



HOUSE OF COMMONS
LONDON SW1A 0AA

Lucy Frazer QC MP
Minister of State
Ministry of Justice
102 Petty France
London SW1H 9AJ

BY EMAIL

Tuesday 26th January 2021

Dear Minister

OBJECTIONS TO PROPOSALS FOR A NEW PRISON IN BUCKINGHAMSHIRE

Please accept this letter as my response to the consultation on the proposed plans for building a new prison adjacent to HMP Springhill and HMP Grendon.

Once the consultation opened last month I encouraged as many residents as possible to respond to it and many have relayed their objections to me.

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

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 suffering 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 suffering as multiple state sponsored big infrastructure projects are built. The cumulative impact of another one is simply unacceptable.

The proposed location would use existing green space 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 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.

The area in question is prone to flooding and extensive concreting over of a greenfield site 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. Any decision to build on this site would demonstrate a lack of understanding of the area's topography.



Looking at the local bedrock geology, the area is generally based on clay subsoil and prone to flooding. This has been shown to be a real problem by the building of housing estates in the Bicester/Aylesbury Vale area. 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. The area cannot sustain any more stress on the water supply. It will take more than a site survey and proposals to develop sustainable drainage systems to convince local residents that you have their interests in mind.

I have concerns regarding the impact of the development on public services and infrastructure. The 'population' of the proposed prison complex will result in an imbalance of local population. The combined population of local villages Edgcott and Grendon Underwood being approximately 1,200 will be swamped by the largest prison complex in the UK. 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 concerns that the local infrastructure without significant investment, and particularly the sewage system, will be unable to cope with the demands generated by the proposed prison. The main sewer from the current two prisons has leakage problems in the field in which it is planned to place the car park. This has been an ongoing problem for many years and has not been addressed.

Local schools and GP services are already at or close to capacity. 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. Increasing demand on these services, from the prison itself and the claimed increase of 500-600 permanent jobs in the local community and the additional jobs associated with the HS2 Infrastructure Maintenance Depot at Calvert, will make this unsustainable.

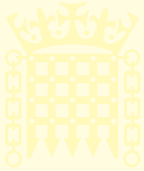
It should not be left to the local council taxpayer to cope with the long term operation issues in what is currently a sparsely populated rural area with limited policing, utilities and transport.

Category C prisons present a very different potential risk to local communities from the current prisons at Grendon and Springhill. HMP Springhill is a Cat D prison and over the years there has been a steady flow of escapees. This makes the local residents feel very insecure about a new Cat C prison.

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 increase this problem.

The proposed plan also shows the site of the prison football pitch being made much closer to residential property. 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.

The proposal is another act of ecological vandalism being inflicted on a rural area following hard on HS2 and EWR. The access to the site where the buildings are to be located will pass close to or even through some of the areas designated for wildlife and hence cause potential disruption to and loss of parts of the current wildlife habitat. Edgcott is known for the likely presence of great crested newts as well as the presence of bats, red kites, foxes, deer and other birds of prey. Developing the large areas of green field space will displace and significantly reduce the amount and variety of wildlife in the locality and this is unacceptable. Even if the majority of the wildlife habitat remains intact, the movement of vehicles passing right past these areas over a 2-3 year period is bound to have a significant and detrimental impact on local wildlife.



The environmental impact of the additional journeys by 1,000 contractors twice daily for a 2-3 year construction phase, the long term additional 1,400 staff journeys made each day after completion, the multiple service 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.

Moreover, the proposal for a number of four storey buildings, on already elevated ground, will be significantly visible especially on the approach from the north of the village, exacerbated no doubt by the need for significant lighting at night, creating light pollution in this rural area.

The site will have rural surroundings and will be exposed therefore the site will be very visible, and there has been little attempt to propose an architecture or massing that is sympathetic to this location.

The proposed time scale to build 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.

Your plans for an Outline Travel Plan (OTP) appear unworkable in a rural location like the proposed site. The roads are too dangerous for many people to even consider using a bicycle and staff members will be coming from a wide range of destinations hence making it impractical for car sharing. Furthermore, buses are infrequent. Only service 16 passes the current prison, the other two of the bus services mentioned in your 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.

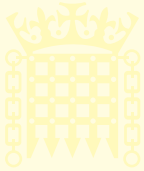
The local roads are not designed for an excessive volume of traffic, particularly heavy construction traffic. The link to the A41 involves a number of narrow and tight bends, goes across a narrow bridge and passes very close to Grendon Underwood Church. In addition, the junction of the A41 and the road 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. Within the years of construction my constituents are very anxious that there will be an incident with serious repercussions.

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.

It was disappointing that traffic movement data was not included in the proposal to give an indication of the impact on the local area. Plans made with HS2 and EWR have been frequently ignored despite many objections. It is difficult to expect local residents to suppose your contractors to be any different from those already passing through the locality.

Furthermore, there is currently a proposal to build 65 new houses on a field next to the proposed development (Application Ref: 17/03317/AOP Appeal Ref: 20/00068/REF Planning Inspectorate Ref: APP/J0405/W/20/3255772). Both projects will have to share the same minor road for construction traffic.



Since the announcement was made two residents of Edgcott have anecdotally told me that they have lost buyers for house sales. This means that these house owners would have to significantly reduce the price of their property if they still wished to sell. This is antithetical to claims in the proposal which states demand for housing in the area will increase and there will be no tangible impact on house prices. This will be an ongoing trend for many years if the prison goes ahead and it will make it extremely unlikely houses in this locality will now be sellable.

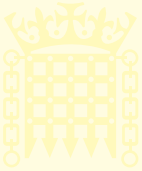
The Consultation document seeks to imply that the expansion of the prison estate is comparable with similar projects at Glen Parva, Five Wells and Long Sutton. It is not. The other locations are close to urban settlements not surrounded by small rural villages where the impact of such a vast expansion of the prison will be so disproportionately felt.

At first glance a prison at Grendon Underwood is the easy option. However, a deeper analysis shows that it is not the optimum solution. The optimum option is possibly at Bullingdon, as identified by Grendon Underwood Parish Council, or another site around the Bicester area which has better transport links. 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.

Finally, there needs to be data published for my constituents to support statements in the proposal that there will be an increased need for prison places in the South East. As it stands Buckinghamshire has one of the lowest crime rates in the South East.

I am concerned that planning approval for these proposals would contravene AVDC/Buckinghamshire County Planning Policies specifically:

- a.) (GP8) that states that planning permission will not be granted where the proposed development would unreasonably harm any aspect of the amenity of nearby residents when considered against the benefits arising from the proposal.
- b.) (GP95) that 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.
- c.) (RA2) that states that new development in the countryside should avoid reducing open land that contributes to the form and character of rural settlements and the Council will have regards to maintaining the individual identities of villages.
- d.) (RA 8) 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.
- e.) (RA29) that 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.
- f.) (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.



g.) (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.

As you will appreciate this is an enormous issue of concern locally, with many constituents understandably having contacted me. I therefore hope my objections on their behalf will be given due consideration. The overriding opinion of residents is that the current plans are designed for easy and fast delivery of the project at the expense of a comprehensive assessment and consideration of more suitable alternatives.

I would be grateful for formal receipt of my objections on behalf of constituents in due course and confirmation that the Ministry of Justice will not be progressing these proposals any further.

Yours ever,


Greg Smith MP