

I am writing to express my opposition to proposals to expand and extend the prison estate at Grendon and Springhill that were circulated for consultation during December.

The proposals outlined in the initial consultation document and the subsequently amended document propose a development programme that would result in what could be the largest prison complex in England and Wales and one of the largest in Europe. This in a largely rural area surrounded by small settlements and served by an inadequate network of rural and unclassified roads that are already suffering the cumulative effect of HS2 and EWR construction projects which intersect approx. a mile from the proposed development.

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.

My specific objections are:

- 1) Any planning approval for these proposals would contravene AVDC/Bucks County Planning Policies i.e.
 - 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.
- 2) The local infrastructure is already overburdened and the stress to it of adding a further 20,000 sq metres of building, 1,440 new prisoners, 5-600 new staff and additional external support from deliveries etc etc is completely unsustainable, particularly:
 - a) The sewers in Edgcott are a continual problem as they are at or over capacity. This is exacerbated by flooding issues. Anticipated development will add to the sewer problems. The impact of the proposed scheme will add to both of these issues.
 - b) The unclassified rural road through Edgcott is already carrying around 3300 vehicles per day on average (c 35% of these on average travelling at or above the 30 mph speed limit). Large numbers of HGV's using the road are increasing due to the EWR and HS2 major works in the locality and there is a forecast of additional sub 7.5tonnes traffic using the road from these projects of over 500 vehicles a day. HS2 and EWR works are forecast to coincide with the timeframe expected for the development works for the prison.
 - c) Even after completion of EWR and HS2 construction projects and the reduction in 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. The rural road is unsuitable for this level of traffic, never mind the cumulative effect of increases that would result from the new prison.

- d) 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 the completion, the multiple service vehicles that will need to visit the site daily plus the potential long return journeys that many visitors will make will have a damaging impact on the local residents quality of life and significantly increase local pollution levels.
 - e) The increase in traffic following completion of a prison complex housing almost 1700 prisoners created by visitors to inmates will further increase traffic on unsuitable rural roads. With visitor halls with a capacity for say 100 visitors at two daily sittings the additional traffic movements will be substantial.
 - f) Local bus services are inadequate for the local community and entirely unsuitable for large numbers of visitors to an expanded prison.
 - g) Local schools, GP services etc are already at or close to capacity and increasing demand on any of them either, in limited circumstances from the prison itself and the claimed increase of 500-600 permanent jobs in the local community and the additional long term jobs created by the HS2 Infrastructure Maintenance Depot at Calvert, will make this unsustainable unless those jobs are filled by people having to travel to the site. See transport limitations and environmental impact comments
- 3) The resulting reduction in the current green space separating the existing prison from Edgcott settlement is unacceptable.
 - 4) The increased light pollution that will result from the expanded prison site is unacceptable.
 - 5) The current green building in the location where the 4 storey buildings will be located is around three storeys high and that is very evident on the elevated site and visible from the North end of Edgcott. The visual impact of the enlarged prison complex in this rural location is unacceptable. I do not accept that the proposed 4 storey buildings can be effectively screened from sight at this location.
 - 6) Category 3 prisons present a very different potential risk to local communities from the current prisons at Grendon and Springhill. 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 that are already overburdened.
 - 7) 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.
 - 8) The current prison site has a pond and various wildlife facilities like bat and bird nesting boxes. 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 or a loss of parts of the current wildlife habitat. Edgcott is a known area for the presence of both great crested newts and bats so some of these species could be lost due to this development.
 - 9) The volume of traffic using ‘rat runs’ through other local villages will increase. In addition, new ‘rat runs’ may be created as contractors and staff find the main routes to the site congested.
 - 10) Only a portion of the contractors, staff and visitors to the new prison would use the link road to the A41. The remainder would travel in the opposite direction and pass through Edgcott and subsequently through other small villages on narrow, winding country roads.
 - 11) Without additional housing there will be a significant travel element for the proposed new prison employees which does not match with the low carbon agenda required for the future and of course would have a long-term impact on local traffic and environmental noise and pollution.

- 12) 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.
- 13) The updated consultation document states that the final proposal may include a seventh four storey accommodation block and consideration is to be given to further expand the open prison facility at Springhill. Both of these additions will further exacerbate all of the objections I have to the current proposal

Claims of benefits for the local community made in the consultation documents released are misleading and misrepresent the effects of the proposals.

Specifically:

- A) The Consultation document seeks to imply that because there will be an increased need for prison places in the South East the expansion of capacity is best placed in Buckinghamshire and specifically at Grendon and Springhill. I suspect that this is almost entirely based on the MoD ownership of the land and the political agenda to deliver the project quickly rather than the suitability of the location. This objective may well be undermined anyway if the Local Planning Authority adhere to their own planning policy and reject an application.
- B) The Consultation document seeks to promote the additional employment benefits that will accrue to the area. Unemployment levels in Bucks are low relative to alternative locations (2.5 to 3.5%) compared with a national average of 3.9% and some hotspots of up to 9%. Surely an area of higher unemployment should be preferred.
- C) The Consultation document seeks to imply that the expansion of the prison estate at Grendon/Springhill 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.
- D) The Consultation document claims that the expanded prison will deliver a comprehensive set of social and community benefits. These benefits may or may not be realised for the wider locality but for Edgcott, Grendon Underwood and nearby villages there is nothing but an adverse impact. In addition the plan will bring new employment buildings into a rural environment which is against local council policies.
- E) Without additional housing which would change completely the character of the existing small settlements surrounding the expanded prison there will be a significant travel element for the proposed new prison employees which does not match with the low carbon agenda required for the future and of course would have a long-term impact on local traffic and environmental noise and pollution. Recent applications to develop 214 new residential properties over several sites within two miles of the prison and that could provide accommodation to an expanded work force have been refused by the local planning authority because they would contravene the Local Plan.
- F) 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.
- G) It is hard to see how the additional local policing requirements that inevitably come from a larger prison at this location can be met satisfactorily.

It seems quite perverse to me that a Category C prison is proposed at this location when a relatively recently opened site at Bullingdon only a few miles away has the apparent potential for significant building extension on adjoining vacant and unused land which I believe is already either owned by the prison estate or the Ministry of Defence. The long term economies of operation of a larger Category C unit at that site rather than a separate new build at Edgcott must surely outweigh any of the costs of land acquisition at Bullingdon and the land in question is probably brownfield and had previously been considered for an Asylum Centre relocation facility. I am convinced 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.