

# Planning application response



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<b>To:</b>	Development Management
<b>Officer:</b>	Danika Hird
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<b>From:</b>	Development and Delivery Team
<b>Officer:</b>	Carri Unwin
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<b>Site:</b>	HM Prison Grendon, Springhill Road, Grendon Underwood, Buckinghamshire HP18 0TL
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<b>Proposal:</b>	Outline application for Category C prison, and ancillary works
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<b>App No.:</b>	21/02851/AOP
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<b>Date:</b>	14 <sup>th</sup> January 2021

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## The application site and its context

The application site occupies an extensive area of around seven field parcels, wrapping round the west, north, and east of the existing HM Prison Springhill. The fields are in open countryside sloping slightly away from the existing prison, which is on a knoll of higher ground amidst screening groups of existing trees. The main part of the site, and location of the 4 story housing blocks and other buildings is very visible in the open countryside, being continuous with further open fields towards Lawn Road, and beyond to the north and east. Field boundaries have some low hedgerows with scattered small trees, and the only pocket of woodland is on site to the east of Lawn Farm. The western part of the site is slightly more enclosed and related to nearby settlement, being bounded by existing housing to the south, the 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.

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).

## The proposed development.

The applicant has submitted an 'outline application' with 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, to be considered and all other matters reserved.

The envelope of new built form is defined by a maximum height of 6 matching cross shaped housing blocks 4 storeys high on the eastern extent of the site on open fields, pushing out into open countryside from the existing prison complex, with a 13m wide boundary strip labelled as screening planting. Moving round anticlockwise, the site then

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has other workshop and entrance buildings to the north of the existing prison; and a large carpark area with some new standard tree planting dotted across it. Further round to the east there are no new buildings, but a rectangle of protected ecological; landscaped area of grass and tree blocks, and a sports pitch. A new access of Grendon Road, to the north of the existing prison access passes to the north of the proposed sports pitch, and then to the south of the ecological area to connect to the new carpark. While there are no buildings proposed in the eastern part of the site – there will be road infrastructure, fencing, acoustic barriers, and lighting.

## **Landscape and Visual Impacts**

The 12 new buildings up to 4 storey in height are proposed to occupy pastoral fields in open countryside. The introduction of some 2 story buildings and of most significance 6 identical housing blocks of atypical form and character, together with associated infrastructure, and sterile floodlit areas before the perimeter security fencing in these fields would wholly 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 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.

Consequently this proposal will have landscape and visual impacts that are significantly larger in magnitude than the existing prison buildings and compound. It should also be noted that the phrase “prison extension” implies a development smaller than the existing but this proposal is a larger development in bulk and massing of groups of new buildings of an unusual visual appearance.

The location of the highest and most unusual form of the 6 housing blocks is in the most prominent and exposed location visually 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. 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 4 storey prison housing blocks onto this currently open field. This change to the visual baseline for these sensitive receptors would be of sufficient magnitude to result in major adverse changes to their visual

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amenity. Similar levels of adverse impacts would also be experienced by users of the Lawn Road and potentially by nearby residents.

As a result I would assess that, notwithstanding the potential mitigation, the proposed development would give rise to major permanent adverse landscape and visual impacts of a scale that would be contrary to policy.

## **Comments on the 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.

In this regard, the LVIA is misleading as it has the following significant omissions in presenting key blocks of the crucial information. Some of these omissions correspond to where the more major adverse landscape and visual impacts on local residents and recreational users of footpaths, would likely arise, so have the effect of downplaying the effects to the reader. For example: only showing wireline proposals of a few of the viewpoints.

In Section 2.5 on p5 it is stated that “ *The proposed development incorporates a landscape mitigation strategy which avoid, reduce or remedy adverse impacts.*” I cannot see how the landscape strategy would remedy adverse impacts of the development on landscape character and views.

The ZTV shows that the development will be visible beyond 3km from the site; and it is not clear where the ZTV has been extended to take account of long distance views.

The LVIA also does not consider any cumulative landscape or visual effects. 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, as are the proposed prison blocks which also combine to have a large scale and semi 'industrial' character, and contribute cumulative landscape effects to this area. Some of the developments identified fall into views of the proposed development site, where the cumulative visual effects of these existing/proposed developments should be considered.

On p57 Section 6.58, only 3 landscape receptors are analysed! There are many landscape receptors missing, and so the impacts on them have gone unanalysed and unreported: Eg. Area of Attractive Landscape; Landform; Trees and hedgerows; Historic Garden; Rights of Way; Recreational Route.

Then of the landscape and visual effects that have been considered, it is written in Section 8.11 p109 that “*In this instance, it is considered that the vast majority of likely effects, as*

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*concluded in the LVIA, are not significant. There are only limited instances where those effects are considered to be significant.”* This is just not factually true at all. Out of the Table 10 of 9 landscape effects, all have moderate to major effects. In Table 11 of 63 boxes of visual effects on 21 viewpoints – 43 contain the words moderate or major. These are significant effects. So Section 8.11 should reach the opposite conclusion.

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. I would also like to see photomontages for these views as the effect would be so major, and adverse, and is one of the primary issues weighing negatively in the planning balance.

## **Conclusion**

Having considered the current application, I am of the opinion that the proposed development would result in significant adverse landscape character and visual impacts, notwithstanding potential mitigation measures, to the extent that it would conflict with VALP policy NE4 and with the NPPF.

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 need taking into account in the planning balance.

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