



Report to Buckinghamshire Council – Strategic Sites Committee

Application Number:	21/02851/AOP
Proposal:	Outline Planning Application with all matters reserved except for access, layout and scale for the construction of a new Category C prison (up to 67,000 sqm GEA) within a secure perimeter fence together with access, parking, landscaping and associated engineering works.
Site location:	HM Prison Grendon, Springhill Road, Grendon Underwood, Buckinghamshire, HP18 0TL
Applicant:	MINISTRY OF JUSTICE
Case Officer:	Danika Hird
Ward affected:	GRENDON UNDERWOOD
Parish-Town Council:	GRENDON UNDERWOOD
Valid date:	5 July 2021
Determination date:	31 January 2022
Recommendation:	It is recommended that permission be refused.

1.0 Summary & Recommendation/ Reason for Planning Committee Consideration

- 1.1 The application submitted on behalf of the Ministry of Justice seeks outline planning permission for the erection of a new Category C resettlement prison adjacent to the existing Grendon (Category B) and Springhill (Category D) prisons off Springhill Road in Grendon Underwood. The matters for determination as part of this outline application include access, layout and scale with all other matters reserved (appearance and landscape).
- 1.2 The scheme includes a number of benefits, the most notable of which is contributing towards the Government's target to provide 10,000 additional prison places across four prisons in England to meet the forecasted increase in prison population over the next 10 years. In addition, this proposal for a new Category C resettlement prison seeks to address imbalance between the needs of prisoners and the types and location of prisons they are held in to improve rehabilitation and be more cost effective. Furthermore, there would be economic benefits which derive from the proposal
- 1.3 However, there are significant concerns regarding the sustainability of the site, the landscape

character and visual impacts, harm to designated and non-designated heritage assets, the loss of playing fields. Insufficient information has also been provided in the form of surveys for the Council's Ecologist to determine the full effect of the proposal on the relevant species, including European Protected Species. Furthermore, the proposal has also failed to demonstrate that the proposal can provide a biodiversity net gain and that it would not sterilise mineral resources at this site. Limited harm has also been identified with regard to the possible loss of best and most versatile agricultural land. Had the above reasons not applied, it would have been necessary for the applicant and the Local Planning Authority to enter into a Section 106 Agreement to secure financial contributions relating to highway/ transport matters. In the absence of such a provision, the Local Planning Authority has also attached negative weight to this matter.

- 1.4 While information has been submitted to support the application, the applicant has not provided clear and convincing justification that the harm to the designated heritage assets could be avoided by finding an alternative site for the development of the new prison. While the public benefits of the scheme are acknowledged to be significant the lack of clear and convincing justification for the development of this site lends further weight to the less than substantial harm identified. As a consequence, the harm is not outweighed by the public benefits. A balanced judgement has been undertaken in respect of the harm caused to the identified non-designated assets.
- 1.5 The relevant policies applicable to this application are within an up-to-date development plan (the recently adopted VALP) and in line with the advice contained in paragraph 11c of the NPPF should be determined in accordance with these policies. The proposal conflicts with a number of relevant planning policies and the benefits of this scheme are considered not to outweigh the harm which has been identified. There are material considerations which relate to this proposal namely the national and regional need for additional prison places. However, the information provides insufficient justification for the development of this sensitive site and does not provide convincing evidence that there are no alternative locations which accommodate this development. The materials considerations do not indicate a decision other than in accordance with the development plan.
- 1.6 Councillors Macpherson, Mahon and Rand have requested that the application is referred to Committee on the grounds of transport and cumulative impact; location; design; flooding; landscape; biodiversity; heritage and archaeology; impact on public services and public safety.
- 1.7 In accordance with the Council's Constitution, where a call-in has been requested by all

members for a particular ward, the application will automatically be considered by the relevant Planning Committee.

- 1.8 It is therefore recommended that permission be refused on the grounds of sustainability, heritage, biodiversity, the loss of playing field provision and the absence of a Section 106 Agreement to secure financial contributions towards highway and transport improvement. The reasons for refusal are set out in Section 21.0 of this report.

2.0 Description of Proposed Development

- 2.1 The application site largely relates to undeveloped land extending circa 29.5 hectares within the open countryside off Springhill Road in Grendon Underwood. The site is situated approximately 1.7 miles north of the A41, 6 miles east of Bicester and 10 miles north-west of Aylesbury. The land predominately falls within the grounds associated with the existing, two adjacent prisons; HMP Springhill (Category D open prison) and HMP Grendon (Category B, Secure Prison). To the west of the site, approximately half a mile away, lies Edgcott with Grendon Underwood lying just under a mile away to the south of the site. To the north and east of the site lies undeveloped agricultural land. HMP Springhill and HMP Grendon are located to the south of the site with residential properties located to the south-west of the site beyond the access and grounds associated with the existing prisons.
- 2.2 The High Speed 2 (HS2) rail line will run along the existing mainline trackway to the east of the site with the East West Rail Route (EWR) being situated circa 3.13km to the north of the application site.
- 2.3 The former Calvert brick pits lies to the north-east and was subsequently used for landfill and part of the Greatmoor Energy from Waste Facility/power station. Within the site itself there are two Public Rights of Way (GUN/16/1 & GUN/17/1), with a series Public Rights of Way within the immediate vicinity of the site and the wider area. The development site slopes to the east and west from a high point that forms a ridge along a north-south axis through the proposed development area and the existing prison site.
- 2.4 The site comprises of areas of grassland, existing HMP Springhill facilities (sports fields & education block) and an area of deciduous woodland with a large pond as well as agricultural land. The application site contributed to the setting of several designated assets and it has been identified that part of the application site falls within a non-designated historic park and garden. Grendon Hall, a Grade II Listed building is situated within the existing prison grounds

and the existing vehicular access serving the existing prisons off Grendon Road is marked by two gated piers and railings, which are also Grade II Listed. Lawn House and Lower Farm are also situated within the immediate vicinity of the site and are Grade II Listed. In addition to this, there are a number of Grade II and Grade II* Listed buildings to the north and south of the site. Grendon Underwood Conservation Area is also situated approximately 780m, at its nearest, to the south of the application site. Furthermore, the two western fields of the proposed development contain medieval-post medieval earthwork ridge and furrow cultivation.

2.5 The proposed development itself seeks outline permission for the erection of new Category C resettlement prison comprising of the following:

- Six new houseblocks to accommodate up to 1,468 prisoners – Located in the eastern development parcel and measuring 17.26m in height.
- The provision of supporting buildings:
 - CASU (Care and Separation Units) – Located in the eastern development parcel and extending at its tallest 9.9m in height.
 - Central Services Hub – Located in the northern development parcel and measuring at its tallest 8.9m in height.
 - Workshops Building – Located in the northern development parcel and extending at its tallest 11.8m in height
 - Kitchen Building – Located in the northern development parcel and measuring at its tallest 9.8m in height
 - Support Building – Located in the northern development parcel and measuring at its tallest 9.8m in height
 - Entrance Resource Hub – Located in the northern development parcel and measuring at its tallest 11.25m in height
- Ancillary development including car parking (c.453 spaces), internal road layout and perimeter fencing totalling 1,700 linear metres enclosing a secure perimeter of 11.04ha.
- The existing ponds and area of woodland in the north-western corner of the site is shown to be retained.
- The existing football pitches and exercise area serving HMP Springhill which is currently situated in the northern development parcel of the site will be relocated to the western development parcel.

- 2.6 This outline consent initially sought to include matters relating to access and scale. However, Officers felt that given the nature of the application, the site's sensitive location within the open countryside and the land being subject to varying ground levels, under Article 5(2) of the Town and Country Planning (Development Management Procedure) (England) Order 2015 matters relating to layout were formally 'called in' for consideration as part of this application. Allowing Officers to carefully assess the impact and relationship of the proposal upon the wider landscape and nearby heritage assets. Consequently, this outline application seeks to formally consider matters relating to access, scale and layout of the proposed Category C resettlement prison.
- 2.7 For ease of reference, given the scale of the proposed development and its relationship with the wider area, this report will refer to particular development parcels. The proposed layout has also been provided assist in understanding general layout. These will be as follows:

- Landscape & Visual Impact Assessment (LVIA)
- Comprehensive Landscape Masterplan
- Briefing Note: Response to Landscape Officer comments
- Flood Risk Assessment
- Proposed SUDS Strategy Report
- SuDS Maintenance Strategy
- Impermeable Areas Plan
- Impermeable Area & Storage Volume
- Greenfield runoff rate estimation
- Proposed Surface Water Drainage Strategy Report
- Proposed Surface Water Drainage Strategy Sheets
- Surface Outfall Levels
- Proposed Foul Water Drainage Strategy Report
- Proposed Foul Water Drainage Strategy Sheets
- Ecological Impact Assessment
- Biodiversity Net Gain Assessment
- Biodiversity Net Gain Area Calculation Plan
- Biodiversity Metric (full)
- Great Crested Newt Survey
- Bat Survey
- Transport Assessment
- Transport Technical Note
- Travel Plan
- Preliminary Site Access Design
- Response to Sport England
- Cover Letter (Dated 14th January 2021)
- Heritage Statement
- Archaeological Desk-Based Assessment
- Utility Report
- UXO Desk Top Survey
- Socio – Economic Statement
- Noise and Vibration Impact Assessment
- Topographical & Utility Survey
- Waste Management Strategy
- Statement of Community Involvement
- Public Right of Way Diversion Plan
- Planning Statement
- Pedestrian Approach Indicative CGI
- Aerial View Indicative
- External Lighting Layouts
- Energy & Sustainability Statement
- Design & Access Statement
- Combined Geotechnical & Ground Contamination Risk Assessment
- BREEAM 2018 New Construction Pre-Assessment Report
- Arboricultural Impact Assessment & Method Statement
- Air Quality Assessment

3.0 Relevant Planning History

Reference: 92/01073/A18

Development: TEMPORARY ACCOMODATION

Decision: No Objection Decision Date: 7 August 1992

Reference: 93/00017/ALB

Development: REMOVAL OF EXTERNAL FIRE ESCAPE INSTALLATION OF INTERNAL STAIRCASE AND ALTERATIONS

Decision: Approved Decision Date: 17 February 1993

Reference: 93/00145/A18

Development: TEMPORARY KITCHEN

Decision: No Objection Decision Date: 6 April 1993

Reference: 94/01270/A18

Development: KITCHEN ANNEXES TO INMATE ACCOMMODATION

Decision: No Objection Decision Date: 11 August 1994

Reference: 97/00623/A18

Development: CONVERSION OF EXISTING ACCOMMODATION IN A WING AND HOSPITAL TO LIVING ACCOMMODATION

Decision: No Objection Decision Date: 30 May 1997

Reference: 97/01665/A18

Development: REPLACE AND RELOCATE STANDBY GENERATOR

Decision: No Objection Decision Date: 3 October 1997

Reference: 99/02112/A18

Development: Fire escape staircases to a b c d f g and h wings

Decision: No Objection Decision Date: 15 October 1999

Reference: 99/02598/A18

Development: Erection of 5.2 metre high security fence

Decision: No Objection Decision Date: 23 December 1999

Reference: 01/01536/ATNB

Development: Erection of 15m telecommunications lattice mast with associated antennas, equipment cabin and fencing

Decision: No Objection Decision Date: 1 August 2001

Reference: 02/00837/A18

Development: Erection of new modular living accommodation

Decision: No Objection Decision Date: 30 April 2002

Reference: 03/02649/A18

Development: Demolition of perimeter wall and construction of new secure perimeter fence with internal lighting

Decision: No Objection Decision Date: 5 December 2003

Reference: 07/02897/APP

Development: Installation of pole mounted 1.8m satellite dish.

Decision: Approved Decision Date: 20 December 2007

Reference: 11/01953/APP

Development: Erection of single storey sustainability training centre and cess pit.

Decision: Approved Decision Date: 12 December 2011

Reference: 11/01954/APP

Development: Erection of single storey sustainability training centre.

Decision: Approved Decision Date: 8 November 2011

Reference: 20/00828/APP

Development: Partial demolition and extension of roofs. Extension vertically of exterior existing staircores to provide access by stairs to roof void. Installation of smoke extraction ventilators on roof and automatic opening vent glazed louvred window on building elevation. Louvred ventilation inlet panels on elevation. Installation of 2 plant compounds for generator, Installation of 6 plant compound for water tanks for fire systems

Decision: Approved Decision Date: 13 May 2020

Reference: 20/02567/APP

Development: Construction of new steel maintenance access towers to various buildings, Installation of internal smoke shafts, with roof mounted ventilators, Automatic opening glazed window ventilators to various buildings, Louvred ventilation inlet panels on elevations, Installation of a number of plant compounds associated with the fire suppression equipment.

Decision: Approved Decision Date: 27 October 2020

Reference: 20/A2567/NON

Development: Non Material Amendment sought on planning permission 20/02567/APP relating to the reduction of the fence to the Misting and Generator Compounds from 5.2m high to 2.4m high and the rotation of one of the stair towers to F Wing by 90 degrees to match the stair tower orientation to that of all other stair towers across the project.

Decision: Approved Decision Date: 10 December 2020

Reference: 20/03988/SO

Development: Screening Opinion for the erection of a new Category C prison comprising of 6 house blocks each accommodating 240 prisoners, support buildings including kitchen, workshops, central services hub totalling circa 20,000sqm plus ancillary development including kennels, polytunnels, car parking (c430 spaces), perimeter fencing and perimeter road.

Decision: Environmental Impact Assessment Not Required Decision Date: 17 December 2020

Reference: 21/01259/SO

Development: Screening Opinion for the erection of a new Category C prison comprising of 6 house blocks each accommodating 240 prisoners, support buildings including kitchen, workshop, central services hub, kennels totalling circa 20,500sqm plus ancillary development including outdoor exercise spaces, car parking (c430 spaces), perimeter fencing and perimeter road and access circulation.

Decision: Environmental Impact Assessment Not Required Decision Date: 1 July 2021

Reference: 22/00550/ADM

Development: Prior notification of demolition of 2 MTU buildings

Decision: Pending Consideration Decision Date:

The development has been screened under the Environmental Impact Assessment Regulations and the Local Planning Authority has concluded as part of application 21/01259/SO that an environmental impact assessment will not be required in this case.

4.0 Representations

4.1 Statutory site publicity has been given to the application including the additional appendices received whilst the application has been under consideration. All representations received have been summarised in Appendix A.

5.0 Policy Considerations and Evaluation

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications are determined in accordance with the development plan unless material considerations indicate otherwise. This is reiterated within paragraph 47 of the NPPF (2021). The development plan is defined in Section 38(3)(b) of the 2004 Act as “the development plan documents (taken as a whole) that have been adopted or approved in that area”.

The development plan for this area comprises:

- Buckinghamshire Minerals and Waste Local Plan 2019 (BMWLP)
- Vale of Aylesbury Local Plan (15th September 2021)

The VALP is considered to be an up to date plan, and in accordance with para 220 of the NPPF the plan has been examined in the context of the NPPF 2012 and apply to the policies in this plan.

Legislation: Sections 66 & 72 of Planning (Listed Buildings and Conservation Areas) Act 1990.

In addition, the following documents are relevant material considerations to the determination of the application.

- National Planning Policy Framework (NPPF)
- National Planning Practice Guidance (NPPG)

There is currently no 'made' nor emerging neighbourhood plan for Grendon Underwood.

6.0 Principle and Location of Development

VALP: Policies S1 (Sustainable development for Aylesbury Vale), S2 (Spatial strategy for growth), S3 (Settlement hierarchy and cohesive development) & S5 (Infrastructure).

- 6.1 Policy S1 of VALP requires all development to comply with the principle of sustainable development as set out in the NPPF, setting out the overall strategy for how this will be achieved. Policy S2 sets out the spatial strategy and distribution of development across Aylesbury Vale and seeks to concentrate strategic levels of growth and investment in sustainable locations. The VALP focuses the majority of growth in its Strategic Settlements, Aylesbury, Buckingham, Winslow, Wendover and Haddenham as well as adjacent to Milton Keynes. These policies coincide with policy S3 which requires development to be of an appropriate scale and sited in accordance with the settlement hierarchy. This positive approach to development seeks to ensure the wider needs of places and communities within Aylesbury Vale are met, whilst minimising the need to travel, and optimising sustainable modes of travel. The VALP (2021) enables an integrated and balanced approach to the provision of homes, jobs and leisure with the aim of providing sufficient and appropriate infrastructure to meet future needs. Consequently, in planning for new development, policy S5 requires appropriate regard to be given to existing deficiencies in services and infrastructure provision.
- 6.2 The application site is located outside the main built-up settlement of Grendon Underwood, approximately a mile to the north, within the open countryside with Edgcott lying approximately half a mile to the west of the site. Although it is noted that the site itself adjoins HMP Springhill and Grendon to the south, and the Springhill housing estate beyond, to the south-west. To the north and east of the site lies undeveloped agricultural land.
- 6.3 Within the Settlement Hierarchy (2017), Grendon Underwood is identified as a 'medium settlement' and therefore Grendon Underwood itself is considered to be a moderately sustainable location. Grendon Underwood is identified as having a *"moderate population size but very poorly connected to a large service centre (Bicester nearly 8 miles away, although near to the A41 which connects Bicester and Aylesbury). Some employment but poor bus service. Good provision of key services"*. Within Grendon Underwood while there are bus routes namely the 16 Aylesbury to Marsh Gibbon and 18 Aylesbury to Bicester routes operating (5 or more days a week) these are with limited frequency during the day. The

adjacent settlement of Edgcott which directly adjoins the application site is identified as an 'other settlement' and therefore is an unsustainable settlement. While Grendon Underwood is considered a moderately sustainable location the site itself is located within the open countryside and is sited a considerable distance from the detached more built-up part of this settlement.

- 6.4 Being in the open countryside, detached from the built up limits of a settlement, the site is not located in a very accessible and sustainable transport location. The limited opportunities available for undertaking trips by sustainable transports modes (discussed in further detail in the transport section of this report below) is reflected within the 80% car driver/ passenger in the Census 2011 Journey to Work data. The proposed new prison seeks to accommodate up to 1468 prisoners compared to the adjacent prisons (HMP Springhill and Grendon) which in total hold up to approximately 500 inmates (as outlined in the supporting Transport Assessment). The increase in the amount of prisoners will result in a significant increase in the number of trips to and from the site. Consequently, this will result in increases in those visiting and working at the site who will be heavily reliant upon the use of a private motor vehicle for a significant proportion of trips. The site is therefore not sustainably located and therefore the proposal would fail to accord with policies S1 and S2 of VALP.
- 6.5 Within the Vale of Aylesbury Local Plan, there are no specific policies which relates to the provision of a new prison, nor is there an allocation for such a provision. Paragraph 84 of the NPPF seeks to encourage planning decisions which enable the sustainable growth and expansion of all types of businesses in rural areas; the development and diversification of agricultural and other land-based rural businesses; sustainable rural tourism and leisure developments which respect the character of the countryside; and the retention and development of accessible local services and community facilities. With paragraph 85 advising that planning decisions should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements.
- 6.6 The majority of the proposal is located on land associated and within the ownership of the Ministry of Justice, adjacent to the existing prisons, HMP Springhill (Category D) and Grendon (Category B). Whilst the proposed development would be associated and sited adjacent to these existing prisons, the proposal seeks the creation of an entirely new prison. Paragraph 84 of the NPPF makes allowances for the expansion of land-based rural businesses, local services and facilities. However, as the proposal is for a new prison rather than the expansion of existing facilities within the open countryside, the proposal would fail to comply with these

exceptions in paragraph 84 of the NPPF.

- 6.7 Within the supporting Planning Statement it advises that a commitment was made as part of the Conservative Manifesto (2019) confirming that the Government would ‘add 10,000 more prison places, with £2.75 billion already committed to refurbishing and creating modern prisons’. In June 2020, this was followed by an announcement that four new prisons would be built across England over the next six years as part of the 10,000 Additional Prison Places Programme. ‘Following analysis of current and future national demand for additional prison places, two of these new prisons are proposed to be built in the North of England and two in the South, targeting areas of greatest forecast demand’.
- 6.8 Paragraph 85 of the NPPF does recognise that there may be need for specific development beyond the existing settlements where there is a clearly identifiable local need. Whilst the above commitment from National Government is acknowledged and it has been identified that there is a regional need for two of the proposed four prisons to be located in the south of England, this in itself does not justify the specific need for the location proposed, particularly given the sustainability issues which surround the site. Given the scale and nature of the proposal, the Local Planning Authority recognise it would be difficult to find an appropriate site within an existing settlement. It is also acknowledged there is some logic to locating a new prison adjacent to an existing prison to allow for shared resources. Nevertheless, as part of the associated pre-application discussions for this proposal, it was advised that information would be required, outlining the site selection process and criteria, including why other sites within the region were discounted, and the functional/ operational reasoning for selecting this site. This justification is pertinent to the determination of this application in order for the Local Planning Authority to consider whether there are any material considerations which indicate a decision other than in accordance with the development plan.
- 6.9 Within the supporting Planning Statement, it is advised that the proposed new prison is targeted to meet demand in the South East of the country and *‘when considering surplus demand for prison places in a particular location, it needs to be considered together with the surrounding region. It is for this reason that the proposed site adjacent to HMP Grendon and HMP Springhill has been identified as a strategically valuable location for a Category C Resettlement prison in the South East. The data shows that without the prison, there will likely be a significant deficit of this cohort in several regions surrounding the Thames Valley region in which this prison would sit’*. The Planning Statement then goes on to state that land within the ownership of the MoJ alongside other government owned land was considered as well as

extensive market research which was undertaken by Cushman & Wakefield based on a set of mandatory, secondary and tertiary requirements. The mandatory requirements centred around the site have a minimum developable area of 12ha and the provision of at least one prison in each region (north & south) with the secondary requirements relating to matters such as the topography, accessibility, security, flooding and connection to utilities without unreasonable cost. The tertiary requirements largely relate to planning considerations such as brownfield site, heritage, ecological and public rights of way as well as matters such as recruitment, shape of the land and the manageability of the site.

6.10 The Planning Statement advises that on a national scale, several sites were shortlisted, and four sites were selected for further consideration as the others were discounted for reasons relating to the search criteria. Out of the four shortlisted sites only the application site is situated within the south region. It is advised that *'the proposed site satisfies many of the site search criteria and is situated in a region where substantial demand for additional prison places is expected. The site is already owned by the MoJ'*. Other than this basic summary as to why this particular site has been selected across the whole of the southern region, no further information has been provided to substantiate the results of this site selection process or that sufficient sites were considered and appropriately discounted. In an attempt to address Officers concerns with the lack of information explaining need for why the proposal specifically needs to be in this location, a covering letter was submitted with amendments in January 2022. Within this letter it advises *"building a new Category C prison in this location will enable MoJ to meet the needs of Category C Resettlement prisoners. Allocations to resettlement prisons are based on closeness to home to help individuals to prepare for release and resettlement into their community, through maintaining or improving their family and community ties. For example, in December 2020, 46 of 157 men residing at HMP Grendon, and 187 of 295 at HMP Springhill were within 50 miles of their origin address. HMP Grendon operates as a specialist therapeutic community prison and so origin addresses are more varied. In December 2020, 18,527 prisoners had an origin address within 50 miles of HMP Grendon and HMP Spring Hill, including 17,846 male and 681 female. We would expect a significant number of prisoners at the proposed prison to be able to be resettled within a 50-mile radius"*. Whilst this does provide greater clarity on the importance of this region, a 50-mile radius is considered to be a fairly extensive search area and, limited information has been provided regarding the consideration of other sites and why they were discounted to ensure that appropriate regard has been given to all possible sites.

6.11 Consequently, with the limited information provided, it is difficult for Officers to conclude that this is the most appropriate site to meet needs identified. Without this information, Officers do not consider sufficient weight can be attributed to the special circumstances of this site to overcome the in principle objection to the development due to the unsustainable location in the open countryside. In addition, there are a number of requirements within the search criteria which Officers are not convinced as to how the site has or can meet these. These will be discussed in greater detail below under the relevant sections of this report.

7.0 Employment issues

- 7.1 Paragraph 81 of the National Planning Policy Framework (NPPF) states significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The application was accompanied by a Socio-Economic Statement which considers the social and economic impact of the proposed development at the local level and for the wider region during the construction and operational phases of development.
- 7.2 Within the socio-economic statement it advises that during the construction phase, the prison *'could support the creation of 45 (net) temporary direction, Full Time Equivalent (FTE), jobs and generate £43.6 million (net) direct Grosses Value Added (GVA). This study also estimates that, in addition to these direct impacts, the construction of the Proposed Development could support a total of 16 (net) indirect and reduced jobs at local and regional level. It could also support an additional £13.1 million (net) indirect and induced GVA at local and regional level'*. Furthermore, it goes on to state that once operational, *'based on comparison data from the MOJ the proposed development could employ 519 staff employed directly at the prison; this data suggests that 487 of these could be undertaken by people residing within a 40-mile radius. The expenditure of the prison itself once operational could lead to a series of additional indirect impacts, including (11.4 million (net with inflation) indirect annual spend with (2.4 million (net with inflation) retained locally, and 197 indirect jobs, of which 39 could be expected to be undertaken by locally. There is also forecasted that supply-chain spend could equal (15.3 million (net with inflation) per annum in the region, supporting 256 jobs at a regional level. Further economic impacts could be expected to result from the expenditure of prison staff and visitors within the economy. These induced impacts could include (8.6 million (net with inflation) induced spend per annum with 25 induced jobs supported'*.

- 7.3 Within the supporting socio-economic statement, a methodology for the findings has been provided to demonstrate how the calculations and conclusions have been reached.
- 7.4 Consequently, the Council has no reason to dispute the figures and conclusions which have been presented within this this statement and as such, the economic benefits derived from the scheme should be afforded positive weight.

8.0 Transport matters and parking

VALP: T1 (Delivering the sustainable transport vision), T2 (Supporting and Protecting Transport Schemes), T3 (Supporting local transport schemes), T4 (Capacity of the transport network to deliver development), T5 Delivering transport in new development), T6 (Vehicle Parking), T7 (Footpaths and cycle routes) & T8 (Electric Vehicle Parking)

- 8.1 The application was accompanied by a Transport Assessment (TA), an Outline Travel Plan (OTP) and a Highways Technical Addendum. The proposed development seeks the erection of a new Category C, resettlement prison with a capacity of up to 1,468 adult males on land adjacent to the existing prisons (HMP Springhill & Grendon) and based on a prisoner to staff ratio of 0.5, there will be up to 734 uniformed and non-uniformed staff at the site.

Sustainability and Travel Plan:

- 8.2 The site is not in a very accessible and sustainable transport location. The limited opportunities available for undertaking trips by sustainable transport modes are reflected within the 80% car driver/passenger in the Census 2011 Journey to Work data. There are limited opportunities for staff trips to be undertaken by public transport, and those members of staff working late shifts are unlikely to walk, cycle, or use public transport and this is acknowledged by the applicant. Whilst the applicant notes that there may be scope for some staff to live in the local area, and walk to and from the prison, shift patterns mean this is unlikely for safety and security reasons. Despite requests from Officers, the applicant has advised that, it is not possible to provide evidence from existing Ministry of Justice sites, because the origin and destination data for staff at existing HMP sites is sensitive and confidential. The origin and destination data for visitors is also sensitive and confidential. For security reasons, the Ministry of Justice will not release data which potentially identifies where a visitor or staff member lives, and how they travel. Staff requirements and shift patterns can vary between prisons, and even if the information was available, it would not necessarily be reflective of how the new prison is going to operate, and visitor travel patterns vary between each prison and inmate. Nevertheless, an assessment has had to be made by

Officers on the information available. With this in mind, the Local Highway Authority can only conclude that very few staff and visitors would live locally, and potentially walk to and from the new prison.

- 8.3 The initial comments received from Local Highway Authority made an assumption about the size and type of development and concluded that such development would generally be located in less accessible and sustainable transport locations such as this. Since providing these initial comments, the Local Highway Authority has undertaken further research in respect of other category C prisons. As part of this research, it was found that these other prisons were more sustainably located, with one on the edge of an industrial area and another having a wide residential catchment serving this prison, and pedestrian infrastructure and lighting in the surrounding area. Furthermore, both of these other prisons have bus services to nearby train stations. Thus, demonstrating that more suitably located sites are achievable for a development of this nature.
- 8.4 There are footways which extend along the front of the site in both directions to Grendon Underwood and Edgcott respectively, alongside Grendon Road. Whilst these settlements can be reached within acceptable walking distances, these offer limited origin and destination for trips to and from the entrance of the proposed new prison and other locations are too far afield on-foot. The width of the route which runs along Grendon Road measures between 1m to 1.2m and is unlit. Owing to the narrow width, unlit and relatively isolated nature, this route would unlikely be used for those visiting or working at the proposed prison. Even if it were to be possible to provide lighting along this footpath, without causing undue harm to the character and appearance of this rural location, this would not overcome the conflict with Manual for Streets 2007 which generally recommends a minimum unobstructed width for pedestrians of 2m. Given the narrow width of the footpath, oncoming pedestrians (including those with pushchairs and wheelchairs) would, for large parts of the routes, be forced into the highway or onto grass verges. This would either lead to inconvenient movements or lead to unacceptable high safety conflicts. For these reasons and the footway being adjacent to a busy 40mph road it is considered that these factors are not conducive to walking. More fundamentally, given the location of the proposed prison very few trips to and from the prison would be on foot.
- 8.5 Cycling is an option for journeys further afield, including Calvert, Marsh Gibbon, and Kingswood, however there is no formal cycle infrastructure provision along these routes, and therefore cycle journeys would be undertaken on the local highway network. The Council's

Travel Plan Officer has requested that as the site is close to a planned section of the Buckinghamshire Greenway cycle route, the applicant should link into this to encourage more cycling. In the event that this planning application is supported, this could be explored. Whilst this may help encourage cycling, there are limited locations within a reasonable 5km cycling catchment, and this prison is likely to draw specialist staff and visitors from far afield. The number of cyclists is likely to be very low. It is a policy requirement for cycle parking to be provided for those who may wish to cycle.

