

PROPOSED MEGA PRISON AT GRENDON UNDERWOOD

INFORMATION SHEET 12 ON LOCATION

1. Objection Details

Guideline: Describe the main objections to the proposal in relation to the subject. Make sure that, where possible, the objections are backed by factual information and or data.

- The Ministry of Justice claim that “A new facility in Buckinghamshire responds to demand, with projections showing the prison population is likely to grow most quickly in Yorkshire, the North West and in the South East of England, linking directly to the large urban centres located there”. This is patently and demonstrably untrue and the choice of this location is clearly motivated primarily because the land is in the ownership of the MoJ. It does not link directly to large urban centres in the South East, there is no unsatisfied demand for prison places for inmates from the locality, and very few current inmates have nearby postcodes as their home address. In fact on 31st December 2020 there were only seven current inmates of HMPs Grendon and Springhill with Buckinghamshire postcodes.
- Land ownership has no relevance in the planning balance and such an application is essentially opportunistic and not born out of any proper planning principles.

Location Criteria Used

- In terms of site selection the MoJ themselves have been inconsistent in their claims on how the Grendon Underwood site was actually selected. The following details highlight the level of inconsistency and a severe lack of transparency.

The MoJ made available to the public in December 2020 two consultation documents and in addition a letter was circulated to all residents within a 3 km radius of the current prison site. In terms of site selection the statements by the MoJ in these three documents were as follows:

1. First consultation document – “...where we have space available to develop quickly and in locations where the prison population is likely to grow most quickly....”
 2. Second consultation document – “The Ministry of Justice and Probation Service have been assessing where we already own space potentially available to develop and where there is likely to be most demand for additional prison capacity;....”
 3. The letter dated December 2020 and circulated to residents – “Having reviewed a number of sites across the country, we believe that land next to HMP Grendon/Springhill in Buckinghamshire would be an appropriate location....”
- In a communication from Gary Badley, Executive Director of Prison Supply Directorate, on behalf of Antonia Romeo, Permanent Secretary for the Ministry of Justice in response to a letter from Grendon Underwood Parish Council, he stated. *“We have considered brownfield sites in England and Wales as part of the site selection process, but are unable to disclose a list of sites we have looked at, as this is commercially sensitive information and may hinder future development plans, as we deliver on our commitment to 18,000 additional prison places announced in the recent Government Spending Review.”*

- Prior to receiving this letter from Gary Badley, a resident had, through a Freedom of Information (FoI) request made on 12th February 2021, asked what other sites had been assessed before selecting the GU site. The request was acknowledged on 8th March 2021 and a response was not received until 20th May 2021. The question posed was:

“Details of any other pre-planning discussions held with other Local Authorities relating to alternative sites considered as alternatives to the Grendon and Edgcott location. If commercial sensitivities preclude disclosure of alternative sites please provide details of the Local Authorities as an alternative.”

And the MoJ response was:

“In response to question two, in accordance with regulation 12(4)(a) of EIR, we do not hold details of any other pre-planning discussions held with other Local Authorities relating to alternative sites considered for the Grendon and Edgcott location.”

This all raises the question “do the MoJ know what their own strategy is with regards to site selection?”

- The location of the development within the rural area would have significant effect on a number of factors including highways, local businesses, the amenities of existing and future residents and the landscape, views, natural, historic and archaeological environment.
- The choice of location at Grendon Underwood is in direct contradiction of the Ministry of justice’s declared policy of locating new prisons close to areas of demand and where the prison population is forecast to grow most quickly. The vast majority of inmates will originate from outside of the local area, mainly London.
- A report was commissioned by the MoJ in 2013 which made "appropriate assumptions for estimating the impact of a new prison on the economy, including a local district economy where it might be located." In addition “New prisons would respond to prison over-population and would be located close to the localities which have the largest supply and demand gaps and would therefore expected to be located in urban areas.”
- Comment by the MoJ:

"The land is already owned by the Ministry of Justice. Other nearby locations such as land adjacent to HMP Bullingdon are not owned by the Ministry of Justice and are therefore likely to be more challenging to develop."

The above statement demonstrates that the decision to propose the Grendon Underwood location is purely for convenience and is not strategically based.

Prisoner Numbers

- The proposed new prison would result in a total capacity of in excess of 9,000 prison places within a 40 mile radius of Grendon Underwood over twelve separate prisons, when Five Wells and if the proposed prison are complete. This would provide c 12% of the prison places within England and Wales in this area. The Ministry of Justice’s own figures indicate the current prison population to equate to c.173 places per 100,000 of population. The area within a 40 mile radius would extrapolate to supporting a population of 5.5 to 6m. There are currently seven prison inmates at HMP Grendon and HMP Springhill with home postcodes in Buckinghamshire. If the Ministry’s

policy is to be believed there is clearly an expectation of a significant crime wave explosion in Buckinghamshire!

