

# EDGCOTT PARISH COUNCIL

11 January 2022

Development Management  
The Gateway  
Gatehouse Road  
Aylesbury  
Buckinghamshire HP19 8FF

Att: Ms Hird

**Edgcott Parish Council, with Support from Grendon Underwood Parish Council, wishes to object to the Construction of a New Mega Prison, Application Reference 21/02851/APP. This objection is related to the major impact of infrastructure projects in the area surrounding the proposed site for the new prison, both during the construction period and during the operational phase.**

## 1. Road Issues Due to East West Rail

Below is a recent article from the Bucks Herald with regards to dangerous road conditions caused by one of the main infrastructure projects in the North Bucks region, East West Rail, and specifically around Steeple Claydon. This report highlights the serious problems that infrastructure projects bring to the region even when those responsible are supposedly putting in place mitigation to avoid such issues.

***MP slams East West Rail Alliance over 'dangerous' Aylesbury Vale road conditions.***

*East West Rail says it takes the MP's concerns 'very seriously'.*

*A local MP has slammed East West Rail over the deteriorating road conditions in Aylesbury Vale, labelling the surface 'dangerous'.*

*Buckingham MP [Greg Smith](#) has called the conditions on roads in Newton Longville, Steeple Claydon and Verney Junction 'hazardous'.*

*Of particular concern to the MP is the muddy surface deteriorating on Queen Catherine Road and Padbury Road in Steeple Claydon.*

*Mr Smith said: "I am utterly disappointed and very concerned with the conduct of senior East West Rail Alliance leaders in the past few weeks and months.*

*"The Alliance has shown blatant disregard for the safety and wellbeing of my constituents and has refused to engage with the Local Authority on how to mitigate the project's impact. I am calling on the Alliance and the Department for Transport to recognise in full the damage this project has caused and to make amends as a matter of urgency.*

*"The significant amount of disruption caused by the EWR's earthworks is far-reaching and, at times, downright dangerous. The Alliance has demonstrated a severe lack of urgency when responding to excessive amounts of mud along the roads leading to/from their compounds, in effect leaving the highway in a hazardous state that threatens the safety of my constituents.*

**Reply to: CLERK**

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*"Residents of Newton Longville, Steeple Claydon and Verney Junction, have been hit particularly hard - having already suffered through month after month and year after year of continuous disruption to their daily lives.*

*"Mud continues to cake the road surface; mile after mile of grass verges have been destroyed by EWR HGVs passing each other on narrow country lanes; several stretches of road are now considered dangerous due to the damage caused by EWR's construction traffic. This is unacceptable and cannot go on."*

*A spokesperson for East West Rail advised it has a community action plan to avoid traffic disruption and residential concerns arising.*

*The spokesperson told the Bucks Herald, the alliance is in daily contact with members of the Bucks community, to understand local concerns and quash potential issues.*

*An East West Rail spokesperson said: "We are aware of comments posted online recently by Greg Smith MP and we take any community concerns very seriously. The team at East West Rail Alliance holds weekly meetings with Mr Smith's office and Bucks Council.*

*"These meetings have been incredibly helpful so far in helping us to understand and take action on the issues that matter to local people. We have been in touch with Mr Smith's office about these recent comments."*

*Another aspect of the MP's annoyance was his feeling that inaction from the alliance forced council resources to be redeployed in the Steeple Claydon area.*

*Mr Smith was particularly frustrated as this means shifting resources away from the traffic measures and staff needed to control HS2 construction.*

*He added: "Despite what is clearly an urgent and alarming situation, the Alliance has been unwilling to step up the resources needed to deal with it. It has therefore fallen to the Local Authority and my office to clean up after the Alliance, a perpetual burden which is unwarranted, unnecessary, and unfair.*

*"Buckinghamshire Council has been forced to re-direct its own resources to dealing with the fallout of the Alliance's poor conduct; those within the council who've been assigned to pick up the pieces have informed me of the toll it's taken, with many already having experienced the overwhelming impact of HS2.*