- 8.6 Grendon Road is currently served by the number 16 bus service which runs between Aylesbury and Marsh Gibbon with a frequency of approximately 9 services per day towards Aylesbury and 2 services per day towards Marsh Gibbon, Monday to Friday. The service also runs on a Saturday at a reduced frequency. There are two existing bus stops located outside the site access on Grendon Road and these are around 600m walk from the entrance to the proposed prison which is a similar distance for HMP Grendon and Springhill.
- 8.7 The existing Aylesbury bound bus stop located outside Willow Lodge may have to be relocated due to the proximity to the proposed site access, and the potential conflict between vehicles associated with the proposed development and buses stopping along Grendon Road to allow passengers to board and alight. The relocation of the bus stop will need to be agreed by the Council's Passenger Transport Team. The Passenger Transport Team has advised that the Aylesbury bound bus stop, which has an older shelter, and which is presumably Parish Council owned should be replaced. A financial contribution of £20k should be sought, including £7k for a new bus shelter, £3k for raised kerbs, and £10k for Real Time Passenger Information (RTPI). On the opposite side of Grendon Road, there is a small area of hard-standing right on the apex of the bend and immediately opposite the entrance to the existing prison. It is suggested that this is relocated opposite the Aylesbury Bound bus stop, as it is unlikely that two buses would meet, though the position of both bus stops and the new access will require further consideration. New hard-standing should be provided, and also dropped kerbs and footway to enable pedestrians to cross to and from the bus stop. The footway may need to extend northwards to the existing gateway feature where the road is narrower for pedestrians to cross.
- 8.8 Whilst the above enhancements would be of some benefit to bus passengers, this does not overcome the issue that bus services are limited. The Passenger Transport Team has commented that existing bus services provide a limited hourly service throughout the day, and that this is due to be revamped, and it is likely that a reduced frequency will be introduced

shortly due to reliability issues. At present, there is a temporary bus timetable, and there are generally only two bus services a day passing the site. This is due to temporary road closures which may be temporary for the next two to three years, as they are associated with HS2 (Highway Speed 2) and EWR (East West Rail). In the long-term, it is unclear what impact HS2 and EWR and associated weight restrictions on existing roads will have on bus routing. Also, whilst the Council recently published a Bus Service Improvement Plan in November 2021, there is unlikely to be sufficient funds to make meaningful changes and improvements to existing bus services serving Grendon Underwood and Edgcott. There is a desire for more use of public transport within the Travel Plan, however what currently runs is unlikely to meet the needs of the new prison, as for example, there is no bus which would enable staff to arrive between 7am and 8am. Current bus services operate between Aylesbury and Marsh Gibbon via Waddesdon, Quainton, and Steeple Claydon, although the connection with Aylesbury which has a train station may provide some opportunity for visitor travel.

8.9 The Passenger Transport Team has advised that a financial contribution of £194k to be used towards two years funding for an extra bus, 10 hours a day, 6 days a week could be sought to increase bus frequency. The nearest train station is Bicester Village, so the funds could either change the no. 16 service, or provide a new service to Bicester Village to make that link, which could also boost transport from other local villages. Whilst a financial contribution towards public transport may encourage and promote public transport use to and from the prison, it is unclear how many staff and visitors would use the bus, and whether there would be sufficient usage to warrant a continued service, and consolidate the service so that it would be commercial. Alternatively, demand response passenger transport might be an option, although a commitment from the applicant to provide this would be required. The conclusion of the assessment is that the existing bus services are inadequate to serve the proposed prison, and at present, the Local Highway Authority is not convinced that the potential options are robust.

8.10 Notwithstanding the above concerns in respect of the site's sustainability, the application was supported by an Outline Travel Plan which has been reviewed by the Council's Travel plan Officer who felt the Travel Plan was well thought out and provided some good measures to reduce single occupancy car use. However, if the application were to be approved, additional information would be required in respect of the Travel Plan which could be secured via a condition. A £5k Travel Plan monitoring fee, details of the Travel Plan Coordinator, and a copy of the Travel Information Pack can be secured via section 106 obligation, in the event that

planning permission is granted. In addition, if the application is supported, then cycle parking will need to be lit, covered, and secure, and showers and changing facilities should be provided to encourage staff to cycle. The Travel Plan is a live document, which will be monitored and additional measures may be required to reduce single occupancy car use by 10%. However, as outlined above, whilst it is acknowledged that some good measures are proposed to reduce single occupancy car use, the measures contained would not overcome the wider sustainability issues with the site as a travel plan is only one element of the sustainable transport considerations for the site. Consequently, the Local Highway Authority continue to raise concerns with the overall sustainability of the site itself.

Trips and Traffic Impacts:

- 8.11 Given the proposed use is not included within TRICS, the Local Highway Authority is satisfied that potential traffic generation identified within the TA is based on information used in previous applications for HMP sites. Based on the information provided by the Ministry of Justice, it is assumed that staff will arrive and depart throughout the hour before and after their shifts start due to operational processes, staff usually have a longer lead in time to allow for security checks and shift hand-overs. Therefore, it is estimated that staff will arrive between 07:00 - 08:00 and leave between 17:30 - 18:30 for main uniform shifts, and arrive between 07:30 - 08:30, and leave between 16:30 - 17:30 for the early non-uniform shift.
- 8.12 Journey to Work data from the 2011 Census has been used to understand which modes of transport will be used by staff and visitors. The data has been interrogated and based on the existing modal splits which reflect the existing sustainable transport options, and the limited opportunities for trips to be undertaken by public transport. These modal splits have been applied to daytime staff but have been amended for those working late shifts as it is considered that these staff are not likely to walk, cycle, or use public transport. For visitor trips and legal visits, it has been assumed that all trips will be made by private car.
- 8.13 The visitor trip rates are based on the two visits per months allowance for prisoners in a Category C Prison and on an assumption that visits are spread evenly across the month, this could equate to 98 visits per day. The visiting periods are as follows:

Day	Visiting Periods	
Monday	09:30 – 12:30	14:30 – 16:30

	(2x 90 Minute Slots)	
Tuesday	09:30 – 12:30 (2x 90 Minute Slots)	14:30 – 16:30
Wednesday	09:30 – 12:30 (2x 90 Minute Slots)	14:30 – 16:30
Thursday	09:30 – 12:30 (2x 90 Minute Slots)	14:30 – 16:30
Friday	09:30 – 12:30	17:00 – 19:00*
Saturday	09:30 – 12:30 (2x 90 Minute Slots)	14:30 – 16:30
Sunday	09:30 – 12:30	17:00 – 19:00*

****Please note, this evening visit takes place twice a week and could be on any day and not necessarily on the days shown. It has been shown for these days for ease of reference.***

8.14 It is assumed that daily visits are spread evenly across these visiting periods, with each prisoner being visited by a maximum of three people. It is assumed that the visitors of each individual prisoner will all travel together, generating a single visiting trip. It is further assumed visitors will arrive in the hour before the start time of the visiting period. In addition, there will also be ad-hoc legal visits utilising five legal visit rooms; however, these trips are unlikely to generate material traffic volumes or occur during the peak hour. Nevertheless, for robustness these trips have been added to the visitor trips. The Local Highway Authority is satisfied with these assumptions as they are based on prison regulations.

8.15 The estimated trip distribution for the proposed prison was derived using Census 2011 Journey to Work data for journeys to Middle Layer Super Output Area (MSOA) Aylesbury Vale 010 and the trip distribution was calculated using online journey planning software to determine which route a vehicle would take from each MSOA along the local highway network to the proposed prison. The resultant distribution used in the assessments is 20% along Perry Hill, 33% along the A41 (West) and 47% along the A41 (East). The applicant notes that there is the potential that some car trips generated from staff at the prison would use Main Street, Grendon Road to access the A41, however it is considered robust to assume that all staff and visitors will use the A41/The Broadway Junction to access the A41. The Local Highway Authority is satisfied with the methodology for the trip generation, trip distribution, and traffic assignment associated with the proposed prison.

8.16 It is forecast that the proposed development would generate 192 and 217 two-way vehicular trips during the development AM and PM peak hours respectively. The vehicle trips have been determined using existing travel characteristics for the local area, so reflect the current options for journeys undertaken by sustainable transport at this location.

8.17 The traffic impacts of the proposal are assessed within the supporting TA where it is acknowledged that due to COVID-19 it has not been possible to undertake recent traffic surveys. Consequently, the applicant has used traffic count data from East West Rail Phase 2 (EWR2), collected between 2015 and 2019 and applied traffic growth factors extracted from TEMPro v7.2 to the traffic count data to establish a 2020 baseline and a 2025 future baseline which the Local Highway Authority considers to be acceptable.

8.18 EWR2 and High Speed 2 (HS2) have permission to use the local highway network in the vicinity of the proposed prison. The construction traffic associated with both EWR2 and HS2 has been included in the baseline traffic flows used in the traffic assessments even though the construction programme for both EWR2 and HS2 indicates that the construction works at this location will be completed by 2025. In addition, the Local Planning Authority are aware of emerging proposals to expand the existing HMP Springhill and whilst this would be subject to a separate future planning application, it has been included within this assessment for sensitivity test purposes only.

8.19 The following scenarios have been used to assess the impact of the development during the AM Peak (07:00 - 08:00) and the PM Peak (17:00 -18:00):

- **2020 Baseline:** Traffic count data factored to 2020. EWR2 and HS2 construction traffic added.
- **2025 Opening Year without Development:** Traffic count data factored to 2025.
- **2025 Opening Year with Development:** Traffic count data factored to 2025. Proposed prison development traffic added.
- **2025 Cumulative with Development (Sensitivity Test):** Traffic count data factored to 2025. Proposed prison development traffic added. Proposed HMP Springhill expansion traffic added.

8.20 The Local Highway Authority raised a number of queries regarding the traffic assessment which had been initially submitted and therefore to address this, a Highway Technical Addendum was submitted. Within the Addendum, it explains that the stand-alone junction capacity assessment in the Transport Assessment (TA) takes into consideration the impact of

the development proposals during the morning peak (07:00 – 08:00) and the evening peak (17:00 – 18:00). These time periods have been determined by the daily flow profile presented in the Highways Technical Addendum, which demonstrates that the network peak hours in 2019 were 07:00 – 08:00 and 17:00 – 18:00 consistent with the peak hours of the proposed development (as outlined within the TA). Furthermore, when you calculate the combined peak, taking into consideration the impact of the development proposals on the local highway network, the peak hours are 07:00 – 08:00 and 17:00 – 18:00.

8.21 The TA includes a capacity assessment of the new site with Grendon Road which confirms that it would operate satisfactorily in all of the 2025 assessment scenarios, with no queuing anticipated. The results of the standalone junction capacity modelling demonstrate that the A41/The Broadway junction already operates over acceptable thresholds of capacity in the 2020 Base during the AM peak with an Ration Flow to Capacity (RFC) of 1.11. The performance of the junction is forecast to reduce in the 2025 Opening Year with Development. The cumulative scenario indicates that if the proposed expansion to HMP Springhill occurs in addition to the proposed Category C Prison, then the performance of the A41/The Broadway junction is further reduced.

8.22 A 2026 junction capacity assessment has been undertaken for the proposed site access and this access is forecast to operate within acceptable capacity thresholds in 2026. The A41 / The Broadway Junction has also been reassessed for 2026, and the modelling demonstrates that this junction operates over acceptable capacity thresholds in 2026, without development. The junction performance is forecast to further reduce in 2026 with development. This matches the conclusion of the TA and therefore the highway mitigation improvement scheme presented in the TA is still proposed. The stand-alone junction capacity modelling indicates that the proposed highway mitigation improvement scheme at the A41 / The Broadway Junction would reduce the impact of the development proposals, and provide a comparable junction performance to the 2026, without development scenario.

8.23 In accordance with requests from the Local Highway Authority, a stand-alone junction capacity assessment for the Edgcott Road / Main Street Junction was undertaken given that 80% of development traffic passes through this junction. The modelling indicates that this junction is forecast to operate within acceptable capacity thresholds in all assessment scenarios. The Local Highway Authority has therefore advised that they are satisfied with the assessments and the outcomes.

Highway Mitigation:

- 8.24 The junction capacity modelling demonstrates that the proposed prison could further exacerbate the performance of the A41/The Broadway Junction and that mitigation is required. It is noted that the applicant engaged in pre-application scoping discussions with the Highway Authority, and that the Highway Authority did not support the applicant's proposed signalisation of the A41/The Broadway Junction. This was due to the introduction of additional delay for vehicles travelling along the A41 and that vehicle speeds along the A41 are likely to be too high for a signalised junction.
- 8.25 The results of the junction capacity modelling for the A41/The Broadway Junction demonstrate that the capacity issues are associated with vehicles trying to access the A41 from The Broadway. In addition, the TA includes an assessment of collisions on the surrounding highway networks within the past five years which is the adopted industry approach. This analysis indicates that all the collisions at the A41/The Broadway Junction involve a vehicle turning out of The Broadway onto the A41 and coming into conflict with another vehicle on the A41.
- 8.26 The applicant has proposed a highway mitigation improvement scheme at the A41/The Broadway Junction. The proposed highway mitigation improvement scheme includes:
- Minor layout adjustments and localised widening along The Broadway to enhance the operational capacity of the existing junction layout.
 - An extension to the existing dedicated right-turn bay along the A41 to increase the existing storage capacity for right-turning vehicles.
 - The introduction of high-friction surfacing and renewed carriageway lining.
 - The removal of vegetation to the west of the junction to improve the visibility from The Broadway.
 - The introduction of advanced directional signage.
- 8.27 Further standalone junction capacity modelling indicates that the proposed highway mitigation improvement scheme at the A41/The Broadway Junction would reduce the impact of the development proposals and provide a comparable junction performance to the opening year without Development scenario. Also, the introduction of physical mitigation measures should improve highway safety at the junction. In addition, the proposed highway improvements at the A41/The Broadway junction would not introduce any additional delay

along the A41 mainline which is considered part of the principle road network within Buckinghamshire.

8.28 Whilst it is acknowledged that the junction scheme aims in part to improve highway safety, these are changes to a classified principle road junction and therefore the Local Highway Authority requested a Stage 1 Road Safety Audit (RSA) of the proposed alterations. The independent Stage 1 RSA along with a Designers Response was submitted as part of this application. The RSA raises concern that insufficient driver information could result in confusion and hesitation, increasing the likelihood of shunt type collisions, and that insufficient offset of signage could increase the likelihood of vehicles striking signs. The Local Highway Authority is satisfied that the Designers Response addresses these concerns, and that these matters can be addressed via detailed design as part of a highway legal agreement. The Local Highway Authority has therefore advised that the proposed junction improvement is considered acceptable in operational and highway safety terms.

8.29 The proposed development will generate additional traffic along Edgcott Road, Grendon Underwood. The Local Highway Authority have therefore requested financial contribution towards the feasibility and implementation of a traffic calming scheme along Edgcott Road, to the west of Grendon Underwood, to mitigate the traffic impacts of the proposed prison. Chicanes and priority systems similar to those through Edgcott should be explored, and a financial contribution of £50k would be required for a feasibility study, statutory public consultation, and the implementation of a traffic calming scheme along Edgcott Road, Grendon Underwood, in the event that the planning application is approved.

Access:

8.30 The proposed development is located off Grendon Road, a classified C-road, and a new access is proposed to serve the new prison approximately 70m north of the existing access to HMP Grendon and Springhill and 30m south of the give-way gateway feature entering Edgcott. Visibility splays of 2.4m by 82m are achievable in either direction of the access, in line with the requirements where a 40mph speed limit is in place, and the proposed access caters for two-way traffic. Footways are also proposed to either side of the new access to tie-in with the existing footway on the eastern side of Grendon Road. In addition, there been no recorded collisions along Grendon Road in the vicinity of the proposed access, in the past five years, and the proposed access would not create conflict with the give-way gateway feature or the existing access to HMP Grendon and HMP Springhill.

- 8.31 Notwithstanding the above, the Highway Authority has a presumption against new accesses onto classified roads and there is also a highway ditch across the site frontage. As part of their initial comments, the Local Highway Authority requested justification for the new access and an explanation as to whether the existing access serving HMP Grendon and Springhill could be used to serve the new prison is required. In addition, the proposed access has been designed to cater for a 16.5m long articulated vehicle and incorporates a pedestrian refuge across the access due to the access width. The proposed access is over-engineered compared with the existing access serving the adjacent prisons and therefore clarification was also sought in respect of the largest vehicle using the access and that the access is scaled down. Furthermore, it is acknowledged that the proposed new access would impact a public right of way, however the assessment of this impact has been deferred to the Council's Rights of Way Officer and will be considered elsewhere within this report.
- 8.32 In response to these concerns, the applicant advised that it is not possible to utilise the existing access serving HMP Grendon and Springhill for non-highway and operational reasons, and that a new separate access is therefore required.
- 8.33 An independent Stage 1 Road Safety Audit (RSA) of the new access was undertaken. The RSA raises concern with the proximity of the new access to the give-way gateway feature entering Edgcott, specifically, that collisions may occur between vehicles turning right to exit the access and vehicles waiting to enter Edgcott village. Also, insufficient forward visibility towards vehicles turning right into the new access off Grendon Road, increases the likelihood of shunt type collisions. In addition, the RSA highlights that access for a 16.5m articulated vehicle is tight.
- 8.34 The supporting Designers Response to the RSA notes that the volume of traffic turning right out of the proposed prison access will not generate conflict between vehicles waiting to enter Edgcott at the traffic-calming. Also, sufficient forward visibility towards vehicles turning right into the new access off Grendon Road can be achieved within highways land to comply with highway requirements. In addition, the kerb-lines of the proposed site access could be adjusted via detailed design as part of a highway legal agreement. As such, the Local Highway Authority is satisfied that a suitable access arrangement including the requisite visibility splays and constructed to highway standards can be secured by planning condition, and via detailed design as part of a highway legal agreement.
- 8.35 Grendon Road provides access to the village of Edgcott to the north, the village of Grendon Underwood to the south and also the A41, and the majority of traffic (80%) is likely

to travel to and from the prison along The Broadway and the A41 based on Census 2011 Journey to Work data. Grendon Road/Edgcott Road/The Broadway are wide enough to accommodate two-way traffic, a 30mph speed limit is in place as the road passes through Grendon Underwood and there have been no fatal or serious collisions along this road, in the past five years. As such, the Local Highway Authority have confirmed that this route could cater for the additional traffic associated with the proposed prison without adverse highway safety impacts.

Site Layout:

8.36 The Local Highway Authority is satisfied that the vehicle tracking of the internal layout provides acceptable access, manoeuvring and turning for a maximum 16.5m articulated vehicle (mobile health scanner).

Parking:

8.37 Policy T6 of VALP states that all development must provide an appropriate level of car parking, in accordance with the standards set out in Appendix B. Policy T6 goes on to state that if a particular type of development is not covered by the standards set out in Appendix B then the following criteria will be taken into account in determining the appropriate level of parking:

- a. The accessibility of the site, including the availability of public transport, and
- b. The type, mix and use of development
- c. Local car ownership levels
- d. Security and public realm
- e. Provision for both on street and off street parking where appropriate

8.38 The proposed use of a prison is not covered within the standards set out in Appendix B of VALP. The proposal is to provide a total of 454 parking spaces to serve the proposed development. Dedicated parking areas providing 374 staff spaces and 57 visitor spaces and 23 disabled spaces are shown. The level of provision shown is based on evidence from other similar facilities and takes account of the availability of existing public transport and the existing travel characteristics at this location. Specifically, operating /visiting times have been used to determine the arrival and departure times of uniform staff, non-uniform staff, and visitors, and overlapping during shift changes to inform the potential parking accumulation within the site. This analysis indicates that the maximum car parking accumulation is 430 vehicles. In the light of this and given parking standards do not set out specific requirements

for a prison, the Local Highway Authority is satisfied with the approach which has been taken. The proposed parking plans include 23 dedicated car sharing spaces and 45 electric vehicle spaces and the Technical Highways addendum advises that additional 44 electric spaces are to be installed as 'infrastructure only' to allow the charging station to be provided at a later date (if required). The provision of electric vehicle parking spaces to be provided from the onset is in excess of the Council's 4% requirement for electric vehicle provision. The addendum advises that the level of electric vehicle spaces is to maximise the sustainable travel opportunities for those traveling to the prison and to support the Department for Transport's 'Decarbonising Transport' Agenda. As such, this provision is considered to be acceptable to Officers and the Local Highway Authority.

8.39 In line with the parking standards contained within the newly adopted Vale of Aylesbury Local Plan (VALP), standard parking spaces of 2.8m by 5.0m are proposed, and the disabled spaces include additional transfer / clearance space. However, as outlined within policy T8 of VALP, electric vehicle charging spaces should be 3m by 6m. Had the Local Planning Authority sought to recommend approval for this application, amendments would have been sought to increase the parking dimensions for electric vehicles in accordance with policy T8 of VALP. The parking areas include a minimum of 6m of access/ manoeuvring space to provide acceptable access, manoeuvring and turning.

8.40 As part of the comments received from the Parish Councils, concerns were raised regarding the sufficiency of the proposed parking provision to accommodate the number of staff that would be on site at any one time, and that the car parking calculations do not appear to take account of the numerous indirect staff who are needed to run a prison. As part of their comment's references were made to other Category C prisons (HMP Berwyn and Five Wells). Whilst it is likely these other prisons are more sustainably located, both have greater numbers of prisoners. The Local Highway Authority has advised that the proposed provision of parking spaces is comparable with the other prisons referenced.

8.41 Like the vehicle parking standards, VALP contains no specific cycle parking requirements in respect of prisons. As advised within the supporting Transport Assessment, given there are no specific requirements within the local plan, a cycling accumulation has been undertaken to estimate the number of cycle parking spaces required on site. The cycle parking accumulation has been undertaken using the same methodology as the car parking accumulation. The maximum cycle parking accumulation for the site based on the number of cycle trips is 12 bicycles when considering the availability of public transport, and the existing

travel characteristics at this location. However, to encourage a modal shift towards sustainable transport it is proposed to provide 36 cycle parking spaces on the site. This was initially proposed to be higher and therefore the Local Highway Authority has advised that the Travel Plan should be amended, if approved, to include a mechanism to monitor cycle usage and increase provision as required. Given the Local Highway Authority were satisfied with this approach in respect of vehicle parking, it is considered appropriate to utilise the same method for establishing an acceptable level of cycle parking. On this basis, this cycle provision is considered to be acceptable subject to details which can be secured via condition.

- 8.42 Overall, the Local Highway Authority has confirmed overall they are satisfied with the approach which has been taken in respect of the proposed parking provision and considers that the level of parking proposed would not result in over-spill parking on the highway or result in highway safety issues. Furthermore, the Council's Travel Plan Officer welcomes the car sharing spaces, as it is a useful method of reducing single occupancy car use.

Construction Access:

- 8.43 A new temporary construction access is proposed located off Grendon Road to the north of Willow Lodge, and once the construction phase has finished, the temporary construction access will be converted into the operational site access. The construction access would not include the pedestrian refuge which would be installed for the operational site access and vehicle tracking has been submitted which demonstrates that the proposed construction access will adequately accommodate a 16.5m long articulated vehicle.
- 8.44 The applicant notes that they have appointed a Contractors Alliance who are in the process of reviewing the Construction Traffic Management Plan (CTMP) and will issue a copy of the document to Buckinghamshire Council once it has been reviewed. Whilst it would be useful to see the CTMP, particularly given the surrounding construction traffic for EWR and HS2, it is standard practice for a CTMP to be secured via pre-commencement planning condition, should this planning application be approved.
- 8.45 Overall, with regards to transport matters and parking, insufficient evidence has been provided to the Local Highway Authority to demonstrate that both staff and visitors to the prison are likely to live locally to be able to access the site by non-car modes either walking, cycling or public transport. The absence of adequate infrastructure and the sites remoteness from major built up areas means that there will be a reliance on the use of the private car

contrary to local and national transport policy. Whilst the proposal is considered to comply with policies T4, T5, T6 and T8 of VALP, the proposal fails to accord with policy T1 of VALP. This matter should be afforded negative weight.

9.0 Raising the quality of place making and design

VALP: BE2 (Design of new development), NE4 (Landscape Character and Locally Important Landscape) and NE8 (Trees, Hedgerows and Woodlands).

- 9.1 The outline application seeks approval for matters relating to access, layout and scale while landscape and appearance are matters reserved for later approval. The application site is situated within the open countryside and would cover a vast area of 29.5 hectares, wrapping round the northern, western, and eastern boundaries of the existing adjacent prisons (HMP Grendon & Springhill). The land predominately comprises pastoral fields and land associated with the existing adjacent prisons (HMP Springhill & Grendon). The proposed buildings vary in height from 3.2m to 17.26m, the tallest of which are the 6 houseblocks. In addition, associated development and infrastructure is proposed in the form of car parking, internal roads, perimeter fencing etc. The proposed buildings are largely to be located in the northern and eastern development parcels.
- 9.2 Whilst the proposed development is to be situated adjacent to existing prisons and a small housing estate once associated with the prisons, it is still very evident that the proposed development is situated in a rural setting with some sporadic development. The scale of the development is industrial in proportions appearing stark and at odds with the rural landscape. This impact is further exacerbated by the undulating topography of the site and surrounding area.
- 9.3 There are very specific operational and security requirements to the size, configuration, layout, and overall design of the proposal. Although appearance is a reserved matter, in reality, there is limited flexibility to influence the design and the proposal reflects a typical form of development. As such, the design is informed by compelling operational and security needs and as such a reason for refusal could not be substantiated on design alone, at this stage. Further consideration into the appearance of the buildings would take place as part of a future reserved matters application if permission were to be granted. In respect to this particular matter, the proposal is considered to accord with policy BE2 of VALP. This matter is therefore afforded neutral weight at this stage.

10.0 Amenity of existing and future residents

VALP: BE3 (Protection of the amenity of residents) & NE5 (Pollution, air quality and contaminated land)

10.1 The application was supported by a Noise and Vibration Impact Assessment and an Air Quality Assessment.

10.2 The application site is located within the open countryside adjacent to existing prisons (HMP Springhill and Grendon). Located to the south of the western development parcel, beyond the existing access serving HMP Springhill and Grendon is a small housing estate (Springhill Road) that was once associated with the existing prisons. Next to the entrance of the existing prison access also lies a single dwelling known as Willow Lodge. The majority of the proposed development, including the buildings, are to be located some distance from these residential properties as they are situated to the north and east of the existing prisons. The closest development parcel to these properties is the western parcel which comprises a new access, SuDS pond, football pitch, a running track as well as proposed new planting. Environmental Health have been consulted as part of this proposal and recommended a condition requiring appropriate mitigation for these residential properties given the proximity to the proposed sports pitches. Subject to this condition, the proposal is considered not to result in any significant adverse impacts to the occupiers of the Springhill Road housing estate or Willow Lodge.

10.3 The nearest property to the buildings associated with proposed prison is Lawn House whose nearest elevation is situated approximately 68m to the application boundary and circa 332m from the nearest building proposed. The proposed buildings serving the development are located on rising land to this neighbouring property with some of the buildings being situated on a high point within the landscape. Owls Barn, a residential property situated to the east of the eastern development parcel, where the tallest buildings (houseblocks) are to be located is situated approximately 180m from the application site. As such, it is likely that views of the proposal will be visible from Lawn House and Owls Barn as well as other residential properties within the locality, with wider views beyond. However, given the distances and the intervening landscaping, particularly in respect of Lawn House, it is considered that the proposed development would not result in significant adverse harm to the amenities of these neighbouring properties or any other residential properties. A further two conditions have been suggested by Environmental Health, the first being a condition requiring appropriate mitigation of the road traffic noise at Lawn House with the second

requiring the submission of a Construction Environmental Management Plan. Subject to these conditions, Environmental Health have raised no objection to the proposal. In conclusion the proposal is considered to comply with the requirements of policies BE3 and NE5. This matter is afforded neutral weight in the overall planning balance.

