



RE: 21/02851/APP Category C Prison in Grendon Underwood.

Grendon Underwood & Edgcott Parish Councils Rebuttal of Highways Consultee Comments on the Outline Travel Plan Submitted as Part of the Application for the New Mega Prison at Grendon Underwood

An Outline Travel Plan (OTP) was submitted as part of the application 21_02851 for the construction of a new mega prison on the site of the existing prisons, HMP Grendon and HMP Springhill in Grendon Underwood. The OTP was reviewed by the Travel Planning Department in Buckinghamshire Council on 20th August 2021 and the review was posted on the Planning Portal on 10th September 2021. We would respectively like to make a few comments on the review itself and point out many failings and misinformation presented in the OTP.

1. Comments on the review are outlined below

- Anyone can write an OTP with minimum experience and make it sound encouraging and suggest that it meets local requirements. Hence documents like this need to be fully scrutinised for any misinformation or bias and accuracy relevant to the particular site which it is related to. This means first and foremost that the reviewer must be experienced in this role, know the site well and should have visited the site to fully appreciate any limitations that might be present.
- The review was not carried out to anything like a high degree of scrutiny, in fact there was no real scrutiny applied at all. This does make one wonder if the reviewer had any knowledge of the site.
- The way in which the reviewer was 'pleased' at almost every statement made by the applicant suggests that they were probably very new to this role and may not have reviewed many, if any, OTPs in the past. This is not meant in a disrespectful way to the author but it is quite alarming to see such comments in a review for a site which has numerous limitations in terms of sustainable travel options and many other factors which are discussed below.
- The final conclusion in the review stated '*This is a well thought out Travel Plan with some good measures to reduce single occupancy car use, there is some additional information required before we are able to approve the plan.*' We would argue that in fact the OTP is just a gesture and contains lots of suggestions and actions which will have little if no impact in terms of reducing single occupancy car use due to the nature and location of the site. Further details are provided below and emphasise the reason that the reviewer of such a plan needs to be fully aware of the location and nature of the site in question.
- In addition the author of the review was not named and there is no indication that this report was checked as no reviewer is listed. Surely with all Buckinghamshire Council consultee comments like this the author and the supervisor reviewing the report should be named.

2. More Detailed Assessment of the OTP and Consultee Comments

The OTP is full of standard phrases for such a document and numerous suggestions about what steps will be taken to make what is an unsustainable site to one that is more sustainable. However, to judge how much truth and reality there is in such suggestions a clear understanding of the site, the public transport services in that area and where the staff would be commuting from is required. In addition a reality check can be carried out as there are already two existing prisons on the site. Hence the practices of current staff can provide a good indication of what the reality is in terms of sustainable travel to this site.

Some of the main suggestions raised in the OTP to achieve more sustainable levels of transport were:

- Appointment of a Travel Plan Coordinator etc
- Car sharing scheme
- Providing information on transport-related subjects to site staff and visitors
- To outline the sustainable options to staff and visitors
- Adding travel information on the prison web site

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- Setting a target of reducing single occupancy car use by 10%
 - Adequate disabled parking spaces
 - Cycle parking
 - Negotiate with local cycle shops to negotiate discount vouchers for bicycle purchase
 - Provision of car-sharing spaces
 - Electric vehicle charging points
 - Annual monitoring surveys
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- Knowing the site very well, as both Grendon Underwood and Edgcott Parish Council members do, it is extremely easy to scrutinise fully the details outlined in the OTP. What follows below is the reality of the site based on facts regarding the two current prisons, other development taking place in the area and the impact that the proposed new mega prison would have. Note also that two recent applications for housing developments close to the prison site were rejected, both after appeal. One of the main reasons for the rejection of both of these proposals was that the two sites were unsustainable. The details are Appeal APP/J0405/W/16/3185166 for Application APP16/04609/AOP and Appeal APP/J0405/W/20/3255772 for Application 17/03317/AOP.
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- 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 only way to travel from this railway station would be by taxi as there are no forms of public transport.
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- To re-enforce the inappropriateness of the OTP, 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 OTP would change the means of travel to the site. The site is unsustainable and does not comply with Government policies to minimise carbon emissions.
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- The OTP suggests that staff and visitors will be 'encouraged' to use other more sustainable forms of transport. This is purely a gesture as the travel options for both parties are extremely limited and staff and visitors alike will use the form of transport most suitable to them and will want freedom of choice and convenience in the way they travel to the prison.
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- 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 were 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%.

- 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'. Hence cycling or walking 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 mode of transport.
- The Outline Transport 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 shifts 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.
- 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. 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 sound, is going to make a significant difference to the way in which staff commute to this site. The evidence regarding the way that staff and visitors travel to the two current prisons is clear evidence that this OTP is purely gesturing.

- The OTP 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 can 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.

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- The OTP 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. 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 mode.
- The 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.”*
- 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.
 - Staff at the two current prisons live over a very wide area from Grendon Underwood to Dunstable. Even those who live in Grendon Underwood and other local villages use private car for their commute.
- The number of staff to be employed in the proposed new ‘mega’ prison is not clear from the documentation provided in the application. 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 staff. 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
 - 600 staff – 456 spaces required
 - 700 staff – 532 spaces required
 - 750 staff – 570 spaces required

One other fact to bear in mind is that the above staff numbers relate to those **directly** employed and does not take account of the numerous **indirect** staff who are needed to run a prison of this scale and nature. Hence these should have been incorporated into the car parking calculations but were perhaps deliberately omitted. One fact that is

known is that there was a significant underestimate of how many car parking spaces were required at the new prison HMP Berwyn which opened in 2017. This was because the indirect staff numbers (approximately 200) were not taken into account in the car parking requirement calculations. As a result a further 194 additional car parking spaces had to be created once the prison had been opened. Hence it would appear that the agent has made the same errors in determining the number of car parking spaces required for the new prison at Grendon Underwood. If so then 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?

The actual level of car parking 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.

3. Conclusions

The OTP is NOT a well thought out travel plan. It is full of standard phrases and gestures to suggest that this rural site with very limited public transport can suddenly be transformed to being a sustainable site. The current staff based at the two existing prisons on the site rely totally on the use of private car for their commute. Visitors also use only private car transport to reach the prison. Despite there being a car sharing policy in place the only staff that do car share are those who live together and work the same shift patterns. The current staff live over a wide area from Grendon Underwood to Dunstable and probably further afield and even those that live within a short distance of the existing prisons use private cars for their commute.

The number of staff in the new mega prison would be significantly higher than that at the current prisons and they would find themselves living over a wide area due to the lack of affordable housing close to the prison. Due to the lack of public transport and unsafe conditions for commuting by bicycle or on foot, the staff would be totally reliant on the use of private car for their commute.

The site is unsustainable in terms of transport and no words or gestures can change this reality.