

TABULAR FORMAT OF MoJ Claims and Reality Check

Note: There is some duplication as some factors are relevant to more than one category.

MoJ Claim	Reality Check
Justification	
‘Our proposals help to deliver part of the national government policy to create 18,000 additional prison places in the coming years through the development of new prisons and expansion of existing establishments.’	What is the actual justification for the need for the additional prison places and where can the policy document mentioned in the proposal be found?
‘A new facility in Buckinghamshire also responds to demand, with an expected requirement for prison places in the North West and in South East of England, linking directly to the large urban centres located there.’	Where is the data to support the sweeping statement in the proposal that there will be an increased need for prison places in the South East and hence a new prison has to be located in Buckinghamshire? Buckinghamshire has one of the lowest crime rates in the South East.
‘The increasing numbers of police, in line with the Prime Minister’s commitment to recruit 20,000 additional officers, is also likely to contribute to a higher prison population, and we therefore believe that creating 18,000 additional prison places will, over the long-term, help to mitigate pressure on prison places in England and Wales in the coming years.’	What progress has been made to date in achieving this level of recruitment? In addition does this 20,000 police officers represent an overall increase in police numbers or are some of the new recruits to fill posts from natural losses?
‘The Government has committed over £4 billion capital funding to make significant progress in creating 18,000 additional prison places across the prison estate by the mid-2020s.’	Wouldn’t the money required to build the proposed new prison be better spent in education, apprenticeships, mental health, youth activities and industry to create jobs that might prevent youngsters becoming involved in crime in the first place? Is this not a failure of our society that we can only think about locking up those that ‘fail’ rather than aiming to prevent them ‘failing’ in the first place?
‘Each house block is proposed to be four storeys in height and will house 240 prisoners, with other ancillary buildings ranging from one to four storeys high. We are looking at potential options to include a seventh house block as part of the new prison and will update you ahead of any decision.’	The proposed prison will increase the existing prisoner population on the extended site by over 200% and would make the site the largest prison in England and Wales. The total prison population on the site would be more than double the population of Grendon Underwood and Edgcott combined and hence represents a major imbalance.
‘Once the prison is operational, it will create around 500- 600 permanent jobs in a wide range of roles.’	The unemployment rate in Bucks is below the national average so there are more appropriate areas to create jobs through this project (Bucks ranges from 2.5 to 3.3% whereas the national average is 3.9%.

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Location and Landscaping	
<p>‘Most of the area of woodland in the north western corner of the site will be retained as part of the proposals. The area of woodland to the west of the site will be retained, and the trees and hedgerows on the existing boundary of the existing prison estate will also be retained. We believe that our plans will be suitably screened from existing residents, and long distant views of the site will be limited by existing trees and hedgerows.’</p>	<p>The site is based on the top of a hill and with the accommodation blocks being 4 storeys high how can the existing trees and hedging screen these from view? Firstly all the trees and hedging are deciduous and hence offer no screening from autumn through until spring. Secondly the trees are relatively young and will not offer any decent level of screening, even in summer.</p>
<p>‘The main car park, enclosed by the existing boundary vegetation, will be further enhanced with the planting of medium size trees and low shrubs.’</p>	<p>A car park of this size and especially on the side of a hill, cannot be screened by the addition of a few shrubs and trees.</p>
Traffic	
<p>‘Any planning application will contain detailed plans explaining how we intend to manage construction traffic and reduce any impact on residents, especially in light of current HS2 and East West Rail vehicles. Our construction traffic plans would be part of any formal planning application submission which residents can review and comment on.’</p>	<p>The MoJ must have traffic movement data for the sites under or having completed construction; why was this not included in the proposal to give an indication of the impact on the local area? Are the numbers so large that they are reluctant to share them? Plans made with HS2 and EWR have been frequently ignored despite many objections. How can the MoJ expect local residents to expect their contractors to be any different from those already passing through the locality? The MoJ have not taken account of the fact that the volume of traffic using local ‘rat runs’ will increase as the main routes to the site become congested.</p>
<p>‘The village of Edgcott is immediately to the north and west along Grendon Road and Buckingham Road and Grendon Underwood is a mile to the south. These local roads have good links to the nearby A41.’</p>	<p>The link to the A41 involves a number of narrow and tight bends, goes across a narrow bridge and passes very close to Grendon Underwood Church. In addition the junction of the A41 and the road to the proposed site is very dangerous and there have been a number of accidents there including fatal ones. Only a portion of the contractors, staff and visitors to any new prison would use the link road to the A41. The remainder would travel in the opposite direction and pass through Edgcott and subsequently through other small villages on small, windy country roads.</p>
<p>‘Similarly, a planning application will include a transport assessment detailing what impact, if</p>	<p>This clearly shows how little the MoJ know about this area. How can they not have</p>

