

Robin Seaton
Programme Director, New
Prisons

05 February 2021

Dear Ms Jackman,

**UPDATE TO KEY STAKEHOLDERS FOLLOWING THE PRE-PLANNING CONSULTATION FOR
A NEW PRISON IN BUCKINGHAMSHIRE**

Thank you for your letter on behalf of Edgcott Parish Council, dated 28 January 2021 addressed to the Permanent Secretary, Antonia Romeo. I have been asked to reply on her behalf.

I am writing to thank you for taking the time to review our consultation materials and pass on your formal comments to our pre-planning public consultation which closed on Friday 29 January, and to respond to the key themes emerging from the consultation.

Our consultation received over 3,700 contributions, of which around 1,000 were from Buckinghamshire residents. These came via our website, email address and written letters from a range of local residents, community groups and other key stakeholders. We have reviewed submissions regularly throughout the consultation period and there are a number of recurring themes. We felt it was important to respond to you both on the individual issues you raised and also to pass to you our wider response to the other key topics raised. I have therefore set out our response to these issues below and whilst this has resulted in a lengthy reply, I hope it is helpful given the importance of these proposals.

I am grateful to everyone who took the time to respond to our pre-planning consultation. We will continue to consider the points made, reflect on whether and how best to adapt our proposals to take account of it, and will in due course make a final decision on whether to press ahead with a formal planning application submission.

The need for new prisons

The long term prison population is expected to increase over the 6-year projection horizon, as published on gov.uk in the prison population projections on 26 November 2020. This is largely a result of the recruitment of an extra 20,000 police officers, which is likely to increase charge volumes and therefore increase the future prison population. As a result, the Government set out plans to create 18,000 additional prison places through the construction of new prisons, and expansion and refurbishment of existing prisons by the mid-2020s.

In examining where to seek to build the next three prisons, the Ministry of Justice's analysis of the future prison population identifies the North West and South East of England as the areas with most need for additional capacity. Our proposal for a new prison in Buckinghamshire therefore seeks to

address this identified future demand and will provide the types of places most needed in a decent, safe and secure environment, with a focus on rehabilitation.

In terms of our specific focus on a new prison next to HMP Grendon and HMP Springhill, we have undertaken two separate pieces of work. Firstly, the Ministry of Justice has reviewed its own land ownership across these regions, in addition to liaising with its partners across Whitehall to understand where suitable land may be available to support our objective of opening new prisons by the mid-2020s. Land next to HMP Bullingdon was not made available by the Ministry of Defence as it is under consideration for an ongoing defence use.

The Ministry of Justice considered brownfield sites in England and Wales as part of the site selection process, but are unable to disclose a list as this is commercially sensitive information and may hinder future development requirements, as we deliver on our commitment for 18,000 additional prison places.

A number of submissions have asked for clarity on whether we plan to deliver a six or seven houseblock prison. As per our consultation documents, a prison with six houseblocks is currently our preference. However, we are still considering both options. If we seek to proceed with seven houseblocks, we would hold another pre-planning consultation with the local community, before considering whether to submit a planning application.

It is also important to separate our proposals for a new prison from our additional consideration of possible expansion of HMP Springhill. Pre-application discussions took place in November, and the next stages of planning for an expansion of the existing prison will be taken separately to the proposed new prison build.

Construction and Operational Traffic

We know that the construction works associated with High Speed 2 (HS2) and East West Rail (EWR) are currently ongoing and that a new prison at this location would generate additional traffic movements on the local highway network. We also need to distinguish between the Construction and Operational Phases associated with the project. If a planning application for a new prison is submitted to the Local Planning Authority and approval is granted, then we would want to ensure that the impact during the Construction Phase is minimal. Therefore, the application would be supported by a Construction Traffic Management Plan (CTMP) which would identify a range of mitigation measures to be adopted by the MoJ during the Construction Phase. These measures would be designed to ensure that construction vehicles can access and egress the site safely and that any temporary impacts caused by the Construction Phase are mitigated to reduce the impact on the local highway network.

With regards to the Operational Phase of the project, any future planning application would include a Transport Assessment (TA) and an Outline Travel Plan (OTP). The purpose of a TA would be to evaluate the transportation aspects of the development proposals and consider the local highway network and sustainable transport provision within the vicinity of the proposed development. An OTP would provide a strategy for the proposed development, including a range of outline measures to encourage travel by sustainable modes (walking, cycling, public transport and car sharing) amongst staff and visitors to the prison .

The Construction Traffic Management Plan, Transport Assessment and Outline Travel Plan would be scrutinised by the local planning authority, and subject to their approval.

Community Concerns & Benefits

Our consultation document details the social value that the Ministry of Justice's new prisons, HMP Five Wells in Wellingborough and the new prison at Glen Parva in Leicestershire, are expected to have delivered to local people both during construction and when the prison is operational, such as hundreds

of career opportunities within the prison, construction apprenticeships and training days, and targeted spend within the local economy. We appreciate that the social value will differ between all of our sites, depending in part upon the local context, and we recognise that this location will have fewer small and medium sized enterprises (SMEs) in its immediate vicinity than at Five Wells or at Glen Parva. Our view is that whilst it might be more challenging to realise some of the social value aspects here, we will commit to working harder and at an earlier stage to work with SMEs to ensure that the positive social value derived from a potential new prison here is felt not just by people living across the wider Buckinghamshire area, but also by the communities immediately adjacent to the proposed site. We are committed to making a positive contribution for local people and if our plans progress and are approved, we would be keen to work with you in the coming months and years to ensure as many local people benefit as possible.

