

PROPOSED MEGA PRISON AT GRENDON UNDERWOOD
INFORMATION SHEET 15 ON TRAFFIC AND PARKING

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.

Traffic

- The location of the site for the proposed new 'mega' prison is such that it has only limited access by non-car vehicle modes of travel. The only source of public transport is the infrequent bus service (No 16 - serves to/from Aylesbury only, narrow timetable, serves as school bus in term times, nothing for most of Saturday, nothing at all Sunday) which stops by the current prison gates and serves some local villages by a circuitous route. There is no bus service from Bicester. There are two train stations in Bicester, one has connections to Oxford and London Marylebone and the other to Birmingham and London Marylebone. There is also a station at Aylesbury Vale which is a slow train to London Marylebone and a further station in Aylesbury town centre to London Marylebone. There is a train station to London Euston and which serves the Midlands but this station is approximately 45 minutes away from the site in Milton Keynes.
- The absence of adequate infrastructure and the site's remoteness from major built up areas are such that those employed at the site will 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. Even the traffic assessment by Atkins submitted as part of the planning documentation concludes that the site is non-sustainable and that at least 83.2% of staff will commute to the site by car. However, their assumptions are based on 2011 census travel behaviour results for the whole of Aylesbury Vale. As a result these results are skewed as the usage of other forms of transport is unrealistically high. For example 5.8% are assumed to reach the site by bus and train which is not feasible at this site. It is also claimed that 6.6% will commute through car sharing. This is an unrealistic proportion as the staff who work at the site will be housed over a wide area due to the rural location and car sharing is highly likely to be much lower than for the whole of the Aylesbury Vale region. Hence the % of staff that will use private car to commute to work is likely to be above 90%.
- The roads are also highly dangerous for cyclists due to the volume and nature of traffic at peak times and both the sharp bends in the road from Grendon Underwood to the prison site and from the North part of Edgcott and beyond. Hence cycling to the proposed site is not a form of transport that would be used and none of the staff employed at the current two prisons use this form of transport.
- The Traffic Assessment suggests that in terms of servicing arrangements, the proposed vehicular access will be used to undertake servicing and deliveries with these activities typically occurring outside of the network peak hours. Try telling that to delivery and servicing drivers. They will arrive at the site when it is most convenient for them and journey times and arrivals will be very much driven by road conditions and traffic rather than trying to work around a shift pattern and peak staff commuting times.

- The Outline Planning Plan (OTP) states “Car sharing is an important element of the OTP to minimise single occupancy car travel to and from the site. As there are multiple shift patterns at the site, to accommodate these it is considered necessary for a site-specific car sharing scheme to be developed and for staff. For some staff, it may be feasible for them to use an area wide car share scheme.”

Staff will be working a variety of shift patterns and live over a very widespread area. Making arrangements for an area wide car share is a noble gesture but how many staff working shift want to vary their route to pick up other staff members. There might be a possibility that some low level of car sharing results from this exercise but in reality it will be very minimal. The current prison staff do not partake in any such scheme and they most likely live over a less widespread region than the future new staff will.

- With an additional 500-700 staff working at the proposed new ‘mega’ prison, plus visitors and service vehicles, the additional traffic to be generated by the proposal would adversely affect the safety and flow of users of the existing distributor road network. This is contrary to the National Planning Policy Framework and the aims of Buckinghamshire’s Local Transport Plan 4. Given this level of severe harm which would impact on the safety, convenience of users of the highway and direct impact on local residents it is considered that this matter should be afforded **significant** adverse weight in the planning balance.
- As the majority of prisoners will be from outside of the local area, mostly from London, the rural location of the proposed prison site will make it difficult and expensive for visitors to visit and hence potentially impact on family relationships. The site location and the means of transport that visitors will need to use to access the site do 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.
- The local roads are already suffering the cumulative effect of HS2 and EWR construction projects which intersect approximately a mile from the proposed development. Edgcott, the community of Springhill and Grendon Underwood are already severely affected by daily construction traffic causing damage to the road network, mud on the roads, delays created by long diversions and noise and vibration impact to properties. The proposed new mega prisons would further compound residents’ misery and coincide with peak construction phases of HS2 and EWR.
- 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.
- 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 proposed new prison.
- 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. In addition how many trucks (as

defined by the FHWA Vehicle Classification) will be travelling to and from the site on a weekly basis throughout the construction phase?