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<p>any, there will be on local roads when the prison is up and running.'</p>	<p>already realised that there WILL BE an impact on local roads and it will be significant?</p> <p>1,000 people involved in the construction will put too much pressure on the local roads which are already struggling to cope with HS2 and EWR construction traffic. A recent traffic survey carried out in Edgcott shows a daily average of 3,436 vehicles passing through the village. This number would increase significantly if this proposal goes ahead.</p>
<p>'If we choose to submit a planning application, an Outline Travel Plan (OTP) will be submitted as part of the Outline Planning Application which will include a range of measures to encourage travel by sustainable modes (walking, cycling, public transport and car sharing) amongst staff and visitors to the prison.</p> <p>'An OTP is a long-term management strategy for the development that aims to minimise travel to and from the site by single occupancy car. Principally, the OTP aims to increase modal choice through the implementation of a package of measures and initiatives.'</p>	<p>Your plans for an Outline Travel Plan (OTP) are unworkable in a rural location like the proposed site. The bus services are poor, 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 due to the poor availability of local housing, hence making it untenable for car sharing. This plan is a non-starter. Have the MoJ even carried out a survey to see how many of the current staff members would fit into your OTP?</p> <p>500 to 600 permanent jobs plus service vehicles and visitors will result in daily two way movements of at least 1,500 additional vehicles which the local roads are not designed for.</p>
<p>Environmental</p>	
<p>'In terms of sustainability, the Ministry of Justice are seeking to make these new prisons the most sustainable in the prison estate achieving the Building Research Establishment Environmental Assessment Method (BREEAM) Excellent rating as a minimum and aiming for an Outstanding rating. The prison, if approved, will also make a substantial contribution to the UKs fight against climate change by having almost no carbon emissions.'</p>	<p>Highly admirable but, nowhere do the MoJ mention the environmental impact of the additional journeys by 1,000 contractors twice daily for a 2-3 year construction phase, the long term additional 1,500 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. Nor do the MoJ consider the damaging impact that these additional vehicle movements will have on the local residents and the increase in local pollution levels.</p>
<p>'The proposed drainage for the site has been carefully developed with consideration to the existing site characteristics, including the existing reported drainage and flooding issues.</p>	<p>It will take more than a site survey and proposals to develop sustainable drainage systems to convince local residents that the MoJ have their interests in mind. There are a number of flood problems in the locality and such a construction as they are suggesting will only exacerbate the local problems. It is no</p>