11.0 Flooding and drainage

VALP: I4 (Flooding)

- 11.1 The application was supported by a Flood Risk Assessment (FRA). The Environment Agency flood maps show the application site to be located within Flood Zone 1 thus having a low probability of flooding. In addition, the Infiltration SuDS Map provided by the British Geological Survey 2016, indicates that the water table across the site is variable. Groundwater levels within the low-lying areas anticipated to be within 3m of the ground surface and in groundwater monitoring locations across the, it is understood that standing water was encountered. As such, the proposed surface water drainage scheme for the site should be informed by site-specific ground investigation.
- 11.2 With regard to surface water, although the supporting FRA indicates that there are areas of potential surface water flooding towards the lower-lying margins of the site, the Environment Agency map– “The Risk of Flooding from Surface Water” illustrates that the site lies in an area of very low risk of surface water flooding (meaning there is less than 0.1% likelihood of flooding occurring in a given year). The Lead Local Flood Authority (LLFA) have confirmed that the site is at low risk of surface water flooding.
- 11.3 In respect of the proposed surface water drainage strategy, due to the local underlying geology it is anticipated that infiltration will not be possible. Therefore, it is proposed that surface water runoff from the impermeable areas will be disposed to the River Ray. This however will be subject to further consideration at a later date, if permission were to be granted, once infiltration rate testing has been undertaken to see whether any infiltration is possible. The surface water drainage scheme is split across two catchments due to the topography of the site, this means that there will be two outfall locations to the River Ray. The total runoff rate for the site has been found acceptable by the LLFA subject to revised greenfield runoff rate calculations as part of the detailed design of the proposed drainage scheme and utilising the most up to date information.
- 11.4 To achieve connections to the outfalls at the River Ray, the applicant will need to

undertake a sewer requisition to cross third party land. Consultation with Thames Water will be required under their powers as a sewage undertaker; however, evidence has been provided to confirm this approach.

- 11.5 In order to restrict the site to the acceptable discharge rates, storage will be required. Storage estimates have been provided for two drainage catchments and include climate change allowance events to demonstrate any flooding is safely contained on-site. At this stage, the required storage volumes are shown to be delivered in strategic basins and underground tanks. Within the western catchment there is a greater opportunity to incorporate a wide range of SuDS, such permeable paving, tree pits, bioretention areas around the car parking area. The strategic basin serving this location will have a permanent water level to aid water quality. Within the eastern catchment there is reduced scope for the inclusion of above ground SuDS features due to the use of this area. Instead storage will be provided under the MUGAs and where possible permeable paving used on low traffic roads within the development. The strategic basins for this catchment will be in the outer perimeter due to other site constraints.
- 11.6 The supporting FRA acknowledges that pollution control will need to be addressed at detailed design to ensure that adequate treatment of surface water runoff occurs prior to discharge.
- 11.7 Overall, the LLFA have raised no objection to the proposal subject to conditions requiring the submission of details relating to the final surface water drainage scheme and a whole-life maintenance plan. The proposal is considered to comply with the requirements of policy I4. This matter is therefore afforded neutral weight.

12.0 Landscape Issues/ Environmental issues

Buckinghamshire Minerals and Waste Local Plan (BMWLP): Policy 1 (Safeguarding Mineral Resources

Vale of Aylesbury Local Plan (VALP): BE2 (Design of New Development), NE4 (Landscape character and locally important landscape), NE5 (Pollution, air quality and contaminated land), NE7 (Best and most versatile agricultural land), NE8 (Trees, Hedgerows and Woodlands), C4 Protection of Public Rights of Way.

- 12.1 The application site occupies an extensive area extending circa 29.5hectares within the open countryside off Springhill Road in Grendon Underwood, wrapping round the northern, western and eastern boundaries of the existing adjacent prisons (HMP Grendon & Springhill).

The development site slopes to the east and west from a high point that forms a ridge along a north-south axis through the proposed development area and the existing prison site. The northern and eastern development parcels are very visible within the open countryside and form part of continuous open fields. Other than a single pocket of woodland situated east of Lawn House, the landscape is open with field boundaries containing low hedgerows and scattered small trees. The western part of the site is slightly more enclosed, being bounded by existing housing on Springhill Road to the south, Grendon Road to the west, a line of existing trees to the north (with another open field beyond), and the existing prison complex to the east.

12.2 The site lies in the 'zone of transition' between three landscape character areas. Most of the site itself lies in the southern extent of the 'Poundon - Charndon Settled Hills' (LCA 7.1), while to the immediate west across the Grendon Road lies the eastern edge of the 'Marsh Gibbon Vale' (LCA 8.1). The eastern part of the site dips into the north-western extent of the 'Kingswood Wooded Farmland' (LCA 7.4).

12.3 The proposed new Category C resettlement prison comprises:

- 6x houseblocks identical cross shaped buildings measuring 17.26m in height and are the tallest of the buildings proposed.
- ancillary buildings varying in height from 3.2m up to 11.8m in height.
- 12 buildings in total
- The buildings occupy pastoral fields in open countryside.

12.4 The application was supported by a Landscape and Visual Impact Assessment (LVIA). The purpose of the LVIA is to communicate a fair representative analysis of what the effects of the proposed development will be on the landscape character of the site and its landscape surroundings, and on representative visual receptors. The LVIA should be used to inform the design of proposals. The supporting LVIA has been reviewed by the Council's Landscape Architect and has concerns that the LVIA omits significant crucial information and appears to be downplaying the effects of the proposal. Furthermore, only a small handful of landscape receptors applicable to this application have been analysed resulting in unanalysed and unreported impacts of the proposal. It is also not clear as to whether the Zones of Theoretical Visibility (ZTV) have been extended to take account of long-distance views. The ZTV shows that the development will be visible beyond 3km from the site.

12.5 The proposed houseblock would be rigid in appearance, form and character, together with associated infrastructure, and sterile floodlit areas, would permanently change the site

from agricultural fields to a large imposing government prison institution. This change would be reasonably regarded as irreversible and adverse in nature when compared to the baseline of undeveloped, pastoral fields and would be incapable of mitigation. The change in character of the area would be exacerbated by the dominant unusual scale of the new built form, and in a style and character discordant with buildings in the surrounding character areas. Whilst it is noted that the proposal will be situated adjacent to the existing prisons, this proposed new groups of buildings is a much larger development in bulk and massing. Consequently, this proposal will have landscape and visual impacts that are significantly larger in magnitude than the existing prison buildings and compound.

12.6 Whilst the houseblocks, the tallest of the buildings proposed and the most unusual form, have been located just off the ridge in the landscape, they are still situated in a high point within the landscape and remain in one of the most prominent and visually exposed locations on the site. The landscape character effects would therefore extend far beyond the site within much of its potential visual envelope as it would introduce tall institutional urban buildings into a rural landscape clearly separated from the adjacent village. This character change would impact on the character of the LCA within which the site is located and those that extend into this visual envelope. Whilst these character impacts are experienced visually, it is important to note that these are separate in assessment terms from the 'visual impacts' of the proposed development that are considered as part of the visual impact assessment.

12.7 The proposed development lies in a landscape characterised by ongoing and anticipated changes. The Energy from Waste Plant is a recent development and a dominant feature in the landscape; ongoing development is also taking place nearby with HS2, and there is currently a planning application for the Calvert solar farm. These are all urbanising features, and with the prison blocks would combine to have a large scale and semi 'industrial' character and contribute cumulative landscape effects to this area. Some of the developments identified above fall into views of the proposed development site and the cumulative visual effects of these existing/proposed developments should have been considered as part of the LVIA.

12.8 Notwithstanding the potential for mitigation, which is very limited, it is clear that users ('receptors') of the footpaths and bridleways to the north, east and south of the site that have views onto and over the site would clearly perceive the introduction of 17.26m high house blocks which are stark in appearance in what is currently open fields. The proposed houseblocks, including the majority of the ancillary buildings would be significantly taller in

height than the majority of built development within the locality. This impact is further exacerbated by the typography of the site and the proposal being situated on a high point within the landscape. This change to the visual baseline for these sensitive receptors would be of sufficient magnitude to result in major adverse changes to their visual amenity. Similar levels of adverse impacts would also be experienced by users of the Lawn Road and potentially by nearby residents.

12.9 The supporting LVIA in respect of the landscape and visual effects concludes that ‘the vast majority of likely effects, as concluded in the LVIA, are not significant. There are only limited instances where those effects are considered to be significant’. This conclusion is in direct conflict with the findings outlined within the LVIA, whereby Table 10 which summarises the Landscape Effects during construction, operation, and year 15 show moderate to major effects. Furthermore, Table 11 provides a summary of the visual effects of 21 viewpoints during the same periods with 43 scenarios showing moderate or major effects. Consequently, these findings clearly show that these are significant effects. For visual effects it is hard to see the true impact of the building mass on the viewpoints when there are no wireline images for Viewpoints 4,7,9-12, 14, 16-21. These wireline images would show some of the most major adverse impacts on views for recreational users of footpaths and local residents, but they are not available to see. This is a major omission of the LVIA as the effects would be major and adverse for these views.

12.10 The Council’s Landscape Architect has therefore advised that notwithstanding the potential mitigation, which has already been identified as very limited, the proposed development would give rise to major permanent adverse landscape character and visual impacts of a scale that would be contrary to policy. The character and scale and uniform dominant massing of the new buildings is discordant with the typical character and size of built form in the area, even taking into account there are some lower prison blocks visible currently on adjacent land. This development would have a significant urbanising effect on the character of the surrounding landscape and have additional urbanising effects cumulative with other nearby developments which also have failed to be considered as part of the supporting LVIA. The proposal is contrary to policy NE4 and negative weight therefore must be attributed to this matter.

Mineral Safeguarding:

12.11 Over half of the western development parcel, nearest Grendon Road falls within the

Minerals Safeguarding Area. Policy 1 of the BMWLP (2019) requires a Minerals Assessment to accompany non-minerals development. This application is not supported by a Minerals Assessment. In the absence of a Minerals Assessment, the development has failed to demonstrate it would not sterilise mineral resources at this site. The proposal is contrary to policy 1 of BMWLP and as such negative weight therefore must be attributed to this matter.

Contaminated Land/ Air Quality:

- 12.12 The application was supported by a UXO Desk Top Survey (explosive ordnance), containing a risk mitigation strategy which should be executed during all Phases of the project. An informative to this effect should be included, if permission were to be granted.
- 12.13 A Combined Geotechnical and Ground Contamination Risk Assessment was submitted with this planning application which concludes that potential sources of contamination were identified as being present at the site and as part of the risk assessment, an intrusive ground investigation was conducted. The investigation did not identify any evidence of widespread contamination, however the presence of asbestos fibres was found in one of the ponds which had been backfilled on site. As such, there is a potential this may also occur in the location of the other backfilled ponds on site and demolished buildings. Whilst this has been identified, the Council's Environmental Protecting Officer agrees that such materials would only pose an unacceptable risk to end users of the site where end users could come into contact with the underlying soils. If covered by some form of hard-surfacing then no pollutant linkages would be present. Consequently, if permission were to be granted, a condition would be required to secure contaminated land assessment and associated remedial strategy, together with a timetable of works. This will ensure further works are carried out targeting any proposed soft landscaping which appears to be within or close to the inferred location of the former ponds and demolished buildings along the northern part of the site. If no such soft landscaping is proposed, then no further assessment or investigation would be considered necessary.
- 12.14 With regard to air quality, the application was supported by an Air Quality Assessment. As outlined previously, this assessment identified during the construction phase the activities, together with the location of nearby sensitive receptors would result in a high risk impact on air quality from dust. To ensure this impact is suitably mitigated, a Construction Management Plan would be required and secured via a condition.
- 12.15 Once operational, the supporting modelling has indicated that the impact of the development traffic on air quality is considered to be negligible at all receptor locations.

Concentrations at the proposed prison buildings would be expected to meet all relevant National Air Quality Objectives. Air quality at the site would therefore be suitable for the proposed development without the need for mitigation, however this would be subject to the final details. Given this application seeks outline consent with a several matters reserved, the detailed design has not been finalised at this stage. If permission were to be granted, at reserved matters stage, it would be necessary to impose a condition requiring an assessment of potential air quality impacts in the event large scale combustion plants or similar are to be proposed.

- 12.16 Overall, in respect of air quality and contaminated land, subject to the suggested conditions the proposal is considered to comply with policy NE5 of VALP. This matter is afforded neutral weight.

Agricultural Land Quality:

- 12.17 Policy NE7 of the VALP (2021) seeks to protect the best and most versatile farmland for the longer term. The Natural England Agricultural Land Classification (ALC) defines the Best and Most Versatile (BMV) agricultural land as grade 1, 2 and 3a with lower grade land at 3b, 4 and 5 defined by wetness and gradient of the land. Development of BMV land (1,2 and 3a) should be avoided and development directed towards land of lower grades 3b, 4 and 5.
- 12.18 The application was not supported by an Agricultural Land Classification report. Within the supporting Planning Statement it advises that the DEFRA Spatial Map confirms most of the site, land within the northern and eastern parcel as Grade 4 (poor quality) with land within the eastern parcel (not currently used for agriculture) is identified as Grade 3 (good to moderate quality). It would appear that an error has been made in the Planning Statement and that one of the references to the eastern parcel should in fact be a reference to the western parcel.
- 12.19 Whilst the Local Planning Authority would have expected an application of this scale to be supported by an Agricultural Land Classification report, Officers have reviewed Natural England's Agricultural Land Classification Maps which appear to largely be consistent with the findings outlined within the supporting Planning Statement. Following a review of Natural England's Agricultural Land Classification Maps it would appear that it is the western development parcel which has been classified as Grade 3 'Good to Moderate'. Without the submission of an Agricultural Land Classification report Officers are not able to determine this area's specific category to distinguish whether the western development parcel

comprises of Grade 3a land or lower grade 3b land. Without evidence to the contrary, the Local Planning Authority will have to assume worst case scenario in that the western development parcel does constitute the best and most versatile agricultural land. In accordance with policy NE7 of VALP 'Where development involving best and more versatile agricultural land (Grades 1, 2 and 3a) is proposed, those areas on site should be preferentially used as green open space and built structures avoided'.

12.20 The western development parcel is shown to comprise of a SuDS basin, proposed football pitch and a new access serving the development, of which a large area is to be retained as green open space with soft landscaping. The majority of the built structures associated with the proposal are to be located on the north and eastern development parcels. While structures are not avoided in their entirety on the western parcel, as advised by policy NE7, they are considered to be limited and therefore a reason for refusal could not be sustained on this particular matter. Nevertheless, limited negative weight should be afforded to this matter.

Trees & Hedgerows:

12.21 As the layout and access are fixed at this time, the impacts to trees and hedgerows can largely be determined, however utilities and service connections have potential to cause harm. It is noted that a detailed Arboricultural Impact Assessment in support of this application shows 9 individual trees and 1 group of trees require removal, with a further 4 groups requiring partial removal as a result of the proposal. Of the trees to be lost, 3 individual trees are Category B with all others being Category C. Of the retained trees, no pruning is required, and the root protection areas (RPAs) will remain largely unaffected other than for the provision of an acoustic screen within the RPA of an individual tree identified as T4 and a group of trees identified as G3. Furthermore, 4 hedgerows are to be removed in order to accommodate the proposal.

12.22 Even though landscaping is a matter which is reserved at this stage, new planting has been referenced in the Arboricultural Impact Assessment (AIA) and shown indicatively on the plans. However, the landscaping shown other than the proposed hedgerow and woodland screening along the perimeter of the eastern development parcel is largely to the west of the site, whereas the removals are predominately to the north and east. Overall, the Council's Arboricultural Officer has advised that there is scope for commensurate or greater replanting in terms of numbers, but in terms of value and proximity to the trees to be removed there is

less clarity at this stage. If planning permission were to be granted, any future detailed landscaping scheme would need to show commensurate replacement provisions for the trees lost and demonstrate the planting is feasible and likely to establish. Future details should also include details of service connections and utilities and be supported by a revised AIA or an addendum to reflect this. Given the proposed new planting is indicative at this stage with limited detail, final conclusions in respect of this matter cannot be drawn at this stage. Consequently, the Council's Arboricultural Officer has raised no objection subject to conditions securing this additional information as part of any future reserved matters application if permission were to be granted. At this stage, this matter should be afforded neutral weight.

Public Rights of Way:

- 12.23 Within the application site there are two footpaths, GUN/16/1 which is situated to the west of the western development parcel which extends diagonally from Grendon Road beyond the existing access serving the existing adjacent prisons. The remaining footpath within the site, GUN/17/1 is situated towards the eastern boundary of the western development parcel. Furthermore, there are a series of footpaths within the immediate vicinity of the site. The Council's Strategic Officer does not envisage any of the existing rights of way network will be used for employees to walk or cycle to work, therefore no improvement to the network would be sought, if permission were to be approved.
- 12.24 The initial plans for this proposal overlaid the incorrect legal alignment of the public rights of way network, however amended plans were received during the course of the application to address this.
- 12.25 A diversion is proposed of Footpath GUN/16/1 and the Council's Strategic Access Officer considers the revised alignment would be satisfactory and can be achieved using S257 of the Town and Country Planning Act 1990. The diversion process will ensure the existing stiles at either end of this path are removed to improve access, and an informative is recommended to this effect.
- 12.26 The submitted plans show landscaping and hedging to be situated along the southern half of footpath GUN/17/1, and it is recommended that walkers also are diverted to the formal road crossing a small distance to the north-east of the footpath. The informative recommended for footpath GUN/16/1 would also apply here. In respect of the northern section of GUN/17/1, north-east of the pond, will need diverting to be around 5m away from

the proposed new trees. Furthermore, this route will require an additional footpath diversion towards the south as this section of footpath deviates from the existing alignment.

12.27 There appears to be one existing obstruction [Footpath GUN/17/1] unaffected by the development, but within the applicant's control. This can be addressed outside the planning process as an offence under section 137 Highways Act 1980. To conclude the Council's Strategic Access Officer has raised no objection to the proposal subject to the informative outlined above. The proposal is considered to comply with policy C4 and therefore this matter is attributed neutral weight.

13.0 Ecology

VALP: NE1 (Biodiversity and Geodiversity) & NE2 (River and Stream Corridors).

13.1 This application is accompanied by a series of ecological Appraisals with species and habitats on site. In general, the Council's Ecologist considers these to be acceptable and an accurate/ robust account of the ecological features present on site at the time of the assessment.

13.2 Within the locality there are two Local Wildlife Sites and four Biological Notification Sites(BNS) located within 2km of the site, including Pond by Stream, Grendon Underwood BNS, the nearest, designated non-statutory site which is located circa 900m from the site. The nearest statutory designated sites are Grendon and Doddershall Wood SSSI (Site of Special Scientific Interest) located 1.2km south east and Sheephouse Wood SSSI located 1.5km north east of the site respectively. Bernwood Forest is a collective name for the area in which a number of ancient woodlands occur, including Grendon and Doddershall and Sheephouse Wood.

13.3 As outlined within the supporting Ecological Appraisal, much of the existing habitats at the site including predominantly poor semi-improved grassland as well as areas of scrub and tall ruderal vegetation would be removed. The removal of a small area of broad-leaved woodland, measuring approximately 0.03ha will be removed, alongside 1.95km of the site's 2.9km of hedgerows to facilitate the proposed development. It is noted that the proposed development has sought to avoid areas of habitats with the highest ecological value and approximately 1.27ha of habitat will be retained, this is largely the existing ecological area and pond to the west of the northern development parcel, adjacent to Lawn House.

13.4 Within the application site itself and the surrounding area, a number of protected species have been identified or there are considered to be suitable habitats which increase the

likelihood of species being found. Outstanding issues remain regarding the degree of bat assessments and Black Hair Streak Butterfly surveys submitted. In addition, the development falls within the red impact risk zone for great crested newts. In the red impact zone, there is suitable habitat and high likelihood of great crested newt presence. The application was supported by a Great Crested Newt Survey which identified a series of ponds, some of which were assumed or contained the presence of Great Crested Newts. The Council's Newt Officer is satisfied that the report provides an accurate account of Great Crested Newts. If the proposal were to be granted, before doing so, the Local Planning Authority must be satisfied that the impact of the proposed development on European Protected Species (EPS) have been addressed and that if a protected species derogation licence is required, the licensing tests can be met and a licence is likely to be granted by Natural England. In respect of Great Crested Newts, there are two routes available to the applicant. The first being a requirement to answer all three Natural England licensing tests alongside a mitigation strategy or alternative formal confirmation through a Naturespace Certificate or Report that the applicant has entered into the Buckinghamshire Council's District Licencing Scheme for Great Crested Newts. It is understood by Officers that the District Licensing Scheme is the preferred route in respect of Great Crested Newts however the required documentation has not been provided to the Local Planning Authority. Without this information, the Local Planning Authority are unable to determine the impact on Great Crested Newts.

- 13.5 Section 99 of ODPM (Office of the Duty Prime Minister) Circular 06/2005 (Government Circular: Biodiversity and Geological Conservation – Statutory Obligations and their impact within the planning system) states *'It is essential that the presence or otherwise of protected species, and the extent that they may be affected by the proposed development, is established before the planning permission is granted, otherwise all relevant material considerations may not have been addressed in making the decision. The need to ensure ecological surveys are carried out should therefore only be left to coverage under planning conditions in exceptional circumstances, with the result that the surveys are carried out after planning permission has been granted'*. It is noted that the applicant was investigating this matter further, however at the time of making this decision the matter remains unresolved. Failure to resolve this matter in advance of determination, particularly with regard bats which are a European Protected Species is contrary to the guidance. Without this information, the Council's Ecologist is unable to determine the full effects of the proposal on these species.

- 13.6 The application is accompanied by a Biodiversity Net Gain (BNG) Assessment which shows a significant gain in habitat units generated on site post development. However, the Council's Ecologist disputes the final figures submitted.
- 13.7 The concerns regarding the Biodiversity Net Gain calculations stem from the applicants use of DEFRA 2.0 with translation tools to generate the final figures despite the nationally recognised standard metric being DEFRA 3.0 being available since July 2021. Furthermore, it is nationally acknowledged that the use of translation tools may not be directly comparable and can lead to habitats being inaccurately identified.
- 13.8 Rather than using the nationally recognised classification for DEFRA 2.0 and 3.0, an alternative classification was used which has created ambiguity in the grassland classification. However, had the nationally recognised classification for the metric been used, BNG would be significantly reduced, resulting in a biodiversity net loss (changing the advised 27.31 units of net gain to a loss of 4.16 units).
- 13.9 There are also some concerns over the condition assessments used within the BNG calculation. No justification has been provided in the BNG Assessment for the any of the baseline habitat, hedgerow and river types and any justification for their current condition.
- 13.10 In addition, the Berks, Bucks and Oxon Wildlife Trust (BBOWT) have raised discrepancies between the submitted Metric and Ecological Appraisal in respect of the number of tree rows and hedgerows, some of which are identified as species rich. It is also not clear as to whether they are currently shown in the metric. There is also a degree of ambiguity over the detail provided in the information submitted on how the site will be managed to obtain the suggested conditions for both habitat creation and habitat enhancement as this has not been specifically set out. The council would expect to see commitment to manage the habitats on-site so that they can reach the condition which are suggested in the metric for 'creation and enhancement' for all three elements of the metric. This is information that is required at this stage of the application and cannot be dealt with at later stages such as condition details or reserved matters.
- 13.11 Given the scale of the development, it is considered insufficient to rely upon BGN calculations which have been generated using a metric tool (2.0) that was known to have flaws that were addressed in the updated metric 3.0. These points have been raised with the applicant and responses received. However, the Council's Ecologist advise is that there remains a significant difference of opinion on how the figures were generated in conjunction with concerns regarding the classification of habitat, condition assessment and time to target

figures which means that the Council's Ecologist is unconvinced that BNG figures the applicant claims this application will generate post development are reliable. Consequently, insufficient information has been received as part of this application for the Council's Ecologist to feel confident that the proposed development is compliant with Policy NE1 specifically on BNG. In addition, the Berks, Bucks and Oxon Wildlife Trust (BBOWT) have also objected to this proposal on similar grounds to those raised by the Council's Ecologist. This matter is afforded negative weight in the overall planning balance.

14.0 Historic environment (or Conservation Area or Listed Building Issues)

VALP: BE1 (Heritage Assets)

Legislation: Planning (Listed Building and Conservation Areas) Act 1990.

14.1 This application is accompanied by a Heritage Statement. Whilst the application site is not a designated heritage asset, part of the site has been identified as forming part of the non-designated Grendon Hall Historic Park and Garden. As part of this application, Historic England has advised that this application does not fall within statutory provisions for a consultation. However, comments have been received from The Gardens Trust and the Council's Heritage Officers. Furthermore, the application site does fall within the setting of a number of designated heritage assets. These include:

Immediate vicinity (and included in the submitted Heritage statement):

- GII Gate piers and railings at the current entrance to HMP Grendon.
- GII Grendon Hall and its curtilage listed walled garden
- GII Lawn House, Lawn Lane, Edgcott
- GII Lower farm, Grendon Rd, Edgcott

To the north of the application site:

- GII Old Manor House, Old Manor Cottage and listed barns, Buckingham Rd, Edgcott
- GII Lower Barn & Upper Barn, Rectory Farm & Rectory Barn, Church Lane, Edgcott
- GII* St Michael's Church, Edgcott

To the south of the application site:

- Grendon Underwood Conservation Area
- GII The Old Rectory, Broadway, Grendon Underwood

- GII* Shakespeare House, Main Street, Grendon Underwood
- GII* St Leonards Church, Broadway, Grendon Underwood
- GII Daffodil Cottage, Main Street, Grendon Underwood

14.2 Given the scale and nature of the proposed development, the varying ground levels within the site and wider area and the landscape setting of the application site it was identified by the Council's Heritage Officer that a wider assessment radius would be required. During the course of the application, a revised Heritage Statement was submitted in response to the request for further assessment to be undertaken and include a wider assessment radius for heritage assets; 3D modelling of impact and views from the identified heritage assets and illustrative analysis of lighting impact to setting.

14.3 It is acknowledged that the revised Heritage Statement does cover a wider radius, which in turn has led to an increased number of heritage assets being considered. Nevertheless, the conclusions drawn have not been fully substantiated and evidenced through provision of adequate 3D / wire drawn images from the heritage assets and in particular from Perry Hill which provides the key approach to the site and heritage assets located to the north of the northern development parcel. Neither has the proposed lighting impact been illustrated. The applicant's response has been to refer officers to the Landscape and Visual Impact Assessment (LVIA) for the illustrative material and lighting. However, the views considered in the LVIA sections 2 & 3 are not taken from the heritage assets, or the key northern approach to the site from Perry Hill and were produced for a different purpose and Section 1 of the LVIA provides night time images of the existing site. This information does not illustrate the increased impact of a much larger complex, or an indication of lighting levels required across different parts of the site i.e. access road & sports field as opposed to housing blocks, parking & service areas. Furthermore, although it is noted that additional planting mitigation and screening is proposed, this will take some years to grow. Even as illustrated this is insufficient to fully obscure the taller elements of the development (housing blocks) or to eliminate the potential impact of lighting proposals. Due to the topography of the landscape and the scale of the proposal these elements of the scheme are anticipated to be highly visible from some distance. Consequently, insufficient information has been submitted to enable a full assessment to be undertaken. The Council's Heritage Officer has advised that in heritage terms in comparison to the existing adjacent prisons, the increased massing and lighting impact from a much larger prison complex is likely to have a far greater impact on the rural

character and setting of the heritage assets identified and will dominate views rather than be seen as an element within a much wider landscape. The need for this specific information was requested throughout the planning process.

- 14.4 In conclusion, there are limitations in the submitted heritage documentation which means it is not possible to fully understand and assess the impact of the proposal on a wider range of heritage assets. Further information is necessary to enable a full assessment to be undertaken. However, from the available information the Officers has made the following assessments:

Setting of Listed Building(s):

- 14.5 Grendon Hall and its associated Walled Garden is Grade II Listed and is situated within the existing adjacent prison grounds. Due to this asset's relationship with the existing prisons, it is accepted that the setting of the Hall to the rear has already been compromised by existing development although it should be noted that the design of the building indicates that this area was never considered to form part of the key views for the building. In addition, as a result of the proposal, the proposed woodland planting would obscure the views across the north park and into the wider landscape and partially obscure views to the south park and wider landscape. The introduction of a substantial new road with associated lighting, formal and informal planting, sports pitches, suds ponds and acoustic fences will largely eradicate the North Park. Furthermore, the approach to Grendon Hall along the original drive and through the GII listed gateway would also be harmed by the loss of open parkland to the north side and the introduction of acoustic fencing, lighting and additional planting.

