

HMP Garth and HMP Wymott, Moss Lane, Ulnes Walton, Leyland Mace (on behalf of the Ministry of Justice)

February 2024

ADDENDUM TRANSPORT PROOF OF EVIDENCE

APPLICATION 21/01028/OUTMAJ

STEPHEN YEATES BSC (HONS) MSC CMILT

VOLUME 1

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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 Technical Director with AtkinsRéalis, and I have over 20 years' experience in the field of transport planning.
- 1.1.2 I have submitted a new Proof of Evidence (PoE) (Core Document M6) and a new Rebuttal PoE (Core Document M9) to support this appeal. Further to the submission of these documents, I have prepared this Addendum PoE which presents an alternative scheme for the A581/Ulnes Walton Lane junction.
- 1.1.3 This Addendum PoE arises out of a change in circumstances since the last PoE, namely that since then the Ministry of Justice (MoJ) has been able to negotiate the acquisition of land (beyond the control of the local highway authority) to facilitate the alternative scheme for the A581/Ulnes Walton Lane junction.
- 1.1.4 The Appellant invites the Inspector to consider this alternative scheme, and the additional evidence submitted in this Proof. It should be noted that the Appellant is committed to deliver either the original scheme (see DWG: GARTH_ATK_HGN_A581_DR_D_0005_P3 in Appendix G, p.370) or the alternative scheme (see DWG: GARTH_ATK_HGN_A581_DR_D_0016_P6 in Appendix A) as both accord with design standards.
- 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. I appear at this Inquiry on behalf of the MoJ to give evidence on transport planning matters.

1.2 Background

- 1.2.1 This Addendum PoE specifically relates to the A581/Ulnes Walton Lane junction.
- 1.2.2 As part of the Hybrid Planning Application, following consultation with Lancashire County Council (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. However, The Secretary of State agreed with the Inspector, that it had not been demonstrated that the proposed works would resolve capacity issues at the A581/Ulnes Walton Lane junction, or that the financial contribution would be sufficient (IR 13.29 in Core Document L1).
- 1.2.3 Therefore, as part of the additional highways evidence (Core Document M3a), the Appellant submitted an outline highways design for the A581/Ulnes Walton Lane junction (see DWG: GARTH_ATK_HGN_A581_DR_D_0005_P3 in Appendix G, p.370). The highways design submitted was proposed to be delivered entirely within land controlled by the local highway authority.



- 1.2.4 However, an agreement is now in place for the MoJ to secure land beyond the control of the local highway authority, and therefore the Appellant has developed an alternative scheme for the A581/Ulnes Walton Lane junction (see DWG: GARTH_ATK_HGN_A581_DR_D_0016_P6 in Appendix A).
- 1.2.5 The agreement is for the MoJ to secure 352m² of land to the east of Ulnes Walton Lane (see DWG: GARTH_ATK_HGN_A581_DR_D_0021_P2 in Appendix B), and 574m² of land to the west of Ulnes Walton Lane (see DWG: GARTH_ATK_HGN_A581_DR_D_0020_P2 in Appendix C).
- 1.2.6 The purpose of this Addendum PoE is to present the alternative design and the updated evidence associated with the A581/Ulnes Walton Lane junction.
- 1.2.7 Volume 1 of my Addendum PoE uses the following structure:
 - a. Chapter 2 provides an overview of the alternative preliminary highways design;
 - b. Chapter 3 presents the findings of the Stage 1 Road Safety Audit;
 - c. Chapter 4 outlines the ecological impacts;
 - d. Chapter 5 outlines the landscape impacts; and
 - e. Chapter 6 provides a summary and conclusion.
- 1.2.8 Volume 2 of my Addendum PoE includes the following appendices:

Appendix A – DWG: GARTH_ATK_HGN_A581_DR_D_0016_P6

Appendix B - DWG: GARTH ATK HGN A581 DR D 0021 P2

Appendix C - DWG: GARTH ATK HGN A581 DR D 0020 P2

Appendix D – Oxfordshire County Council's Technical Specification

Appendix E - DWG: GARTH ATK SPA A581 DR D 0008 P1 A

Appendix F - DWG: GARTH_ATK_SPA_A581_DR_D_0016_P5

Appendix G – DWG: GARTH_ATK_SPA_A581_DR_D_0016_P5 A

Appendix H - DWG: GARTH ATK SPA A581 DR D 0016 P5 B

Appendix I – DWG: GARTH_ATK_SPA_A581_DR_D_0016_P5 C

Appendix J – Junctions 10 Outputs (Operational Phase)