Some local residents have raised concerns about the potential security risks of a new prison, mentioning prisoner absconds, and concern drugs or alcohol could be left around the area. The existing Category B HMP Grendon is a high security prison and the proposed Category C prison will also be a secure prison. The existing HMP Springhill is a Category D open prison.

Absconds are extremely rare and those who do so face tough consequences, including being returned to closed prison conditions where they may have to serve additional time.

All prisoners eligible for release on temporary licence for work placements or other forms of rehabilitative activity in the community are subject to robust risk assessments and the small number who do abscond face tough consequences, including being returned to stricter prison conditions where they may have to serve additional time. At the proposed Category C, only a small number of prisoners would be eligible for release on temporary licence at any one time.

We take the security of prisons extremely seriously and as well as an additional £100m investment in new measures to stop drugs entering our prisons, we are designing all our new prisons with additional security to deter the smuggling of contraband, such as bar-less windows which further reduces risk of items being passed in or out of cells.

House prices

Whilst in purely planning policy terms a development's potential impact on property prices and land values is not a material planning consideration when planning committees are determining planning applications, we understand local residents' concerns. However, there is currently no empirical study showing that the facilities planned as part of our New Prisons Programme will have a long-term detrimental impact on local property prices.

Local public services

A number of submissions have queried whether a new prison in Buckinghamshire will have a detrimental impact on local residents' ability to access public services, such as health services. Alongside our public consultation work, in the past few weeks we have met all the local 'blue light' emergency services to discuss our proposal and to hear their views. If we were to take forward proposal we would engage in detailed operational planning with these agencies to manage any demand from a new prison without impact on the services for residents.

It is also important to add that primary health services in prisons are not delivered through local GP practices but directly inside the prison via NHS England, another stakeholder we have engaged with.

Were our plans to be submitted to the Council as a formal planning application, these organisations would be statutory consultees during the Council's own 21-day consultation.

Staffing

Some submissions relate to concerns over how the new prison will be staffed. Staff recruitment and turnover can be challenging, and should plans go ahead, staffing is something we would work very closely with the operator (whether public or private) during the preparation and mobilisation phases. The Prison Service has a strong track record in recruitment, for example recruiting around 4,000 prison officers between October 2016 and September 2020. We are confident we would be able to staff the proposed prison.

Environmental considerations

Many of the submissions we have received, especially from people living in the immediate vicinity of the proposed development site, have raised concerns on topics such as the potential impact on biodiversity, the proposed location of the football pitch, parking spaces, and flooding.

We are committed to meeting the policy requirement that all new developments should result in a 10% increase in biodiversity. The project team is working with a team of landscape architects and ecologists to maximise the increase in biodiversity delivered as a result of our plans. If we decide to submit a planning application we will provide detailed plans of how we would achieve this, which would be subject to approval by the local planning authority.

On the current proposed location of the football pitch and its proximity to existing residential dwellings, we are considering its location and orientation to ensure the impact on local amenity is limited. With the new car park currently planned to be next to the football pitch, we are continuing to assess the number of car parking spaces required and their location and orientation on the proposed site.

Alongside this work, we are also conducting a flood risk and drainage assessment, on the back of our initial feasibility assessment about whether a prison could be built here. We are cognisant of the historic flooding and drainage issues locally, and should our plans be submitted to the Council for consideration, our extensive and robust flooding and drainage assessment would be available for local people to view and comment on. Our proposals will ensure that the new prison will not increase flood risk elsewhere in the local area and will include sustainable drainage, in line with national and local planning policies.

Some submissions suggest our plans would create the largest prison complex in the country. Whilst the prison population at Grendon and Springhill would be significantly increased, it would not be the largest prison complex in the country. Sites with two or three prisons are not unusual, and the two largest individual prisons are HMP Berwyn and HMP Oakwood, each designed to have a capacity of 2106 prisoners.

I believe that the information set out in this letter addresses not only the points raised in your individual submission but also sets out our response to the most frequently raised concerns by people from Buckinghamshire and across the UK during the consultation exercise. It is important to reiterate that the end of our consultation exercise does not represent the end of our community conversations on these plans. The next stage of our process will see us consider all feedback, reflect on whether and how best to adapt our proposals to take account of it, and then in due course make a final decision on whether to press ahead with a formal planning application submission. Were we to do so, we would keep the local community and key stakeholders updated on our plans and be open to further consultation, working closely with the local planning authority and the community. We will also share a final 'dashboard' of the consultation responses we have received in due course.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'R Seaton', written in a cursive style with a long horizontal stroke extending to the right.

Robin Seaton
Programme Director for new prisons