

OBJECTION TO THE PLANNING APPLICATION AT GRENDON UNDERWOOD FOR THE CONSTRUCTION OF A NEW MEGA PRISON, APPLICATION REFERENCE 21/02851/AOP

I would like to object to the proposal to construct a new mega prison at the site of the existing two prisons in Grendon Underwood in the strongest possible manner. My main concerns are given below under various headings where the proposal would cause significant harm.

Landscape and Visual Impact

The site proposed for the new mega prison is located within the 'Poundon – Charndon Settled Hills' Landscape Character Area LCA7.1 and the 'Woodland Rolling Lowlands' Landscape Character Type, LCT7, as defined by the Aylesbury Vale Landscape Character Assessment 2008. The main part of Grendon Underwood is located in the LCA 7.4 Kingswood Wooded Farmland (LCT 7). The landscape character is of gently sloping or undulating landform with some small hills. It is predominantly pastoral with large areas of ancient woodland.

Paragraph 174 of the National Planning Policy Framework (the Framework) requires planning decisions to recognise the intrinsic character and beauty of the countryside and to support thriving rural communities, amongst other things. Policy GP.35 of the Aylesbury Vale District Local Plan 2004 (LP) 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. There is nothing to suggest that this policy is not consistent with the Framework or applicable to outline planning applications. Policy GP.38 requires development to include landscape proposals to help buildings fit into their surroundings and conserve natural features. Policy GP.40 presumes against the loss of trees and hedgerows of landscape value. The proposed new mega prison development could hardly be described as meeting any of the above mentioned factors.

The proposed development would also conflict with policy GP35 of the Aylesbury Vale District Local Plan and would not constitute sustainable development. It would fail to comply with the core planning principles of the NPPF to recognise the intrinsic character and beauty of the countryside, to conserve and enhance the natural environment and to reuse land that has been previously developed. Furthermore the proposed development would reduce the open land on the prison site by around 70 acres, destroy the form and character of the area due to the vast scale, size, height and form of the buildings and associated services and fencing planned. In addition it will contribute to coalescence of the area between Edgcott and Grendon Underwood. These aspects are in conflict with Policy RA2 of the Local Plan.

The development of a new mega prison as a whole would appear particularly intrusive and out of place in the landscape setting when viewed from most parts of Edgcott, the northern part of Grendon Underwood and the wider panorama as well as from parts of the public rights of way in the locality. In conclusion the proposal would cause significant harm to the character and appearance of the area.

The current prison site is in an area which is rural and open in character and where any limited built form is sporadic. Given the open and green nature of the site it contributes positively to the prevailing character and appearance of the immediate area. One feature of the proposed site is that there has been no significant developments surrounding the prison site, or the villages of Grendon Underwood and Edgcott since the 1960s. This means that the landscape and visual impact of the area has been settled and remained unchanged since that time. The proposed new mega prison would result in irreversible and significant harm to the landscape and the visual impact in the area and as an amenity space. Furthermore the development would have an undesirable urbanising effect on the local landscape and would result in the irreversible and permanent loss of countryside.

The proposed development for the mega prison would introduce a large-scale development to a currently open area of farmland and open, green field space with irreversible effects on the character and visual impact on both the site and adjoining countryside. It is claimed in the Outline Planning Application that the new prison buildings would be screened from view with the addition of some additional planting. The planting proposed is deciduous and would take many years, probably decades to reach a maturity level which might form some level of screening and then this would only be during the summer months.

The field where the new site entrance and road would be located, as well as the football pitch, is part of the Historical Park and Pleasure Gardens of Grendon Hall which were completed by the late 1880s (Ref: *The Buckinghamshire Gardens Trust Research & Recording Project, Grendon Hall March 2021, modified in June 2021*). Hence this land forms part of the Historic Park of a historic and locally very significant Grade II listed property and hence should be taken into account in the planning balance. The historic park and garden layout survives considerably intact, except for a 7 ha housing estate in the south park and prison buildings in the pleasure grounds around the Hall to the east and south. The area within the site boundary represents the significant coherent remains of the designed landscape. The rural setting enjoys views over the Vale of Aylesbury but has been damaged by the large prison development immediately to the east of the Hall. The above mentioned field is also an area of historic ridge and furrow cultivation and this should be preserved rather than irreversibly destroyed due to MOJ's selection of a site which is inappropriate and unfit for the purpose of building a new mega prison.