Appendix K – Junctions 10 Outputs (Construction Phase)

Appendix L – LCC Joint Statement

Appendix M – VIA East Midlands Ltd Stage 1 RSA

Appendix N – Preliminary Ecological Appraisal

Appendix O - Landscape Assessment



2. Design Overview

2.1 Introduction

- 2.1.1 An alternative design for the A581/Ulnes Walton Lane junction (see DWG: GARTH_ATK_HGN_A581_DR_D_0016_P6 in Appendix A) has been produced.
- 2.1.2 The specific measures proposed include:
 - a. The provision of a raised table;
 - b. The provision of speed cushions along the A581;
 - c. Three new lighting columns on the Ulnes Walton Lane approach;
 - d. Relocated speed limit signs along Ulnes Walton Lane to extend the 30mph zone; and
 - e. Dragons Teeth on all approach arms.
- 2.1.3 As per Paragraph 4.4.7 in Core Document M6, mini roundabouts were developed as a method to improve junction safety, particularly at locations with long straight sections of road. The location of the proposed junction is within a 30mph zone and adheres to guidance regarding the use of this type of junction. Further, the measures proposed would contribute towards the objectives of the A581 Rufford to Euxton Safety Improvement scheme through the introduction of physical traffic calming measures along the A581.
- 2.1.4 At this stage we have not designed the pavements, or specified kerbs as those are items addressed at the Section 278 / detailed design stage. Notwithstanding, there will need to be a kerb upstand, and that upstand will an important part of the highway drainage system. The kerb upstand will need to be reduced so that a car can comfortably pass over it, whilst demarking the difference between the footway and carriageway. To provide evidence on this point, I have included Oxfordshire County Council's technical specification (Appendix D) which states that "All kerbs at vehicle crossovers are to have a maximum 25mm upstand."

2.2 Traffic Flows

2.2.1 For ease of refence, Figure 2-1 provides a summary of the peak hour traffic flows at the A581/Ulnes Walton Lane junction for the '2025 Opening Year without Development' scenario. Figure 2-2 provides a summary of the peak hour traffic flows for the '2025 Opening Year with Development' scenario. The traffic flows have been extracted from Table 7-10 in the TA (Core Document A35).



Figure 2-1 - A581/Ulnes Walton Lane Traffic Flows (2025 without Development)

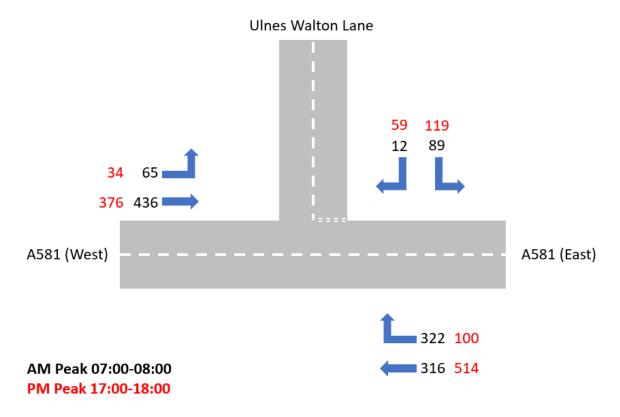
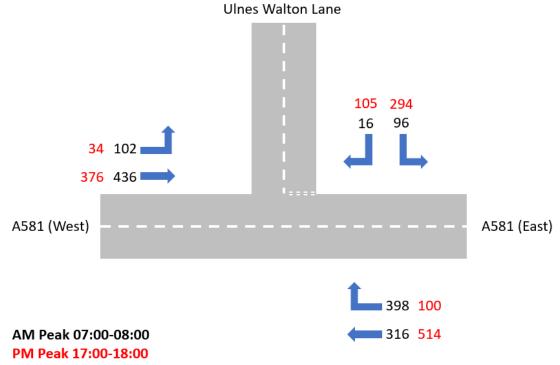


