



GRENDON UNDERWOOD PARISH COUNCIL

All correspondence to the Parish Clerk on clerk.gupc@outlook.com
Tel: 0787 368 3043 Web Site: <https://www.gupc.org.uk/>

5th February 2021

FAO: Permanent Secretary Antonia Romeo
Ministry of Justice
102 Petty France
Westminster
London
SW1 H9AJ

Ref: Public Consultation by the Ministry of Justice in regard to proposals to build a 1440 bed Category C prison on green field & next to two current prisons in Grendon Underwood, Buckinghamshire.

Notified 3rd December 2020 with closing date of 30th December 2020 - later extended to 29th January 2021 – later extended to 5th February 2021.

Grendon Underwood Parish Council Response II.

Dear Permanent Secretary,

Further to a second extension to the deadline for input to subject proposal, Grendon Underwood Parish Council takes this opportunity to expand on a previous submission.

On behalf of the residents of the parish, some 75% of which have responded to oppose in writing, the Council is appalled at the bully boy tactics being deployed by the Ministry during its dealings with the people most affected so far.

The first extension was only as a result of the intervention of our MP and the latest paltry extension was a direct result of the inability of the MoJ team to provide further, actually promised, information and responses to rational interrogation of the proposals.

Neither in any way have resulted in a reasonable consultation period either in material, credible information or in time.

A consultation period of some 9 weeks [when your own government's guidelines specify 12 weeks] to include the run up to Christmas and then the actual holiday period over Christmas and New Year [when your own government's guidelines state the period should not include holiday periods] and in the teeth of a pandemic is nothing short of scandalous, an egregious abuse of power and an outrageous contempt of due process. Your, so called, 'community engagement' was nothing more than a clear demonstration of the contempt in which you hold this whole debacle.

The Council is also concerned that a large proportion of our residents are elderly and not fluent with web sites or the internet. You have limited all communications to email, closed down several email addresses and government departments have advised it is not appropriate to do door to door distribution. So how on earth are we to inform a significant cohort when only a limited number of those to be affected can effectively be engaged in any event?

For the avoidance of doubt:

- The information contained in both of the consultation documents issued is so scant as to be almost worthless. The complete lack of understanding and ability of the MoJ team to answer



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legitimate questions or do anything other than narrate the written presentation and add general comments indicates and reinforces the feeling amongst residents that the whole exercise is one of “ticking a box” and not the real engagement that is a requirement.

- The consultation has reached only a limited number of residents that will be affected. Written documents were delivered to those within a 3 mile radius. The proposals would impact a much wider area. The documents lack sufficient and accurate information. Without the ability to have “roadshow type presentations” that can present visual conceptualisations and 3D models that would usually be part of a consultation of this type, and to provide explanations and clarifications, the consultation cannot be seen as a meaningful engagement, as is required.
- With the exception of the written material mentioned above all engagement with the communities affected have required computer interaction and has therefore excluded all residents who are not computer literate or do not have access to a computer. This cannot be seen as a meaningful engagement that is required.
- The scant information provided to the few is inaccurate and misleading in several respects.
- The information provided was changed between the first presentation provided and the second. This would be legitimate if the second document added detail to the first. In this case however the layout of the site was changed and additional comments indicated the potential for a further block to accommodate more prisoners was being considered. Such fundamental changes would make the current consultation at best invalid and at worst part of a deliberate strategy to mislead, to avoid scrutiny and to withhold the true plans. It is certainly not meaningful engagement.
- At a subsequent visit to the site an MoJ representative referred to the need to acquire land, by CP if necessary. It is clear to the communities that the ultimate proposals that the MoJ are seeking for the site will be significantly different to those contained in the consultation documents provided. They are not fit for purpose and any consultation based on them is invalid.
- The MoJ have still not provided the answers they promised to the questions raised at the open Zoom meeting on 19th January 2021 to date. We are now less than 24hrs from the twice extended closing date. This hardly constitutes meaningful engagement.
- Despite the latest extension to the consultation process attempts to send this complaint via the link in the consultation documentation are met with a notice that the consultation is closed. That really encapsulates the disingenuous nature of the MoJ professing genuine desire for feedback on their proposals and confirms suspicions that this is just a deliberate attempt to stifle opposition.

Yours faithfully,

GRENDON UNDERWOOD PARISH COUNCIL,

Dated: 5th February 2021



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Appendix 1

Objections to the Ministry of Justice New Prison Proposal – A Summary

1. Justification

- Bucks and particularly the Vale of Aylesbury is a low crime area so why build it here?
- Resulting imbalance of local population with local villages being swamped by the largest prison complex in the UK.
- Unemployment not a major problem so extra jobs not an incentive.

