

## PROPOSED MEGA PRISON AT GRENDON UNDERWOOD

### INFORMATION SHEET 14 ON SUSTAINABLE TRAVEL AND DISABLED ACCESS

#### 1. Objection Details

*Describe the main objections to the proposal in relation to the subject. Make sure that, where possible, the objections are backed by factual information and or data.*

##### **Rural Location**

- 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 site's remoteness from major built up areas are such that staff employed at the new prison, and visitors, are extremely likely to be reliant on the use of the private car which would be contrary to the National Planning Policy Framework which seeks to focus significant development in locations which are or can be made sustainable and to the aims of Buckinghamshire's Local Transport Plan 4.
- The prison site is in a rural backwater miles from the support and connectivity afforded by a location for example nearer Aylesbury or Bicester. If the project went ahead, in each year of operation, there would be tens of thousands of journeys to and from Edgcott and Grendon Underwood, which would negate many times over the sustainable construction advantages outlined. The Ministry should be locating a project of this size close to a larger population centre with good connectivity to rail and motorways as is the case at Leicester and Wellingborough. The Grendon Underwood project is locationally unsustainable and should be abandoned.
- The notion that even a small proportion of staff will cycle or walk to work is misguided. Apart from the fact there is a shortage of affordable housing already in this area, it is a rural community and there is limited housing stock. All major housing areas are approximately nine miles away, in Bicester or Aylesbury. Of the prison officers employed at the existing prison, 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.
- With regards to the location of the site, it is clearly detached from the main settlement of Grendon Underwood, in a remote location at some distance from the local services which can currently be found in the main village of Grendon Underwood to the south. The site is not considered to be locationally sustainable and would be reliant on the use of the private motor vehicle, which would be contrary to the aims of the NPPF.
- Due to the location of the site and the relative affluence of the local area, it is anticipated that the majority of staff would need to travel some distance by car to the site which does not align with the Government's low carbon agenda. In addition this would have a long-term impact on local traffic and environmental noise and pollution. There is also likely to be further impact from additional visitors traveling to the site which is hard and expensive to reach via public transport; there is just one bus per hour Monday to Saturday only and no direct public transport connectivity between the site and train stations in Bicester, Aylesbury Vale or Milton Keynes.
- Based on 600 staff 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 may well commute from further afield which of course would increase the level of emissions. This situation is in complete contrast with Government aspirations to significantly reduce carbon emissions. These levels will be further increased by the hundreds of visitors each month, most of whom can be assumed to make the journey to the site by car. This is a result of the folly in proposing a rural site for a new mega prison.

- The proposal would be in conflict with paragraph 103 of the Framework 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).
- In the Public Consultation document, under "The Planning Context", the Ministry of Justice refer to linking to large urban centres. The Grendon Underwood site is in a position totally unconnected to urban areas. It sits in a wholly rural, farming locality without any large, local population that can be described as direct linking.

### **Road Network and Current Volumes**

- 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 vague 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%. In addition the number of vehicles passing from the A41 junction with the Broadway, down the Broadway and past the outskirts of Grendon Underwood and Hall Cottages could increase by a much greater volume. This would be both during the construction and the operational phases.
- Based on data from a Freedom of Information request to the Secretary of State for Justice, the following details are related to the most advanced of the new prisons, Five Wells in Northamptonshire.
  - Between January 2021 and end of June 2021 – 8,916 HGVs made deliveries to the site
  - The number of car and van movements into the site when work started in May 2019 was around 100 vehicles per week. This increased to around 3,500 vehicles at the peak in October 2020. Currently the level is around 2,500 vehicles per week.
  - The workforce on site when work started in May 2019 averaged 100 people per day. The workforce built up over time and peaked in November 2020 with approximately 1,000 people per day for a two month period. In July 2021 the site was running with approximately 750 people per day during the working week.
  - To date at the new mega prison being constructed at Five Wells, 15,183 pre-constructed concrete panels have been incorporated into the installation. This averages to delivery of 290 panels per week.
- From the information submitted in the Outline Planning Application, it is considered that 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. Given this level of severe harm which would result to the safety and convenience of users of the highway, it is considered that this matter should be afforded significant adverse weight in the planning balance.

- The significant amount of additional traffic that will be generated by the proposal, both during construction and operation, would adversely affect the safety and flow of users of the existing distributor road network, contrary to the National Planning Policy Framework and the aims of Buckinghamshire's Local Transport Plan 4.
- By private car any connection is primarily by a rural road network. The prison is served by a single, single carriageway road running north to south. This road is currently, and for the next several years, burdened with heavy traffic from HS2, and East West Railway construction. Thereafter, it will carry operational traffic associated with two major rail networks and 24/7 maintenance installations. From the South, is a singular road from the A41, which is already signposted by the Local Authority as an accident blackspot route.
- The proposal for the new mega prison essentially forces the use of private road transport for prison visitors and staff alike. The notion of car sharing does not exist in the current prison staff arrangement: work shift patterns are 24/7 every day of the year, starting and stopping at any times that prison needs dictate, and thus, will exist in the future. However, if the new proposed prison was in operation, the numbers of staff and visitors involved will be significantly and irreversibly increased from the current levels.
- The plans for an 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. This plan is a non-starter. Furthermore, buses are infrequent. The only bus service that passes the current prison is the 16 bus. This service only covers part of the day, Monday to Saturday, on an hourly basis and as a rural service to connect the villages, it takes a very circuitous route which means it is not practical to use for staff or visitors on a regular basis. Therefore, using a bus service to reach the site by employees is untenable.

### **Visitors**

- 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. The only possible alternative for them would be to use a much more costly form of public transport, and one which takes a significantly longer period of time, which would likely limit the number of times that they would be able or willing to make visits.

### **Local Footpaths**

- For the very small number of staff at the new prison that might be located within nearby villages, there is no safe and viable form of sustainable route for them to reach the site, either by walking or by bicycle. The road is narrow and windy from all directions and with up to around 4,000 vehicle movements a day it is not a safe and viable form of commuting. In addition the footpath from Edgcott or Grendon Underwood to the site is unlit, narrow and close to a busy road where vehicles

travel at speed. This footpath is between 1m and 1.2m wide and any footway should be 2m, or an absolute minimum of 1.8m, as stated in Manual for Streets, and the Chartered Institution of Highways and Transportation (CIHT) guidance 'Designing for Walking'. Given its limited width, the narrow footways leading to the site would not cater for all pedestrian's needs. Manual for Streets states that the term 'pedestrians' includes children, wheelchair users, people with less obvious disabilities and people pushing prams. It is not considered that the local highway network would adequately cater for all of these pedestrian movements.

## **2. Any Other Points**

*Include any other relevant information or sources that might help in making the objection.*

**Include any other thoughts on aspects and problems related to travelling to the prison site and the impact of this on locals.**