In summary the proposal for a new mega prison would not accord with the design, character and appearance requirements of policy GP35 of the Local Plan and paragraphs 170b and Chapter 12 of the NPPF. Furthermore, there would be similar conflict with the design, character and appearance requirements of policies BE2, S1, S2 and NE4 of the VALP, given the consistency of these policies with the NPPF.

Impact on Character and Appearance plus Open Space

The field designated for location of the new site entrance and new road to the proposed site currently forms a green edge to the Springhill housing estate and Willow Lodge. Given the open and green nature of the site it contributes positively to the prevailing character and appearance of the immediate area. This positive contribution to the local countryside and current open space would be irreversibly lost if the development were to go ahead.

Constructing a new site entrance and long road into the proposed construction site, as well as locating the football pitch in the above mentioned field would destroy the current open nature of that open space and cause considerable harm to character and appearance of the locality. Furthermore the proposed developments in this field would appear particularly intrusive and out of place in the landscape setting when viewed from parts of Edgcott/Grendon Road and from parts of the public rights of way as well as from the Springhill housing estate. This harm would be particularly evident and highly visible as the field slopes upwards towards Grendon Hall and hence could not be screened. In addition the development of a new mega prison would not represent the natural evolution of the existing settlement.

As detailed in Appeal Ref: APP/J0405/W20/3255772, Land at Edgcott Road, Grendon Underwood HP18 OTQ, Paragraph 29 describes the setting in this part of the site as *"one of the positive and defining characteristics of the immediate area is one where, in the main, the land is devoid of trees/vegetation and where the essentially open and rural landscape adds positively and distinctively to the character and appearance of the area."* The development in the proposal for this area would

appear particularly intrusive and out of place and would have an undesirable urbanising effect on the local landscape and would result in the permanent loss of the countryside. Furthermore the new site entrance seems out of place in this location where the current prison gates and fencing, Grade II listed, are reminiscent of a grand entrance to a stately home through parkland. It feels unnatural for this type of development to be even considered. This harm would be particularly evident and highly visible from the highway, from the footpath and from both Willow Lodge and the Springhill housing estate.

In an attempt to overcome the loss of habitat due to the building of a new mega prison, a considerable amount of deciduous planting is proposed at the top of the field next to Willow Lodge. This planting is to help increase the biodiversity by the required 10% across the site. However, the planting would destroy a further section of the ridge and furrow cultivation which is a special feature of this area. Furthermore it would have a negative impact on the current open character of the area leading up to Grendon Hall on the hill at the top of the field.

In addition to the loss of the open space in the above mentioned field, a further c. 70 acres of open space will be lost on the main site where the new prison would be constructed. There is a public right of way which passes through the edge of this site. The public viewpoint as the path enters this area is one of open, rural countryside with only distant evidence that a prison is present on this site. This space also forms part of the setting of the two Grade II listed properties, Grendon Hall and Lawn House. Development of the new prison would lead to significant urbanisation of the open countryside which would decrease the rural experience from the public right of way.

A development of this scale would also have a major adverse effect 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 a lot of night time light pollution from the current prison but this is nothing compared to the level of light pollution that will be evident if the proposed prison was developed. Both the intensity and the area of the lighting would be significantly greater and evident from a wide panoramic viewpoint.

Amenity Impact

Noise from the current prisons can be heard some distance away as the buildings are situated on top of a hill allowing the sound to travel a long distance. If the proposed prison was built the level of noise pollution would increase significantly. The current noise pollution is particularly bad when the prisoners are playing football on the pitch in its current location, and the noise and bad language can be heard across all of Edgcott and most of the Springhill housing estate. If the football field is relocated to where it is now proposed, the noise pollution for the Springhill housing estate will be significantly increased due to it being located within 20-30 metres of the nearest houses. The impact of noise pollution on Willow Lodge, parts of Edgcott, Hall Cottages and parts of Grendon Underwood would also be significant. This pollution cannot be simply determined in decibels but has to be considered in terms of nuisance and aggressive language.