- The volume of construction traffic involved in building such a new prison would be hugely significant and would have a major impact on the local villages. It is claimed that the MoJ would work with the Council on a traffic management plan, just as HS2 and ER promised. These plans have been frequently ignored by the contractors despite many objections. How can local residents be expected to expect the MoJ contractors to be any different from those already passing through the locality?
- The volume of traffic using 'rat runs' through other local villages will also increase. In addition new 'rat runs' may be created as contractors and staff find the main routes to the site congested.

Outline Travel Plan

- The Outline Travel Plan (OTP) suggests that alternative forms of transport to reach the site are by foot, bicycle or car-sharing. There are a number of factors which make these options non-viable. Firstly there is insufficient housing in the locality to house some 500-700 staff and hence the vast majority of staff would be located in a wide and rather distant area from the site. The small volume of housing that might be available within a walking or cycling distance would also be too expensive for the majority of those employed on a prison salary. In addition the nearby footpaths are very narrow (less than 1m in places), in poor condition and in some parts are directly adjacent to the road on which traffic, including large heavy goods vehicles, travel at speed on bendy roads. This makes the option of walking to work a very limited and dangerous one.
- To re-enforce the inappropriateness of the Outline Travel Plan, of the current prison staff based at HMP Springhill and HMP Grendon, only seven prison officers live in the parish of Grendon Underwood and none live in Edgcott. Furthermore all current staff use private car as their means of transport and none walk or cycle to work. In addition, although there is a car sharing policy in place, the only staff that car share are ones that are couples who live together and happen to work the same shift patterns. It is inconceivable that this Travel Plan will change the means of travel to the site and resulting in the site being unsustainable and does not comply with Government policies to minimise carbon emissions.
- The Outline Travel Plan suggests that staff will be 'encouraged' to use other more sustainable forms of transport. 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.
- The Outline Travel Plan states "An effectively tailored Outline Travel Plan (OTP) can deliver a significant impact upon travel patterns of staff and visitors, in favour of the use of sustainable modes (walking, cycling, public transport and car sharing). Therefore, the overall aim of this OTP is to reduce the reliance of the private car, through promoting and encouraging the use of sustainable travel modes.

The specific OTP objectives for this site are to:

- Promote sustainable travel at the site;
- Encourage the use of public transport amongst staff and visitors;

- Encourage car sharing amongst staff and visitors; and
- Manage car parking. “

This is purely a gesture and hollow words. How can you encourage more sustainable travel to a rural site when the workforce is scattered over a very wide area and there is no public transport system in place except for a single and irregular bus service? This is an unsustainable site and no travel plan, however encouraging it might seem, is going to make a significant difference to the way in which staff commute to this site. The evidence regarding the way that staff commute to the two current prisons is clear evidence that this OTP is purely gesturing.

- The Outline Travel Plan states that “Travel information for visitors will also be added to the prison’s visitor information page on the Justice website. In addition, a visitor transport information board will be located in a communal area to disseminate up to date public transport timetables for use by visitors. The board should be located in an easily accessible location, to promote awareness.” This will be a very small notice board as there is such limited public transport to the site, if the visitors are coming from London they have some choice about which local railway station they catch a train to, for example Aylesbury, Aylesbury Vale, Bicester North or Bicester Village but they then have to find a form of transport to travel to the prison site. The only quick route is to use a taxi which is going to be expensive for them. Visitors would then have difficulty finding a taxi for the return journey to the relevant train station as there are no local taxi ranks and to book a taxi would result in a further delay and additional cost as the taxi would have to come from Aylesbury or Bicester and hence their distance of travel would increase the cost.