Impact on the Locality

- The impact of the location of the site adjacent to an existing prison must also be taken into account. In March 2019 the Justice Committee, appointed by the House of Commons produced a report on the future of Britain's prisons. This report quoted written evidence from the Prison Governors Association:
 - The Prison Governors Association expressed concerns about the location of new prisons which it believed was based on availability of sites rather than geographical need. They explained that HMPPS had found it very difficult to obtain new sites for prisons, hence the decision to re-build at Rochester, Glen Parva and Wellingborough and next to HMP Full Sutton. They were particularly concerned that new prisons built close to existing prisons, such as the cluster of prisons (HMP Belmarsh, HMP Thameside and HMP Isis) in South East London, could exhaust the local labour market of potential staff.
- The proposed site at Grendon Underwood is totally inappropriate for the siting of such a large mega prison. The site lies on a hill, there is poor access to the site, it is an area of very limited sustainability, the public transport services are almost non-existent, there is insufficient room for the size of car parking required and it would destroy much of the local green field space and have a significant, detrimental, irreversible and harmful impact on the character of the local landscape.
- The shape (horse shoe shape) of the proposed site does not lend itself to a suitable design of such a large prison with all the associated services. In particular the access to the main part of the site where the prison buildings would be located is very narrow, at the far end of a field between Grendon Road and HMP Springhill and runs directly between buildings forming part of HMP Springhill and the ecological area of the current prison.
- The other new prisons that are 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. What is the logic in pursuing such a mega a development on this site; it is purely down to ownership of land and speed? How can such a large unit in this rural location possibly be justified?
- Building a prison in such a rural, green field location goes against all the Government policies in terms of minimising carbon emissions and building on brownfield sites. This is due to both the amount of contractor, staff and visitor journeys that will be required both during construction and once in operation plus the distances that will be travelled due to the remote and rural location.
- The location of a Category C prison in a rural area means that it will take longer for emergency services to reach it in the case of any problems.
- The field in the proposed plans for a new 'mega' prison which is designated for the new site entrance and the main road into the site, is part of the Historical Park and Pleasure Garden of Grendon Hall. (*Report: Bucks Gardens Trust, Site Dossier: Grendon Hall, Aylesbury Vale Area March 2021, revised June 2021*). The field also contains the remains of a much larger area of ridge and furrow and hence is of great historical interest as well as providing valuable green field and amenity space.

- Siting the relocated football pitch in the same field is a barbaric act and highlights two main aspects. Firstly it emphasises the point that this site is totally inappropriate for a mega prison as there is nowhere else left on the site to locate the football pitch. As a result the MoJ is simply trying to 'shoe horn' the required buildings and ancillary aspects into a site that is simply inappropriate. Secondly the location of the football pitch in the allocated position shows complete disregard for the well-being of and the amenity aspects for local residents.
- The layout of the grounds at Grendon Hall used to comprise a largely typical ensemble of pleasure ground and park for a country house developed in the 1880s with buildings in Jacobean style. The 1880s design incorporated hedgerow trees as specimens in the new park and a straight main drive was framed by an avenue. Some of the early specimens survive enclosing the informal lawns within the modest pleasure ground. Elements lost to development include the 7 ha housing estate in the south park and prison buildings east and south of the Hall. The rural setting enjoys views over the Vale of Aylesbury but has been damaged by the previous large prison development immediately to the east of the Hall. Too much of the Historic Park and gardens of Grendon Hall has been lost to development and this is no justification for further parts of the grounds to be also built upon and cause further harm to the landscape.
- Is it not best to locate any new prison in the most suitable spot rather than one which is perhaps the quickest place to develop? There may be some short term gains in speed but the long term costs will far outweigh this gain.
- If the project went ahead, in each year of operation, there would be tens of thousands of journeys to and from Edgcott and Grendon Underwood, which would negate many times over the sustainable construction advantages outlined. The Ministry should be locating a project of this size close to a larger population centre with good connectivity to rail and motorways as is the case at Leicester and Wellingborough. It is clear that locating a mega prison in this rural location would go against the Government policy of reducing carbon emissions and using more sustainable forms of transport. The latter is not feasible in the proposed location as staff and visitors will both need to travel by private car and also over a considerable distance.
- It is unacceptable to bring forward a further major infrastructure project in this area, given the schemes already intruding into the rural environment and resulting in increased urbanisation, e.g. HS2 and East West Rail. Furthermore, the development proposed is located on previously undeveloped land, originally designed to form a buffer zone between Grendon/Springhill and the Edgcott community. The fact that this land is already owned by the Ministry of Justice and is therefore appropriate for development, is facile. The Ministry should be looking for a brownfield site in a more urban location where buildings of the design proposed could be more readily accommodated.
- Such a mega prison should be located on a brown field site in an urban environment. The proposed site is a rural area, surrounded by small settlements and served by an inadequate network of rural and unclassified roads that are already suffering the cumulative impact of High Speed Two (HS2) and East West Rail (EWR) construction projects which intersect approximately a mile from the proposed development.

- The proposed location would use existing green space to make the prison effectively a massive extension to a small village and is totally inappropriate to being built in this part of rural Buckinghamshire. Brownfield sites should be considered as a priority for this type of building work rather than causing the loss of further green, rural spaces. There are far more suitable brownfield sites available that have much better and safer transport access.
- By reference to what new prisons are currently being constructed elsewhere, not only does the Ministry of Justice fail to present any real case to support the Grendon Underwood site as being suitable, but clearly they demonstrate that the site is manifestly not suitable for the siting of the standard innovative design mega prison. This site does not have any of the geographical location, employment requirement and existing essential infrastructure requirements that the other sites do have.
- The proposed site has a compromised footprint with access to the main buildings being via a narrow gap in the corner of a field. The proposed development also completely fills the available footprint. These constraints can only mean that there will be higher costs of development and operation (not good value for public money) and limited space for further developments.
- Due to the rural location many of the services required are going to result in additional costs and further disruption to the country side as 100's of metres of piping is inserted to take the rain water and foul water to appropriate output points. In addition a new power substation will be required on site and this is likely to be run across the country side from Waddesdon.