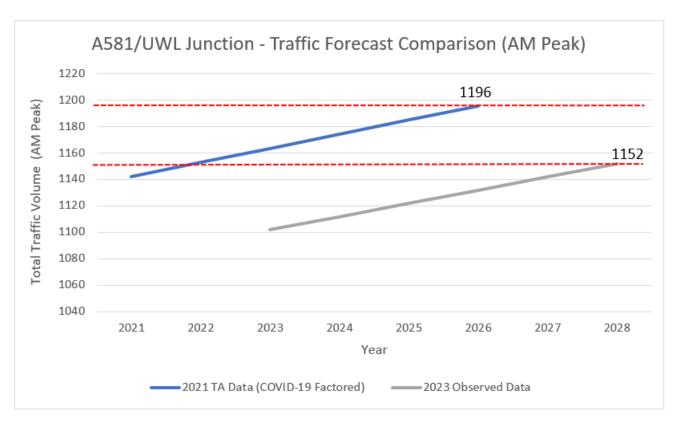
Figure 2-2 - A581/Ulnes Walton Lane Traffic Flows (2025 with Development)





2.2.2 The Transport Assessment (TA, Core Document A35) was issued in August 2021. To validate the traffic analysis in the TA, I have factored the 2023 observed peak hour traffic flows at the A581/Ulnes Walton Lane junction to a 2028 future assessment year using traffic growth factors from TEMPro v7.2¹ in line with the TA (see Figure 2-3 and Figure 2-4).

Figure 2-3 – A581/Ulnes Walton Lane traffic forecast comparison (AM Peak)



¹ Please note that TEMPro v8.0 was released in 2022. However, the local adjustment figures contained within TEMPro v8.0 have not yet been released so it is not possible to calculate traffic growth factors.



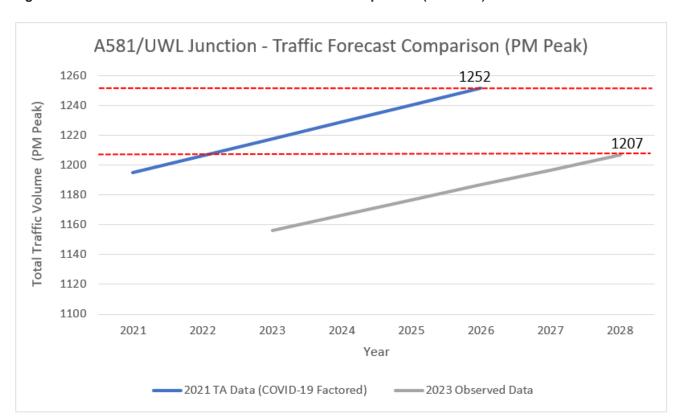


Figure 2-4 - A581/Ulnes Walton Lane traffic forecast comparison (PM Peak)

2.2.3 The analysis demonstrates that the forecast 2028 peak hour flows are lower than the 2026 peak hour flows used in the TA. This demonstrates that the traffic flows used to inform the analysis within the TA (Core Document A35) are robust.

2.3 Visibility Requirements

2.3.1 The proposed visibility to the right (on all approach arms) associated with the alternative design for the A581/Ulnes Walton Lane junction (DWG: GARTH_ATK_HGN_A581_DR_D_0016_P6 in Appendix A) conforms with the requirements set out within Manual for Streets (MfS) Table 7.1 and CD 116 'Design of Mini Roundabouts' Figure 5.21 and Table 5.21. Therefore, no departures are required for the alternative design.

2.4 Swept Path Analysis

- 2.4.1 Swept Path Analysis (SPA) has been undertaken using a 'Max Legal Length Articulated Vehicle' based on the existing highway layout at the A581/Ulnes Walton Lane junction (see DWG: GARTH ATK SPA A581 DR D 0008 P1 A in Appendix E).
- 2.4.2 In addition, SPA has been undertaken for the alternative design using a 'Large Car', 'HG Rigid Vehicle' and a 'Max Legal Length Articulated Vehicle' (see DWG: GARTH_ATK_SPA_A581_DR_D_0016_P5 in Appendix F).