Many local residents enjoy daily walks in the open space and public footpaths in the locality for simple pleasures like walking the dogs, walking with family and friends as this is an important part of country life. However, the high volume of traffic and especially HGVs travelling through the area due to other large infrastructure projects like HS2, has had an impact on this simple pleasure. The overall impact on the local amenity space from this proposal would be significant for residents on the Springhill housing estate, for Willow Lodge and Edgcott. In addition residents in the Springhill housing estate would not even be able to enjoy even their own outdoor space whilst football matches are ongoing. The 2m high acoustic fencing to be fitted down the side of the football pitch facing Springhill housing estate is purely a gesture and will have little impact on the noise pollution generated.

If the proposal went ahead the amenity pleasure of the landscape and surrounding open space would be replaced with an urban sprawl of large scale buildings, a car park, a new site entrance and road to the main site and the relocation. This would have an irreversible impact on the local amenity space and result in significant harm to the mental health and wellbeing of local residents.

It would appear from the proposal that the field adjacent to Willow Lodge would also become the recreational area for prisoners. This is because their current recreational area adjacent to HMP Springhill is to be developed to locate the new prison buildings. This means that inmates from HMP Springhill will, on a regular basis, use the field for general exercise as well as playing football. The inmates need to have access to open spaces but this will inevitably have a harmful impact on the amenity aspects for local residents as many will feel more vulnerable with the close proximity of inmates.

Heritage

In terms of considering the impact on heritage assets the history of the site is important. The two current prisons and the Springhill housing estate were built in the 1950s and 1960s. Grendon Hall, like other country houses of its period (1880s) had an associated park and pleasure gardens totalling 160 acres. The details of this park have recently been reported (*Ref: Report by the Bucks Garden Trust on Grendon Hall, March, 2021, updated in June 2021*). The field adjacent to Willow lodge is the only remaining section of the Historic Park still owned by the MoJ. If Grendon Hall had been listed prior to the construction of the current prisons listed in 1985) the impact of those contemporary developments on its setting would have been material consideration.

The layout of the historic park and gardens survives considerably intact, except for a 7 ha housing estate in the south park and prison buildings in the pleasure grounds around the Hall to the east and south. The area within the site boundary represents the significant coherent remains of the designed landscape. The rural setting enjoys views over the Vale of Aylesbury but has been damaged by the current prison development immediately to the east of the Hall.

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. The original and Historic Park and Gardens of Grendon Hall would have initially represented the setting for this listed property. However, as described in Historic England document *The Setting of Heritage Assets Historic Environment Good Practice Advice in Planning Note 3 (Second Edition) 2017*, *“The extent and importance of setting is often expressed by reference to visual considerations. Although views of or from an asset will play an important part, the way in which we experience an asset in its setting is also influenced by other environmental factors such as noise, dust and vibration from other land uses in the vicinity, and by our understanding of the historic relationship between places. For example, buildings that are in close proximity but are not visible from each other may have a historic or aesthetic connection that amplifies the experience of the significance of each. The contribution that setting makes to the significance of the heritage asset does not depend on there being public rights or an ability to access or experience that setting. This will vary over time and according to circumstance. When assessing any application for development which may affect the setting of a Heritage asset, local planning authorities may need to consider the implications of cumulative change.*

‘Change over time’: Settings of heritage assets change over time. Understanding this history of change will help to determine how further development within the asset’s setting is likely to affect the contribution made by setting to the significance of the heritage asset. Settings of heritage assets which closely resemble the setting at the time the asset was constructed or formed are likely to contribute particularly strongly to significance but settings which have changed may also

themselves enhance significance, for instance where townscape character has been shaped by cycles of change over the long term. Settings may also have suffered negative impact from inappropriate past developments and may be enhanced by the removal of the inappropriate structure(s).