- 14.6 Within the supporting Heritage Statement, it advises that Grendon Hall Gate piers, gates and railings which are Grade II Listed have already been impinged upon by the existing prisons and residential development set back and to the south of the gates and forms only a minor part of the view. The Council's Heritage Officer disputes this argument and considers that this assessment belittles their listed status, statutory protection and the associated historic narrative relating to the development of the wider site. Grendon Hall Gate piers, gates and railings form the entrance to Grendon Hall itself and continues to retain this relationship today. Currently this gateway still provides the primary access to GII Grendon Hall as well as to the existing prison sites which developed on the land following war time use of the Hall and its land by the Special Operations Executive for the secret development and cracking of codes and ciphers. The Hall site is home to a memorial plaque in memory of SOE

agents and the First Aid Nursing Yeomanry. The gates are located on the main road between Grendon Underwood and Edgcott villages and are the most publicly visual indication that the site has any heritage significance at all. The creation of a new vehicular access approximately 35m to the north of this historical access would reduce and refract the significance of this designated asset and its relationship with Grendon Hall. Less than substantial harm has therefore been identified to both Grendon Hall and Grendon Hall Gate pier, gates, and railings.

14.7 Lawn House is a 17th century Grade II Listed dwelling which is located on the outskirts of Edgcott village, with the dwelling itself (not including its grounds) being situated approximately 75m to the west of the northern application parcel. Despite this property's relatively close position to the existing prison complexes, there are existing large green buffer zones between the property and the existing prisons which help to retain its separation and setting as a semi-isolated rural dwelling. Whilst it is acknowledged that the more built-up elements of the proposal have been located furthest away from this listed building, the proposal does result in new development being situated much closer to this particular designated asset. The proposed new access, sports facilities and car parking effectively wrap around Lawn House on two sides. The property is reasonably well screened from the application site by established trees and the provision of additional noise cancelling measures within the proposal will reduce some impact. However, the areas closest to the Listed Building are proposed to have what appears to be quite high levels of lighting.

14.8 In addition, Lower Farm House, a Grade II Listed Building, located on the opposite side of Grendon Road is located circa 150m to the north-west of the western development parcel. This designated asset is separated from application site by existing hedgerows and looks out towards the application site over a green and rural aspect. As a result of the proposal, this asset's immediate setting will remain largely unchanged however the increased intensity and scale of development at the prison site bringing activity much closer to this asset will introduce additional noise, increased traffic and lighting pollution to the setting of Lower Farm House. Whilst it is noted that lighting spillage drawings have been provided, these lack context within the landscape and from the nearby heritage assets and as such insufficient information in the form of an assessment of the proposal's lighting impact has been submitted as part of this application. Without this information a full assessment of the harm caused by the proposal cannot not be undertaken.

Historic Park and Garden:

14.9 During the course of the application, it was identified that the Historic Park and Gardens at Grendon Hall would meet Historic England's criteria as a Non-Designated Heritage Asset on the basis of age, historic interest, group value, archaeological value and artistic interest. The Bucks Gardens Trust has recently conducted a research project on both Grendon Hall and Lawn House to identify the significance of both as designed landscapes. The results of this research have been consolidated into a report Titled: Understanding Historic Parks and Gardens in Buckinghamshire: Grendon Hall (Dated March 2021 & Revised June 2021). The report has identified that the key elements of the late C19 country house designed landscape and its associated structures survive to a high degree, and are of considerable significance to the county of Buckinghamshire. The supporting heritage assessments fail to recognise Grendon Hall as a non-designated heritage asset nor has an appropriate historic impact assessment been undertaken in respect of this particular asset, despite the status of this park and garden being highlighted during the course of this application. Within the comments received from The Gardens Trust, reference is made to a speculative large scale development on an adjacent site and the lack of consideration to the cumulative effects on the historic environment together there is no scheme before the Council for consideration and no weight can be afforded to this possible future scheme at this stage. If submitted, appropriate weight and consideration will be given to the cumulative impacts, where appropriate.

14.10 Grendon Hall is listed Grade II, the Walled Garden is included under this listed as a curtilage structure. The gate piers, pedestrian gates and railings at the entrance to the site are separately listed Grade II. Lawn House and its grounds were formerly part of Grendon Hall and the historic park associated with the Hall. These historic assets are set within their contemporary and integral landscape which is of high local significance for its artistry, relationship with the built environment and level of survival. Grendon Hall was erected in an elevated position with the clear intention of benefitting from wide panoramic views across the Vale. The building's design utilises large bay windows to the front and side which were intended to capture these spectacular views from the inside of the building, and the view from the main entrance is also a key design element. Landscaped features such as the north step which terminates the elongated drive across the front of the building, the gate further to the south and the hill summit provide further opportunities within the park to enjoy the panoramic views. The capturing of these views is the primary reason why the building has been erected and orientated as it is. As such the building's design and significance are directly

related to the surrounding park and gardens and the wider landscape which form its setting. The layout of the site survives considerably intact, except for a 7ha. housing estate in the south park and HMP Springhill buildings in the pleasure grounds around the Hall to the east and south. The elevated areas of the site enjoy extensive views south and west. Whilst it is noted that some of the significance of the historic park and garden has been lost and views are interrupted in some areas due to inappropriate planting (reversible) and development (existing prisons and Springhill housing estate, all which took place prior to the listing of the Hall), it is not to extent inferred within the supporting documents and the relative openness and character of the parkland still provides an important setting to the listed building and frames the key designed views from the front and North side of the building. Furthermore, the Gardens Trust have advised that in spite of previous development which has caused harm to the significance of associated heritage assets, much of the historic site and its significant fabric, design and setting remains intact. However, it does recognise that further development, such as the one proposed, would result in irretrievable damage and ultimately loss of the significance of this historic asset. The Gardens Trust have advised that whilst the site does not currently offer public access, there is also the potential of uncovering other features of the historic park and garden.

14.11 The North Park of Grendon Hall's historic park and garden lies west of the Hall and gardens, and north of the main historic drive from the lodge to the Hall. It is of high significance to the ornamental designed landscape. Whereas the South Park is not so immediately visually connected with the Hall and gardens. It is the park destination for walks from the Hall, particularly the spectacular elevated views from the high point on Spring Hill (and possibly also from Mill Hill to the south) over the Vale of Aylesbury, including Waddesdon Hill, Brill Hill and the Chilterns beyond. These contrast with the views of Otmoor from the North Park. It is also the southern setting for the main drive and Listed Grade II gateway. To promote the park character, the existing access serving the existing adjacent prisons was deliberately not fenced in to allow for a seamless understanding of the parkland. Whilst it is acknowledged that the South Park will not be physically affected by the proposal, harm will be sustained to its setting by the proposed development to the north, which will be highly intrusive in the panoramic views particularly from an ornamental park gateway, and the important panoramic park viewpoint on the high point of Spring Hill.

14.12 With regard to the proposals impact on the North Park, the North Park would be largely lost to development and its relationship to the GII listed building and wider landscape would

be lost. This section of the park land has a different feel and character to the south park but is an equally significant part. The north park of the historic park and garden serves the same function as the south park in that it frames and softens the views outwards to the wider countryside, provides the setting for the main Hall, as well as a buffer between the house and the wider community leading the eye into the site from the village of Edgcott and other surrounding heritage assets towards Perry Hill. Additionally, both parks provided an open parkland aspect to either side of the approach drive, as this has been irretrievably lost to the south (with the introduction of the housing estate) the natural and open nature of the North Park arguably retains more significance in this respect. The proposed development will harm the late C19 historic fabric and character of the North Park by the introduction of alien features, particularly the new entrance, extensive road and sports pitches, and re-landscaping of the areas between, including a new SuDS basin. It will greatly damage the immediate setting of and views from the core of the site (the Hall and gardens) which is of the highest significance to the design, and from the main drive and Listed gateway, which together form a feature which is also highly significant to the design. The Gardens Trust have also advised that the proposal will harm designed views of the Hall and its gardens from the public road.

14.13 It is also noted that harm will be caused to the setting to the north and north-east, to the rear of the Hall and its service structures, and adjacent to the north side of the walled garden which was formerly part of the east pleasure grounds. While the setting and views from these features are of lesser significance than those relating to the North Park and environs of the Hall and adjacent gardens, and the South Park viewpoints, they will be harmed to a greater degree by the dense modern development in the adjacent setting which has to some degree been compromised already. Consequently, the Council's Heritage Officer and The Gardens Trust have identified the total loss to a key remaining part of this non-designated historic park and garden.

14.14 Overall, in respect of the designated assets (listed structures), in accordance with paragraph 202, where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset (as identified above), this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use. Furthermore, harm has also been identified to the significance of a non-designated heritage asset (Grendon Hall's historic park and garden) and therefore paragraph 203 of the NPPF requires a balanced judgement to be made, having regard to the scale of any

harm or loss and the significance of the heritage asset. In addition, insufficient information has been submitted to enable a full assessment to be undertaken with regard to the wider radius of heritage assets identified. The consideration into the public benefits of the scheme and the balanced judgement to be taken will be considered towards the end of this report, in the 'Weighing and balancing of issues / Overall Assessment' section. Overall, until the harm identified for the designated assets has been weighted against the public benefits and a balanced judgement has been applied in respect of the non-designated assets, Officers cannot conclude at this stage whether the proposal complies or is contrary to policy BE1 of VALP, as this exercise is also a requirement of this policy. Nevertheless, as harm has been identified, this matter should be afforded negative weight.

15.0 Archaeology

VALP: BE1 (Heritage Assets)

- 15.1 Following a review of the HER records, archaeological features and finds have been recorded from the Medieval period to the Iron and Bronze Age within the vicinity of the proposed scheme. Medieval to post-medieval earthwork ridge and furrow cultivation which is part of a large and important survival of the open field system of Grendon Underwood Parish are contained within the western development parcel. The Council's Archaeologist has advised that they would prefer to see the earthwork ridge and furrow cultivation retained. Whilst the Council's Archaeologist believes that with careful consideration, much of the ridge and furrow could probably be retained, as this area is shown to be predominately green space, Officers are not convinced that this would be the case. Although the eastern parcel of the western development parcel is predominately shown as soft landscaping with the provision of new woodland areas and a 600m running track is proposed to run largely around the perimeter of this parcel. The new access serving the proposed new prison would also extend across adjacent to the northern boundary of the entire western development parcel, all of which are likely to impact on earthwork ridge and furrow cultivation that is present. In addition to this, within the most westerly section of the western development parcel is a SuDS pond and a new football pitch, further removing the presence of the existing ridge and furrow.
- 15.2 Consequently, the Council's Archaeologist has identified significant harm to the remaining ridge and furrow earthworks will take place. These two fields which comprise of the western development parcel are part of a larger and significant survival of this field system and the

development as proposed would cause a high degree of less than substantial harm. In accordance with paragraph 203 of the NPPF, this matter also requires a balanced judgement to be made, having regard to the scale of any harm or loss and the significance of the heritage asset.

15.3 Notwithstanding the harm identified, the Council's Archaeologist has advised if the ridge and furrow cultivation cannot practically be retained, then an earthwork survey should be undertaken, and archaeological evaluation will be required as it can mask earlier buried archaeological features and finds. Evaluation will also be required for all the currently undeveloped areas of the proposal. If permission were to be granted, conditions would therefore be required to secure appropriate investigation, recording, publication and archiving of the results.

15.4 The requirement for Officers to undertake a balanced judgement on this matter will be considered towards the end of this report, in the 'Weighing and balancing of issues / Overall Assessment' section. Overall, this matter should be afforded negative weight.

16.0 Building sustainability

VALP: S1 (Sustainable development for Aylesbury Vale) & C3 (Renewable Energy)

16.1 Policy C3 requires that all development achieves greater efficiency in the use of natural resources, including measures that minimise energy use, improve water efficiency and promote waste minimisation and recycling. Developments should minimise, reuse and recycle construction waste wherever possible.

16.2 This application is accompanied by an Energy and Sustainability Statement and a BREEAM Pre- New Construction Assessment report which sets out the sustainable design and construction measures for the proposal. Within these documents it is acknowledged that certain elements may vary, at this stage, as the detailed design progresses.

16.3 Nevertheless, although it is noted that the details may change, there is an expressed intention for the development to achieve greater efficiency and utilise sustainable construction methods. If planning permission were to be granted, to ensure the proposal is compliant with policy C3 of VALP, a condition would be required to secure the final sustainable design and construction measures for the proposal. Subject to this condition, this matter is attributed neutral weight.

17.0 Sports Provision

VALP: I1 (Green Infrastructure), I2 (Sports and Recreation) & I3 (Communities facilities, infrastructure and assets of community value).

17.1 The northern development parcel of the application site is grassland, currently utilised for sports and outside activities by prisoners and staff of HMP Springhill. The area currently includes a single football pitch, a small area of outdoor gym equipment and is also utilised weekly for a Park Run (5k route), open to staff, prisoners and other who have security clearance. As part of the additional information submitted in respect of this matter, the statement confirmed there is no open community access for sports.

17.2 As defined in The Town and Country Planning (Development Management Procedure) (England) Order 2015 (Statutory Instrument 2015 No. 595), the site is considered to constitute playing fields, or land last used as playing field.

17.3 Paragraph 99 of the NPPF states 'existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:

- a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements;
- b) or the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or
- c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.

17.4 The requirements of paragraph 99 of the NPPF align with Sport England's exception 4 policy with the added requirement that the new area of playing field provides equivalent or better accessibility and management arrangements.

17.5 Throughout the course of the application, Sports England have maintained their objection to the proposal. Discussions have taken place between Sports England and the applicant which has resulted in additional information being received. The amended plans now show the existing provision to be relocated including the provision of a new football pitch and 600m running track on the western development parcel. Furthermore, 3x 5-a-side football pitches are to be provided within the centre of the houseblocks, with one pitch per two houseblocks. The amendments received as part of this application are welcomed by Sports England as they would improve the sporting and recreational offer at the site and if permission were to be granted, have requested a condition requiring details of the design and layout of the MUGAs (Multi-Use Games Areas). However, even though it is noted from the additional information that the existing playing field area is significantly sloped, particularly to the western edge of the playing field, historical aerial

imagery shows the site has accommodated additional small-sided pitch provision. The current arrangement also benefits from being able to move and reconfigure pitches in different locations to reduce wear and tear on well-used areas. The playing field has in the past also been marked out with a cricket wicket. This flexibility will be lost under the proposed new playing field arrangement.

17.6 To conclude, it is noted that there are sporting benefits to the proposal which includes the re-provision of some facilities and enhancements such as the provision of MUGAs which are welcomed, however overall Sport's England consider that these benefits do not outweigh the harm caused by the loss of playing field at the site which includes loss of usable playing field/pitch space. Furthermore, although Sport England recognises that their Exception 3 policy (loss of playing field land incapable of accommodating a playing pitch or part of a playing pitch) may apply to a small area of the heavily sloped western edge of the playing field, it does not apply to the whole playing field area outside the marked adult football pitch which is shown on the submitted plans. The proposal is therefore considered to be contrary to policy I2 of VALP and Exception 4 of Sport England's Playing Fields Policy. This matter should be afforded negative weight.

18.0 Infrastructure and Developer Contributions

18.1 As noted above, there are a number of requirements arising from this proposal that need to be secured through a S106 Planning Obligation Agreement. These obligations include:

- Financial contribution of £50k towards the feasibility and implementation of a traffic calming scheme along Edgcott Road.
- Financial contribution of £20k towards sustainability measures. (Including £7k for a new bus shelter, £3k for raised kerbs, and £10k for Real Time Passenger Information (RTPI)).
- Financial contribution of £194k towards two years funding for an extra bus (10 hours a day, 6 days a week to increase bus frequency).
- A £5k Highway monitoring fee.

18.2 It is considered that such requirements would accord with The Community Infrastructure Levy (CIL) Regulations 2010. Regulation 122 sets out the Government's policy tests on the use of planning obligations. It is now unlawful for a planning obligation to be considered as a reason for granting planning permission if the obligation does not meet all of the following tests; necessary, directly related to the development and fairly and reasonably related in

scale and kind to the development.

18.3 In the context of this application the development is in a category to which the regulations apply. The requirement for all of the above named measures, if the proposals were to be supported, would need to be secured through a Planning Obligations Agreement. These are necessary and proportionate obligations that are considered to comply with the tests set by Regulation 122 for which there is clear policy basis either in the form of development plan policy or supplementary planning guidance, and which are directly, fairly and reasonably related to the scale and kind of development. Specific projects are to be identified within the Section 106 in accordance with the pooling limitations set out in CIL Regulation 123.

18.4 Had the reasons for refusal not applied, it would have been necessary for the applicant and the Local Planning Authority to enter into a Section 106 Agreement to secure the necessary obligations.

19.0 Weighing and balancing of issues / Overall Assessment

19.1 This section brings together the assessment that has so far been set out in order to weigh and balance relevant planning considerations in order to reach a conclusion on the application.

19.2 In determining the planning application, section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that proposals be determined in accordance with the development plan unless material considerations indicate otherwise. In addition, Section 143 of the Localism Act amends Section 70 of the Town and Country Planning Act relating to the determination of planning applications and states that in dealing with planning applications, the authority shall have regard to:

- a) Provision of the development plan insofar as they are material,
- b) Any local finance considerations, so far as they are material to the application (such as CIL if applicable), and,
- c) Any other material considerations

19.3 Positive weight is attributed to:

- national need to provide increased levels of prison places and
- economic benefits that arise from the development.

19.4 Neutral weight is attributed to matters that comply with the relevant policies because they do not represent benefits but an absence of harm. These matters are:

- design
- residential amenity,
- flooding,
- trees & hedgerows,
- contaminated land and air quality
- public rights of way and
- building sustainability have been demonstrated or could be achieved.

19.5 Negative weight has been attributed to:

- transport sustainability,
- landscape and visual impact,
- biodiversity,
- loss of playing fields,
- the loss of best and most versatile agricultural land,
- mineral safeguarding
- the absence of a Section 106 Agreement to secure financial contributions relating to highway/ transport matters and
- harm of designated and non-designated heritage assets.

19.6 These matters Conflict with policies T1, T5, NE4 & NE1, NE5, NE7 and I2 of the Vale of Aylesbury Local Plan and Policy 1 of Buckinghamshire Minerals and Waste Local Plan.

19.7 With regard to the impact on the setting of nearby listed buildings (designated heritage assets), the development of the greenfield site next to Grendon Hall, by virtue of its layout, scale and massing and light pollution would result in adverse landscape and visual impacts on the site which are considered to be harmful to the countryside (agricultural) and parkland character of the wider area. The provision of a large new access within the setting of Grendon Hall and a short distance from the Listed piers, gates and railings would also result in a competing form of development which detracts from the overall significance of individually listed access. The proposed development is considered to have the potential to cause less than substantial harm to the setting of nearby listed buildings (Grendon Hall and Grendon Hall's Gate piers, gates and railings, both of which are individually listed). To determine the level of harm further information was requested however without that information it is necessary to assume the worst-case scenario. The harm is therefore considered to be at the medium to higher end of less than substantial harm. In accordance with paragraph 200 of the NPPF, any harm to or loss of, the significance of a designated

heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Furthermore, where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, paragraph 202 of the NPPF requires this harm to be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.

19.8 In terms of the public benefits, it is acknowledged that the proposed development would contribute towards both national and regional needs for additional prison places to meet current and future demands. With economic benefits which derive from the construction and long-term operation of the new prison. These are considered to be significant public benefits of the scheme. The harm identified to the designated heritage assets, without any evidence to indicate otherwise, is the medium to higher end of less than substantial. It is also acknowledged that the applicant has failed to provide sufficient justification to properly evidence that the site selection has considered and discounted other alternative sites within the region and that this is the only site for the development of the new prison. So firstly, the applicant has not provided clear and convincing justification that the harm to the designated heritage assets could be avoided by finding an alternative site for the development of the new prison. While the public benefits of the scheme are acknowledged to be significant the lack of clear and convincing justification for the development of this site lends further weight to the less than substantial harm identified and consequently is not outweighed by the public benefits at this point in time in the absence of necessary evidence.

19.9 Harm has also been identified to non-designated Grendon Hall Historic Park and Garden and the ridge and furrow field system which is present within the site. The development of the North Park (NDHA) would result in total loss of a large section of the NDHA Park which would be substantially changed in character and appearance and would negatively impact the setting of the GII Grendon Hall and the GII Gates and Piers due loss of designed views from both assets and through the introduction of a competing entrance to the Park/ Hall. Furthermore, ridge and furrow contained within the western development parcel would also be harmed as a result of the proposal.

19.10 In accordance with paragraph 203 of the NPPF, in weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset. As previously outlined, Officers are not convinced that a rigorous site selection process has taken place to demonstrate that this is the most suitable site in the region for a development of

this nature. Consequently, without this information, when applying a balanced judgement to the scale of harm or loss and the significance of the heritage asset, the harm identified, particularly to the non-designated historic park and garden is considered not to be outweighed by the need to provide additional prison places which potentially can be provided elsewhere. In addition, the harm caused would result in irretrievable damage and ultimately loss of the significance of this historic asset.

19.11 Overall, after considering the public benefits of the scheme in respect of the designated heritage assets and applying a balanced judgement for non-designated heritage assets, as required by the NPPF, the merits of the scheme do not outweigh the harm identified. In addition to the policy conflicts of the development plan which have been outlined at the start of this section, the proposal is also considered to conflict with policy BE1 of the Vale of Aylesbury Local Plan and Section 66 of the Planning (Listed Building and Conservation Areas) Act 1990. The Local Planning Authority has a statutory duty to pay special regard and attention to the desirability of preserving the setting of nearby listed buildings and the desirability of preserving or enhancing the character and appearance of the nearby conservation area, as required by section 66 of the Planning (Listed Building and Conservation Areas) Act 1990.

19.12 In accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004 the proposal should be determined in accordance with the development plan unless material considerations indicate otherwise.

19.13 The material considerations for this application relate to the national and regional need providing additional prison places. As outlined within the report, information has been submitted in the Planning Statement and the supporting Cover Letter with amendments providing further information on the needs of this proposal. The information which has been provided in respect of this proposal is considered to be fairly high level, setting out Central Governments agenda for providing 10,000 more prison places to meet current and future national demand. As part of the Government announcement, it was advised that four new prisons would be built across England over the next six years as part of the 10,000 Additional Prison Places Programme. 'Following analysis of current and future national demand for additional prison places, two of these new prisons are proposed to be built in the North of England and two in the South, targeting areas of greatest forecast demand'.

19.14 Within the supporting Planning Statement, it is advised that the proposed new prison is targeted to meet demand in the Southeast of the country. Out of the shortlisted sites only

the application site is situated within the south region. As part of the application, a list of the search criteria was provided with limited explanation as to why the site has been selected. Other than providing a basic summary as to why this particular site has been selected across the whole of the southern region, no further information has been provided to substantiate the results of this site selection process and that sufficient sites were considered and appropriately discounted.

19.15 Additional information was provided in the form of a cover letter explaining that this prison is situated to accommodate and respond to demand in a 50-mile radius. However, this information still does not provide information on other sites considered within this search area or why they have been discounted. Officers consider that a 50-mile radius is a fairly extensive search area and would expect information to demonstrate extensive research had been undertaken to find the most appropriate site with conclusions presented. Even if Officers were to accept that there is no other alternative site, there would be an expectation that detailed reasoning would be provided to demonstrate this and for it be fully explained. If such justification were to be provided, Officers consider that greater weight could have been attributed to the specific need for this site. However, without this, the weight to be attributed is reduced.

19.16 As such, whilst information has been submitted to support the application, it is considered that insufficient justification has been provided for the development of this sensitive site, as well as insufficient evidence to show that the proposed prison could not be located in a less sensitive, alternative location within the surrounding region/ 50-mile radius. Consequently, without this information, Officers do not consider that the material considerations have been sufficiently justified to indicate a decision other than in accordance with the development plan.

19.17 It is recommended that permission be refused for the reasons outlined below.

19.18 Local Planning Authorities, when making decisions of a strategic nature, must have due regard, through the Equalities Act, to reducing the inequalities which may result from socio-economic disadvantage. In this instance, it is not considered that this proposal would disadvantage any sector of society to a harmful extent.

19.19 Human Rights. There are no specific human rights which will be affected by the recommendation to refuse this planning application.

20.0 Working with the applicant / agent

In accordance with paragraph 38 and 39 of the NPPF the Council approach decision-taking in a positive and creative way taking a proactive approach to development proposals focused on solutions and work proactively with applicants to secure developments. The Council work with the applicants/agents in a positive and proactive manner by offering a pre-application advice service, and as appropriate updating applications/agents of any issues that may arise in the processing of their application. In this instance the applicant was provided with pre-application advice, was updated of any issue and provided the opportunity to submit amendments. However, the proposal did not accord with the development plan and the benefits which derived from the scheme were not considered to outweigh the level of harm identified.

21.0 Recommendation

It is therefore recommended that permission be refused for the following reasons:

1. The location of the site is such that it has only limited access by non-car modes of travel. The absence of adequate infrastructure and the sites remoteness from major built up areas is such that it is likely to be reliant on the use of the private car contrary to local and national transport policy. The development is therefore contrary to policies S1 and T1 of the Vale of Aylesbury Local Plan, paragraphs 7, 8 and 105 of the National Planning Policy Framework, Buckinghamshire Council Local Transport Plan 4 (adopted April 2016) and the Buckinghamshire Council Highways Development Management Guidance document (adopted July 2018).
2. The development of the greenfield site next to Grendon Hall, by virtue of its layout, scale, and massing and light pollution would result in adverse landscape and visual impacts on the site which are considered to be harmful to the countryside (agricultural) and parkland character of the wider area and therefore the setting of other nearby heritage assets. The development would be intrusive and highly visible from a large number of these heritage assets and would negatively impact on how they are read and enjoyed by future generations. In the absence of evidence to the contrary the harm to the designated assets is considered to be on the scale medium to high of less than substantial harm. The failure to provide clear and convincing justification that this is the only site for the development of the new prison and without this the less than substantial harm is not outweighed by the public benefits. The development is therefore contrary to policy BE1 of the Vale of Aylesbury Local Plan, Section 66 of the Planning (Listed Building and Conservation Areas)

Act 1990 and Section 16 of the National Planning Policy Framework.

3. The development of the North Park (NDHA) including loss of ridge and furrow, would result in total loss of a large section of the NDHA Park which would be substantially changed in character and appearance and would negatively impact the setting of the GII Grendon Hall and the GII Gates and Piers due loss of designed views from both assets and through the introduction of a competing entrance to the Park/ Hall. The development is therefore contrary to policy BE1 of the Vale of Aylesbury Local Plan and Section 16 of the National Planning Policy Framework.
4. Insufficient and unambiguous information has been provided to determine whether the proposal would provide Biodiversity Net Gains. The proposal has failed to utilise the nationally recognised standard DEFRA 3.0 metric for calculating biodiversity net gains which has led to disputes over classification of existing and proposed habitats within the metric. The submitted Biodiversity Net Gain Assessment is considered not to be an accurate account of the gains generated on site and would fall below the thresholds set nationally contrary to policy NE1 of the Vale of Aylesbury Local Plan and paragraphs 174 and 180 of the National Planning Policy Framework.
5. The development of this greenfield site, by virtue of its layout, scale, and massing, would result in a significant intrusion into open countryside and would have an urbanising impact on an individual basis as well as cumulatively with other nearby development in this rural location, would result in adverse landscape and visual impacts on the site and would give rise to harmful effects on the character of this area. As a result of the scale of the development, the potential for mitigation would be very limited, leading to an intrusive form of development which is highly visible from within the site and long-distance views. This would fail to respect and compliment the physical characteristics of the site and its surroundings, the scale and context, and ordering and form of the locality, contrary to the adopted Vale of Aylesbury Local Plan policies BE2, NE4 and NE5 and paragraphs 174 and 185 of the National Planning Policy Framework.
6. Insufficient information has been submitted regarding species specific assessments and mitigation relating to Great Crested Newts, Bats and Black Hair Streak butterflies. Had the above overarching reasons for refusal not applied, the Local Planning Authority would have sought further information in relation to the potential impact of the proposal in order to ensure that any harm would be satisfactorily assessed and mitigated if necessary. In the

absence of this information the proposal the Local Planning Authority is unable to determine the full effects of the proposal on these species, including a European Protected Species. The proposal has failed to demonstrate that there would not be an adverse impact to these species and as such is contrary to the requirements of NE1 of the Vale of Aylesbury Local Plan and paragraph 180 of the National Planning Policy Framework.

7. The development, by virtue of its layout has failed to demonstrate that the loss of playing field, including the loss of usable playing field/ pitch space would be replaced by an equivalent or better provision in term of quality and quantity in a suitable location, and the proposal would be contrary to policy I2 of the Vale of Aylesbury Local Plan, Exception 4 of Sport England's Playing Fields Policy, and paragraph 99 of the National Planning Policy Framework.
8. Had the above reasons for refusal not applied, it would have been necessary for the applicant and the Local Planning Authority to enter into a Section 106 Agreement to secure appropriate financial contributions towards highway and transport improvements. In the absence of such a provision, the Local Planning Authority is not satisfied that the proposal will constitute sustainable development that fulfils a social, economic and environmental role, and the proposal would be contrary to the requirements of policies T1 and T5 of the Vale of Aylesbury Local Plan and paragraphs 57 and 58 of the National Planning Policy Framework.