- 2.4.3 When comparing the SPA for the existing highway layout junction (DWG: GARTH_ATK_SPA_A581_DR_D_0008_P1 A in Appendix E) to the SPA for the alternative preliminary highways design (DWG: GARTH_ATK_SPA_A581_DR_D_0016_P5 in Appendix F), it is evident that the introduction of a mini roundabout at the A581/Ulnes Walton Lane junction provides a betterment in terms of vehicle tracking.
- 2.4.4 Furthermore, SPA has been undertaken using the alternative preliminary highways design for the following vehicles/movements:
 - a. A 'Large Car' accessing/egressing the private accesses to the south of the A581 (see DWG:
 GARTH ATK SPA A581 DR D 0016 P5 A in Appendix G);
 - b. A 'Refuse Vehicle', 'Standard Rigid Bus', and a 'Horse Box' making all turning movements at the junction (see DWG: GARTH_ATK_SPA_A581_DR_D_0016_P5 B in Appendix H); and
 - c. A 'Refuse Vehicle', 'Standard Rigid Bus', and a 'Max Legal Length Articulated Vehicle' making the ahead movements along the A581 (see DWG: GARTH_ATK_SPA_A581_DR_D_0016_P5 C in Appendix I).
- 2.4.5 The SPA demonstrates that all the vehicles tested can safely navigate the alternative design for the A581/Ulnes Walton Lane junction (DWG: GARTH_ATK_HGN_A581_DR_D_0016_P6 in Appendix A).

2.5 Interaction with Private Driveways

2.5.1 As demonstrated in Appendix G, it is possible for a 'Large Car' to access/egress the private accesses to the south of the A581. As per Section 4.5 in Core Document M6, I have demonstrated that mini roundabouts with private accesses located off the circulatory carriageway are a frequent occurrence within Lancashire. In addition, where a mini roundabout does interact with a private driveway, I have demonstrated that there is no correlation between mini roundabouts with private driveways and an increase in collisions.

2.6 Operational Phase Highway Capacity

Assessment Software

Junctions 10 software has been used to undertake a standalone junction capacity assessment of the alternative preliminary highway design at the A581/Ulnes Walton Lane junction (DWG: GARTH_ATK_HGN_A581_DR_D_0016_P6). Junctions 10 is the latest version of the internationally recognised software application for predicting capacities, queue lengths and delays (both queueing and geometric) at non-signalised roundabouts and priority intersections.



Geometries

2.6.2 The geometries used to inform the standalone junction capacity assessment have been derived from DWG: GARTH ATK HGN A581 DR D 0016 P6 using AutoCAD.

Traffic Flows

2.6.3 The traffic flows outlined in Table 7-10 of the TA (see Section 7.3.6.1 within Core Document A35) have been used to inform the standalone junction capacity assessment. As per Figure 2-3 and Figure 2-4 in this Addendum PoE, the traffic flows used to inform the standalone junction capacity assessment are robust.

Junctions 10 Outputs

2.6.4 Table 2-1 presents the updated results of the standalone junction capacity assessment for the A581/Ulnes Walton Lane junction. The full outputs are provided in Appendix J.

Table 2-1 - Model Outputs - A581/Ulnes Walton Road Junction - Alternative Mini Roundabout

	AM P	PM Peak (17:00-18:00)				
Approach Arm	Queue (PCU)	Delay (S)	RFC	Queue (PCU)	Delay (S)	RFC
	2025 Opening \	ear with De	evelopmen	t		
A581 Southport Road (W)	6.0	39.03	0.87	1.1	8.63	0.51
Ulnes Walton Lane	0.3	8.17	0.21	2.3	18.99	0.70
A581 Southport Road (E)	4.6	22.05	0.83	3.2	17.30	0.76
	2026 wit	h Developn	nent			
A581 Southport Road (W)	6.5	41.80	0.88	1.1	8.71	0.51
Ulnes Walton Lane	0.3	8.23	0.21	2.3	19.42	0.70
A581 Southport Road (E)	4.8	22.75	0.83	3.3	17.81	0.77

2.6.5 The updated results of the standalone junction capacity assessment demonstrate that the alternative preliminary highway design for the A581/Ulnes Walton Lane junction would mitigate the impact of the development at this location to an acceptable degree in line with Paragraph 114(d) in the National Planning Policy Framework (NPPF). The analysis demonstrates that the proposed mitigation scheme 'with development traffic' would operate better than the existing junction layout 'without development traffic' (see Table 7-11 in Core Document A35).



2.6.6 In addition, the measures proposed would contribute towards the objectives of the A581 Rufford to Euxton Safety Improvement scheme through the introduction of physical traffic calming measures along the A581.

2.7 Construction Phase Highway Capacity

Junction Capacity Assessment

2.7.1 To demonstrate that the effects of the construction phase can be adequately mitigated, standalone junction capacity assessment software has been used to model the combined construction peak (December 2027) at the A581/Ulnes Walton Lane Junction based on the alternative highway layout (GARTH_ATK_HGN_A581_DR_D_0016_P6).