'Access and setting': Because the contribution of setting to significance does not depend on public rights or ability to access it, significance is not dependent on numbers of people visiting it; this would downplay such qualitative issues as the importance of quiet and tranquillity as an attribute of setting, constraints on access such as remoteness or challenging terrain, and the importance of the setting to a local community who may be few in number. The potential for appreciation of the assets significance may increase once it is interpreted or mediated in some way, or if access to currently inaccessible land becomes possible." Hence the whole of the current prison site can now be considered to be part of the 'setting' of both Grendon Hall and Lawn House."

The construction of the two current prisons as well as the Springhill housing estate caused considerable harm to the settings and Historic Park of Grendon Hall but also the setting of Lawn House. Examples of this harm include loss of character of the countryside surrounding the two assets, destruction of much of the landscape setting surrounding them, loss of open space, unsightly buildings constructed close to the two heritage assets and noise, light, smells and traffic pollution from the operation of the prison and the housing estate.

Construction of a new mega prison on the land behind the two current prisons, plus the placement of a new site entrance and road in the field between the current prisons and Grendon Road in Edgcott, would have a further significant, irreversible and harmful impact on the settings of both Grendon Hall and Lawn House. There would also be harm to the setting of the Grade II listed gate piers and metal fencing at the current entrance to the prison site. The new prison would also impact on a number of other Heritage assets in the locality including the two Grade II* Churches in Edgcott and Grendon Underwood. Full details of the harm on heritage assets has not been included in the Heritage Assessment submitted as part of the proposal.

The field where the new site entrance and road will be located as well as the football pitch, consists of historically important ridge and furrow cultivation. This particular field used to be connected to a more extensive region of ridge and furrow in the area including on Springhill and Mill Hill before the two prisons and the Springhill housing estate were built in the 1950s and 1960s. It would be extremely harmful to irreversibly destroy the remaining part of the ridge and furrow land in the vicinity of Grendon Hall. The building of the new entrance, the new road and locating the football pitch would severely distract from the landscape and current visual impact as well as causing significant harm to the historic ridge and furrow cultivation area.

The harm already inflicted upon the local heritage assets is no excuse to cause further irreversible harm by the construction of a large mega prison whose buildings would be of a scale, height and design not comparable with anything else in locality. On this matter Historic England Good Practice in Planning mentions the cumulative impacts of changes and subsequent harm to heritage assets. The details are as follows.

Cumulative impact (From Historic England Document: *The Setting of Heritage Assets Historic Environment Good Practice Advice in Planning Note 3 (Second Edition) 2017*)

"28: The cumulative impact of incremental small-scale changes may have as great an effect on the significance of a heritage asset as a larger scale change. Where the significance of a heritage asset has been compromised in the past by unsympathetic development to the asset itself or its setting, consideration still needs to be given to whether additional change will further detract from, or can enhance, the significance of the asset in order to accord with NPPF policies. Negative change could

include severing the last link to part of the history of an asset or between the asset and its original setting. Conversely, positive change could include the restoration of a building's plan form or an original designed landscape."

Furthermore as stated in the Historic England Document (see Page 4 heading 5, The Setting of Heritage Assets 2017), ***"the cumulative impact of harm to the settings should be avoided and due consideration should be given, to accord with NPPF policies, as to whether additional change will further detract from or enhance the significance of the asset."*** Hence the planned proposal is contradictory to Historic England Guidance and should be rejected.

Location

The site at Grendon Underwood is totally inappropriate for the building of a new mega prison. The site lies on a hill, there is poor access to the site, there are very limited public transport services, there is insufficient room for the amount of car parking required and it would destroy much of the local open space and have a significant, detrimental, irreversible and harmful impact on the character and visual impact of the local landscape.

A new site entrance and a new access road into the site will need to be constructed. This road will be approximately 600m in length and built off an unclassified country road. The location of the new site entrance is close to the existing site entrance, two bus stops, a bend and the road narrowing to the entrance of Edgcott. An assessment of the current traffic flow at the junction between the current prison site entrance and the highway has not been carried out or even requested. This is a major oversight as it is well known by the locals that there are major issues at that junction, especially at the peak morning and evening time periods. This is due to the cumulative impact of the prison staff movements, the resident traffic from the housing estate on Springhill and the volume of daily traffic passing through Edgcott (measured in May 2021 and approximately 4,000 vehicles per day).