Appendix A: Consultation Responses and Representations

Appendix B: Site Location plan

Appendix C: Map of Grendon Hall's Historic Park and Garden

Appendix D: Grendon Underwood Parish Council Comments

Appendix E: Edgcott Parish Council Comments

Appendix F: Greg Smith MP Comments

Appendix G: Cllr A Macpherson, Cllr F Mahon & Cllr M Rand Comments

APPENDIX A: Consultation Responses and Representations

Councillor Comments

Cllr A Macpherson, Cllr F Mahon & Cllr M Rand: All three Members requested the application be “Called In” to Committee. Furthermore, a joint representation was submitted objecting to the proposal on the following grounds outlined below. Their comments have been appended in full towards the end of this report.

- Transport and cumulative impact
- Location
- Design
- Flooding
- Landscape
- Biodiversity
- Heritage & Archaeology
- Impact on Public Services
- Public Safety.

Parish/Town Council Comments

Edgcott Parish Council: Extensive comments were received from Edgcott Parish Council on an individual basis and joint with Grendon Underwood Parish Council. Given the extensive nature of the submissions, Officers made a request to the Parish Council that a document be provided which the Parish considers summarises their comments. This document has been provided and has been appended in full towards the end of this report.

Grendon Underwood Parish Council: Similarly, extensive comments were also received from Grendon Parish Council on an individual basis and joint with Edgcott Underwood Parish Council. Officers made the same request to Grendon Underwood Parish Council (as outlined above). This document has been provided and has been appended in full towards the end of this report.

Hillesden Parish Council: Objected on the following grounds:

1. **Access and traffic on the C3 road:** A prison of the size proposed will generate heavy traffic originating from outside the local area, from Aylesbury, Bicester, Buckingham and other towns. This traffic would consist of staff commuting from home, families visiting inmates, and general supplies of food etc. Most of this traffic would originate from well outside the local rural area which would be unable to supply the demand for new prison staff. The C3 road is a winding fairly narrow single carriageway entirely unsuited to the numbers of vehicles coming to the prison. There are entirely inadequate local transport services. There would be traffic congestion, rat runs through villages, and increased noise and vehicular emissions affecting local communities.

2. **Carbon emissions:** The substantial increase in road traffic would result in high carbon emissions and be contrary to the government policy of reaching zero carbon by 2050.
3. **Light Pollution:** We are concerned that there would be a substantial increase in night time light pollution which would be visible and have an adverse impact on Hillesden that is already experiencing an increase in night time light from the HS2 Infrastructure Maintenance Depot at Calvert/Steeple Claydon.
4. **Environmental impact:** the proposed prison would result in the creation of a continuous built up or semi built up area extending from the Greatmoor Waste Incinerator, through the Calvert landfill, the present Springhill and Grendon prisons, the HS2 Infrastructure Maintenance Depot and up to Steeple Claydon and Twyford. This would seriously impact on the rural landscape, local wildlife, and the natural environment.
5. **Local Infrastructure:** a prison of 5000 inmates plus staff and ancillary workers would be far larger than even the largest local village of Steeple Claydon. This would require a substantial development of drainage, water supply, foul water drainage (sewers) , energy supply, and general waste disposal.
6. **Surface drainage:** much of the site is low lying, flat land with a heavy impermeable clay local rock. This is all former marshland in the vicinity of the village of Marsh Gibbon. There is an increased risk of increased surface runoff resulting in regular flooding at the site and in the area around.
7. **Landscape quality:** the proposed prison blocks cover an area much greater than the present prisons, and are to be sited on rising ground, having an adverse effect on the landscape. They are entirely out of scale as compared with the scale of the local rural villages, and would be visible from a considerable distances beyond the local area.

East Claydon Parish Council: Strongly objects to this planning application and fully endorses the detailed submission from Grendon Underwood and Edgcott Parish Councils.

Steeple Claydon Parish Council: Objected on the following grounds:

“In essence Steeple Claydon supports the objections stated by the many other Parishes, in particular detailed reports by Edgcott and Grendon Underwood Parish Councils, and individuals in the area.

Currently, this area is significantly impacted by the building of HS2, East West Rail and the development of several new fairly large housing estates nearby. These projects are causing a huge impact not only on the residents, but has destroyed the habitats of wildlife and seen the Calvert Jubilee Nature Reserve being destroyed. We have seen an increase in serious road traffic collisions as well as a recent fatalities on roads in the area. To add the possibility of the construction of a further significant development without there being a comprehensive and joined up review of the future of the area north of Aylesbury and up to the town of Buckingham appears to be an act of extreme folly.

The main issue that concerns Steeple Claydon is that the combination of a new prison

complex in addition to the ongoing construction of HS2 and its Infrastructure Maintenance Depot (IMD) on the boundary of the parish will result in an increase in road traffic for which the local roads are not designed.

The figures speak for themselves, the IMD is scheduled to employ 180 people permanently on site, there will be no on site accommodation so all workers will travel on a daily basis. The proposed prison will accommodate at capacity over 1200 inmates. The stated ratio of staff to prisoner in male establishments is 1 to 4.8 in male establishments. From this it can be inferred that there will be around 250 officers working plus a similar number of support staff working four shifts.

In addition there will clearly be visitors to the prison these being a combination of families and various categories of legal and other support staff. This proposal is for construction in a green built area while there are lots of brown field areas available elsewhere, even nearby. In addition to HS2 and EWR this is another major serious blow to the local environment.

There is no significant public transport in the vicinity of the prison location and the nearest railway stations are at Aylesbury Parkway and Bicester Village both about five miles from the site.

So, the upshot of all these additional people is that at certain times of day the density of traffic will be hugely and unreasonably increased. And this on roads which are often little more than metalled cart tracks that have during the HS2/EWR construction been demonstrably unfit for purpose. This will inevitably add to the likelihood of incidents and add massively to the costs of maintenance that will fall on the local Council Tax payers in an area that the current council have failed to demonstrate they can maintain to a reasonable standard".

Gawcott with Lenborough Parish Council: Objects on the following grounds:

"The Gawcott with Lenborough Parish Council objects to this application on the grounds that it contravenes all three of the sustainability objectives set down in the Government's National Planning Policy Framework [NPPF] for sustainable development. To meet the parameters of a sustainable development, the NPPF requires that a development should positively contribute to the economic, social and environmental objectives set down in the Framework. On all three counts the MoJ's proposal fails.

The proposal fails the environmental objective:

- Failure: There is little or no recognition of the effect of the proposal on this rural area or the communities of Edgcott and Grendon Underwood. The development proposals by virtue of their siting, scale and design cannot 'fit into' the rural landscape;
- Failure: The scale of the proposal, the location on high ground and the adjacency of buildings to site boundaries mean that attempts to screen the development are futile;
- Failure: By placing four storey, industrial-style buildings on the highest ground in the immediate area, the development would be intrusively visible across a wide rural area. Light pollution would be an ongoing environmental issue;

- Failure: The creation of jobs in this location [a key feature of the MoJ proposal] with a minimal supply of available labour in the vicinity would result in thousands of additional car journeys each week along inadequate roads, already overcrowded with HS2 and East West Rail-related vehicles;
- Failure: The 'remote' location would result in thousands of additional private transport journeys for visitors to reach the new prison;
- Failure to fully evaluate the capacity of the existing drainage and utility supplies and to plan to accommodate a huge increase in demand;
- Failure to adequately measure the wider increased traffic consequences of the proposal through perhaps a 10 or 15 mile radius of Springhill.

The proposal fails the social objective:

- Failure: A disregard, bordering on contempt, for the permanent disruption which this proposal would bring to the communities of Edgcott and Grendon Underwood;
- Failure to understand the consequences of the scale and form of the MoJ proposal overwhelming the rural settlement of Edgcott with a present population of less than 400, perhaps equivalent to the capacity of one wing [of four] of the proposed prison;
- Failure to understand that the diminution of open space by developing the green fields around Springhill degrades the environment for residents which would adversely affect their mental well-being;
- Failure: Locating 1400 plus inmates in a rural location removed from motorway and rail connections with limited public transport means that families would find it expensive and difficult to visit, thereby potentially harming the important support of families which inmates need;
- Failure to appreciate the cumulative effect of the multiple state-sponsored big infrastructure projects already under construction in the locality and the negative effect on the lives and mental health of the wider population of north Buckinghamshire.

The proposal fails the economic objective:

- Failure: The existing transport, utilities and residential accommodation infrastructure are designed to meet the needs of the present rural community. A major investment in infrastructure would be required to accommodate the prison proposal. It would be more economic for the MoJ to locate a new prison close to a major town where much of the required infrastructure would already be in place;
- Failure to appreciate the local labour market - are there really 1000 potential employees in the immediate area? A prison located in Bicester or any large town would have a large labour pool from which to draw staff;
- Failure to evaluate the supply and affordability of accommodation for those who would work at the new prison, meaning the majority of staff would unsustainably commute to the new prison;
- Failure to take account of the increased costs of developing on this sloping site with

the difficulties of draining into a surrounding area already subject to flooding.

The proposal lacks any recognition or understanding of the rural character of its setting. The fact that the site of the proposal is already owned by the MoJ is irrelevant. Ownership of a green open space at Springhill does not render it 'brownfield' rather than 'greenfield'. Acres of brownfield, Government-owned land around Bicester would provide a more appropriate location for a new prison, allowing the Grendon/Springhill site to remain as originally intended: a green buffer around the existing facility.

The Parish Council contends that the MoJ proposal is unsustainably and thoughtlessly located, being completely out of context with its local and wider setting. The proposal displays a staggering disregard for the well-being of residents in the immediate and wider area. The MoJ proposal fails to recognise the sustainable needs of the current communities, whilst compromising those of future generations. It fails on so many of the sustainability objectives set down in the Government's own NPPF.

In short, it is the wrong scheme, in the wrong location, exhibiting numerous unsustainable features and, therefore, must be rejected.

The Gawcott with Lenborough Parish Council OBJECTS IN FULL to this proposal and requests that the application be rejected”.

Marsh Gibbon Parish Council: Objected on the following grounds:

“Marsh Gibbon Parish Council strongly objects to this planning application and fully endorses the detailed submission from Edgcott Parish Council. The location of the proposed prison will destroy around 50 acres of open countryside. The proposed buildings are of an urban design and up to 5 storeys high including roof services. Being on the top of a hill they will be visible for many miles around and will be intrusive not just for many local residents but also the large number of walkers who enjoy the public footpaths around the site.

The light pollution from the existing prisons is already significant but the new prison will increase the light pollution by up to 3 times the current level.

The proposal would be contrary to Policy S1 (d) and (g) of VALP as it patently gives sequential priority to greenfield land as opposed to vacant or underused brownfield land, and Policy BE2. In addition, the environmental harm would also be contrary to NPPF.

There are a number of listed buildings within the vicinity of the site which would be seriously impacted by this proposal including the Grade II Gate piers and railings at the current entrance to HMP Grendon, Gil Grendon Hall (within the site) and Gil Lawn House (Lawn House Lane). A number of Listed Buildings are located in the wider locality, including the two Grade II Churches of St Michael's (Edgcott) and St Leonard's (Grendon Underwood).

There is also much archaeological interest in this location with many significant finds in recent years which are not unexpected bearing in mind the nearby Roman Road (Akeman Street A41) and the ancient Bernwood Forest which is still evident at Doddershall,

Grendon, Sheepphouse and Finemere Woods. The HS2 construction work has also unearthed items of interest.

A medieval ridge and furrow field at the entrance to the proposed site will also be destroyed to make way for a new access road and football pitch”.

Middle Claydon Parish Council: Objected on the following grounds:

“The Middle Claydon Parish Council collectively wish to register their profound objection to this planning application and set out the reasons for objection based on the following reasons.

1. Location and Impact on the Local Area
2. Transport and Travel
3. Impact on current facilities

1. Location and Impact on the Local Area

This proposed location is not following the government’s priority of Brownfield sites before green field rural sites and we will lose 73 acres of green and rural spaces. The proposed site is served by an inadequate network of rural and unclassified roads and poor public transport.

The proposal would have a significant and detrimental impact on the character and appearance of the locality moreover; it is poorly related to the existing settlements and would result in a significant and harmful blot on the local landscape. The proposed development would irreversibly alter the landscape character of the whole site from open countryside to a very large urbanised development of tall and extremely large buildings positioned on the top of a hill which will destroy the visual amenity.

Location of a new prison of this size is totally inappropriate to such a rural area and goes against all government policies to reduce carbon emissions. Staff would have to travel from a wide area, as there is little available affordable housing in the surrounding villages. An urban brownfield site, affording greater connectivity to the rail and motorway network would be more suitable to a development of this size, offering greater accessibility to staff, visitors and service providers.

Further a development of this scale, within an area of largely undeveloped countryside, would have major, irreversible adverse effects on the surrounding landscape in terms of night time visual experience with the significant level of lighting required for the operation of a mega prison. There is currently insufficient housing in the locality to house some additional 550-750 staff members and hence the vast majority of staff would be located in a wider area from the site. Only seven of the current prison officers in HMP Grendon and HMP Springhill, live in the parish of Grendon Underwood.

2. Transport & Travel

The Impact on the local area would be enormous. The inadequate network of local roads is already being overwhelmed by heavy vehicles serving the construction of both HS2 and EW Rail, and the inevitable increase in traffic, especially HGV’s, during the building of such a new prison would probably coincide with peak activity on those two projects which will be the case for a further 5 years. The local community is already suffering considerably from damage to roads, traffic management problems, and a huge increase in traffic volume and so any further escalation caused by the building of another major infrastructure project would be unsustainable and devastating. An alternative site for such a development would

be the ex MOD site at Bicester which has excellent road links (M40) and Rail links to surrounding towns and would probably already have local infrastructure services available.

3. Impact on Current Villages Services

Again the Impact on the local area would be enormous. All of the villages in the Claydons (which are currently seeing 3 major housing developments) and surrounding villages have some smaller but extremely important local services, such as local retail shops, doctors' surgeries, local schools, and local District Nursing community locations, all of which are vital to us. These services are accessed via the above inadequate network of narrow, ill surfaced roads, which is already stretched to full capacity by existing construction traffic. This vital access would be severely compromised by any further increase in heavy traffic, to the detriment of community wellbeing.

In summary the Parish Council collectively cannot see any clear validation for this development environmentally or financially and would recommend that the planners rethink their proposal as there are many alternative sites that could be explored with less impact".

Charndon Parish Council: Objects on the following grounds:

"Members of the Charndon Parish Council, along with our residents, would like to voice our strong objections against the proposed building of a new prison within Grendon Underwood.

Charndon Parish Council is attached to the Edgcott and Grendon Underwood villages and services the residents of Charndon and Calvert (not Calvert Green), the population of which currently sits at around 821 (*based on a 2019 census estimate). Currently, we are significantly impacted by the building of HS2, East West Rail and the development of several new housing estates nearby. These projects are causing a huge impact not only on the residents, but has destroyed the habitats of wildlife and seen the Calvert Jubilee Nature Reserve being destroyed. We have seen an increase in serious road traffic collisions in the area, with a recent fatality within our parish and one close by, along with a serious collision in recent weeks which has left a member of the public paralysed. This area is NOT built for mass development and as such, is not in any way built for an increase in traffic or population. Please find below various objections to your proposal.

Firstly, before we even consider a new prison, you cannot ignore the issues currently experienced by HMP Springhill. Residents are exposed to noise and light pollution daily, particular when the prisoners are in the open areas. Not only that, but due to the nature of a Cat D prison, there is a constant stream of prisoners absent without leave, causing a significant amount of stress to local residents and nothing seems to be done to negate these matters. Now I bring to your attention the issues that a new prison will bring:

Pollution

Due to the nature of a prison, particular that of a Category C, security plays a big part of the infrastructure which would include flood lighting. The current lighting installed at Springhill is visible from the roadway. Therefore, the new site, which is to be built at an elevated point, will be visible to all residents, including those within Charndon. The residents of Calvert are already enduring noise AND light pollution from the School Hill HS2 batching plant and compound, as well as the West Hill compound. If this build is to go ahead – what mitigating factors are you taking into consideration?

Security

The proposed site for the new prison is located very close to residential properties. With contraband getting into prisons at a record high, what measures will be put in place to ensure perimeter security and stop visitors coming to the area and making attempts to throw/drop items over perimeter walls? The use of drones to do this has increased across the country and therefore is easily achievable, particularly in a new prison where there are always going to be teething problems to start with.

Charndon and surrounding villages currently have a significantly low crime rate, which we strive to keep. The mega prison will start to introduce criminal associates to the area and expose our villages and homes to such persons.

The public transport system around the villages is minimal and there is limited access to leaving the area utilising public transport. Residents are concerned about the behaviour of prisoners who are released, pretty much thrown out into the world and have to find their own way home. Will we see a flurry of tracksuit clad offenders walking around our streets, targeting residents and properties?

Development

The build itself will be too impactful for the area. Roads are crumbling already, proving they are not suitable to support HGVs and alike. Residents are suffering with the constant flow of heavy vehicles passing through, numerous road closures and diversions. You will find yourself having constant challenges by parishes, requesting speed checks, speed awareness, road repairs and community engagement, all of which will be of a significant cost to yourselves. Currently, Fusion and Kier developments provide residents with printed copies of all works as part of an agreed plan to engage the community and keep them updated. Is this something that you will be able to fund and keep up with?

Traffic

I invite you to take a look at the Buckinghamshire Council website and all of the current, ongoing and proposed road closures in the locality, which is where you will see the current situation and how bad it is. We have residents waking up not knowing how they will get to work as they are pinned in by road closures. Our only saving grace are the roads that lead out of the village towards the A41, which is the main access road in and out of the village, providing quick access to local surgeries and hospitals. Your proposed plan will cause grid lock on our roads, particularly being so close to the A41.

The roads are far busier than ever and there has been a huge rise in both damage and non-damage collisions. Within the last three months I am aware of two fatalities, a serious collision which has left someone paralysed and numerous reports of damage caused to cars within a two mile radius of Calvert. In the initial stages of your plan, the construction phase, you bring with it a fleet of vehicles, many of which will most likely be from independent companies or self-employed drivers. What we have found is that these drivers do not respect the communities they drive through, swearing at residents who challenge them to slow down or committing traffic offences. Then when the prison is complete, there will be a massive influx of cars on the road, with staff, visitors and

civilians accessing your site. This is not acceptable. We should be putting measures in place to save lives and reduce our carbon footprint.

Overview

You have heard so many objections to the proposed plan that it should be clear the prison is not welcome or supported. As a human being, please remove yourself from the situation and see it for how it is for us – what have we done to deserve this? First HS2, then EWR and now this.

The area is not ready for such a development. There are so many more suitable locations for a prison, certainly towns that can cope with such a build. The residents of Charndon, Edgcott, Grendon and Brill chose to move to a rural area as it is just that – rural! Please do not be the next government funded project to ruin our homes and lives”.

Calvert Green Parish Council: Objects on the following grounds:

“Calvert Green Parish Council on behalf of its residents oppose to the proposal to build a new prison nearby.

- The proposals outline a development plan of what could be the largest prison complex in England and Wales and one of the largest in Europe. This is a largely rural area surrounded by small settlements and served by an inadequate network of rural and unclassified roads. The local infrastructure is already overburdened and suffering from the cumulative effect of HS2 and EWR construction projects which intersect approx. a mile from the proposed development. The unclassified rural road through Edgcott is already carrying around 3,300 vehicles per day on average. Large numbers of HGV's using the road are increasing due to the EWR and HS2 major works in our area. These works are forecast to coincide with the timeframe expected for the development works for the prison.
- Even after completion of EWR and HS2 construction projects and the reduction of construction traffic, the IMD Depot being built at Calvert to service the HS2 line will employ c 300 people and traffic increases will result permanently from its operation. Adding further traffic from 5-600 new staff and additional external support from daily deliveries etc. is completely unsustainable.
- The resulting reduction in the green space separating the existing prison from Edgcott settlement is unacceptable.
- The increased light pollution that will result from the expanded prison site is unacceptable.
- There has been a steady flow of absconders/escapees from HMP Springhill over the years which already makes the local community feel insecure. Category 3 prisons present a very different potential risk to local communities. A location so close to such a small and relatively remote settlement is inappropriate and will put significant additional strain on police, ambulance and fire services in the case of any emergencies.
- Surrounding villages have for some years experienced drug and alcohol ‘drops’ undertaken by visitors who seek to smuggle substances into the prison estate. The expansion of the complex will increase this problem.

- A new prison would result to a fall in house prices in the surrounding areas.
- Building a prison in such a rural location does not comply with Government policies to minimise carbon emissions due to the amount of contractor and staff journeys that will be required during construction and the distances that will be travelled to the location by staff, suppliers and visitors”.

Consultation Responses (Summarise)

Local Highway Authority: Object on grounds of site sustainability and reliance on the use of private vehicles.

Archaeology: Less than substantial harm identified to ridge and furrow earthworks.

Ecology: Object due to insufficient information being submitted to fully demonstrate a Biodiversity Net Gain can be achieved on site.

Historic England: Raised no comment as proposal falls outside the scope for a consultation.

Environment Health: Raised no objection subject to conditions regarding mitigation of road traffic and sports pitch noise and a Construction Environmental Management Plan.

Great Crested Newts: Further information required in terms of proof of entry into Buckinghamshire Council’s District License Scheme or European Protected Species Mitigation (EPSM) licensing for GCN.

Environmental Protection Officer: Raised no objection subject to conditions.

Sport England: Object on the grounds of the loss of the playing field.

Health & Safety Executive: Raised no comments.

Tree Officer: No objection subject to further information required at reserved matters stage (to be secured via condition).

Landscape: Object on grounds of significant adverse landscape character and visual impacts.

Natural England: Raised no objection. Natural England considers that the proposed development will not have significant adverse impacts on statutory designated sites.

Recycling and Waste Team: Raised no objection.

Travel Plan: Requested Amendments

Lead Local Flood Authority: Raised no objection subject to conditions regarding a surface water drainage scheme and a whole-life maintenance plan.

Nuclear Regulation: Raised no comment as it does not lie within a consultation zone around a GB nuclear site.

Western Power: There is apparatus in the vicinity of the proposed works and standing advice has been provided.

Environmental Health: Raised no comments on the Hazardous Substances Consent as submitted.

BROWT (Berkshire, Buckinghamshire and Oxfordshire Wildlife Trust): Object on the grounds of

errors and omissions in the Biodiversity Net Gain Metric and whether a net gain is actually attainable; insufficient evidence of existing baseline conditions; insufficient survey for black hairstreak butterfly and survey effort/ impact of scheme on bats.

Heritage: Object on the grounds of less than substantial harm to the setting of Grade II Listed designated heritage assets and the total loss to a key remaining part of Grendon Hall's non-designated historic park and garden. Furthermore, insufficient information has been submitted to enable a full assessment to be undertaken with regard to the wider radius of heritage assets identified. Requests were made from the Heritage Officer for repair and preservation of the Grade II Listed piers, gates and railings which are located towards the entrance of the existing adjacent prisons. The applicants have confirmed a willingness to commit to appropriate repair and preservation, however Officers do not consider that this request directly relates to the proposal for this to be secured as part of this application.

Gardens Trust: Object on the grounds the proposal would cause significant, irreversible, and highly harmful damage to the fabric and character of Grendon Hall designed landscape and to the northerly setting. The setting of the Grade II Listed Hall and gate piers and metal fencing at the entrance to the prison site will also be damaged. The site of the new site entrance and road, football pitch and associated modern landscaping is a key part of the historic park which comprises the immediate setting for Grendon Hall and would result in irreversible and highly damaging harm to the historic fabric and character.

Representations

Greg Smith MP: Objected. The comments received in respect of this application has been appended in full towards the end of this report.

The Countryside Charity: Objects on the following grounds:

"We are writing in response to the New Prisons Programme Public Consultation and specifically the proposal for a new prison in Buckinghamshire. The Buckinghamshire branch of CPRE, The Countryside Charity, as a long standing charity, has a role to protect the countryside from developments that do not meet acceptable planning guidelines. We would like to register CPRE Bucks' opposition to the proposal for the reasons below:

1. The case is not made. The evidence of any need for new greenfield development is not there. Brownfield first - redevelop existing sites.
2. This consultation is for only part of what you are proposing to do. That is not acceptable as we need to see the whole of the proposal to comment. Piecemeal consultations cannot allow an assessment of the overall impact.
3. The location is inappropriate.
4. This proposal would greatly increase the light pollution for surrounding areas

where the light pollution is already great.

We detail these points in the following paragraphs. We would also note that the site is within the Impact Risk Zones (IRZs) for the Grendon and Doddershall Woods and Sheephouse Wood, which are two SSSIs nearby. By definition these are zones around each site which reflect the particular sensitivities of the features for which it is notified and indicate the types of development proposal which could potentially have adverse impacts. We do not believe this has been recognised and we would strongly suggest an impact analysis is required.

The case is not made

The proposal is for one of the largest prisons in England and Wales, with prison population figures only superseded by HMP Oakwood and HMP Berwyn. If the new site proposed in Buckinghamshire has 7 new blocks, as the consultation suggests may be the case, it will be the same size as the prison which is currently under construction in Wellingborough, Northamptonshire, just 40 miles away from the proposed site in Grendon Underwood. In relation to the government's "levelling-up" policy and the existing capacity already in the area just to the north and west of London, we think the government need to look elsewhere.

This consultation is only for part of the proposed development

The consultation document notes that additional options are being considered to expand HMP Springhill site as well; this would obviously further increase the prisoner population of the combined site. We therefore have concerns regarding the potential extension of HMP Grendon/Springhill and how this decision is likely to be consulted on separately from the new build proposal. It is not acceptable to consult on incomplete proposals.

The location is inappropriate

The current combined populations of the 2 nearby villages, Grendon Underwood and Edgcott is approximately 1000 residents. The potential scale of the proposal and new development is therefore relatively vast and is likely to have a significant impact on local residents, the surrounding infrastructure and, by no means least, the countryside - which is already disappearing at a horrendous rate in this area. We have not seen any evidence that brownfield sites, including looking at improving existing prison sites to make better use of the land available, have been properly considered before taking the "easy" option of building on open countryside.

Light and Noise Pollution will be a lot worse

This site, as we have pointed out, is open countryside close to a number of rural villages. Already, the existing prisons are causing light and noise pollution which reduces the quality of life for those living near the location. As evidence of that, we direct you to CPRE's online survey of dark skies across the country, which

demonstrates that the existing prisons are already causing significant light pollution, as the screen grab below shows:



Overall, therefore, we do not believe the site close to Edgcott and Grendon Underwood is the correct location for the proposed new prison and believe it would negatively impact on the countryside and natural environment. We therefore strongly object to this proposal”.

Amenity Societies/Residents Associations

Springhill Residents Group: Objects on the following grounds:

“We are writing on behalf of the Springhill Residents Group. We have had majority objection from the residents of Springhill against the proposed new prison on the site of HMP Grendon and Springhill. We believe that this proposal is inappropriately placed and an alternative brown field site should be considered.

Proximity

We are very concerned about the impact of the proposed prison site due to the scale and location. We will be living within 20-30m of an area actively used by inmates with the current proposal. At present the prison impacts on us minimally. There is a high level of traffic at certain points of the day but it is easy to avoid contact with prisoners in our area. With the proposal of having an activity area and football pitch within close reach of the housing development increases access and proximity to people who will likely be a danger to our residents through behaviour and influence.

Traffic

The traffic impact of this proposal is causing grave concern. Road tubes monitored approximately 3,900 vehicles per day in Edgcott, 270 of those considered to be HGVs. The proposal is looking to increase this by 2000 contractor movements per day at the peak of construction. The roads are small and narrow, they are inadequate for our current level of

traffic. If this project gets completed the ongoing single occupancy vehicle movements will maintain for staffing and visitors due to the rural location of this proposal, this is currently estimated at 1,400 per day including service vehicles. The options of public transport in this area is very minimal and caters only to those wanting to travel to near by villages on the way to Aylesbury. The bus is infrequent and expensive.

Flooding

Flooding is a common concern for residents in this area. We do not have any confidence that the management of this will be improved when residents have had to consult with the parish council, MP Greg Smith and Buckinghamshire Council to get their concerns addressed. We are connecting with the current prisons and help is now forthcoming to address issues but it takes a long time for any action to happen. With the proposed new demand on drainage including sewerage and the removal of permeable fields replacement with large car parks and buildings we have less capacity to manage the risk of flooding from rain water through to raw sewage.