Assessment Software

2.7.2 Junctions 10 software has been used to undertake the standalone junction capacity assessment of the daily arrival and departure profile during the combined construction peak (December 2027).

Traffic Flows

- 2.7.3 The 2021 traffic flows used to inform the standalone junction capacity modelling contained within the TA (see Core Document A35) have been used to inform the construction phase assessment. However, it should be noted that traffic growth factors from TEMPro have been applied to establish a 2027 baseline (in line with the combined construction peak).
- 2.7.4 It has been assumed that all HGVs will arrive/depart the site via Ulnes Walton Lane (south) and the A581 (east) in line with the preferred construction access routes.
- 2.7.5 Recognising that construction personnel are likely to arrive from various origins, the construction personnel (cars) have been distributed on to the local highway network using the same trip distribution presented on Figure 5-1 within the TA (see Core Document A35).

Junctions 10 Outputs

2.7.6 Table 2-2 provides a summary of the vehicular flows (PCUs) used to inform the assessment of the A581/Ulnes Walton Lane Junction.



Table 2-2 - A581/Ulnes Walton Lane Junction - Traffic Flow Summary (PCUs)

Arm (From)	Arm (To)	2027 Baseline			2027 Baseline + Construction		
		06:00- 07:00	07:00- 08:00	17:00- 18:00	06:00- 07:00	07:00- 08:00	17:00- 18:00
A581	Ulnes Walton Lane	18	66	35	117	85	35
Southport Road (W)	A581 Southport Road (E)	193	442	382	193	442	382
Ulnes	A581 Southport Road (E)	36	90	202	36	97	331
Walton Lane	A581 Southport Road (W)	10	12	59	10	12	119
A581	A581 Southport Road (W)	86	320	521	86	320	521
Southport Road (E)	Ulnes Walton Lane	60	327	102	261	374	108

- 2.7.7 Table 2-3 presents the result of the standalone junction capacity assessment for the A581/Ulnes Walton Lane junction (combined construction peak). This assessment is based on the alternative highway layout (GARTH_ATK_HGN_A581_DR_D_0016_P6).
- 2.7.8 The full outputs are provided in Appendix K.



Table 2-3 - Model Outputs - A581/UWL Junction - Combined Construction Peak - Proposed

Amazza ala Azza	AM Construction Peak (06:00- 07:00)			AM Network Peak (07:00-08:00)			PM Construction/Network Peak (17:00-18:00)		
Approach Arm	Queue (PCU)	Delay (S)	RFC	Queue (PCU)	Delay (S)	RFC	Queue (PCU)	Delay (S)	RFC
		2027 Baselin	e + Combii	ned Construc	ction Peak				
A581 Southport Road (W)	0.8	8.67	0.44	4.7	30.87	0.83	1.1	8.90	0.52
Ulnes Walton Lane	0.1	5.56	0.07	0.3	8.48	0.21	3.6	27.61	0.79
A581 Southport Road (E)	0.7	6.41	0.40	4.0	19.44	0.80	3.7	19.74	0.79



2.7.9 The proposed highways layout at the A581/Ulnes Walton Lane junction would ensure that the junction does not operate over capacity during the construction phase of the project, and that the local highway network could accommodate the additional construction traffic during the combined construction peak (December 2027). Therefore, it is recommended that the proposed highway improvements at this location are delivered prior to the start of construction. This would be secured via Condition 4B to ensure that the impacts of construction can be adequately mitigated.

2.8 Consultation with Local Highway Authority

- 2.8.1 LCC had no highways objections to the Hybrid Planning Application as outlined within the statutory consultee comments (Core Document B1). The Appellant has continued to engage with LCC throughout the appeal, and the Appellant has presented LCC with the alternative highways evidence outlined in this Addendum PoE.
- 2.8.2 LCC has reviewed the additional evidence/proposals in relation to the A581/Ulnes Walton Lane scheme, and they have confirmed that the mini roundabout could be delivered under a s278 agreement. Therefore, the additional highways measures proposed would be subject to detailed design and the associated Road Safety Audit (RSA) required at each appropriate stage of the design.
- 2.8.3 A joint statement has been prepared by LCC and the Appellant (Appendix L) which confirms that LCC, in its capacity as Local Highway Authority, fully support the Appellants position and continue to have no highways objections.