The proposed site has a compromised footprint (horse shoe shape) and does not lend itself to the design of a mega prison with all the associated services. This is one of many examples of how poor the site footprint is for this type of prison. For example the location of the workshop building should be located close to the accommodation blocks as it is in other new prisons being constructed like Five Wells, Glen Parva and Full Sutton. **The inmates will need to visit this building virtually every day but in the proposed site plan the furthest accommodation block is around 700m from the workshop building.** Hence the logistics of these transfers would be a significant issue for staff and inmates alike.

Another example of the compromised footprint of the proposed site is the location of the football pitch in the field adjacent to Willow Lodge. **The football pitch is only being located in that field because there is no room for on the main site but this is exactly where it should be located.** This presents another logistics issue but this time for the existing HMP Springhill prison. The inmates playing football will need to be escorted and supervised, will be a long way from their accommodation blocks and any kind of changing and toilet amenities as well as close to two roads and the general public. The location of the football pitch in this field shows complete disregard for the well-being and the amenity aspects for local residents.

The proposed expansion of HMP Springhill, application to be submitted in late September, by 120 prisoner places will only exacerbate the problems highlighted above.

Flood Risk and Drainage

There have been quite frequent and quite major overflows of foul waste on the public right of way that passes in front of Grendon Hall and in the field adjacent to Springhill. Although not part of the current application, some aspects of the proposal for the new prison will potentially exacerbate the existing foul waste issues. This is due to the current layout of the foul waste system in the above

mentioned field. The planned new road will be located on top of parts of the current foul waste system, unless this is relocated. Parts of the additional deciduous planting will be located on top of the existing foul waste system and the football pitch, depending on the exact location will either be placed adjacent to or located on top of the existing foul waste system that runs down the side of the field close to the hedge adjacent to Springhill housing estate.

The above mentioned aspects are one clear reason why the expansion of HMP Springhill should be evaluated at the same time as the proposal for the new prison and not assessed separately.

Although the site for the proposed new 'mega' prison and the land in the immediate area is in Flood Zone 1, parts of the site and surrounding area are prone to flooding from surface water. In particular the field adjacent to Willow Lodge proposed for the location of the new site entrance and road to the main development site regularly, suffers from standing water. Standing water is also an issue on the main road leading to the current prisons, around the current prison gates and Buckingham Road in Edgcott.

Some of the water that runs from the current prison site flows down the hill via ditches from different parts of the site. One such ditch runs close to the pond in the ecological area, past the rear of Lawn House and across the fields to meet the ditch that runs parallel to Grendon Road, Edgcott. There is a second ditch which runs a bit further towards the Grendon Underwood direction and this also runs down the fields and meets up with the ditch by Grendon Road. The flow rate of water in these ditches has at times caused flooding along parts of Grendon Road close to the road narrowing on the southern edge of Edgcott, and the footpath in that location.

There is also a small ditch that runs along the road side of the field adjacent to Willow Lodge that is in a poor state and has not been cleared out by the Prison for many years. This regularly contains standing water which spills out into the road and runs down to the prison gates and results in standing water either side of the gates

Sustainability

The Government policy is to minimise carbon emissions and has recently established challenging timelines to reach a carbon neutral target. In addition the Conservative election manifesto promised to reduce carbon emissions and to build on brownfield sites. Recently a report on climate change has declared "Code Red for Humanity" and one expert commented "*It is a statement of fact, we cannot be any more certain; it is unequivocal and indisputable that humans are warming the planet.*" Despite these promises and stark warnings about climate change the MoJ, driven by a clear message from the highest levels of Government, has decided to build a new mega prison in a rural, unsustainable location on an open, green field site. The site is not an urban area. In addition it is in an area where there is low unemployment, low levels of crime and where the housing stock would not support the number of new staff required to run such a prison.