Only Aylesbury Town rail station has a bus service to the site but it takes around 45 minutes and it is not frequent, has a reduced service on Saturdays with no service on Sundays. Hence the only realistic and convenient way of visitors travelling to the site is by private car, i.e. the site is unsustainable.

- The Outline Travel Plan states “Baseline surveys will be carried out six months after initial occupation. The survey should be distributed in a communal area or for staff via an online questionnaire. For staff, the survey would seek to understand the following:
 - Current mode of travel and reasons for use;
 - Willingness to use alternative modes;
 - Incentives to encourage the use of sustainable modes; and
 - Other transport related issues. “

This aspect of the OTP is another gesture and hollow words. Anyone can write a plan to include such gestures but in reality staff will be already using the form of transport which is most convenient for them and are extremely unlikely to be persuaded from changing that.

- The Outline Travel Plan (OTP) states “Provide a public transport information system in a publicly accessible area, to allow building users access to up-to-date information on the available public transport and transport infrastructure. Including information on the nearest bus stop, nearest railway station, connectivity information, relevant timetables and fare information for key destinations.
 - Include signposting from the site to public transport, cycling, walking infrastructure, and local amenities
 - Investigate the possibility of providing bus ‘taster tickets’ for employees. This would allow staff to trial their journey to work by bus to see whether it is a feasible option for them.
 - Investigate the possibility of providing increased services to correspond with shift times.”

The authors of this report are really struggling and clutching at straws. How can you provide information on services that don't exist! They can advertise where train stations are and the timetables but staff or visitors have to travel from the site to the stations. The best advert they could place was a list of taxi companies in local towns with an estimated prices list depending on time of day.

- What use would the signposting be?
- Bus faster taster tickets for a bus service when the timings are not compatible with any of the shift patterns, yet another gesture only.
- Provide extra services, to where? The new staff will be living over a very widespread area so multiple services would have to be set up to stand even the slightest chance of encouraging staff to commute by bus. However, having lived through Covid 19 times I don't think many staff would want to travel by public transport anyway; they would rather have the convenience of using private car transport and the reduced risk that this form of transport provided them with.

Location and Environment

- 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.
- The environmental impact of the additional journeys by 1,000 contractors twice daily for a 2-3 year construction phase, the long term additional staff journeys in excess of 1,000 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.
- Nowhere is there a mention of the environmental impact of the additional journeys by 1,000 contractors twice daily for a 2-3 year construction phase, the long term additional minimum of 1,000 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. The estimated carbon emissions from staff journeys alone will be well in excess of 1,000 tonnes of carbon per annum (based on Certified Institute of Building Service Engineers calculations) and this will be significantly higher when visitor journeys are also taken into consideration.
- 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, goes across a narrow bridge 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.

Site Access

- It is proposed to create a new entrance slightly north of Willow Lodge. This entrance would lie in between the current entrance to the prison and the road narrowing at the southern edge of Edgcott. In addition there are two bus stops, one each side of the road, by the current prison entrance and a bend on the Grendon Underwood side of the current entrance. The distance between the road narrowing and the current prison site entrance is just 110 m. Hence there would

be two site entrances and a road narrowing restriction within 110m plus two bus stops and a bend, making this a potential accident spot, especially considering the number and size of vehicles using this route and the speed at which they travel. At shift change times in the current prisons there is severe congestion at the current site entrance so this situation would be exacerbated by the addition of a further site entrance that would have a significant flow of traffic.

- The entrance to the current prisons is marked by the Grade II listed piers and railings associated with Grendon Hall and creating a new major entrance just a short distance away will cause harm to and dilute the impact of this grand and historical entrance.