2.9 Scheme Costings

- 2.9.1 The highways works presented within this PoE would be delivered via a s278 Agreement with LCC. Therefore, the additional highways measures proposed would be subject to detailed design and the associated RSA's required at each appropriate stage of the design.
- 2.9.2 The scheme cost estimates for the additional highways work have been assessed and the Appellant can confirm that the additional scheme costs associated with the alternative mitigation package do not adversely impact on the delivery of the overall development.



3. Stage 1 Road Safety Audit

3.1 VIA East Midlands Ltd Stage 1 RSA

- 3.1.1 A Stage 1 RSA was produced by VIA East Midlands Ltd on 5 January 2024 (see Appendix M). The Stage 1 RSA reviewed the alternative highway layout at the A581/Ulnes Walton Lane junction (GARTH_ATK_HGN_A581_DR_D_0016_P6) and identified two RSA problems (see Table 3-1).
- 3.1.2 It should be noted that VIA East Midlands undertook a Stage 1 RSA for the previous highway layout at the A581/Ulnes Walton lane junction in February 2023 (see Section 5.7 in Core Document M3). However, VIA East Midlands has confirmed that the alternative highway layout is materially different to the previous highway layout, and therefore the problems identified within the previous RSA are not considered relevant to the alternative highway layout.

Table 3-1 - Stage 1 RSA Problem Summary - A581/Ulnes Walton Lane Junction

ID	Location	RSA Problem	RSA Recommendation
4.1	A581/Ulnes Walton Lane	Collisions in junction when drivers misinterpret the road layout.	It is recommended that splitter islands are incorporated into the design within the proposed hatched areas. These would add definition to the road layout and junction form, especially if they can accommodate additional signing. However, consideration will need to be given to turning movements including from private driveways. Warning signs on each approach might also be appropriate, and/or direction signs could be converted to "map-type" to include the roundabout symbol.
4.2	A581/Ulnes Walton Lane	A581 approaches to mini roundabout.	It is recommended that extreme care is taken in the detailed design of the cushion features. They should also be made as visible as possible, and the street lighting assessed to ensure they remain prominent at night.
			Alternative forms of 'traffic calming' such as plateaux may be explored, although these will result in increased noise nuisance for nearby residents and may be unpopular with drivers of HGVs buses and other large vehicles.
			The detailed design of the speed cushions (and their locations) should be reviewed and amended to suit the bus stops on this route.



3.2 **Problem 4.1**

- 3.2.1 As outlined in Paragraph 2.8.2, the additional highways measures proposed would be subject to LCC sign-off, detailed design, and the associated RSA required at each appropriate stage of the design as part of the s278 process.
- 3.2.2 The recommendations outlined in 'RSA Problem 4.1' will be carefully considered during the detailed design, including the potential to include splitter islands, additional warning signage and "map-type" directional signage.
- 3.2.3 However, it should be noted, as per Paragraph 2.1.2, that the alternative design for the A581/Ulnes Walton Lane junction (see DWG: GARTH_ATK_HGN_A581_DR_D_0016_P6 in Appendix A) includes the provision of a raised table which would add definition to the road layout and junction form. In my expert opinion, there are numerous ways to address the issues raised in 'RSA Problem 4.1' which could be considered during the detailed design.

3.3 **Problem 4.2**

- 3.3.1 The recommendations outlined in 'RSA Problem 4.2' will be carefully considered during the detailed design, including the location of the speed cushions, and the lighting requirements to ensure the traffic calming measures remain visible at night.
- 3.3.2 However, it should be noted that the Designer has considered the location of the speed cushions (as part of the preliminary design), taking into account the location of the private accesses along the A581. In addition, the proposed size of the speed cushions is 3.7m x 1.7m which is the recommended size for bus routes to ensure that buses can straddle the speed cushions.
- 3.3.3 It is important to note that the RSA does not suggest that the problems identified cannot be dealt with satisfactorily during the detailed design. Therefore, in my expert opinion, a solution can be agreed with LCC during the detailed design for all issues outlined in 'RSA Problem 4.2'.



4. Ecological Impact

4.1 Introduction

4.1.1 CGO Ecology Ltd (CGO) has conducted a Preliminary Ecological Appraisal (PEA) of the land adjacent to the A581/Ulnes Walton Lane junction. A copy of the PEA is provided in Appendix N.