*"To make matters worse, the Alliance has u-turned on its willingness to constructively engage with key local stakeholders, including the council. Representation at critical joint meetings has been patchy and there is a general expectation from the Alliance that we engage on their terms.*

*"This is NOT how a major infrastructure project should be managed; standards have slipped considerably and it is plain for everyone involved to see. The delivery of East West Rail should not and cannot be conditional on the daily misery suffered by stakeholders, which those overseeing the project have failed to remedy, resulting in blighted communities and an overburdened local authority. The Alliance must step up, engage with us constructively, and put in place measures to prevent any further risk to the safety and wellbeing of my constituents."*

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## 2. Cumulative Impact of Local Infrastructure Projects

In addition to the East West Rail project, work is ongoing on the HS2 project in the same region. This project has also resulted in road and verge damage as well as HGV vehicles having to mount pavements and or verges to avoid collision due to the narrow roads from Grendon Underwood through to Buckingham. Both EWR and HS2 construction work has resulted in and will continue to cause a number of temporary road closures in this area. As a result the diversionary routes that result from the closures add considerable times to journeys much to the distress of road users. Furthermore access for some local businesses has been severely disrupted. Notification of such road closures is also often at short notice which further exacerbates the related problems.

In December 2020 an application was submitted for the building of a new mega prison at Grendon Underwood on the site where HMP Grendon and Springhill prisons are based (reference 21/02851/APP). The new prison would house 1,440 Cat C prisoners. Since this application it has also become clear that HMP Springhill is also to be extended by 150 places.

There are many reasons why the application for the construction of a new mega prison on the Grendon Underwood site should be rejected and these have been thoroughly documented in the hundreds of objections that have been posted on the Planning Portal in response to this application.

One key objection which has been widely emphasised by the local MP Greg Smith is the cumulative impact that initiating a further major infrastructure project would have on the local area surrounding Grendon Underwood. Both the East West Rail and HS2 projects will continue for several years and hence would coincide with the building of the new mega prison if this development was granted approval. Although the disruption of major infrastructure projects during the construction phase does not weigh heavily in the 'Planning Balance', it has to be taken into account when there are multiple projects ongoing at the same time and the cumulative impact would have such a significant and detrimental impact on local residents, businesses and highways. Furthermore, in due course there will be a large HS2 IMD - maintenance depot at Calvert with accompanying vehicle movements which will no doubt mainly travel from the A41, down the Broadway and through Edgcott. The end result if there are cumulative projects will be further significant traffic disruption, further damage to highways and verges which will continue during the operation of these major projects once completed. The local roads are narrow and bendy and not fit for the volume and type of traffic that will be using them for many decades to come.

## 3. Traffic Volumes During Two Current Mega Prisons Under Construction

To highlight the traffic volumes that would result from the construction of just the new mega prison (a period of 3-5 years) see below the responses to questions submitted by the local MP Greg Smith to the Secretary of State for Justice with regards to the number of vehicles involved in the construction of other prisons currently being built.

1. To ask the [Secretary of State](#) for Justice, how many contractors have been on site per week at the (a) [Five Wells](#) site and (b) [Glen Parva](#) site from the beginning of construction to the current date?

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At [HMP Five Wells](#), starting in May 2019, the workforce on the site averaged around 100 people per day throughout the working week. The workforce built up over time and peaked in November 2020 with approximately **1,000 people per day** for a two-month period. Currently the site is running with approximately **750 people per day** during the working week.

At [Glen Parva](#), construction began in August 2020 with around 30 people per day on site. This has steadily risen as activity increases on site, with a number of dips such as over the Christmas period. Currently, there are approximately **470 people on site each day**.

2. To ask the [Secretary of State](#) for Justice, how many (a) car and (b) light vehicle movements per week there have been at the (i) [Five Wells](#) site and (ii) [Glen Parva](#) site from the beginning of construction to date?

At [HMP Five Wells](#) car and van movements (entering and leaving site) started in May 2019 at around 100 vehicles per week and increased to around **3,500 vehicles per week** at peak in October 2020. The site is currently (in July 2021) running at around **2,500 vehicles per week**.