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<p>We will undertake a comprehensive Flood Risk Assessment, which will identify all key issues relating to flood risk on the site'</p>	<p>good considering just the site on which any prison might be built but a much wider area has to be taken into account due to the clay subsoil and the impact on the surrounding locality.</p> <p>Existing services such as rainwater and sewage systems are not designed for a large increase in runoff from the hard surface resulting from the prison buildings and surroundings.</p> <p>In considering any flood risks there are a number of stake holders in addition to those mentioned in the proposal which include the Council who still own some land in Edgcott and local residents who have long suffered the consequences of flooding.</p>
<p>'Ahead of starting construction for the new prison, the demolition of the existing education block associated with HMP Springhill prison is required and a new sports pitch will be installed to serve the existing prison. Both the relocated education block and a new sports pitch will be replaced.'</p>	<p>The proposed plan shows the site of the football pitch being closer to residential property than the current location. The noise from the current location, and in particular the language, is disgraceful and can be heard throughout the local area. How do the MoJ intend to minimise the noise pollution from the new location and ensure that no foul language is spread across the residential area close to the sports pitch?</p>
Wildlife	
<p>'...the plans have been developed to protect existing sources of biodiversity. The existing pond, woodland and perimeter hedgerows will mostly remain untouched, and the strategy inside the prison has been developed to secure a biodiversity net gain'.</p>	<p>The area that is to be developed is currently green field space and full of wildlife. Edgcott is also known for the likely presence of great crested newts as well as the presence of bats, foxes, deer, red kites and other birds of prey. Developing the large areas of green field space will displace and significantly reduce the amount and variety of wildlife in the locality and this is unacceptable.</p> <p>The current area surrounding parts of Grendon Hall has favorable conditions for wildlife with bird boxes, some ancient trees plus hedges and a pond which is probably full of wildlife. Some of the trees and hedges will need to be removed to allow access to the main site where the prison will be located. Even if the majority of the wildlife habitat remains intact, the movement of ooo's of vehicles passing right past these areas over a</p>

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	2-3 year period is bound to have a significant and detrimental impact on local wildlife.
Local Infrastructure and Services	
<p>'The existing prisons are served by bus from Aylesbury bus station which stops on Grendon Road at the foot of the access road, about 10 minutes' walk from the prison (service nos. 5, 16 and 677).'</p>	<p>Only service 16 passes the current prison, the other two of the bus services mentioned in your proposal do not come through Edgcott.</p> <p>The 16 service only covers part of the day on an hourly basis. Hence using a bus service to reach the site by employees is untenable.</p>
<p>'NHS England is responsible for commissioning healthcare for people in prisons and young offender institutions in England (with the exception of emergency care, ambulance services and out-of-hours services).'</p>	<p>The comment completely missed the point raised which was related to any staff that might live in the local villages. This could push already stretched local services beyond their limits.</p>
Housing	
<p>'The Ministry of Justice and Her Majesty's Prison and Probation Service is not aware of any evidence that a new prison in an area leads to a fall in house prices. In many cases the availability of long term, permanent jobs will bring people to the area and potentially increase the demand for housing.'</p>	<p>Since the announcement was made that a new prison was proposed in this area, two residents of Edgcott have lost their buyers for house sales, one of these being in the very late stages of the sale process. This means that these house owners would have to significantly reduce the price of their property if they still wished to sell, hence resulting in a price reduction. This is the exact opposite to the claim that the MoJ make. This is likely to be an ongoing trend for many years if the new prison does go ahead and it will make it extremely unlikely that houses in this locality will now be sellable.</p>
<p>'Once the prison is operational, it will create around 500- 600 permanent jobs in a wide range of roles, providing opportunities for members of the community to build a career within the criminal justice system and with partner agencies.'</p>	<p>Existing housing stock in the immediate locality is very limited and much of it unaffordable to prison staff and hence they would have to journey some distance into work.</p> <p>If new housing developments in the locality were initiated to address the housing shortfall, this would add even more people to the area and this in turn would put even more strain on the local infrastructure including roads, services, and education facilities.</p>
Category C Prisons	
<p>'Prisoners escaping? 'Extremely unlikely. The prison will be a secure establishment holding category C prisoners, the lowest risk of prisoners that can be held in closed conditions.'</p>	<p>HMP Springhill is a Cat D prison and over the years there has been a steady flow of escapees/absconders. This makes the local residents feel very insecure. You claim that a Cat C prison would be secure. What are the</p>