2. Location

- Green field site and too large for a rural area.
- More suitable brown field sites such as land at MoD Bullingdon and other MoD sites.

3. Visual Impact and Landscaping

- Loss of much green field space with Edgcott joining the prison.
- 4 storey blocks totally unsuitable for a rural location and cannot be screened adequately.

4. Traffic

- Cumulative impact of multiple infrastructure contracts in the area.
- Local roads already struggling to cope with HS2/EWR traffic.
- Extra 1,000 contractors per day will bring traffic chaos and gridlock.
- Staff and visitors on completion will overload the local roads.

5. Environmental aspects

- Traffic pollution during and after construction particularly if staff are unable to live locally.
- Light pollution.
- Flooding increase by concreting over the fields.
- Public footpaths under threat.

6. Wildlife

- Fields and woodland on and around the site are full of wildlife which will be lost.

7. Local infrastructure

- No capacity in the local sewerage system to cope with an extra 2000+ users every day.
- Local surface water drainage system would require a massive overhaul in an area that floods badly.
- Unacceptable increase in demands on local ambulance/fire/police/doctors.

8. Housing

- Where will up to 700 staff live?
- If locally then large scale housing development will swamp the area.
- Local house sales currently falling through due to the proposed prison.
- House prices will almost certainly fall.

9. Economic aspects

- Can we believe the MoJ job figures when they have got Five Wells at Wellingborough so wrong?

10. Further potential development

- Concern that a 7th block and Springhill expansion will be included in the same scheme.

11. MoJ Consultation due process

- Local anger that this came out of the blue on 3 December allowing only a 3 week consultation period. Since extended but still a good time to bury bad news over the Christmas period and during a pandemic.



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Appendix 2

CONSULTATION PRINCIPLES UPDATED 2018 – REF: GOV.UK

A. Consultations should be clear and concise

Use plain English and avoid acronyms. Be clear what questions you are asking and limit the number of questions to those that are necessary.

Make them easy to understand and easy to answer. Avoid lengthy documents when possible and consider merging those on related topics.

B. Consultations should have a purpose

Do not consult for the sake of it. Ask departmental lawyers whether you have a legal duty to consult. Take consultation responses into account when taking policy forward. Consult about policies or implementation plans when the development of the policies or plans is at a formative stage. Do not ask questions about issues on which you already have a final view.

C. Consultations should be informative

Give enough information to ensure that those consulted understand the issues and can give informed responses. Include validated impact assessments of the costs and benefits of the options being considered when possible; this might be required where proposals have an impact on business or the voluntary sector.

D. Consultations are only part of a process of engagement

Consider whether informal iterative consultation is appropriate, using new digital tools and open, collaborative approaches. Consultation is not just about formal documents and responses. It is an on-going process.

E. Consultations should last for a proportionate amount of time

Judge the length of the consultation on the basis of legal advice and taking into account the nature and impact of the proposal. Consulting for too long will unnecessarily delay policy development. Consulting too quickly will not give enough time for consideration and will reduce the quality of responses.

F. Consultations should be targeted

Consider the full range of people, business and voluntary bodies affected by the policy, and whether representative groups exist. Consider targeting specific groups if appropriate. Ensure they are aware of the consultation and can access it. Consider how to tailor consultation to the needs and preferences of particular groups, such as older people, younger people or people with disabilities that may not respond to traditional consultation methods.

G. Consultations should take account of the groups being consulted

Consult stakeholders in a way that suits them. Charities may need more time to respond than businesses, for example. When the consultation spans all or part of a holiday period, consider how this may affect consultation and take appropriate mitigating action, such as prior discussion with key interested parties or extension of the consultation deadline beyond the holiday period.

H. Consultations should be agreed before publication

Seek collective agreement before publishing a written consultation, particularly when consulting on new policy proposals. Consultations should be published on gov.uk.

I. Consultation should facilitate scrutiny

Publish any response on the same page on gov.uk as the original consultation, and ensure it is clear when the government has responded to the consultation. Explain the responses that have been received



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from consultees and how these have informed the policy. State how many responses have been received.

J. Government responses to consultations should be published in a timely fashion

Publish responses within 12 weeks of the consultation or provide an explanation why this is not possible. Where consultation concerns a statutory instrument publish responses before or at the same time as the instrument is laid, except in very exceptional circumstances (and even then publish responses as soon as possible). Allow appropriate time between closing the consultation and implementing policy or legislation.

K. Consultation exercises should not generally be launched during local or national election periods.

If exceptional circumstances make a consultation absolutely essential (for example, for safeguarding public health), departments should seek advice from the Propriety and Ethics team in the Cabinet Office. This document does not have legal force and is subject to statutory and other legal requirements