4.2 Impact Assessment

4.2.1 CGO has confirmed that the alternative preliminary highways design for the A581/Ulnes Walton Lane junction would result in the loss of species-poor hedgerow, whilst nesting birds and hedgehog could also be impacted.

4.3 Mitigation and Compensation

4.3.1 The PEA concluded that the loss of hedgerow must be offset by new hedgerow planting along the development edges whilst three bird nest boxes must be installed in retained trees nearby to offset the loss of breeding habitat. I can confirm on behalf of the Appellant that they will offset the loss of breeding habitat in line with the recommendations set out within the PEA as part of the proposed highways works for the A581/Ulnes Walton Lane junction. In addition, the preliminary highways design will be developed further during the detailed design to include landscaping details and boundary treatment.



5. Landscape Impact

5.1 Introduction

5.1.1 Pegasus has conducted a Landscape and Visual Appraisal of the land adjacent to the A581/Ulnes Walton Lane junction. A copy of the report is provided in Appendix O.

5.2 Impact Assessment

- 5.2.1 Pegasus has confirmed that the greatest impact would be the loss of roadside hedgerows, some hedgerow trees and the dilapidated cheshire railings. However, the introduction of new highways infrastructure such as lighting, signage and footways would have a negligible impact given these are existing components of the landscape.
- 5.2.2 Considering landscape character, the change would be negligible and highly localised.

5.3 Mitigation

5.3.1 Pegasus has confirmed that where the highways mitigation does result in the loss of landscape components (i.e. hedgerows and cheshire railings) it is both possible and practicable to reinstate these using standard approaches to landscape design and implementation.



6. Summary and Conclusion

6.1 Summary

6.1.1 This PoE has demonstrated:

- a. The Appellant has continued to engage with LCC throughout the appeal, and the Appellant has presented LCC with the alternative highways evidence outlined in this Addendum PoE. LCC continue to have no highways objections;
- b. An agreement is now in place for the MoJ to secure land beyond the control of the local highway authority, and therefore the Appellant has developed an alternative scheme for the A581/Ulnes Walton Lane junction (see DWG: GARTH ATK HGN A581 DR D 0016 P6 in Appendix A).
- c. The proposed visibility (to the right) associated with the alternative preliminary highways design for the A581/Ulnes Walton Lane junction conforms with the requirements set out within Figure 5.21 and Table 5.21 in CD 116 'Design of Mini Roundabouts';
- d. SPA has been undertaken for the alternative preliminary highways design using a 'Large Car', 'HG Rigid Vehicle', 'Refuse Vehicle', 'Standard Rigid Bus', 'Horse Box', and a 'Max Legal Length Articulated Vehicle'.
- e. The standalone junction capacity assessment has demonstrated that the alternative preliminary highway design for the A581/Ulnes Walton Lane junction would mitigate the impact of the development at this location to an acceptable degree (Operational Phase);
- f. A new Stage 1 RSA has been undertaken after VIA East Midlands confirmed that the alternative highway layout is materially different to the previous highway layout, and therefore the problems identified within the previous RSA are not relevant to the alternative highway layout.
- g. The proposed highways layout at the A581/Ulnes Walton Lane junction would ensure that the junction does not operate over capacity during the construction phase of the project, and that the local highway network could accommodate the additional construction traffic during the combined construction peak (December 2027);
- h. The Appellant has confirmed that they will offset the loss of breeding habitat in line with the recommendations set out within the PEA as part of the proposed highways works for the A581/Ulnes Walton Lane junction; and



 The Appellant can confirm that the additional scheme costs associated with the alternative mitigation package do not adversely impact on the delivery of the overall development.

6.2 Conclusion

- 6.2.1 The Appellant invites the Inspector to consider the alternative scheme, and the additional evidence submitted in this Proof. It should be noted that the Appellant is committed to deliver either the original scheme (see DWG: GARTH_ATK_HGN_A581_DR_D_0005_P3 in Appendix G, p.370) or the alternative scheme (see DWG: GARTH_ATK_HGN_A581_DR_D_0016_P6 in Appendix A) as both accord with design standards.
- 6.2.2 In my opinion, the additional evidence presented within this PoE demonstrate that the impact of GW2 at the A581/Ulnes Walton Lane junction can be cost effectively mitigated to an acceptable degree in line with Paragraph 114(d) in the NPPF², Paragraph 115 in the NPPF, and Policy BNE1 of the Chorley Local Plan 2012-2026.

² NPPF last updated 20 December 2023



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