Environmental impact

The CPRE (Countryside Charity Buckinghamshire) have demonstrated the current level of light and noise pollution in the area as being high from the existing prison estate. Through this proposal of building one of the largest prisons in the country will create unprecedented light and noise disturbance within open countryside. The placing of the buildings will be on the horizon shining essential lighting all through the night, every night. As described in the government guidance on light pollution the impact on wildlife and annoyance to local residence is a key concern (www.gov.uk/guidance/light-pollution). In regard to the impact of noise pollution in humans, it has been shown to cause a range of health problems from stress, poor concentration, productivity losses in the workplace, and communication difficulties and fatigue from lack of sleep to more serious issues such as cardiovascular disease, cognitive impairment, tinnitus and hearing loss (Australian Academy of Science accessed May 2021). As humans we can do some things to mitigate this but there is increased awareness of the impact of noise on wildlife. There is evidence that the stress from these processes reduces longevity of species, reduced abundance and avoidance behaviours. Human noise pollution is now being considered as one of the most significant harms we are doing to our environment. This area is a green field site. We have some haven at least, in amongst a lot of disturbance already present from ongoing developments.

Summary

The residents of Springhill and those of local areas have explained many other issues of concern relating to this development. We are very concerned about the impact of the project and its lack of consideration to the local area and vicinity. We vehemently oppose this proposal and hope more thought is given when considering extension of the prison estate”.

Edgcott Parochial Church Council: Objects on the following grounds:

“Edgcott Parochial Church Council (PCC) objects in the strongest possible terms to this application. The Edgcott Parish Council has written in great detail, outlining the shortcomings of the proposal and their numerous, overwhelmingly persuasive objections to the application. The PCC fully endorses the PC’s carefully considered set of objections and we refer you to that submission.

In addition, the PCC would also like to emphasise their own particular objections on grounds of location, heritage, community wellbeing. The proposed location of the new prison is on a hill immediately opposite Edgcott’s oldest building, the medieval church of St Michael and All Angels, a Grade 2* Listed Building, which dates back to the 12th century (<https://historicengland.org.uk/listing/the-list/list-entry/1214280>). The area immediately around St Michael’s is still remarkably unspoiled, with all recent building having been in keeping with the traditional local, rural styles. To ruin this tiny rural church and the special atmosphere of Church Lane by building a disproportionately large modern, urban style prison immediately across the fields and in full view, would be utterly against the principles of enlightened Planning for the 21st century. The Church is on a small hill, which means that anyone visiting it, whether for a regular church service, a wedding, a funeral or for quiet contemplation would (if this proposal goes ahead) find themselves looking out onto an enormous six block prison, totally out of character with the surroundings. The proposed site of the prison is therefore entirely inappropriate. It would be extremely intrusive and distressing for many local people, an especially unfortunate circumstance for those attending a funeral. If the proposal is not rejected, the new buildings and associated noise, disruption, traffic and light pollution both during the construction and once the prison is operational will have a very detrimental and irreversible impact on this ancient landscape.

The PCC is also very concerned about the welfare aspects of the proposal. Local people are already distressed by the prospect of further environmental damage, greatly increased traffic, noise, light and air pollution. The area has suffered greatly from the construction of HS2 so people are deeply apprehensive about the impact of this new proposal. As the pandemic has caused a great deal of grief and suffering of various kinds, the PCC is very opposed to anything that will aggravate rather than ease the general sense of anxiety. The idea of a greatly expanded prison site – and population – is doing nothing to help restore people’s sense of stability and hope for the future. It is recognised that at times of deep uncertainty, people find familiar things not just comforting but vital to their mental health. This proposal threatens to destroy something that is fundamental to local people’s sense of their own place – the familiar landscape. It would be deeply troubling at any time, but at this extraordinary moment of the nation’s history, it is even more worrying. The Edgcott PCC request that that full consideration be given to the likely psychological, emotional and spiritual impact of this proposal – and to refuse the application”.

Other Representations

476 comments have been received objecting the proposal:

Noise pollution:

- Impact of noise from construction and earthworks will affect the community feel of this area and could negatively effect the local community.

- Noise will particularly affect the residents in Springhill who are directly adjacent to the site and may cause stress to residents.
- Increased noise levels from the operating of the prison.
- Increased traffic will increase noise levels in the area.
- The current noise pollution is particularly bad when the prisoners are playing football on the pitch in its current location, the noise and bad language can be heard across Edgcott and the Springhill housing estate.
- Location of proposed football pitch will increase noise levels to residents in the immediate vicinity.

Residential Amenity:

- Quality of life will be totally destroyed by the construction of a prison and in particular, a football pitch directly behind Willow Lodge. Causing further alarm is it is now proposed that the facility be opened to the community for their use.
- The current rural view which is to be replaced with noise barriers and floodlighting is going to severely impact quality of life and mental health.
- All disruption for residents from this proposal would be on top of current disruption created by HS2 and EWR construction as the height of the construction phases for all of these projects would overlap.
- Loss of privacy and sense of security to houses that overlook the current green field where, within this proposal, the access road and football pitch will be built.
- The prison buildings will overlook many properties in Edgcott and Grendon Underwood which will cause concerns to residents.
- Impact on amenity pleasure through loss of landscape and open space will result in harm to the mental health and wellbeing of local residents.
- A PROW will be diverted during construction which will impact the wellbeing of the community.
- The buildings will be highly visible, greatly impacting views causing major adverse effects for those living nearby and those who travel through the surrounding area.
- Impact on air quality due to traffic.
- The existing prison emits unpleasant cooking smells from the kitchen, another kitchen will add to this.

Location/ Design:

- The buildings are described by the architect, Tim Irons, as appropriate for an urban setting, they are not suitable for this rural area.
- The design of the proposal is completely out of character with the surrounding area.
- Loss of all green space in the area.
- The proposed site layout is horseshoe shaped which does not lend itself to a suitable design of such a large prison.
- The location of the football pitch confirms the inadequate recreational facilities that will be available on this site.
- Sport England has stated that the proposed replacement playing field provision may fall

short of their requirement that a replacement playing field will be of equivalent or greater quantity than the area of playing field to be lost.

- The proposed location of the football pitch is adjacent to the current road into the prison complex on the southern side and the new road on the northern side which has the potential to cause accidents if balls from the pitch end up on either road.
- The site is not sufficiently flat, it's on a hill.
- The Ministry of Justice's application ignores that the Grendon Prison is in a rural location and promotes benefits based on urban prisons.
- The prison is not being built in the same tradition as other structures or using the materials that match its setting.
- The site is simply not big enough for the proposal.
- A prison of this size should be sited in an already urban area.

Landscape/Character:

- No evidence that consideration has been given to the danger of urban sprawl resulting from encroachment into a Greenfield area.
- The prison will also be visible day and night from surrounding areas including Quainton Hill, Brill Hill, Waddesdon and Ashendon, all popular destinations for walkers.
- The size of the prison will dominate not only the villages of Grendon Underwood and Edgcott but all of the Aylesbury Vale region.
- Loss of green space around the Springhill housing estate which contributes to the character and appearance of the immediate area.
- This proposal will urbanise the local area beyond recognition.
- The proposal will result in loss of the spatial separation between Springhill and Edgcott, coalescing two distinct villages.
- Major adverse effects for sensitive visual receptors (including residents and PROW users) close to the site from the north and east.
- Development of a greenfield site within the open countryside for a new prison would fail to comply with national and local policies. The government should be using Brownfield sites for these types of proposals.
- Huge impact on local landscape character.
- Further from the site, visual effects reduce to moderate to major and moderate adverse where there is extensive existing reference to prison built form, or at middle distances.
- Amount of lighting required for security will cause significant light pollution for the local area.
- The area of lighting would be significantly greater than from the current prison and would be evident from a wide panoramic viewpoint.
- The proposal is very large construction that will have the impact of joining two discrete residential areas. It is against planning to have the impact of joining communities and urbanising a rural area.
- Very urban, almost "Brutal" style of architecture which will cause harm to the character of the area and open countryside.

Heritage/Archaeology:

- The field where the new site entrance and road will be located as well as football pitches forms part of the Historic Park of a historic and locally significant Grade II listed property and this should be considered.
- Construction of the new prison would have a significant impact on the settings of both Grendon Hall and Lawn House. There would also be harm to the setting of the Grade II listed gates piers and metal fencing at the current entrance to the prison site.
- The Grade II listed Church and additional Grade II listed buildings within Edgcott and Grendon Underwood will also be permanently affected by the scale, noise, and light pollution of this development.
- The field where the new site entrance and road will be located as well as football pitches are an area of historic ridge and furrow cultivation, remnants of medieval farming practice, and this should be preserved. It is going to take an enormous amount of earthworks to make this a suitable site for a football pitch.
- The Heritage Statement states that the level of impact on the heritage assets is 'extremely limited', this new prison would have a major and negative impact on several heritage assets.
- The proposal overlooks the historic association between Grendon Underwood/Edgcott and Shakespeare.
- Adverse impact on Grendon Hall's historic park and garden.
- Potential for evidence of Roman occupation on the building site is high given the proximity to Akeman Street.
- There's also Archaeological interest in the ancient Bernwood Forest which is still evident at Doddershall, Grendon, Sheephouse and Finemere Woods.
- Potential for remains relating to prehistoric activity within the site.

Traffic & Highways:

- This community already adversely impacted by and has a high volume of traffic, especially with HS2 and East West Rail traffic.
- Impact of construction traffic on the roads, nor are the roads suitable.
- The access roads are not suitable for construction traffic. The area is served by narrow local lanes and B roads.
- Grendon Road is in a state of disrepair, increased traffic will compound this issue.
- Traffic increase from the operation of the prison.
- Not enough and inadequate public transport/access to transport links in the area to support this proposal.
- Buses are not compatible with shift times for workers. There are no appropriate services at weekends for visitors.
- There is no bus service to Bicester Village Railway Station to the site meaning staff and visitors will be unable to get to the prison on public transport. Taxis are commonly financially prohibitive for visitors.
- It is now proposed the local community will be encouraged to use the proposed football pitch. Where are the visiting non-penal footballers going to park as there is no provision for parking close to pitch and Springhill Road is unsuitable.

- Those who want to visit prisoners who do not have cars may not be able to get to visit the prison due to inadequate provision of public transport. This will have a detrimental effect on prisoners and their families, a 2014 MoJ report found that offenders who maintain family relationships and receive visits while in custody are 38% less likely to reoffend than those who do not receive visits.
- The existing prison is served by bus routes which stop on Grendon Road, about a 10-minute walk from the prison. The NPPF (2019) states that developments should address the needs of people with disabilities and reduced mobility in relation to all modes of transport. This site does not meet this need.
- Surrounding roads are already dangerous, additional construction and prison traffic increases the risk of accidents.
- Pavements are dangerous as they are too narrow, increased traffic increases the risk to pedestrians.
- Estimates predict 575 in and out daily traffic movements once operational. This will have a huge impact on the local community.
- MoJ's Economic Impact Report for a new prison identified an employee containment rate of 54%. Nearly half will be driving through the village and local area from outside of the area to go to work. This will greatly impact local and regional area in terms of traffic creation.
- The proposed car park is not big enough, it has 453 spaces, staff numbers alone are estimated at 734 plus visitors. A similar model for parking spaces was used at HMP Berwyn and a further 194 spaces had to be added.
- The increased traffic will be a danger to all road users.
- The proposed new access road is too close to the existing prison entrance and the traffic calming road narrowing entering Edgcott, this would inevitably lead to congestion, delays and even accidents.
- The Energy and Sustainability Statement states that sustainable modes of transport will be encouraged for staff and visitors through the provision of cycle storage facilities and vehicle charging points. However, the surrounding roads are unsuitable for cycling.
- It should be noted that the current prison actively advises staff against cycling and walking for safety reasons.
- The Outline Travel Plan states that a car sharing scheme will be developed for staff, however staff will be working a variety of shift patterns and live over a widespread area making a wide-spread car sharing scheme unlikely. The current prisons' staff do not partake in such a scheme.
- Question the response received from Travel Plan team on the submitted Outline Travel Plan.
- The plans for the proposed new site entrance show that during the construction phase a security barrier will be introduced just inside the new entrance. Assuming that this is to check that HGVs have authority to enter the site, where will other vehicles wait whilst vehicles are awaiting clearance? They will have to wait on the highway causing delays.
- The proposed new entrance is in close proximity with the existing prison entrance on Grendon Road, 2 bus stops and the traffic calming measure. This will increase the chances of accidents and will cause significant traffic congestion.
- In the area around Grendon Underwood there are several on-going building projects including HS2 maintenance depot at Calvert; Sites A, B and C in Marsh Gibbon where ~40 homes are under construction; and major housing development in Steeple Claydon. These developments will lead to large increase in traffic in the surrounding roads which are in poor condition.

- More than 80% of the additional staff will have to use the A41/Broadway junction which is already over its safe working load. It is dangerous to pull in and out of this junction.

Natural Environment:

- Trees will not be able to screen the prison buildings, buildings of this size would require tall, mature trees which would take years to grow.
- Detrimental effect on the local wildlife.
- Light pollution may affect nocturnal wildlife in the area
- The wildlife that will be affected includes many birds of prey.
- The planned development will cause irreversible damage to the local environment, ecology and the historical setting.
- Irreversible loss of countryside (73 acres).
- Habitats of local level ecological importance are being removed within the development proposal, including:
 - 1.95km of hedgerows.
 - 0.03ha broad leaved woodland.
 - Great crested newt terrestrial habitat.
 - Seven species of bats.
 - Protected birds including some that are red-listed as a Bird of Conservation Concern.
 - A badger sett at the west of the site and use the site for foraging.
 - A breeding population of common lizards.
 - Butterflies, Invertebrates including toads, grass snakes, aquatic invertebrates etc.
 - A wildflower meadow.
- The ecological consultants state it would take 25 years for a positive effect on habitats at a local level. Meaning the development will negatively impact the environment for 25 years.
- Hedgerows and ponds are a local priority habitat within Buckinghamshire. The prison threatens both.
- Topsoil will be destroyed during construction.
- Loss of green space: 70 acres of farmland and almost 800m of hedgerows.
- Effect of noise pollution on local wildlife.
- The site is within the Impact Risk Zones for the Grendon and Doddershall Woods and Sheephouse Wood, which are two SSSIs nearby. This doesn't seem to have been recognised and an impact assessment is required.
- Staff will access the new site and car park by driving past the edge of the ecological area and parking adjacent to this area. Although the main ecology area will be left in place, the noise and light pollution and general disturbance from traffic for the construction and operation of the prison will cause disruption to the wildlife.
- Concerns about the validity of the Biodiversity Net Gain calculations.
- Light and noise is already polluting the development from significant developments in Bicester, HS2 and EWR, adding further light and noise pollution will have a catastrophic impact on biodiversity.
- Land on which the building is planned is home for many rare birds, mammals and amphibians. Loss of biodiversity will have a spiral of long-term devastation.

- In light of the numerous amendments to the OPA, Grendon Underwood and Edgcott Parish Council request that a second environmental impact assessment be carried out to reflect the changes
- Light pollution has a negative effect on wildlife.

Environment:

- All travel to the prison will have to be made by car due to the rural location and this will create significant carbon emissions. The estimated carbon emissions from staff journeys along is more than 1000 tonnes of carbon per annum.
- The prison will generate over 605 tonnes of water per year.
- Prison development will have an adverse effect on the environment
- An estimated 1kg per resident per week, equating to 75 tonnes of food waste will be generated per year.
- This proposal seems out of line with Government's commitments to address the climate emergency e.g. promoting active travel and use of public transport rather than reliance on private cars.
- The construction of the new prison will contribute to carbon emissions.
- Building the prison in such a rural location goes against Government policies of minimising carbon emissions as it is not a sustainable site.
- Building on this green field site will release 6678 tonnes of carbon trapped in the fields.

Economic:

- No economic benefit to the local community. There will be no demand for employment opportunities, this is illustrated by the fact that the current prisons are experiencing staffing difficulties.
- Most of the country has good employment levels so staffing the prison will be difficult. In line with government levelling up policies, this prison should be built in an area where there is a need for local employment.
- Economic benefits massively overstated as this is a low unemployment area with little social housing and high house prices.
- Building the new prison close to the existing prisons could exhaust the local labour market of potential staff.
- The MoJ's projected 8.6M spend per annum in the local economy is clearly misleading and can only have been modelled on an urban prison with nearby amenities, shops, pubs etc., which are not present in this rural location.

Safety:

- Residents will not feel safe allowing children to play outside.
- Proposed site has contamination from Military usage. The risk level on site is medium and given that some UXO retains the potential to detonate if disturbed, there is potential for harm and damage, with possible severe consequences.
- The change in location for exercise and recreation for inmates to the field adjacent to Willow Lodge may increase drug and other 'drop offs' in this part of the site. This area is very close to Springhill Estate and is likely to become a hotspot for drugs 'drop-offs'.
- What measures will be put in place to ensure perimeter security and stop visitors coming to the area and dropping items over perimeter fences.

- Over the years there have been a steady flow of absconders from the Category D HMP Springhill, this makes residents feel very insecure about the new Category C prison.
- Health concerns for houses close to the construction site from construction debris.
- The construction traffic will be significant in noise, dust pollution and traffic congestion.
- The plans for the prison and the football pitches will put local children in close proximity, with offenders and witnesses to their behaviours.
- The prison should be sited far away from residential areas.
- Behaviours of prisoners once released.

Infrastructure:

- Local infrastructure already struggling to cope. Roads, water pressure, waste and flooding are all issues. The addition of 1400 inmates as well as employees will add to the strain of infrastructure.
- Area is already prone to flooding and this proposal will exacerbate a serious problem putting local houses at risk of flooding.
- Impact on local services. Outsiders infringing upon healthcare systems.
- Poor drainage in the area, which would be exacerbated by the proposal. The sewage system will be unable to cope with the demands generated by the proposed prison.
- The fields surround the proposed site are important for surface water drainage and are already overwhelmed causing them to overflow, resulting in regular flooding of roads and gardens.
- If the new prison were to be approved there would need to be an upgrade of all the existing drainage and sewage systems.
- The application states encouragement to cycle or walk to get to the site, this assumes interested parties will live locally. There is no infrastructure to support this population increase.
- Evident that the Hydrock and Pick Everard submissions regarding flood risk assessment is it evident that both are a desk-top analysis.
- Concerns regarding the assessment in the flood risk assessment.
- Location of proposed SuDS basin and it may be required to install a pumped system to drain it.
- Relationship between SuDS basin and neighbouring property and football pitch.
- Lack of local infrastructure to cope with current demand on housing, doctors, schools etc.
- Increased strain on emergency services.
- There are no plans to have areas to store and aid the collection of waste nor areas to store and sort recyclables, where is the waste from this facility going to go?
- Increased pressure on already strained local NHS services.
- Increased impact on local police service, residents have recently received a circular from the Prison Service and Thames Valley Police noting an increase in criminal activity around the perimeter of the existing prison.
- The Police Commissioner has stated that the Thames Valley Police do not have the staffing capability to cope with the increased problems associated with the prison population.
- Most of the services that the new prison will require will need to be upgraded e.g. drainage systems and installation of a new electrical substation, which will cause disruption for the area.
- The sewer system in Edgcottis already overcapacity.

Prison specific issues

- These plans create space for more prisoners when prisons are hurtful to communities and progression everywhere.
- General objection to expanding the prison industrial complex in this country.
- The government has stated that new prisons should be built close to the sources of crime, Buckinghamshire currently has a low crime rate and shouldn't need additional prison capacity.
- Increased anti-social behaviour from prison visitors.
- Another option for this development is at HMP Bullingdon which has vastly better transport links.
- Siting of the prison is wholly unsuitable. It is an inappropriate location based on where inmates will come from. The new prison should be situated closer to the conurbations from which the offenders come. Buckinghamshire has a disproportionate number of prisons and secure units for the size of population and crime incidence.
- The site is within 40 miles of 10 existing prisons which is >10% of prison capacity of England and Wales, the new prison would increase this to >12%. This is an inequitable distribution.
- Concerns about the MoJ's plans to expand HMP Springhill by 120 places on top of this proposal. Springhill expansion should have been submitted alongside the new prison application.
- Building and maintained prisons is a violent, classist and racist endeavour and it needs to be stopped. If you build it, it will be filled. Prisons are a human right violation and a stain on a civilised society. Building another prison will only serve to continue incarcerating people who often need support from elsewhere.
- Concerns regarding welfare of prisoners and moral issues relating prisoners being held in such a facility.
- Prisons do not prevent crime, they only displace people and ensure the crime happens to a vulnerable populations e.g. prisoners

Property Concerns:

- Likely to have a negative effect on house prices in the area.
- With HS2 being built around this area and the development of this new prison this area will become undesirable.
- Increases to home and car insurance.
- Roadside dwellings are constantly being shaken by the constant heavy construction traffic, some showing evidence of cracks. Further construction traffic is putting local homeowners at risk of structural damage to properties.

Application

- The application does not demonstrate how they have discounted brownfield sites and other potential sites.
- In response to a FOI request, the MoJ commented that no-planning application discussions had taken place with other local authorities. Hence, the MoJ has not undertaken cost/benefit analysis of the Grendon Underwood site versus alternatives.
- The proposal is yet another example of many others; the necessary factual details have not been put forward for proper planning scrutiny because to do so it would demonstrate the impossible.

- An environmental impact assessment should have been submitted.
- The Grendon Underwood site does not meet the site selection criteria used for a new prison near Wrexham, HMP Berwyn, which opened in 2017:
 - It is not sufficiently flat.
 - It doesn't have good strategic access to public transport and road networks.
 - It isn't accessible for construction traffic without major enhancement of transport infrastructure e.g. building a new site entrance to access the main construction site.
 - The site is overlooked which may compromise security.
 - There are severe standing water issues within the prison site as well as surrounding areas.
 - It is not previously developed/brownfield.
 - It is not a suitable shape for a prison development as it is horseshoe shaped.
 - It is not manageable in terms of ground conditions due to the heavy clay soil in this area.
 - There are public rights of way running through the site which are significant to and widely used by the local community. Its diversion would impact the local community.
- In the report by Hydrock, the noise measurements are inflated:
 - The readings were taken at the start of term for schools following a prolonged isolation period and parents were driving their children to school rather than letting them on buses due to COVID. Therefore, there was even more traffic on the road at that time.
 - Grendon and Edgcott are experiencing increased levels of traffic due to HS2 and EWR but the report does not make allowances for what the levels were like before these projects began.
- Concerns around inaccuracies in the Cushman and Wakefield report
 - Paragraph 7.53 states that "around 44% biodiversity net gain is being targeted for the site." This seems to be an exaggerated statement as there is one single aspect where the predictive model shows this level of gain. Overall, the biodiversity is simply stated as in excess of 10% net gain, not 44%.
 - Paragraph 7.55 states that "a site-specific flood risk assessment has been completed and there is deemed to be a low risk of flooding." However, it is well known that parts of the site and surroundings are prone to flooding from surface water which hasn't been taken into account.
 - Paragraph 7.71 states that "at least 10% of total parking will be allocated to fast charge electric vehicle charging points coupled with locally installed PV." The units mentioned in the proposal are not fast charging.

Other:

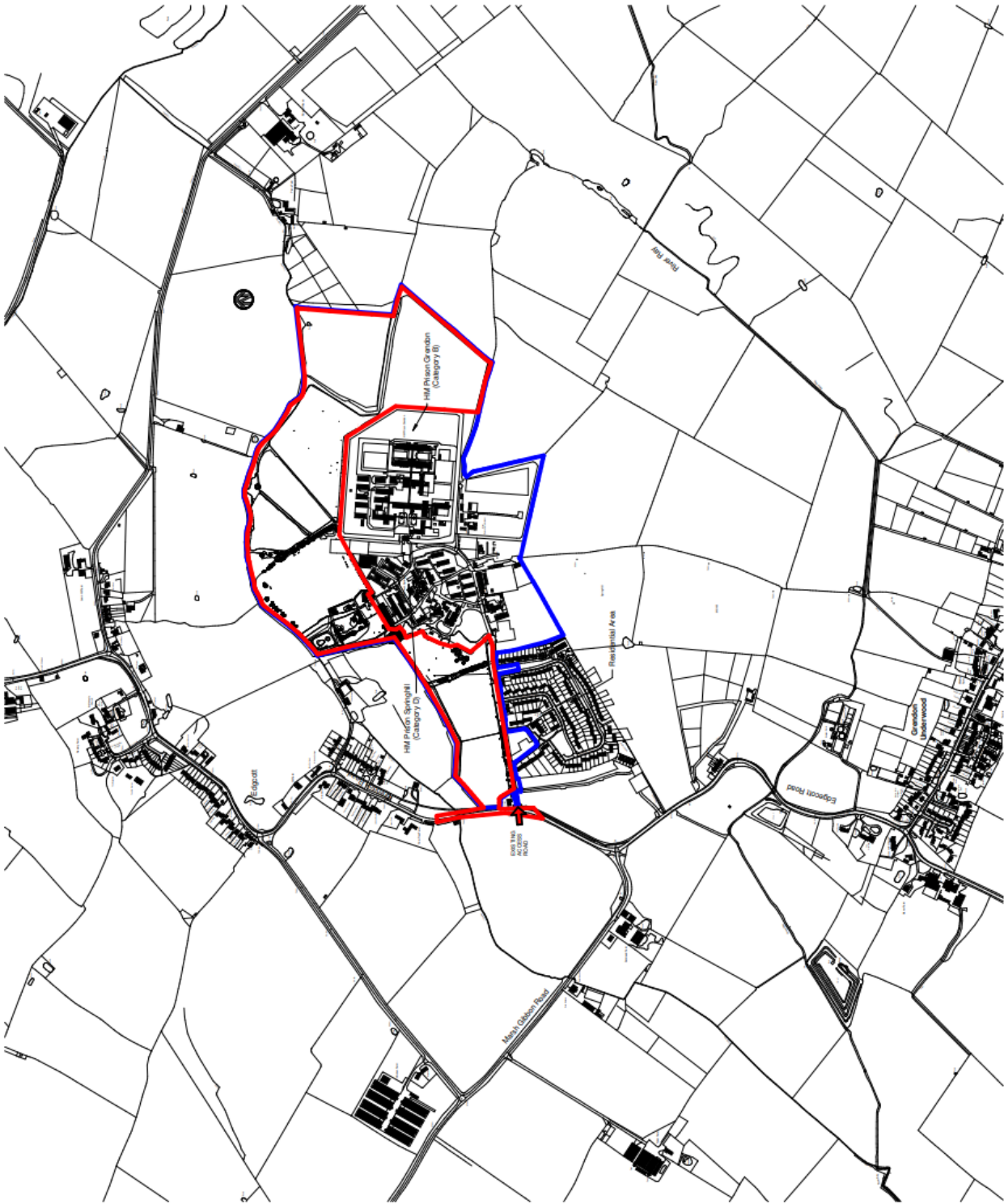
- A prison of this size should not be built so close to village communities.
- Two planning applications for development of 65 & 60 houses, located on Edgcott Road and Land South of Springhill Road, were rejected on appeal by the inspector and the primary reason for rejection was that these locations were not sustainable and deemed inappropriate for building.
- Planning applications on nearby land have been turned down and appeals rejected. The same rationale applies to this application and should be rejected for all the same reasons the secretary of state has rejected other local and smaller applications.

- The money it will take to build and run could be spent on preventative measures to behaviours which are criminalised, for things which can improve the health and safety of the community – health care, schools etc.
- Building huge prisons should be the last priority on the list in a time of global crisis from war to the cost of living and climate breakdown. Valuable resources should not be going towards projects of this nature.

