Dunkirk Lane/School Lane for 130m south of Moss Lane and "improvements to carriageway markings for improved forward visibility and to facilitate safe right turns into Moss Lane." However, there are no drawings to demonstrate what these measures are.
- 7.1.16 It is my opinion that 130m mitigation scheme proposed will not mitigate the impact of a 24% increase in traffic along the 1.5km southern section of Ulnes Walton Lane. Notably, the mitigation proposed also does not align with the three recorded PIAs that occurred on Ulnes Walton Lane. All three recorded PIAs on Ulnes Walton Lane south of Moss Lane occurred much further south than the proposed mitigation, which would lead me to question on what basis the mitigation proposals have been developed and it confirms that the development is likely to contribute to an existing safety issue at the junction and this section of Ulnes Walton Lane, despite there being no recorded PIAs.
- 7.1.17 The increases in traffic along Ulnes Walton Lane south will also impact on pedestrians, cyclists and equestrians who are all on road along this section and will be exposed to increased risk of accidents due to the increase in development traffic. Ulnes Walton Lane is part of the Lancashire Cycleway, and there are two PRoW routes that intersect this section, FP9 and FP8, and no consideration is given to these road users in the mitigation proposals.
- 7.1.18 The appellant has also proposed a traffic calming scheme on Ulnes Walton Lane north, School Lane and Dunkirk Lane in Appendix B of the Technical Addendum. Whilst it is acknowledged that these proposals have been produced in an attempt to mitigate the safety impact of increased traffic on these sections, comparatively, these sections see the lowest development impact with an 18% increase in traffic on Ulnes Walton Lane and a 15% increase in traffic on School Lane.
- 7.1.19 Whilst these too are notable increases in traffic, this highlights the disproportionate approach to mitigation provided by the appellant, especially given that the recorded accidents on this section are also not dissimilar to the other roads in the study area.

- 7.1.20 In addition, the mitigation does not address the impact on PRow routes FP7, FP6, FP13 and the footpaths south of Hedgerows Road, where an increase in traffic of 18% and a combined lack of formal crossing facilities at these locations will expose PRow users to a greater number of vehicles and will increase waiting time to cross the road. This often leads to impatience and risk-taking behaviour, ultimately increasing the risk of accidents.
- 7.1.21 The appellant has also proposed a mitigation scheme for the A81 Southport Road/Ulnes Walton Lane junction however this was based solely on the impact of the development in terms of capacity. The results of this assessment demonstrated queueing and delays at the existing junction, which cause driver frustration and can lead to risk-taking behaviour and potentially accidents.
- 7.1.22 The mitigation proposes to upgrade the junction from a priority-controlled junction to a signal-controlled junction and includes widening of the carriageway to provide a right-turn pocket on the A581 Southport Road east.
- 7.1.23 Whilst it is understood that the scheme may not be the final scheme implemented by LCC, this scheme has been proposed with the aim of mitigating the impact of the development and for deriving S106 contributions towards a corridor scheme. However, the proposed mitigation has not been appropriately assessed. It is highly unusual for a scheme to be proposed to mitigate a capacity impact without a modelling assessment to justify it is an appropriate solution.
- 7.1.24 The TA and Technical Addendum did not comment on the impact of safety at this junction nor at the Barlow Trailers access or New Lane junctions, despite the junction capacity assessment of the existing junction indicating queues on the A581 Southport Road east that would block back through these junctions. There was no consideration of the recorded PIAs at these two junctions, with two recorded PIAs at the A581 Southport Road/Ulnes Walton Lane junction, one of which being serious, and two recorded PIAs at the A581 Southport Road/New Lane junction.
- 7.1.25 The signalisation scheme proposed also has numerous issues that would affect its deliverability as I have set out previously in section 6.2. There are also potential safety implications associated with the design of the scheme including omission of pedestrian and cyclist facilities, reduced visibility for the adjacent Barlow Trailers access and the incorporation of the three residential accesses into the junction without signalisation.
- 7.1.26 In addition, it is also unclear how the cost estimate has been derived and whether it reflects the requirement for third-party land to provide a junction that mitigates the proposals in terms of safety and capacity.
- 7.1.27 It is therefore my conclusion that the appellant has yet to demonstrate that the proposals will avoid problems of safety across the study network and is therefore contrary to paragraph 110 and 111 of the National Planning Policy Framework, policy BNE1 and policy ST1 of the Chorley Local Plan 2012 - 2026.

## 8 APPENDIX

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Photograph 1 – Moss Lane, looking south from Willow Road



Photograph 2 – Road signs on Moss Lane on the approach to Willow Road



**Photograph 3 – Moss Lane/Ulnes Walton Lane junction**



**Photograph 4 – Sharp bend sign (left of lamppost) on Ulnes Walton Lane south of Moss Lane obscured by dense vegetation**



**Photograph 5 – Approach to bus stop on the north side of Ulnes Walton Lane east of Moss Lane**



**Photograph 6 – Pedestrians in road hazard warning sign on Ulnes Walton Lane, north of junction with the A581 Southport Road**



**Photograph 7 – Footway on A581 Southport Road, looking east towards the Ulnes Walton Lane junction**









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