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	number of prisoners that have escaped from Cat C prisons on an annual basis for the last five years up until the end of June 2020?
<p>‘Smaller house blocks of four storeys that accommodate 240 prisoners - 60 prisoners per floor This is to allow prisoners to benefit from a greater sense of community with fewer barriers between prison staff, and each other, promoting safety and reducing violence.’</p>	<p>There have been many reports of troubles within the nearest Cat C prison which is at Bullingdon. Many of these troubles, like in many other prisons across the country, are associated with drugs. How will the MoJ prevent drugs entering and circulating in the new prisons that you are building?</p>
Economic Aspects	
<p>‘Recent experience from a similar project at HMP Five Wells in Wellingborough has delivered community benefits such as:</p> <ul style="list-style-type: none"> • hundreds of jobs for the community during the construction phase; • over 1,700 work placement days; • over 600 people upskilled through training and experience. <p>Our work in Wellingborough also helped create opportunities for local small and medium-sized businesses to support the delivery of construction.’</p>	<p>The figures that were included for the jobs etc created at Five Wells prison being built in Wellingborough were inconsistent across the two versions of the proposal. In the second version the MoJ mentioned that ‘hundreds of jobs for the community’ would be created, in the first version they mentioned just 144 jobs had been created. Are they manipulating data to make the numbers look more favourable?</p>
Further Potential Developments	
<p>‘We are also considering options to expand HMP Springhill as part of our plans to deliver 18,000 prison places across the prison estate.’</p>	<p>What is the justification for this possible expansion and when might this take place?</p> <p>If HMP Springhill is extended there will be even more nefarious characters free to wander around Grendon and Edgcott, probably resulting in an escalation of the incidence of caches of drugs, mobile phones etc., being found in hedgerows, bus shelters and the like.</p>
<p>‘Once the prison is operational, it will create around 500- 600 permanent jobs.’</p>	<p>Existing housing stock in the immediate locality is very limited and much of it unaffordable to prison staff and hence they would have to journey some distance into work. Or is there a further development plan being hatched to build significant new houses in the area and place yet further pressure on the local residents and services.</p>
Ministry of Justice Proposals	
<p>‘Your comments can influence a range of elements in our plans such as the orientation of our proposed buildings, proposed building</p>	<p>In the second proposal the MoJ mention that local residents can have their say and influence things like ‘the orientation of our proposed buildings, proposed building</p>

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materials, colours and our approach to landscaping.'	materials, colours and landscaping'. This statement is both offensive and patronising. How can we expect to trust anything that the MoJ say if we can only influence matters like this? This strongly suggests that they have already decided to submit your proposal for planning approval and that it is therefore 'a done deal'. Is it not more a matter of that whatever we say it won't have any impact on the MoJ plans?
'No final decision has been taken on whether to proceed with these proposals and submit a planning application to the council. If we decide to go ahead and submit formal proposals to Buckinghamshire Council, this would be in early 2021, and we would expect a planning decision in the summer of 2021.'	The MoJ mention that no final decision has yet been made about whether or not to proceed to planning and yet the timetable for any submission is early 2021. Does this not suggest that they have already made their minds if that is the timescale that they are working to? How can we trust any statements made by the MoJ?
'Our plans are evolving and after we initially engaged local residents and other stakeholders in early December, we have sought to share more information with the community as it has become available.'	This is not the case. The MoJ were asked by the local Council and others to increase the amount of information contained within the proposal because the first version was too light on detail.
'Stakeholders felt that an extension of the deadline beyond 24 December 2020 would give more people more time to have their say. We have therefore been happy to extend the feedback deadline to 18:00 on Friday 29 January 2021.'	The fact that the initial deadline was very short, during severe Covid 19 restrictions and over the Christmas period was an utter disgrace. This, along with some other comments in the proposals, gives an indication that the MoJ are paying 'lip service' to local residents and little they say will ever be taken into account.