4 comments have been received neither supporting nor objecting to the proposal:

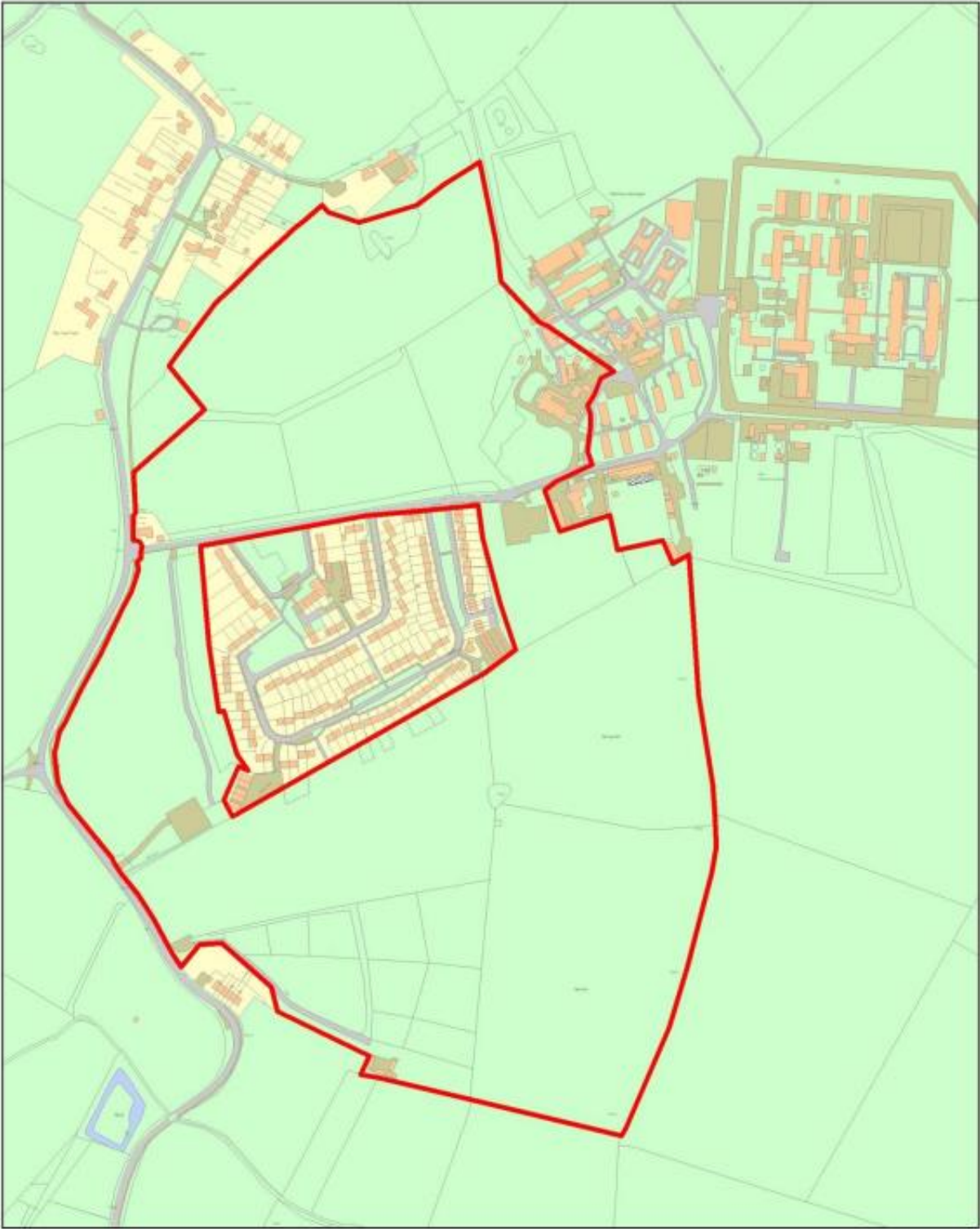
- Should this plan proceed, extra public transport should be put in place to allow both prison staff and visitors to be able to travel using public transport.
- Prison construction traffic should not be allowed through Edgcott or Grendon Underwood, only from the A41 along Broadway.
- There should be resurfacing and better maintenance of roads and pavements within the Springhill estate.
- There needs to be a commitment, valid for 50 years, that no further development will occur on green space in the surrounding area.
- Existing footpaths should be maintained or enhanced, not diverted.
- Buildings should be low-rise and fit beneath the tree line to not spoil views.

APPENDIX B: Site Location Plan



Do not scale – this map is indicative only

APPENDIX C: Map of Grendon Hall’s Historic Park and Garden



Grendon Hall: boundary of historic designed landscape interest

Produced by the Council Archaeology Service
March 2021

Scale: 1:5,092 at A4



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APPENDIX D: Grendon Underwood Parish Council Comments

21/02851/AOP: Abridged Statement of Grendon Underwood Parish Council 11th March 2022.

Introduction.

At a properly constituted meeting of Grendon Underwood Parish Council (GUPC) held on 27th July 2021, minute 2107.06, Council concluded that subject application represented a major adverse impact on the community, that this would significantly and demonstrably outweigh any alleged benefits and that proposed mitigations are patently implausible and unsustainable. A Planning Statement to this effect was submitted to County on 25th August 2021 and this is abridged herein to include various late, additional submissions by the Applicant, and the GUPC responses to them in corroboration of the Councils' request to refuse this application outright & without conditions. For the avoidance of doubt, Council wishes to make it abundantly clear that it does not, and has never, disputed the Government rationale for its national prison expansion programme, its projections for numbers of prison places nor the effectiveness of incarceration over other means of punishment, deterrent & rehabilitation. In any event, this would not be a valid planning consideration.

This objection is entirely focused on the location of the proposed development, how it was arrived at in preference to alternatives and the extent to which it would impact local communities and the sustainability of local infrastructure & amenities.

I. In Weighing the Planning Balance -

The Council weighed all relevant statutes including the NPPF, June 2021, as a whole, all relevant policies of the now adopted Vale of Aylesbury Local Plan (VALP), the GUPC Planning Response Policy Ref; CP16, all supplementary submissions by the Applicant, including claimed mitigations, the responses of various Buckinghamshire Council consultee departments, and hundreds of negative responses by local residents & businesses.

Overall, it is believed the adverse impacts of this application would significantly and demonstrably outweigh any alleged economic benefits and contravenes multiple requirements of the NPPF & VALP, both in the development phase and in the sustainability of the longer-term operation of three prisons accessing the local infrastructure through two access points, in close proximity, and on top of a hill on a greenfield site.

Therefore, GUPC opposes this application on the following grounds:

1. The proposed development, by virtue of its remote and unsustainable location within the open countryside, would require users to be entirely reliant on private motor vehicle transport, and would not provide good access for sustainable modes of transport.

There is no clear, valid, planning justification for the use needing to be located within this rural location and the development would not serve to meet local business and community needs in this rural area.

The application fails to adequately demonstrate that there are no more suitable sites for the development on brown field locations & within an appropriate area or that any demand would not be adequately addressed by alternative facilities within its own estate & catchment criteria. Furthermore, the proposed development would fail to have due regard to the sensitivity of its surroundings both local to an adjacent residential development, the villages of Grendon Underwood & Edgcott and across the wider aspects of Aylesbury Vale.

The proposed development is therefore considered contrary to Policies S1, S2, S3, S7 and D6 of the VALP and paragraphs 85 and 174 of the NPPF 2021.

2. The proposed development by virtue of its design, scale and massing would result in major adverse impacts on the landscape character and visual amenity of the site and its surroundings, and significant adverse impacts on the landscape character and visual amenity of the wider area, including during hours of darkness given the lighting that would be reasonably required to serve the intended uses, which would not and could not be adequately mitigated. The proposed development is therefore considered contrary to policies S1, NE4, NE5 and BE2 of the VALP and paragraph 174b) and Section 12 of the NPPF.

3. The proposed development by virtue of its siting, would result in the loss of a significant area of ridge and furrow medieval earthworks which the Local Planning Authority identify as a non-designated heritage asset of regional importance. The proposed development necessitates digging up and moving of earth over the area of ridge and furrow, which would result in the total loss of a significant area of ridge and furrow and permanent harm to the historic environment. Any alleged benefits of the proposal are not considered sufficient to outweigh this harm to the non-designated heritage asset, and therefore the proposed development is contrary to policies S1 and BE1 of the VALP and paragraph 203 of the NPPF.

4. Due to insufficient information, the application fails to credibly demonstrate that the proposed development would result in a net gain in biodiversity and it is considered likely that the development would result in harm to protected species, namely Great Crested Newts & various Passerine species. The information provided is insufficient to demonstrate that the protected species license could be granted by Nature England or the District Licensing programme. As such, the proposed development fails to comply with the requirements of the Wildlife and Countryside Act 1981 (as amended) and The Conservation of Habitats and Species Regulations 2017 and is contrary to policy S1 and NE1 of the VALP and paragraph 174 d) of the NPPF.

5. The proposal would conflict with policy GP35 of the Local Plan and would not constitute sustainable development as to local employment, transport infrastructure & carbon footprint.

6. It would fail to comply with the core planning principles of the NPPF in regard to economic objective, social objective & environmental objective for healthy & safe communities.

7. The indicative layout of the development show a separate stand-alone facility which would multiply the harms to sustainability of the current site and fail to complement the existing occupational characteristics of the site to the detriment of its character and impact on the wider community.

8. GUPC believes the mitigations suggested fail to recognise that the local topography & infrastructure necessary to make them credible or workable just does not exist.

II. Weight of Opposition. GUPC has sought and obtained the views of local residents through 4 public meetings and 3 open, public exhibitions and now conveys them in good faith on behalf of the community it represents. In doing so GUPC is grateful for support from other bodies including:

Buckinghamshire Council, who opposed at a meeting of Cabinet on 25th January 2021,

Greg Smith, MP, who has tabled some 21 written questions and has spoken in the House stressing the cumulative effect on infrastructure from two current prisons, HS2, EWR, one of the largest incinerators in Europe and continuing large scale development in the same area.

The Buckinghamshire Police and Crime Commissioner, Matthew Barber, speaking to Greg Smith on 16th August, saying “We need prisons but we need them in the right places already in the Thames Valley we have a significant prison estate and that has a real impact on local policing is a draw on police resources that should be spent policing our communities outside the wire another prison will just put more pressure on Thames Valley’s resources. And that is why I think this is a wrong decision by the Ministry of Justice.”

The Deputy Chief Constable of Thames Valley Police who advises “Due to the volume of crime investigation generated by [current] prisons, Thames Valley Police have dedicated Prison Crime investigation Teams (PCIT). **They are currently at capacity** and this will increase demand on the team the reality is that an additional prison will put pressure on our scarce resources and **will involve an increase in reported crime**”. Representing a dangerous degradation of police capacity and will constitute ‘*unnecessary loss of valued facilities and services*’ and ‘*reduce the community’s ability to meet its day-to-day needs*’

Other Parish Councils opposing include Edgcott, Charndon, Gawcott, Calvert Green, Marsh Gibbon, Hillesden, Middle Claydon as well as other groups including the Springhill Residents Association, Edgcott Parochial Church Council, many local businesses

Dept. of Zoology, University of Oxford - In a Literature Review Examining the effects of Traffic Noise & Light on Wildlife, Dr Marianne Sinka, May 2021, covering bats, birds, invertebrates, frogs, mammals & habitat loss, it is noted “During both the construction phase and the operation of the proposed prison the noise and light pollution would be substantial; due to the proximity of much of this to the ecology area and other nearby sources of nature, the impact on the local wildlife could be highly significant.

The Garden Trust “It is clear that the applicant’s wireline visualisations minimise the effects to a misleading degree including in the choice of viewpoints. Block visualisations... are an accurate representation which should be used in all visualisations as well as wirelines” and who conclude “the applicant’s visualisation methodology is greatly flawed, does not follow established professional guidance for such visualisations, and has resulted in a misleading representation of the visual effects to a considerable degree. It is not a reliable representation.”

In contrast, the only expression of support GUPC is aware of is from the Applicant itself.

III. Late Submissions. GUPC has reviewed several late submissions by the Applicant attempting to justify claims made in the OPA and re-submissions of County Consultee departments arising. These include

Archaeological Service; Environmental Health; Heritage; HSE; Natural England; Sports England;

Highways - Council welcomes the conclusion of The Planning, Growth & Sustainability consultee to “objects and recommends that this planning application is refused for the following reason:” “I have fundamental concerns with the accessibility and transport sustainability of the site.” However, GUPC would request some clarification:

In regard to Access, there seems to be no consideration that this access point will be for THREE prisons using TWO gateways.

In regard to Trips & Traffic Impact, whilst noting modelling for the A41/ Broadway junction for 2026 shows it would “operate over acceptable capacity without development”, it then accepts the “proposed highways mitigation” for that junction would provide “comparable junction performance to the 2026, without development, scenario”.

In regard to Highways Mitigation, the suggestion for more chicanes along Edgcott Road does not seem to recognise this is a HGV construction route for both HS2 & EWR and still not sure if there is an appreciation that the HS2 depot is a permanent one?

In regard to Sustainability & Travel Plan, it casts doubt on the comments of the Council’s Travel Plan Officer querying how the applicant’s Outline Travel Plan could be considered ‘a well thought out plan’ whilst also requiring more information. It is also claimed a copy of the Travel Information Pack can be secured via S106 obligation. S106 doesn’t apply to this development.

In regard to Parking, the consultee makes reference to other similar applications and has accepted them without considering the Applicant’s previous record for submitting parking projections that are unreliable & cannot be relied on for planning purposes (a 46% error at one location). Shift overlap modelling is found acceptable without independent scrutiny and without taking into account staffing/ visiting/ servicing for three prisons not just one.

Community Consultation by the Applicant. GUPC notes the Statement of Community Involvement, June 2021, submitted with the OPA, purporting to suggest communities had been adequately involved. They have not - and Council is keen to ensure this is in no way considered to be an accurate or plausible interpretation of events.

Demand in Location. GUPC notes that there are 11 prisons in operation or with planning permission within 40 miles of the proposed site. This means there would be circa 11.3% of the whole prison capacity of the whole of England and Wales within 40 miles of Grendon Underwood. Council agrees the solution to the demand should be ‘linked directly to major conurbation centres’, therefore not on remote, green-field sites and suggest demand would be far better served at more appropriate locations, especially on brown field sites, in areas of sustainable transport links, high unemployment, high crime and adequate housing.

Design. The NPPF Section 12 - Achieving well-designed places. Para 127 states “*Design policies should be developed with local communities, so they reflect local aspirations, and are grounded in an understanding and evaluation of each area’s defining characteristics.*”. The Applicant accepts this is a design better suited to urban locations.

Local Employment - Suitable local housing is grossly inadequate now and the majority of staff (employed and ‘through the gate’) will have to come from neighbouring conurbations remote from site and ill-served by public transport. HMPs at Grendon Underwood, Springhill & Bullingdon are understaffed and already finding it difficult to recruit especially in competition with current prisons & London based facilities attracting London weighting.

Local Character Council notes the Landscape & Visual Impact Assessment, Pegasus, June 21, especially Appendix A, submitted with the OPA using misleading line representations of visual impacts from several aspects around the proposed site. GUPC has commissioned full block photomontage visualisations to address this shortcoming. Comments from the Bucks Garden Trust include “BGT/TGT has been sent the attached photomontage visualisations commissioned by GUPC and consider they:

21/02851/AOP: Abridged Statement of Grendon Underwood Parish Council 11th March 2022

Present an accurate representation of visual impact based on rigorous methodology endorsed by leading professional bodies. They can be relied upon to present the true effect of the proposals as far as such visualisations can do.

Show far greater damaging visual impact than the applicant's visualisations.

Can be taken to indicate that of the applicant's other views where the proposed buildings are visible similar visual effects are also likely to be evident both in daytime and at night.

Archaeology – Council has weighed the Buckinghamshire Council Archaeological Service response to the OPA, 26th July 21, who note that the following records are relevant and that “If planning permission is granted for this development, then it is likely to harm a heritage asset's significance”. Council would urge the outright rejection of the proposal and that the suggestion of approval with conditions is an abject dereliction of any duty and responsibility to our archaeological heritage.

Ecology - During both the construction phase and the operation of the proposed prison, noise and light pollution would be substantial & unacceptable and, due to the proximity of much of this to the ecology area and other nearby sources of nature, the impact on the local wildlife would be highly significant.

Heritage - The BC Heritage response to the OPA states “It is noted that whilst some additional planting mitigation and screening is proposed, this will take some years to grow. Even as illustrated this is insufficient to fully obscure the taller elements of the development (housing blocks) or to eliminate the potential impact of lighting proposals. Due to the topography of the landscape and the scale of the site these elements of the scheme are anticipated to be highly visible from some distance.” BGT/TGT recognises that the GUPC commissioned visualisations confirm the high level of damage on the setting of the heritage assets (LBs and designed landscape) that BGT/TGT objections have previously alluded to. As day-time visualisations they are indicative of the level of night-time light pollution that will also occur over a wide area in this visible site. In addition,

1. The heritage assessment has only considered a small number of assets in the immediate vicinity of the application site. As previously discussed, the impact of a large development of the scale and nature of the proposal, and within the topography and landscape setting of the application site, requires a wider assessment radius. The assessment should as a minimum take consideration of views, and light pollution from all the assets listed.

2. No proposals have been put forward for the repair and appropriate preservation of the GII Listed gate piers, railings and gates to Grendon Hall. These have been allowed to fall into a poor state of repair and neglect of this asset which falls within the wider site is unacceptable.

3. It is noted that whilst some additional planting mitigation and screening is proposed, this will take some years to grow. Even as illustrated this is insufficient to fully obscure the taller elements of the development (housing blocks) or to eliminate the potential impact of lighting proposals. Due to the topography of the landscape and the scale of the site these elements of the scheme are anticipated to be highly visible from some distance.

4. Basic 3D modelling provided by the Applicant does not provide a suitable appreciation of the final development within the wider landscape or from the heritage assets detailed. Multiple views would be necessary to better understand the impact.

Similarly, in a report by the Buckinghamshire Gardens Trust Research & Recording Project, March 2021, updated June 2021, it was found this application would seriously impact the Grade II listed building Grendon Hall and degrade its associated historical pleasure park. “This site is one of several hundred designed landscapes county-wide identified by Bucks County Council as potentially retaining evidence of historic interest, as part of the Historic Parks and Gardens Register Review project carried out for English Heritage (now Historic England) (BCC Report No. 508)”

Amenity- GUPC has weighed the Sports England submission with the OPA and the Applicant's subsequent submission revising the use of the Western field to accommodate a new site entrance, a 600m access road, a large SUDS pond, a re-located football pitch, a running track & various other planting. These will irreversibly destroy some 80% of the remaining evidence of ancient ridge & furrow agricultural practice at this site and a cherished local amenity for walking whilst segregated from prison inmates. Suggested mitigations do not credibly address this loss.

Outcome of the Balance - Local character, Archaeology, Ecology, Heritage & Amenity.

Council has given special regard to the statutory test of preserving the setting of listed building and conservation areas under sections 66 and 72 of the Planning (Listed Building and Conservation Areas) Act 1990, which it is accepted is a higher duty. Due to the proximity of several listed buildings, the destruction of ancient ridge & furrow topography, the disruption to wildlife & habitat, light & noise pollution and visual impact, the OPA contravenes the overarching Environmental Objective for Achieving Sustainable Development, described in Section 2. 8. of the NPPF, and Council has given ‘Local character, archaeology, ecology, heritage & amenity’ significant negative weight in the Planning Balance.

Considering the overwhelming & inordinate nature of local harms, Council is not convinced any suggested mitigation is practical, viable or credible.

Authorised: Chairman, GRENDON UNDERWOOD PARISH COUNCIL. 11th March 2022.

APPENDIX E: Edgcott Parish Council Comments

EDGCOTT PARISH COUNCIL

Application reference 21/02851/AOP – New Mega Prison at Grendon Underwood.

Edgcott Parish Council wish to strongly object to the above mentioned application for the numerous points mentioned below.

1. Location and Site Selection

- The site is compromised in terms of both shape and size resulting in layout issues, e.g. re-location of the current football pitch close to residential properties and the workshop in the new prison is located 700m from some of the inmate accommodation blocks.
- Only a very small part of the 12.5 acre field adjacent to the highway is being used for the new prison, i.e. the site entrance and road. The other parts of this field are being used solely to provide facilities for HMP Springhill rather than having anything to do with the proposed prison.
- The site is on the top of a hill and around **600 m** from the nearest road.
- There is a low level of unemployment in the region and affordable housing for staff is limited and hence recruitment will be challenging and new staff will live over a widespread area.
- Experienced prison officers are required to run a prison – there will be competition with other new prisons for staff recruitment. Problems with violence were encountered at HMP Berwyn, in North Wales when it opened in 2017 due to the lack of experienced prison staff.
- There are currently two other major infra structure projects ongoing in the North Bucks area, namely EWR and HS2, impacting on villages such as Edgcott, Grendon Underwood, Steeple Claydon, Charndon, Poundon, Gawcott and Twyford and many others. To add a third infrastructure project like the construction of a new mega prison, which would overlap with the timescale of the current projects, would be a step too far and cause further catastrophic harm on so many fronts to the local area.
- As a starting point, site selection is clearly inadequate, as proven by the need to ‘acquire’ more land to make any of the layouts work and there is no unsatisfied local need. The selection process was all about ‘Project Speed’ with no direct evidence of the full review of alternative sites.
- The ownership of the land (and the immediate proximity to existing prisons), which should be attributed little if any weight in planning balance considerations, has been used as a ‘default’ position to artificially outweigh many key and irreversible planning harms, including sustainability, heritage, landscape and visual impact, transport, ecology, residential and amenity space. The MoJ’s site selection is an exercise in tokenism and reverse engineering as the solution to the Grendon Underwood location.

2. Sustainability

- The site is remote and unsustainable with predominantly car access only due to limited public transport. In addition new services required to run the proposed prison would be extensive.
- It is important to note that the unsustainable nature of this location has been independently acknowledged by two independent appeal Inspectors who dismissed residential schemes on land at Edgcott Road (PINS reference 3255772) and South of Springhill Road (PINS reference 3185166) respectively.

3. Socio Economic Benefit

- Economic benefits are over exaggerated and more relevant to a large urban area and will result in limited local benefit. Furthermore the local area to which the alleged economic benefits are claimed is defined as within a 40-mile radius of the site, this provides an entirely misleading perspective to the LPA. Such a radius encompasses a significant portion of Oxfordshire, West London and parts of Northamptonshire, Bedfordshire, Warwickshire, Gloucestershire, West Berkshire, Hertfordshire and Wiltshire.

4. Landscape, Character and Visual Impact

- Since the construction of the two existing prisons and the Springhill housing estate in the 1950s and 1960s no further significant developments have taken place on the prison site or the surrounding area. Hence this area has been a ‘settled environment and landscape’ for around 60 years and currently belongs to a network of open fields in the surrounding landscape.

EDGCOTT PARISH COUNCIL

- The development would result in a significant and irreversible, adverse impact on the tranquil landscape character and the visual impact, both at a local level and at a wider regional level. This was clearly highlighted by the photomontage study commissioned by the local PCs.
- The development would represent an extension into the open countryside and result in a major degree of urbanisation plus some coalescence of Edgcott and Grendon Underwood. This would decrease the rural experience.
- The existing visual effect of the Prison complex would be significantly magnified by spatial sprawl, introduction of large, bulky house blocks on an elevated part of the site, an enormous car park, provision of workshops and other utilitarian buildings.
- Ancillary features would cause additional harm. In particular, an array of lighting in and around the site would draw attention to the intensified institutional use, especially at night-time, causing significant pollution to the rural countryside as well as impacting on wildlife.
- The proposed car park would also appear as a harsh, uncompromising feature on the site with its impact reinforced by continuous vehicular activity, headlights at night and so on. This being so close to Grendon Hall and Lawn House can hardly be described as 'enhancing' the setting of those two Heritage Assets.
- Screening of the buildings on the main site as proposed is inadequate as native, deciduous planting is proposed and would be limited in effect.
- In the wireline analysis work reported in the LVIA the 'worst case' viewpoints were NOT considered and this is a significant flaw in the LVIA. In conclusion this was not a fair and objective study of wireframe on worst case visual receptors and is not a fair representation. As a result GU and Edgcott PCs commissioned a photomontage study by a leading expert in this field (MS Environmental) and this **did** consider 5 of the 'worst case' viewpoints. The results of this work clearly highlighted the significant impact on the landscape that this development would have.
- Many of the documents in the application are misleading, biased (especially the LVIA) and inconsistent. Furthermore poor responses were given when Consultees requested further information.

5. Heritage and Archaeology

- The field leading from the highway to Grendon Hall has great historic value and provides a green edge to the public footpath and Springhill housing plus between Grendon Underwood and Edgcott.
- This field is part of the Historic Park and Gardens associated with Grendon Hall as reported by the Bucks Garden Trust (report issued in March 2021 and updated in December 2021) and importantly it consists of ancient ridge and furrow and has potential archaeological value due to local findings.
- All local Heritage assets close to the site were listed in 1984-5 after the construction of the existing prisons. According to English Heritage Guidance (2017), the whole of the current site can be regarded as part of the setting of Grendon Hall. Furthermore, accumulation of harm to the setting of local Heritage assets has to be taken into account in the case of proposed developments.
- Significant harm would be caused to the Historic Park and Gardens which forms part of the setting of Grendon Hall. In addition a significant area of historic ridge and furrow would be irreversibly destroyed.
- Harm would also be inflicted upon the majority of the other local Heritage assets including both Grade II* Churches.
- **In conclusion** it is considered that the impact of the proposals would be at the upper end of the spectrum related to harm for consideration as part of the NPPF heritage balance. This harm is not considered to be outweighed by the alleged public benefits.

6. Ecology

- The site features an ecology area and the whole site contains much wildlife including a badger set and 65 species of birds including 15 on the red list and 13 on the amber list. GCNs are also present in the pond on the site as well as in a large number of surrounding ponds recently surveyed. In

EDGCOTT PARISH COUNCIL

addition, nine species of foraging bats were recorded including two rare species (Bechstein's and Barbastelle). Noise, light pollution and general disturbance from the construction and subsequent operational traffic would cause significant disruption to the wildlife and some of it may be permanently displaced from the site.

7. Amenity Space and Value/Safety/Wellbeing

- The noise and light pollution from the football pitch and other recreational activities would result in a loss of amenity space and impact on resident's wellbeing. Furthermore, the current 'soft boundary' between inmates and the public would no longer exist and would result in significant security and safety concerns, especially for those residents with children.
- The net result is that the development would result in significant harm to the residential amenities of a number of local residents, reducing their residential amenities to a level below which they could reasonably expect to enjoy. As a result many residents may choose not to use some of the public footpaths due to safety concerns. This harm is not considered to be outweighed by the alleged benefits of the proposal.
- The changes proposed to this field could create a new hot spot for drug and other drop offs.
- One can attempt to mitigate landscape and wildlife issues but cannot mitigate the harm to the welfare and mental health issues of residents that this development would bring.

8. Good Design

- The proposal offers a purely functional response to the MOJs alleged accommodation requirements, and falls well short of the design bar in a number of material respects. Good Design requirements must apply to every facet of the current proposals in the context of the high 'building beautiful' bar established by the revised NPPF. The proposal offers a purely functional response to the MOJs alleged accommodation requirements, and falls well short of the design bar in a number of material respects.

9. Traffic and Parking

- The proposed new site access would create a significant new road junction in the village, which will be in constant use day and night, 7 days a week, 365 days a year, all adjacent to the road narrowing into Edgcott and an existing prison access road also serving a housing estate. This would severely impact on the relative tranquillity of the locality as well as create a potential accident black spot.
- There would be a significant increase in traffic; traffic currently passing through Edgcott has been recorded at close to 4,000 vehicles per day (May 2021).
- There is in addition a concern that the number of car parking spaces has been underestimated.

10. Flooding

- There is an existing and demonstrable issue with surface water both in and around the vicinity of the site, evidenced by resident photographs, which could be made worse with this development.
- The Flood Risk Analysis and Pick Everard proposals are both no more than a theoretical Desk Top Analysis. Using assumed data from standardised sources as site specific data applied to the strict site boundaries, with no quantified consideration of wider effect, but acknowledging the need to site store a theorised quantity, which is not certified for design purposes. Re-use and storage proposals, without specific location or size, will have huge environmental and public expenditure implications.

In addition to the points above, some consultees objected to the application including Highways, Sport England, The Gardens Trust, BBOWT and Heritage and Ecology had major concerns with the proposals.

In conclusion on almost all defined planning criteria the application would result in irreversible planning harms of varying degrees of significance. Mitigation measures proposed will have minimal impact. The applicants have not demonstrated that there are other material considerations as provided for in NPPF Guidelines sufficient to outweigh all of the harms that would result.

APPENDIX F: Greg Smith MP Comments

GREG SMITH MP
BUCKINGHAM CONSTITUENCY



HOUSE OF COMMONS
LONDON SW1A 0AA

Planning Department
Buckinghamshire Council
Aylesbury Vale Area Office
The Gateway
Gatehouse Road
Aylesbury
Buckinghamshire, HP19 8FF

BY EMAIL

Monday 23rd August 2021

To Whom It May Concern:

OBJECTIONS TO PROPOSALS FOR A NEW MEGA PRISON IN BUCKINGHAMSHIRE (21/02851/AOP)

Please accept this letter as my response to the planning application for the proposed new prison adjacent to HMP Springhill and HMP Grendon. This builds on my objections that were forwarded to the applicant in January 2021.

I outline the primary concerns my constituents have relayed to me and set out my opposition to this proposed new prison.

The proposal also does not take into account the cumulative impact of High Speed Two (HS2) and East West Rail (EWR) construction projects which intersect approximately a mile from the proposed development. It is a reality that my constituents are having to deal with significant disruption to their daily lives and amenity with multiple state sponsored big infrastructure projects currently under construction. The cumulative impact of another one is simply unacceptable.

While I note that the applicants have heard and responded to some of the concerns raised in their pre-application consultation, they have not addressed the fundamental issue: there is no Local Plan policy for this proposal, and also none in the "emerging" Vale of Aylesbury Local Plan (VALP). This is a **speculative** application, with **no** consideration of the local plan making process, the rural context of the site, and no proven need.

This proposal would take place in a rural area, surrounded by small settlements and served by an inadequate network of rural and unclassified roads that are already under pressure from existing approvals and proposed growth in Aylesbury and Bicester. This rural buffer between two fast growing areas is critical to ensure the rurality of Buckinghamshire is protected.

The proposed site would use existing green land and take additional agricultural land to make the prison effectively a massive extension to a small village and is totally inappropriate to being built in this part of rural Buckinghamshire. It is of a scale of a small town, with large staffing numbers and inmates, not to mention the large numbers of daily deliveries and visitors a site like this would require.