Car Parking

- The number of staff predicted to be employed at the proposed new mega prison ranges from 450-734. There will also be a regular flow of visitors. The assumptions made about the number of staff that will be present on site at any one time and hence how many car parking spaces are required suggests that a total of 430 spaces for staff and visitors and 23 for disabled users would be sufficient.
- The number of staff to be employed in the proposed new 'mega' prison is not clear from the documentation provided. In some cases it states that there will be a ratio of 0.5 compared to the number of prisoner spaces which equates to 734. In other parts of the documentation the numbers of staff are quoted as a range from 450-550. Using the calculations used to estimate the car parking spaces required at other new prisons, e.g. Full Sutton, it was assumed that approximately 76% of the total directly employed staff would be on site at any one time. Using this figure leads to the following car parking requirements at the proposed site at Grendon Underwood:
 - 500 staff – 380 spaces required (number allocated in the indicative plans)
 - 600 staff – 456 spaces required
 - 700 staff – 532 spaces required
 - 750 staff – 570 spaces required

The actual level of car park spaces then depends on how many staff/visitors are on site at any one time. From the data included in the Traffic Assessment it is actually quite difficult to determine what these numbers are. The Car Park Accumulation details are shown in the Traffic Assessment Document on Page 30 in Figure 6-1 and the raw data is provided in Appendix 1. However, no details are provided as to how this actual data was determined. Further details should be provided so that a layman can follow this situation as there was a significant underestimate of how many car parking spaces were required at the new prison HMP Berwyn in 2017. In that situation they had to create a further 194 places so has the Agent used the same method as previous? If so then has the number of car parking spaces been underestimated and later in the project further spaces will have to be created on what is already a cramped site. Where would any additional car parking spaces be located?

- Hence the range of car parking spaces required for staff alone ranges from 380 to 570! The proposal has used the lowest end of this range and has deliberately underestimated the actual number of parking spaces that will be required to serve the new prison. If this is the case where would any further car parking spaces be located?

- To confirm the statements made above consider the car parking situation that arose at HMP Berwyn near Wrexham. These are the main points that arose and caused chaos with regards to parking:
 - The car park was not completed for four months after the prison opened and so there was nowhere for the staff to park. Chaos followed until arrangements were made with local companies on the nearby industrial estate for spaces to be allocated for the prison staff.
 - Once the prison fully opened it was clear that the number of car parking spaces had been underestimated. This was because the parking allocation had not taken into account the number of non-directly employed staff that would also work at the prison (see extract from a local newspaper article below).
 - Approval was sought from the Local Authority to establish a temporary car park on some land at the site which was available and later this was converted to a permanent car park with an additional 194 spaces.

From 'The Leader' in October 2020

Higher than expected staffing levels are said to have caused the issue at HMP Berwyn in Wrexham, which has resulted in some workers resorting to parking on the main road into the site. The £250m facility on the town's industrial estate currently has 420 allocated spaces for vehicles with more than 900 staff.

It comes despite officials originally estimating there would be closer to 600 people working at the prison when it was built. The prison service has now applied to create just under 200 extra parking spaces in order to alleviate the problems. In documents submitted to Wrexham Council, bosses said some staff had experienced difficulty accessing public transport due to travelling long distances, but added they were being encouraged to car share.

The prison's car park was not ready to be used when it opened in early 2017, meaning staff had to park at neighbouring factories for the first four months.

It was originally estimated there would be 575 workers directly employed at the facility, but the actual figure currently stands at 651. The initial projections also failed to take account of employees from other organisations who regularly work at the site. Officials said: "The none directly employed staffing figure currently stands at 262 across all partners with this figure having the potential to rise to 300 as not all partners are in place".

Although the prison is designed to house around 2,100 men, it has yet to reach full capacity and is holding 1,300 inmates present.

- From the above details it is clear that fundamental errors were made in assessing the required number of car parking spaces at HMP Berwyn. From a review of the planning applications for other new prisons currently being built, HMPs Five Wells, Glen Parva and Full Sutton, the same errors would appear to have been made. The requirement for car parking spaces has been estimated using only the number of directly employed staff and does not take account of the additional non-directly employed staff that will be required in these prisons.
- Finally on the matter of car parking another important consideration has not been discussed in the outline planning application. This is, where will the 1,000 contractors on site each day during the construction phase park? In addition where will the materials delivered to site, e.g. the large pre-cast concrete sections, be stored prior to use?

2. ANY OTHER POINTS

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

Any individual concerns about travel and parking to be included.