If the project was approved there would be tens of thousands of journeys to and from Edgcott and Grendon Underwood each year. Based on 600 staff (there may well be many more than this) at the proposed new prison, using Certified Institute of Building Service Engineers calculations, and assuming that 50% of the staff will commute from Aylesbury and 50% from Bicester, this would result in excess of 1,095 tonnes of carbon emitted per annum. Many of the staff at the current prisons commute from further afield which of course would increase the level of emissions related to future staff if the proposed prison was built. In fact the level of emissions could be almost double the levels of carbon suggested. Is this the way to reduce carbon emissions and save the planet?

The location of the proposed site and the lack of public transport means that the proposal for the new mega prison would result in the use of the private car for prison visitors and staff alike. The Outline Travel Plan in the proposal suggests that staff will be '*encouraged*' to use other more sustainable forms of transport, there are none. This is purely a gesture, staff will use the form of transport most suitable to them and will want freedom of choice and convenience in the way they commute to work. The level of car sharing at the current prisons is very low and only undertaken by people who live together and work the same shift patterns.

Other aspects of the Outline Travel Plan (OTP) are 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.

Family visits are important for the welfare and rehabilitation of inmates. Locating a new mega prison in a remote location with no realistic option for the use of public transport means that visitors will have no choice but to use private car to reach the site or use trains and expensive taxis.

Traffic

It is claimed that the proposed site has good road links to the A41. Firstly this road link involves a number of narrow and tight bends and passes very close to Grendon Underwood Church. 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 to the site from the opposite direction and pass through the whole of Edgcott and through other small villages on narrow, windy country roads. Given the nature of the country roads and the existing volumes of traffic, there are already conflicts between pedestrians, cyclists and vehicles. Building a new mega prison in this location would only increase the level of such conflict.

From the information submitted in the Outline Planning Application, the additional traffic likely to be generated by the proposal, both during the construction and the operational phases would adversely affect the safety and flow of users of the existing road network. There are already major delays at shift change times at the current prisons, at the current prison site entrance. Locating a new site entrance close to the existing one would just add to the problems already experienced.

The current volume of traffic travelling through Edgcott on weekdays as measured in May 2021, over a two week period using road tubes, ranged from 3,709 vehicles per day to 3,973 vehicles per day. This included a range of 203 to 274 trucks (as defined by the FHWA vehicle classification) per day. The total vehicle numbers include all vehicles from motor cycles up to the largest HGVs. Based on the assumptions made in the Transport Assessment submitted as part of the Outline Planning Application, the number of vehicles travelling through Edgcott could increase by around 30%. The increase in traffic volumes from the prison site to the A41 would be even greater.

It is unacceptable to bring forward a further major infrastructure project in this area, given the schemes already intruding into the rural environment and resulting in increased urbanisation and significant increases in traffic, e.g. HS2 and East West Rail. The additional and cumulative impact on the volume of traffic that would result from the proposed prison would seriously impact on the well-being, patience and safety of residents. The further increase in traffic would be unacceptable and totally inappropriate for the local roads.

Expansion of HMP Springhill

In the proposal in Traffic Assessment Appendix L, it is very clear that, in addition to building a new mega prison on the Grendon Underwood site, the MoJ intends to expand HMP Springhill by 120 places. **Recently this expansion was confirmed in a letter from the Parliamentary under Secretary of**

State for Justice Alex Chalk. The application for this extension is expected towards the end of September 2021.

Although the application for this proposal has not yet been submitted, **it is justifiable to consider the cumulative impact that will result from both the new prison and the extension of HMP Springhill.** In fact why did the MoJ not submit the two proposals together? Were they concerned that the cumulative impact of both would have a detrimental impact on the proposal for the new prison? From a planning perspective both proposals should be considered together and the cumulative impact assessed. **May I respectfully suggest to the Case Officer that this matter is taken into account and that the proposal for the new prison should not be finalised until the application for the HMP expansion has been submitted?**

The expansion of HMP Springhill would impact on all of the following aspects which are discussed above:

- Landscape and visual impact
- Character and appearance plus open space
- Harm to the setting of the Heritage assets
- Amenity space with more open prisoners on the site
- Traffic and parking due to the additional staff
- Flood risk and drainage
- Impact on amenity space