The applicant has not demonstrated convincingly how they have discounted brownfield sites which is a policy direction that Buckinghamshire Council has made clear in the commencement of the new Local Plan. It is my belief that brownfield sites should be considered as a priority for this type of building work rather than causing the loss of green, rural spaces. There are far more suitable brownfield sites available that have much better and safer transport access, and as the applicant admits, they have a “local” area of up to 50 miles radius to search.

In the following section, I break down my objections into policy areas, in alphabetical order.

Biodiversity & Ecology

The proposed new mega prison would result in the removal of a total of over ¾ km of hedging, and trees associated with that hedging. This would have a huge impact on the site’s existing ecology. In addition there would be a loss of a total of approximately 60 acres of open green fields across the whole site. Additional loss of trees would be seen with the creation of the new site entrance from Grendon Road, Edgcott and from the field near Grendon Hall into the main site.

The site is rich in wildlife (and well documented by constituents), which will be put at risk with such a large scale construction project, and the destruction of so much of the habitat.

Saved Policy GP40 presumes against the loss of trees and hedgerows of landscape value, which this application fails to meet.

Cumulative Impact

This speculative application does not address the cumulative impact of having three institutions co-located at the same site, and also does not take into account the local disruption that is already underway with HS2 and East West Rail.

The proposed time scale to build the mega prison is three years. This is an intolerable amount of time for excessive disruption from construction traffic and workers. There is general concern among residents that there will be slippage and this time period will become extended.

From reading the applicant’s Traffic Assessment, it is clear that, in addition to building a new ‘mega’ prison on the Grendon Underwood site, the Ministry of Justice intends to expand HMP Springhill by an additional 120 places. The expansion of HMP Springhill was mentioned in the second consultation document issued in December 2020 as a possibility which was being considered. However, there is now clear evidence that the HMP Springhill expansion will be the next development on this site to come forward. Although no application has yet been submitted for this extension, it is justifiable to consider the further cumulative impact on the overall site.

Design

It is with much regret that the applicant has ignored significant feedback on the design, and this is very important for this outline application as the design fundamentally informs the scale.

The applicant has persisted with proposing an off-the-shelf modular system designed for urban sites, with completely inappropriate design, massing and layout, placed on top of raised topography, which will make this a very imposing development in the rural landscape.



There is no consideration of the rural context, the scale, the roofscape or indeed any architectural thought given to this proposal. This is contrary to the government's very clearly stated policy on quality of design and recently updated NPPF. Indeed, according to NPPF 134, "Development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance..."

The proposed new mega prison would be on a scale and of a design that would conflict with both the NPPF and the Aylesbury Vale Local Plan. The proposed site is over 29.5ha, significantly larger than the current two prisons on the site. The height of the planned accommodation blocks is four storeys (c. 17.5 m) but given the significant exposed roof top servicing (though some drawings now show a pitched roof), this will result in buildings five storeys high. The support buildings on the site would range from one to three storeys high and c. 9.5-17.5 m high and the scale and height of these will be exaggerated further because many of them will be situated on one of the highest parts of the local landscape.

The proposal will be extremely visible from a large part of the surrounding area and in particular from the majority of Edgcott, Springhill Road estate and the northern part of Grendon Underwood Main Street as well as a large part of the surrounding area. It will also be particularly intrusive to the rural setting with uncontrolled lighting which will affect the surrounding area significantly, especially in the autumn to spring period where large numbers of windows at a high elevation will be clearly lit, and even after decades of tree growth, will not be concealed. This will clearly have an impact not only on existing residents' amenity, but disrupt the local wildlife with light pollution.

Indeed, the whole proposal will dwarf not only the existing prison, but all settlements in the whole area and will be contrary to existing and emerging local policies on design and should be given considerable weight in the assessment of this application.

At the very least, one would expect to see "verified views" from existing settlements and rights of way locations to test the massing and scale.

Economic Benefits

A 25 mile radius from this site is not creating "local" benefits. This would stretch to Northampton, Marlow, Didcot and well beyond Banbury. Any commitment to upskilling would need to be specific to local education establishments, and there are very few SMEs scaled to benefit from local contracts. Indeed, the Planning Statement refers to a 40-mile radius which suggests staff could be commuting from London and the Hanger Lane gyratory (as the crow flies), so hardly benefiting the Buckinghamshire economy if 487 of the staff are from this very broadly defined area.

There is a claimed indirect spend of £2.4m retained locally after completion (planning statement 4.36), but given the lack of shops and business in the immediate vicinity, it can only be assumed that this figure is based on urban developments, not remote rural ones.

The Socio Economic arguments submitted by the applicant does not accurately reflect the impact of what is proposed at this isolated rural site location. It fails to take account of significant local factors and uses assumptions drawn from other urban prison proposals that are not comparable.

We are fortunate in having a low unemployment situation in the constituency, so it is highly likely that the vast amount of economic benefit will be for those that need to commute to this site to build it, and commute to the prison to staff it when completed. There is no mention of providing key worker accommodation for staff that want to relocate to this site. All this will of course have an impact in sustainability and transport.

Saved policy RA29 states that except where otherwise allowed for in the Local Plan outside the built up areas of



settlements and identified employment areas, the Council will resist proposals for new employment buildings and for the expansion of established employment sites into the countryside.

Flooding

The area in question is prone to flooding and significant removal of permeable fields will exacerbate the potential for additional flooding in local villages. The large area for buildings and car parking will have a significant consequence on the drainage of surrounding areas where there is already significant flooding in inclement weather. The inclusion of some notional ponds demonstrates a simplistic way to deal with surface water, especially for the long access road, the huge car park, and of course the significant number of buildings without any obvious water attenuation design strategies, and no integrated design solutions.

Grendon Underwood is already regularly under siege by the Water Authorities digging up Main Street to repair the failing sewage system and water piping. Further use caused by the proposed building works, and permanent residents, will not ease the situation. Water supply and sewerage capacity is of significant concern, and proposals would need to be implemented prior to any development to safeguard existing residents.

The entrance to the existing prison, and the ditches along this area already struggle to cope with runoff from the prison landholding. Residents have photographic evidence to show roads and footpaths under water.

I am also concerned to note that the existing site suffers from sewer blockages and leaks, as recently as March 2021, and sadly illustrates why my constituents have so little confidence in this proposal given existing management issues.

Policy EN4 that states that developments should be directed away from areas at highest risk of flooding to ensure that development does not increase flood risk elsewhere. There is little detail in the submission that they have considered in any detail the significant impact this proposal will have on existing surface water flooding and the scale of design, and location at the top of a catchment, will need very significant water attenuation incorporated into the design, and this will have an impact in layout and potentially access.

Heritage & Archaeology

The potential for evidence of Roman occupation on the prison estate is high, given the proximity to the Roman road "Akeman Street" and archaeological evidence nearby along the route of HS2. The site is also located in the medieval Forest of Bernwood. Given the scale of the proposals, and the green field nature of the scheme, a comprehensive archaeological assessment is required before detail design of the prison is fixed. Ridge and furrow fields are visible on the western side and provide a historic and green buffer between the existing prison and the main road and village.

I note that the site is adjacent to four listed (grade II) properties; Grendon Hall and the original gates and railings, and two houses to the north and west of the site, and the prison proposals will harm the settings of these heritage assets.

Landscape

The topography of the site means that any new development will have an adverse impact on the rural setting, and will cause irreparable damage to some heritage landscapes, including some ridge and furrow fields. The proposal



compounds this by placing urban scaled pre-fabricated buildings in a very visible location, with exposed building services adding to the impact on the rural landscape. This will be a very institutional intrusion into a sparsely built rural area, and the proposal would have a significant and irreversible, harmful impact on the centuries-old grain character and appearance of the landscape and the setting of Grendon Underwood and Edgcott. Policy GP40 presumes against the loss of trees and hedgerows of landscape value.

I would expect any contentious proposal to attempt to respect and complement the physical characteristics of a site and its surroundings, the historic scale and context of the setting, the natural qualities and features of the area and important public views and skylines. This proposal does not, and makes no effort to consider the architectural intrusion on the landscape.

Indeed saved policy RA3 that states that proposals for the extension of residential and other developed curtilages beyond the built-up area of settlements that would adversely affect the character and appearance of Rural Areas will be resisted.

Saved policy RA8 that states that Development proposals in these areas should respect their landscape character. Development that adversely affects this character will not be permitted, unless appropriate mitigation measures can be secured. There is no proposed mitigation to compensate for the loss of open countryside.

Location

Government policy is brownfield first, and a strong emerging theme in the new Buckinghamshire Plan, but it appears from recent Freedom of Information responses from the Ministry of Justice, that there have been no preliminary discussion with any other local authority which suggest that existing land ownership, rather than a suitable brownfield site, has resulted in this application. From the applicant's own statement of community involvement, they admit that their site process was based on land ownership first, not where the prison is needed and best placed for prisoners (paragraph 5.4).

The proposal locates the prison in an isolated rural location, and significantly erodes the open landscape buffer between the existing site and adjacent residents, to the extent that it will also urbanise this village setting. The choice of location at Grendon Underwood is in direct contradiction of the Ministry of Justice's declared policy of locating new prisons close to areas of demand and where the prison population is forecast to grow most quickly.

The application's pre-consultation documentation seeks to imply that the proposed expansion of the prison estate is comparable with similar projects at Glen Parva, Five Wells and Long Sutton. It is not; the other locations are close to urban settlements, not isolated rural locations surrounded by small rural villages.

At first glance a prison at Grendon Underwood is the easy option. However, a deeper analysis shows that it is not the optimum solution, and indeed the land ownership is not sufficient for the proposals. A better option is possibly at Bullingdon, as identified by Grendon Underwood Parish Council, or another site around the Bicester area which has vastly better transport links, including train, coach and bus. A new prison near HMP Bullingdon would also be served by a much larger main road complex (including the A41 and M40) and the prison would be much easier to get to for visitors. The new prison would be close to the town of Bicester and the train stations and nearer to Oxford, which again would be helpful to visitors. There is no evidence that brownfield sites have been robustly considered, or what level of discussion was held with the Ministry of Defence.

The planning statement refers to the need of "prisoners in the right type of prison at the right time" and this also extends to the right location to ensure links with family and post-release support services. However, there is no evidence that Buckinghamshire is in need of such a large prison, and the planning statement acknowledges that



currently Springhill and Grendon has nearly 50% of a prison population from over 50 miles away (para 6.17). The 50-mile radius is not sufficient to demonstrate that this particular location is meeting the needs of the prisoner's home location – as this includes London and other major cities, and this also emphasises how difficult it will be for visitors to access the prison.

The planning statement para 6.21 suggests that the project will create 550-700 permanent jobs for the local community, but is contradicted by the applicant's own documentation, which defines local as also including London. The applicant will be aware of its existing recruitment challenges at Grendon and Springhill, so it is clear that any further increase in staffing requirements will have further challenges of recruiting, further encouraging longer commuting, and little if no benefit to the local community.

The planning statement outlines the site selection process and it is notable that this proposal fails to meet several of the secondary and tertiary requirements of the site, which indicates how sub-optimal this proposed location is.

The proposed site layout (now horseshoe shaped) of the proposed mega prison does not lend itself to a suitable design of such a large prison with all the associated services and the addition of another parcel of green field since the pre-application consultations shows that they have struggled to make this rural location work and having to resort to even more land take outside their ownership. In particular, the access to the main part of the site where the prison buildings would be located is very narrow, at the far end of a field between Grendon Road and HMP Springhill and runs directly between buildings forming part of HMP Springhill and the ecological area of the current prison.

The proposed plan also shows the site of the prison football pitch being made much closer to residential property, and despite minor amendments following the pre-application consultation, it does not properly address these concerns. Residents with young children have complained to me about the noise and language coming from prisoners using the football pitch. There are concerns that foul language will be able to be heard even clearer now that the sports pitch will be closer to residents' properties. I also note that Sports England has submitted an objection based on the lack of replacement facilities which indicates the proposal is also over development of the site.

The field in the proposed plans for the new mega prison which is designated for the new site entrance and the main road into the site, and the football pitch mentioned above, is part of the Historical Park and Pleasure Garden of Grendon Hall. (*Bucks Gardens Trust June 2021*). The field also contains the remains of a much larger area of ridge and furrow and hence is of great historical interest as well as providing valuable green field and amenity space.

Policy GP35 of the Aylesbury Vale District Local Plan 2004 requires proposals to respect and complement the physical characteristics of the site and its surroundings, the historic scale and context of the setting, the natural qualities and features of the area and important public views and skylines. Sadly this proposal does not comply with any element of that policy.

Policy GP8 and GP95 states that in dealing with all planning proposals the Council will have regard to the protection of the amenities of existing occupiers. Development that exacerbates any adverse effects of existing uses will not be permitted, and this development will have significant adverse impact on the amenity of surrounding residents, including impact on the rural tranquillity, light pollution, impact on green landscape, concerns on safety and numerous transport related matters including the impact of traffic through existing settlements.

In the recently dismissed appeal (3 March 2021) for 65 houses on the site immediately to the south of the existing prison entrance, the inspector referred to several issues to lead to the appeal to be dismissed; in paragraph 25 he concludes that the site is not sustainable due to its location and lack of accessibility other than by private car, and a development in this location would erode more open and rural landscape (20/00068/REF).



Public Safety

Category C prisons present a very different potential risk to local communities from the current prisons at Grendon and Springhill. HMP Springhill is a Category D prison and over the years there has been a steady flow of escapees, with police appeals for absconders a regular feature in local papers and social media. This makes the local residents feel very insecure about a new Cat C prison, and adds to the resource pressure on Thames Valley Police.

Over the last three months (April-June 2021) I have been advised that there have been 197 recorded offences involving inmates from HM prisons within the Thames Valley Police area. These range from violence against a person to sexual offences, all requiring different time scales and expertise to investigate, and the current local team is already at capacity.

The location of a Category C prison in a rural area means that it will take longer for emergency services to reach it in the case of any problems, with the nearest police stations being some distance away in Aylesbury or Bicester.

Edgcott and surrounding villages have for some years experienced drug and alcohol 'drops' undertaken by visitors who seek to smuggle substances into the prison estate. The expansion of the complex will inevitably increase this problem.

Public Services Impact

Local infrastructure is already overstretched, and the impact of the proposals will increase the existing prisoner population on the extended site by over 200%. The total prison population on the site would be more than double the combined population of Grendon Underwood and Edgcott, the two settlements immediately bordering the development site.

There are serious concerns the local police and NHS will not be able to cope with a development of this size. Evidence from HMP Oakwood shows that the local ambulance service received 358 calls in 2014 alone from a prison of similar size. This would put undue strain on the local ambulance service. Thames Valley Police has submitted concerns that they do not have the resources to manage an additional prison and in-prison crime.

There is concern for those leaving prison in a rural location such as this with lack of council and probation support services in the immediate vicinity.

It should not be left to the local council taxpayer to cope with the long term operation issues in what is currently a sparsely populated rural area with limited policing, utilities and transport.

Transport

There are two critical transport issues as a result of this proposal. A lengthy construction phase, and the operation phase. Both are of significant concerns.

The site is very poorly served by public transport. It is highly likely that the vast majority of construction staff will live remotely given the scarcity of rental accommodation in the area, made worse with HS2 and East West Rail operatives also in the area. This will lead to additional journeys by 1,000 contractors twice daily for a 2-3 year construction phase, not to mention the large number of plant, equipment and materials that will need to be delivered, and potentially very large pre-manufactured units.



The local roads are not designed for an excessive volume of traffic, particularly heavy construction traffic, and struggle to cope with the current additional HS2 traffic which has led Buckinghamshire Council to have to recruit a Marshall to monitor contractor's damage, at the local council taxpayers expense. Given the safety concerns of the adjacent unclassified roads, and a tragic accident history on the A41, this proposal is clearly in the wrong location, and there are no commensurate proposals in the transport mitigations to reduce the risk of increased traffic through adjacent villages or safely accessing the A41.

Post completion, the long term additional 1,400 staff journeys, the multiple service and delivery vehicles that will be needed to visit the site daily will have a damaging impact on the local residents' quality of life and significantly increase local pollution levels.

The applicant's Outline Travel Plan (OTP) appear unworkable in a rural location like the proposed site. The roads are too narrow and dangerous for many people to even consider using a bicycle, and is not taking into account the rural nature of the existing road and path infrastructure.

Despite the proposal including an already landscape hungry number of car parking spaces with a total of 453, and the lack of real alternatives, and that there will be up to 734 staff employed on the site, plus visitors and service vehicles the number of car parking spaces, clearly this is an underestimate and reinforces the views that the applicant is trying to squeeze far too much into an inappropriate site. A similar analysis was carried out at HMP Berwyn in North Wales and an additional 194 car parking spaces had to be added later.

The provision of electric car charging points is a step in the right direction, but 3kW chargers are inadequate for visitors who will have come a long way. I find the notion that 1.6% of staff will arrive by train to be non-sensical as the nearest train station is in Bicester, and another transport method is required to get to the site.

All the quoted travel times to the site are to the main road access point. This is disingenuous for walking and cycling given the significant length of the access road up the hill to access the site's main entrance will add several more minutes, reducing the number of houses located within a convenient walking and cycling distance further. It is telling that the Design & Access statement refers to the changes in the location of the car park since the pre-application consultation for accessibility reasons due to the 400m walk and 10m level rise, which indicates about half of what a cyclist or pedestrian would be expected to cover from the main road.

Furthermore, buses are infrequent. Only service 16 passes the current prison, the other two of the bus services mentioned in the proposal do not come through Edgcott. The 16 service only covers part of the day on an hourly basis. Therefore, using a bus service to reach the site by employees is untenable.

All major housing areas are approximately nine miles away, in Bicester or Aylesbury. It is important to note that of the prison officers employed at the existing prison, it is reported that only seven live within the Grendon Underwood Parish. Furthermore none of the current staff car share to work unless they are partners living in the same household and work the same shift pattern, overall a very rare event.

The link to the A41 involves a number of narrow and tight bends, goes across a narrow bridge and passes very close to Grendon Underwood Church. In addition, the junction of the A41 and the road to the proposed site is very dangerous and there have been a number of accidents there including fatal ones. Already constituents have had too many close calls with haulage vehicles on the roads. With the years of construction my constituents are very anxious that there will be an incident with serious repercussions. The applicant's transport assessment offers "minor" mitigations to the A41 junction which are wholly inadequate, and it is telling that the traffic assessment includes Google images rather than current photographs, and traffic observations from May 2021, which was well before full easing of lockdown and commuting traffic had not returned to anywhere near pre-covid levels.



The unclassified rural road through Edgcott is already carrying around 3,300 vehicles per day on average, a recent survey by residents showed 35% of these are on average travelling at or above the 30 mph speed limit. Large numbers of HGV's using the road are increasing due to EWR and HS2 and there is a forecast of an additional sub 7.5 tonnes of traffic using the road from these projects to over 500 vehicles a day. HS2 and EWR works are forecast to coincide with the timeframe expected for the development works for the prison.

Even after the completion of EWR and HS2, the IMD Depot being built at Calvert to service the HS2 line will employ c 300 people and traffic increases will result permanently from its' operation. The rural road is unsuitable for this level of traffic.

The proposal would be in conflict with NPPF paragraph 104 which seeks to focus significant development in locations which limit the need to travel and offer a genuine choice of transport modes. For the same reasons it would also be in conflict with the aims of Buckinghamshire's Local Transport Plan (2016 to 2036) (LTP4). NPPF para 111 gives clear grounds to refuse this application on highway matters alone as the proposal cannot in this location ever meet the expectations of para 112.

Policy S1 of the emerging VALP also makes clear that development must comply with the principles of sustainable development as outlined in the NPPF. The proposal also fails to meet policy T1 due to the lack of any convincing sustainable transport vision, and given the remote location of this site, it is difficult to see how the applicant can attempt to overcome this significant planning policy.

Conclusion

The concept of an urban prison in a rural location is wrong on many levels as I have outlined in this submission, and the application does nothing to try and resolve or even mitigate the urban scale, brutal massing, and ill-thought out impact on its green field location, including numerous failures to address local and national planning policy matters, from transport and drainage, to sustainability and design.

This planning application is an enormous issue of concern locally, with many constituents and parish council having contacted me. I therefore trust that my objections will reinforce their own submissions, many of which are incredibly detailed and full of evidence and that these will be given due consideration.

The proposals are designed for easy and fast delivery of a prison which may be commendable in some urban brownfield locations in need of regeneration, but it is clear that this application is in the wrong location for an off-the-shelf modular-designed high-rise set of structures in a rural location, and in no way does it meet the requirements of sustainable development as outlined in local policy (existing or emerging) or the NPPF.

For the reasons above, and the many others from the parish councils and concerned residents, the application should be refused.

Yours sincerely,

Greg Smith MP

Appendix G: Cllr A Macpherson, Cllr F Mahon & Cllr M Rand

Comments

22 September 2021

Planning Department
Buckinghamshire Council
The Gateway
Gatehouse Road
Aylesbury
Buckinghamshire
HP19 8FF

OBJECTIONS TO PROPOSALS FOR A NEW MEGA PRISON AT GRENDON/SPRINGHILL IN BUCKINGHAMSHIRE

In our capacity as the three local Councillors for Grendon Underwood Ward, Buckinghamshire Council we are writing to strongly object to the outline planning application (21/02851/AOP)

As passionate advocates for the residents we represent and the countryside that we seek to preserve, your proposal to build a new mega prison is totally inappropriate in a rural area of open countryside surrounded by small settlements and served by an inadequate network of rural and unclassified roads.

The population of the new prison would dwarf the combined population of Grendon Underwood, Edgcott and the Springhill community. There are already strains on local services such as schools and GPs. Other public sector services such as policing and ambulance services realistically anticipate that there would be additional demand from such a large development.

We have grouped our objections into headings in the next section of this letter:

Transport and cumulative impact

The local roads are already suffering the cumulative effect of HS2 and EWR construction projects which intersect approximately a mile from the proposed development. Edgcott, the community of Springhill and Grendon Underwood are already severely affected by daily construction traffic causing damage to the road network, mud on the roads, delays created by long diversions and noise and vibration impact to properties. Additionally there are significant safety concerns around very large numbers of construction vehicles and LGVs using small unclassified roads which feed from the A41 which has witnessed several serious RTAs and recent fatalities. This enormous new prison will further compound residents' misery and coincide with peak construction phases of HS2 and EWR. It is estimate that construction traffic will result in additional journeys

by c 1000 contractors twice daily for two to three years and in addition deliveries of very large pre-manufactured construction units, plant and equipment.

Even after completion of EWR and HS2 construction projects and the reduction in construction traffic, the maintenance depot at Calvert to service the HS2 line will employ at least 300 people and traffic increases will result permanently from its operation. Following completion of the prison there would be significant journeys throughout the day and night, in shift patterns that will have a damaging impact on residents and the local community.

The environmental impact of the additional journeys by up to 1,000 contractors twice daily for the estimated three year construction phase, the long term additional 1,400 staff journeys made each day after the completion, the multiple service vehicles that will need to visit the site daily plus the potential long return journeys that many visitors will have to make, will have a damaging impact on the local residents quality of life and significantly increase local pollution levels. Building a prison in such a rural location does not comply with Government policies to minimise carbon emissions due to the amount of contractor, staff and visitor journeys that will be required during construction and beyond.

Representations from local residents and parishes casts significant doubt on the ability to deliver a robust sustainable travel plan. The applicant's Outline Travel Plan (OTP) is unworkable in this rural location. The roads are narrow uneven and dangerous and not conducive to cycling to and from the prison. The OTP mention 1.6% of staff will arrive by train which is very questionable as the nearest station is Bicester some 8 miles away so additional transport would be necessary. Hence the prison will not be easily accessible for family members wishing to visit inmates. Other public transport links to the site are limited, for example there is only one bus service operating on an hourly basis and the majority of journeys will be made by car. With up to 734 staff employed on the site and visitors it is very unlikely that provision of 453 parking spaces is adequate and would substantiate the view that too much is being attempted on a site of inappropriate size.

Location

The location of the proposal is one of the key objections that as councillors we hear from the local community. The location is isolated and rural and the proposal will urbanise this setting. The choice of this location contradicts the Ministry of Justice's policy of locating prisons close to areas of demand and where the prison population is predicted to grow most quickly. Additionally and in line with Government policy and the local plan the consideration has not been to prioritise brownfield sites first.

The land ownership appears to not be sufficient for the proposals and parish councils have identified sites at Bullingdon and in the Bicester area as far more suitable, particularly as they are served by better road network and public transport options.

The proposed plan shows the site of the site of the prison football pitch being made closer to residential property at Springhill. Concerns have been expressed about noise and foul language impacting on residents and particularly young children living very close to the pitch.

The development in this location will have a significant detrimental impact on the amenity of local residents particularly the impact on green landscape, rural tranquillity, light and noise pollution and the great impact of traffic through existing settlements and on site.

Design

The designers of the proposal, at previous local consultation events, have acknowledged that the site will not conform to the local environment. Instead, proponents of this proposal are asking us to accept a cookie-cutter off the shelf design better suited for an urban setting with no consideration of the rural setting the scale, roofscape or any sympathetic architectural approach.

The scale and design at over 29.5 ha would conflict with the NPPF and VALP.

With buildings of five storeys in height will be highly visible from villages in the surrounding area and intrusive with respect to light pollution emanating from the site 24/7. It will take many years of tree growth to shield significant light pollution in a rural area of currently dark skies and this will inevitably have an impact on residents and wildlife.

Flooding

Significant removal of fields to accommodate the mega prison will increase the risk of flooding in an area which is already prone to flooding situations and will result in issues with drainage in the surrounding areas. Water authorities are regularly working in the Grendon Underwood area to repair failing water pies and the sewage system which has capacity constraints.

Residents have provided images of the entrance to the prison where ditches do not manage to contain run off water from the prison's land. There is little evidence from the outline planning application that there has been detailed consideration of the impact this will have on existing flooding issues and the scale and location of the development will need significant mitigation to be implemented to avoid flooding and safeguard residents.

Landscape

The new mega prison will impact on the rural setting and damage heritage landscapes resulting in loss of trees and hedgerows and some ridge and furrow fields. Development policy indicates that proposals should respect the landscape character. The plan does not offer any substantial mitigation for the loss of open countryside and should attempt to complement the physical characteristics of the site and its surroundings the historic scale and context of the setting, the natural qualities and features of the area and the valued public views and skylines. This would be a harmful intrusion in a rural area with small settlements and have a harmful and irreversible impact on the centuries old character and appearance of the landscape of Edgcott and Grendon Underwood.

Biodiversity

There is significant concern on the environmental destruction and biodiversity impact that the new complexes will have on the natural habitat in this rural area of Buckinghamshire. Local wildlife includes bats, deer, foxes, badgers, birds of prey, rare species of butterfly and great crested newts that would be put at risk with such a large scale project and the destruction of so much habitat. In addition the proposal would result in the loss of nearly 1km of hedging and associated trees plus a loss of roughly 60 acres of open green fields across the site.

Heritage and Archaeology

This site is set in the mediaeval forest of Bernwood and there are heritage concerns relating to the four adjacent grade II listed properties which will be harmed by this proposal. Additionally it is likely that Roman occupation on the prison estate could be evidenced and recent archaeological evidence from HS2 excavations nearby would substantiate this. visual impact of the proposed blocks on the Grade II heritage assets to the north and impacts of light and hard standing on local listed building. The existing prison gates are on Buckinghamshire Council's Building at Risk list as they require conservation works for future preservation.

Impact on public services

With the doubling of the prison population on the site, there is serious concern that Thames Valley Police, probation services, South Central Ambulance Service and the NHS, particularly mental health services, will be severely stretched by such a increase in the prison population all of which have implications for the local taxpayer.

Public safety

Category C prisons represent a potentially different risk to the local community than the current prisons at Grendon and Springhill. Springhill is a cat D prison and there has been a significant level of absconders over the years. Residents naturally feel insecure about a new Cat C prison and with the rural location this will take far longer response times for emergency services. Local communities particularly Springhill and Edgcott have experienced drug and alcohol drops from visitors to the site and are concerned this will increase and of the impact on children and young people in the area who will witness this.

In summary, this planning application is of great concern to the residents we represent locally. It is clear that the proposal, whilst potentially appropriate for an urban setting as a high rise modular design, is completely inappropriate for this rural green field location. It should be re- emphasised that it is a speculative

application with no local plan policy in the recently adopted (15/9/2021) Vale of Aylesbury Local Plan and would be on a scale and of a design that would conflict both with the NPPF and the VALP.

Parish councils, local residents and those from further afield have presented strong objections to this proposals on a significant range of issues namely location, flooding, biodiversity, heritage, transport, impact on public services and not least the cumulative impact of other major national infrastructure projects being constructed in the same time frame.

We recommend that taking the objections from local stakeholders that this application should be refused.

Yours sincerely,

Cllr Angela Macpherson
Cllr Frank Mahon
Cllr Michael Rand
Representing Grendon Underwood Ward
Buckinghamshire Council