At [Glen Parva](#), car and light vehicle movements are not tracked specifically – deliveries to site are tracked but this includes heavier vehicles and excludes operatives arriving by car. It is therefore not possible to provide data on the number of car and light vehicle movements at the site.

3. To ask the [Secretary of State](#) for Justice, how many HGV movements there have been at the (a) [Five Wells](#) site and (b) Glen Parva per site from the beginning of construction to the current date?

Deliveries commenced at [HMP Five Wells](#) in May 2019 however, **it is not possible to distinguish between HGV deliveries and non-HGV deliveries** from the data available. Deliveries commenced at [Glen Parva](#) in January 2021. Between **January 2021 and the end of June 2021, 8,916 HGVs made deliveries to the site**. All main contractors provide a traffic management plan which is shared with sub-contractors. This helps to manage the impact of construction traffic on the surrounding community.

The most striking data from the above responses is as follows:

1. At Five Wells the number of contractors on site per working day peaked at 1,000 for a two month period and was then 750 contractors per day for a much longer period of time. Such large numbers raise the following questions. Where were this large number of contractors staying during the working week, how did they reach the site each day, what distances were they travelling and how many vehicle journeys resulted from these movements?
2. In answer to the last part of the above question it would appear that there was a peak of 3,500 vehicle movements per week, i.e. an average of 700 per day and a sustained level of 2,500 per week for a longer period of time.

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3. At the Glen Parva site the monitoring of vehicle movements is much less precise and no data could be provided on the number of car and light vehicle movements.
4. In terms of HGV movements the Five Wells site does not distinguish between HGV and non-HGV deliveries and hence could not provide data on the number of HGV vehicle movements to the site. This is incredulous and surely the companies responsible for managing this project should have been instructed to monitor such movements. This is especially important as there is supposedly a traffic management plan put in place for such large development projects to manage the impact of construction traffic on the surrounding community. This highlights once again how such plans are *'tokenistic and full of hollow phrases and promises'*.
5. The Glen Parva site does appear to record the number of HGV vehicle movements to the site and from January to the end of June 2021 there were 8,916 HGV deliveries to the site. This averages out to around 68 HGV vehicles per day.
6. There is clearly an inconsistent approach between the different sites on how the traffic flows to and from the sites are recorded and managed. As a result, how can the anticipated traffic numbers provided in a new applications, or associated traffic plans, for a mega prison be taken seriously?

## 4. Unsustainability of the Grendon Underwood Site Proposed for the New Mega Prison

The site suggested for the proposed new mega prison at Grendon Underwood is recognised as being unsustainable, even by the applicants themselves within the transport documentation submitted in the application.

### a. Previous Local Planning Applications which were Rejected

The unsustainability of this area was recognised in two local planning applications related to small housing developments that were rejected even on appeal, these were:

- *Appeal Ref: APP/J0405/W/20/3255772*, Land at Edgcott Road, Grendon Underwood HP18 0TQ
- *Appeal Ref: APP/J0405/W/16/3185166*, Land south of Springhill Road, Grendon Underwood

### b. Current Local Applications Rejected by Buckinghamshire Highways

Very recently two further planning applications have been rejected by the Highways Department at Buckinghamshire Council due to sustainability issues and these are:

**21/03284/APP:** Temporary 7-year change of use of agricultural land for the establishment of an operator skills hub for training operatives in relation to the development of major infrastructure projects and caravan park and erection of temporary buildings, Red Furlong Farm, Twyford Road, Poundon, Buckinghamshire OX27 9BG.

The Highways response was: *The Highway Authority objects and recommends that this planning application is refused for the following reason: 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 sites remoteness from*

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major built up areas is such that it is likely to be reliant on the use of the private car contrary to local and national transport policy. The development is therefore contrary to the National Planning Policy Framework, Buckinghamshire Council Local Transport Plan 4 (adopted April 2016) and the Buckinghamshire Council Highways Development Management Guidance document (adopted July 2018). Since the Highways objection was submitted the Case Officer report has been issued (4<sup>th</sup> January 2022) and recommends rejection of the proposal for many reasons including the unsustainability of the site. A final decision on this application will be made by the Planning Committee.

