

EDGCOTT PARISH COUNCIL

28 January 2021

FAO: Permanent Secretary Antonia Romeo
Ministry of Justice
102 Petty France
Westminster
London
SW1 H9AJ
Via email: PSDenquiries@justice.gov.uk

Dear Madam

The New Prisons Programme and proposals for a potential new prison in Buckinghamshire Proposed New Prison at the Grendon/Springhill Site

Below is a list of objections/comments to the proposed new prison under appropriate categories. There are some areas of duplication as some factors fall under more than one category.

1. Justification for a new prison?

- a. 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?
- b. 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? The following link shows data that suggests that there are parts of the South East that have much higher crime rates than Buckinghamshire and hence it would make more sense to locate a new prison in one of those areas.
<https://www.plumplot.co.uk/South-East-violent-crime-statistics.html#:~:text=Annual%20crime%20rate%20in%20South,crimes%20reported%20in%20the%20region>
- c. The proposals also mention the fact that the number of prison places will increase due to the Governments pledge to increase the number of the police force by 20,000. What progress has been made to date in achieving this level of recruitment? In addition does the 20,000 police officers represent an overall increase in police numbers or are some of the new recruits to fill posts from natural losses?
- d. 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?
- e. 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 and possibly in Europe. 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.

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- f. 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% plus some hotspots with unemployment rates up to 9%).

2. Location

- a. The other new prisons that are being or will be built are located close to large urban areas. The proposed site is not close to a large urban area but is surrounded by a cluster of small villages. How can building such a large unit in this rural location be justified?
- b. Building a prison in such a rural location goes against all the Government policies in terms of minimising carbon emissions. This is due to both the amount of contractor and staff journeys that will be required during construction plus the distances that will be travelled due to the location?
- c. The location of a Cat C prison in a rural area means that it will take longer for emergency services to reach it in the case of any problems.
- d. The new prison supposedly has to be located in the South East, that is a very large area and there may well be other more suitable locations than the one proposed. For example would Bullingdon not be a more suitable location to house the proposed new Cat C prison? Just because the land is owned by the MoD should not be prohibitive. There is still much surplus MoD land in this location and access to the A41 and M40 is much easier than the access to the Grendon site.
- e. Is it not best to locate any new prison in the most suitable spot rather than one which provides the fastest option?
- f. 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.

3. Visual Impact and landscaping

- a. Four storey blocks are proposed which would be totally out of character for a rural area and would not be screened from view by the current trees and hedging.
- b. A claim is made that 'most of the area of woodland' would be retained. The trees and hedging are nowhere near tall enough to offer any decent level of screening for a number of 4 storey buildings when built in what is one of the highest locations in the area. In addition the great majority of the trees and hedging are deciduous so there will be virtually no screening from autumn through to spring.
- c. Claims are made about adding screening for the entrance and the car park. It is not possible to hide a car park for hundreds of cars with a few trees and shrubs.
- d. There will no longer be green field space between Edgcott and the proposed prison.
- e. The damage to the environment will be significant with the loss of much green space.

4. Traffic

- a. There is no indication given in the proposal of what the number of vehicles entering and leaving the site each day throughout or after the construction phase will be. There will be up to 1,000 contractors on site during construction and presumably scores if not hundreds of Lorries entering and leaving the site each day. This does not represent a 'slight increase'. Based on current experience in building a prison like that proposed, you should, as a minimum, provide data on the predicted numbers of heavy and light vehicle movements to and from the construction site throughout the build.

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- b. You mention in the proposal that the proposed site has good road links to the A41. Firstly this road link 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.
- c. 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.
- d. The volume of construction traffic involved in building such a new prison would be hugely significant and would have a devastating impact on the local villages. The MoJ state that they would work with the Council on a traffic management plan, just as HS2 and EWR promised. These plans have been frequently ignored despite many objections. How can you expect local residents to expect the MoJ contractors to be any different from those already passing through the locality?
- e. The volume of traffic using 'rat runs' through other local villages will increase. In addition new 'rat runs' may be created as contractors and staff find the main routes to the site congested.
- f. In the Q and A section the MoJ mention that **if** there is any impact on local roads after the prison is built a transport assessment dealing with the impact will be carried out. How can the MoJ not have already realised that there **WILL BE** an impact and it will be significant?
- g. The MoJ plans for an Outline Travel Plan (OTP) are unworkable in a rural location like the proposed site. The bus services are poor (only one bus service passes through Edgcott, not three like the MoJ claimed in their proposal), 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. The 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 their proposed OTP?
- h. 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 showed a daily average of 3,436 vehicles passing through the village. This number would increase significantly, possibly by as much as 50%, if this proposal goes ahead.
- i. Without additional housing which itself is controversial, there will be a significant travel element for the prison employees which does not match with the low carbon agenda required for the future and of course would have a long-term impact on local traffic and environmental noise and pollution.
- j. 500 to 600 permanent jobs plus daily visitors will result in daily two way movements of at least 1,500 additional vehicles which the local roads are not designed for.

5. Environmental Aspects

- a. The MoJ make environmental claims about the sustainability of any new prison that is constructed but nowhere do they 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 they consider the damaging impact that these additional vehicle movements will have on the local residents and the increase in local pollution levels.

