

Gartree Prison – Lubenham issues in response to 21/01600/OUT,

General

The application goes against the policies of the Lubenham Neighbourhood Plan, adopted July 2017 on which the MOJ were consulted. Contrary in particular to policy LNP19 and also in part to LNP01 LNP12 and 13 LNP15 and 16

It is also incompatible with HDC Local Plan Policy GD3 and the vision of the rural Market Town. It will impact on the unique rural identity of Market Harborough and the rural villages and considerably increase the District's Carbon footprint. Its construction in this location will damage the HDC Local Plan's objective of promoting the growth of tourism (particularly at Foxton Locks) and improving the visitor experience of Harborough District.

While the new prison will create jobs these are unlikely to all be filled by local people and so will increase traffic to the rural roads

HDC Policy BE1 does not designate this site as an area for business/employment growth.

There are specific issues that will affect the residents of Gartree Estate as this proposed development will compromise the rights of the residents who own the majority of Welland Avenue and it will have an *'adverse impact upon the living conditions of (the) nearby residents from nuisance or disturbance caused by odour, noise, vibration or traffic movement,'* (LNP policy 19); further details are at point 9 below

In addition

There is insufficient infrastructure (Roads, Sewerage, Health, Solar Electricity) to support a development of this size in this rural location. With a lack of public transport or access to cycle paths and footways, workers will be arriving from a distance by car. Post 2024 many of these cars will need to be electric powered and there will be insufficient charging capacity provided by the solar power proposed.

Recruitment of prison officers in the area is already a problem and we understand they travel from a wide radius to work at Gartree 1 – perhaps a location for a new prison closer to the workforce might be available to minimise the use of private transport.

We do not consider that sufficient evidence has been given that this is the most appropriate site in the country for such a facility; land ownership by the MOJ is insufficient evidence to prove that this is a suitable site.

There is potential for the proposed development to cause flooding to neighbouring settlements of Lubenham, Gartree and Foxton; this is very concerning.

A public sewer has been identified on the development site and development proposals will affect existing public sewers; development over existing public sewers should not be permitted

Should the plan go ahead, there is a need for

- Considerable offsite traffic mitigation measures to deal with the A4304 junction with Foxton Road and Laughton Roads and the ability of pedestrians to cross; also, the Foxton Road/ Gallowfield Road Junction and the Gallowfield Road/ B6047 junctions will require improvement.
- a more appropriate access could be used from Gallowfield Road to the rear of the existing prison down the existing track.
- Robust measures in place to prevent flooding to neighbouring villages.
- Considerable redesigning of the local sewerage assets to accommodate effluent from the increased population of the area 1,700 residents + 700 staff. We suggest that such a development requires its own sewerage system.

The application is too incomplete for determination; too many issues have either not been addressed or are incomplete. These must be satisfactorily resolved before a decision is made

Our main concerns are:-

1. Flooding

- The proposed development will lead to an unacceptable risk of flooding downstream in Lubenham with water discharging into the river which already floods on a frequent basis with some properties also being flooded.
- Foxtan Road floods regularly from a stream that runs through the proposed development site.
- Gallowfield Road floods.

2. Water and Sewerage

- Insufficient detail has been agreed in relation to water and sewerage disposal in spite of 'extensive communication with Anglian Water'.
- By their own admission '*An outline foul water drainage strategy drawing has been prepared for this site, however this does present a number of potential issues*'. These would need to be resolved before an application could be determined.
- The applicant has not identified a discharge rate for used water.
- Waste water should be reused on site.
- A public sewer has been identified on the development site and development proposals will affect existing public sewers; development over existing public sewer should not be permitted. This is likely to affect the existing properties and, we believe, roadside drains that run onto the proposed site, from Welland Avenue and if disrupted may lead to flooding.
- Both Lubenham and Foxtan pumping stations are at capacity. Lubenham pumping station regularly needs attention with effluent sometimes overflowing into the river.

3. Traffic

- Insufficient traffic and transport assessments have been undertaken with no attention paid to the remoteness of the site. And the following lack of infrastructure:
 - Remote from the major road network
 - No cyclepaths
 - No footways
 - Access from an unadopted road
 - No bus connection directly to the site and only a very limited service to the north of Welland Avenue
- Insufficient attention is paid to the impact of additional offsite traffic on neighbouring roads both during and after construction and the cumulative effect of recently granted permissions for housing, showground, and proposed business units.
- A4304 junction with Foxtan Road is unable to take large construction or delivery vehicles. This junction is considered to be the safe road crossing for school children. It is also close to the Laughton Road which children have to cross to get to school.
- Foxtan Road access would be past residential properties where children cross to get to the village play area and Village Green.
- Recent fatalities on Laughton Road and accidents at Foxtan Rd Junction.
- Gallowfield Road/B6047 junction has been the location of fatal accidents.
- Foxtan Road and Gallowfield Road meet just outside Foxtan Primary School where problems arise with heavy goods vehicles at school pick up and drop off times.

4. Environment/Biodiversity

- Loss of greenfield site and the effect on biodiversity and agricultural land. (The UK is one of the world's most nature depleted countries).
- NPPF states that sites on Greenfield land over 20ha must be referred to Natural England – Natural England have identified a lack of suitable investigations to justify development here.
- Contaminated Land and Air Quality Officer states the Geoenvironmental assessment is insufficient
- Loss of habitats, badger setts, and home to other wildlife.

5. Health Infrastructure

- Although health and mental health services may be available within the prison, we are aware that the current Gartree prison already utilises minor injuries facilities locally. We have no indication that the facility at St Luke's, which is already lacking capacity for local use, will not be used by the new prison residents.

6. Carbon Neutral Considerations

- The solar facilities planned will not provide sufficient supply to run the prison and the car charging points that will be required post 2024 when electric car targets have to be met.

7. Light pollution

- Additional security lights will cause light pollution and affect the rural nature of the surrounding villages.

8. High Pressure Gas Main

- The southern boundary of the site is very close to the High-Pressure Gas Main which would cause catastrophic consequences if damaged.

9. Gartree specific issues

The development will adversely impact upon the living conditions of residents in Welland Avenue, causing nuisance, disturbance from noise and traffic movement and a loss of privacy (LNP policy 19)

- Proposed access to the site is from the unadopted road. Welland Avenue belongs in part to Gartree residents who own the majority of the road.
- With prisons at either end of Welland Avenue, delivery vehicles and visitors will use this as a through route.
- Insufficient detail is provided regarding operational vehicle movement post construction and its effect on Welland Avenue Gartree or proposals for mitigation.
- Roadside drains from Welland Avenue discharges into the channel which runs onto the proposed site.
- Parking around the prison – vans delivering to prison already park on yellow lines and obscure vision.
- The only bus stop is at north end of the estate, any visitors will walk through the estate to access the proposed new prison.
- 4 storey buildings look into residents' gardens.

If this development is to go ahead a more appropriate access could be made from Gallowfield Road to the rear of the existing prison, with all traffic signposted to arrive via A6 - B6047 and Gallowfield Road. This route should also be used to access the existing Gartree Prison, thus avoiding any prison traffic using Welland Avenue.