**21/04269/COUOS** Determination under Class S of Part 3 of Article 3, Schedule 2 to the Town and Country Planning (General Permitted Development) (England) Order 2015 (Amended) as to whether prior approval is required in respect of transport and highways impacts, noise impacts, contamination risks and flood risks, and whether the location or siting of the building makes it otherwise impractical or undesirable for the change of use of an existing agricultural building state funded school falling within Use Class F1 (a) | Dunsty Hill Farm Edgcott Road Calvert Green Buckinghamshire OX27 0BJ

The Highways response was: *The Local Planning Authority has assessed the proposed development and concluded that the Prior Approval is required and Prior Approval is REFUSED, for the following reason: Prior approval of transport impacts is required because an unknown number of school trips have a potentially deleterious impact on the highways. The application provides no details regarding pupil numbers or measures for managing traffic. The site is located within the open countryside without access via public transport or safe pedestrian or cycle access. It must therefore be assumed that all tutors and pupils at the site would arrive by private motor vehicle. The transport impacts also need to be considered cumulatively with the other change of use consents that have been granted prior approval at the site. A Transport Statement is required, to understand the transport demands of the site in context with the other permitted uses. The information submitted with the application is insufficient to determine that transport impacts would be acceptable, therefore, prior approval is refused.*

In conclusion, of four small scale developments in the region two have already been rejected upon appeal, mainly for sustainability issues and two more recent ones have received rejection responses from Highways due to the unsustainability of the two sites.

Since the volume of traffic that would use the proposed prison site, both during the construction period and during operation, would be significantly greater than that at any of these small sites the same argument must apply to the lack of sustainability. In fact the proposed prison site would generate the volumes of construction traffic highlighted in Section 3 which is several times greater than the volume that would have been incurred during construction and operation of all four of the other developments even if they had been developed concurrently.

The current volume of traffic travelling through Edgcott on weekdays as measured by Buckinghamshire Council in May 2021, over a two week period, 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. Based on the vague assumptions made in the Transport Assessment submitted as part of the Outline Planning Application for the new mega prison, the number of vehicles travelling through Edgcott during the operation of the new prison 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 would increase by a much greater volume. In addition to this increase in

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traffic there would also be a constant stream of traffic related to deliveries to the site by both small and large vehicles as well as traffic due to visitors.

## 5. Conclusions

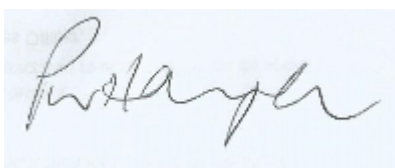
Infrastructure projects can cause major disruption, harm and frustration to local residents plus damage to the highways and verges in rural areas. There are currently two major such projects ongoing in the North Bucks area, namely EWR and HS2, impacting on villages such as Edgcott, Grendon Underwood, Steeple Claydon, Charndon, Poundon, Gawcott and Twyford and many others. To add a third infrastructure project like the construction of a new mega prison, which would overlap with the timescale of the current projects, would be a step too far and cause further catastrophic harm to the local area. Despite various monitoring groups being set up and supposed ongoing mitigation plans put in place for the two current projects, it is clear to the local community and recognised by the local MP Greg Smith, that such systems are failing the local residents.

Although the construction phase of large projects does not carry significant weight in the planning balance, it has to be taken into account, especially if there are multiple projects ongoing on the same timescale.

Once in operation the new prison would generate a large volume of additional traffic to the Grendon site due to the number of staff employed, the daily delivery traffic and a significant number of visitors to the inmates. Due to the location of the proposed prison site virtually all of these journeys will be made by private car due to the lack of public services to the site. The local roads were not designed for this volume of traffic or the nature and number of the heavy vehicles using the local roads.

Due to the unsustainability of the proposed site for the new mega prison and many other reasons highlighted in the objections posted already on the Planning Portal, the planning application should be rejected outright.

Yours faithfully



Chair  
Edgcott Parish Council

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