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- b. The proposed car park would potentially result in a significant increased risk of flooding to that area of the site.
- c. 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 good considering just the site on which any prison might be built but a much wider area due to the clay subsoil and the impact on the surrounding locality.
- d. In considering any flood risks there are a number of stake holders that need to be consulted in addition to those mentioned in the proposal; these include the Council who still own some land in Edgcott and local residents who have long suffered the consequences of flooding.
- e. The damage to the environment will be significant with the loss of much green space.
- f. The new prison will need to be well lit at night for security reasons resulting in much light pollution.
- g. 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.
- h. 500 to 600 permanent jobs plus daily visitors will result in a daily two way movement of at least 1,500 additional vehicles which the local roads are not designed for.
- i. The proposed plan shows the site of the football pitch being much closer to residential property, and in particular close to many more residents with younger children than the current location. The noise from the current location, and in particular the language, is disgraceful and can be heard throughout parts of Edgcott. How do you intend to minimise the noise pollution from the new location and avoid the inevitable harm that this will cause to the local community and ensure that no foul language is spread across further residential areas close to the sports pitch?
- j. This area is prone to flooding and concreting over the fields will make the flooding worse.

6. Wildlife

- a. 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.
- a. 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 000's of vehicles passing right past these areas over a 2-3 year period is bound to have a significant and detrimental impact on local wildlife.

7. Local Infrastructure and Services

- a. Existing housing stock in the immediate locality is very limited and any new build will add even more people to the area and this in turn will add even more strain to local infrastructure including roads, services, and education facilities.
- b. The local bus service is extremely limited with an hourly service only and during limited periods of the day making reaching the site for employment untenable. Two of the bus services mentioned in the MoJ proposal do not travel through Edgcott.

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- c. 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.
- d. The comment in the second Proposal about health services being dealt with within the prison environment 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.
- e. The local sewerage systems struggle to cope at present and do not have the capacity for an additional 1,440 to 1,680 inmates and 500 to 600 workers.

8. Housing

- a. 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.
- b. If new housing developments were initiated in the locality 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.
- c. The MoJ claim that they are not aware of any evidence that a new prison in an area leads to a fall in house prices. Have they ever fully checked this situation? 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 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 made by the MoJ. This is likely to be an ongoing trend for many years if the new prison does go ahead and it will make it more difficult for local residents to sell their property. Will any form of compensation scheme be available for those affected by such difficulties?

9. Cat C Prisons

- a. 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. The MoJ claim that a Cat C prison would be secure. What are the 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?
- b. 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?

10. Economic Aspects

- a. The figures that the MoJ 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 they mentioned that 'hundreds of jobs for the community' would be created, in the first version they mentioned that just 144 jobs had been created.

11. Further Potential Developments

- a. Whilst trying to justify the proposal for a new prison, several times in the proposal it is mentioned that the MoJ also intend to expand HMP Springhill? What is the justification for this and when might any such expansion take place?
- b. Due to the lack of local housing stock to house 500-600 new staff, either they will have to travel some distance to the site or are there plans to further develop this area with new housing developments?

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12. MoJ Proposals

- a. 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 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 their proposal for planning approval and that it is therefore 'a done deal'.
- b. The MoJ mention that no final decision has yet been made about whether or not to proceed to planning and yet their timetable for any submission is early 2021. Does this not suggest that they have already made up their minds if that is the timescale that they are working to? How can we trust any statements made by them?
- c. The extension of the deadline for comments was appreciated. However, 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 is paying 'lip service' to local residents and little they say will ever be taken into account.

13. Relationship with HMP Grendon and Springhill.

- a. The two existing prisons were built in the 1950s and 1960s. They are both small prisons with a combined total of less than 600 inmates. The nearby villages have learned to live with the prisons and largely accepted them as being part of the community. A good relationship exists between the Prisons and the villages including regular liaison meetings with the Governor and Parish Councils. The proposed new prison, with a massive influx of staff and more escapes, will overwhelm the local area and ruin this trusting relationship.
- b. The population rate of new prisons including this one is particularly high and there is concern that many new inexperienced officers will be recruited who will be less able to cope than experienced officers.

14. Impact on current inmates

- a. The proposed new prison is to be built not only on land adjoining but also within the two existing prisons. A 2 to 3 year construction period with 1000 contractors on site every day will put immense pressure on the mental and physical health of the current inmates. The only answer to this problem would be to vacate the 2 existing prisons during the construction period.

15. Security during construction

- a. With 1000 outside contractors visiting the site every day the opportunities for smuggling contraband into HMP Springhill in particular, and if it stays open, will be huge. It will be impossible to search 1000 contractors every day.

16. Emergency Services

- a. The increase of call outs on our already overburdened Police and Ambulance Services from an additional 2000+ people on this site every day is a great concern and will impact on local residents for several miles around.

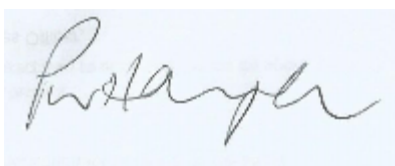
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17. Heritage Assets

- a. There are a number of historic properties close to the site which have Listed Building status and would be severely affected by this proposal. There are also ridge and furrow fields which are to be concreted over as part of the project. Within the existing prison grounds is Grendon Hall, a Grade 2 Listed building. None of these properties were listed until after the 2 existing prisons were built and it is unlikely that the 2 prisons would have been built here if these historic properties had been listed before 1950.

Yours faithfully



PETER HARPER
Chair Edgcott Parish Council

Copy by email:

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Lucy Frazer, QC MP, Minister of State for Prisons and Probation
Mr G Smith, MP (Buckingham)
Mr M Tett, Leader Buckinghamshire Council
Mrs Angela Macpherson, Deputy Leader Buckinghamshire Council and Member for GU Ward
Mr Cameron Branston, Buckinghamshire Councillor
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Mr Barry Martindale, Clerk Grendon Underwood Parish Council
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