

Re: Outline Planning Application with all matters reserved except for access and scale for the construction of a new Category C prison (up to 67,000 sqm GEA) within a secure perimeter fence together with access, parking, landscaping and associated engineering works (application reference 21/02851/AOP). Applicants being the Ministry of Justice (MOJ).

1. Introduction

This objection is related to the western part of the proposed development site namely the field that lies adjacent to both Edgcott Road and Springhill Road, is situated opposite the Springhill housing estate and is next to Willow Lodge which is located by the current prison gates. The images below highlight the nature of this field at two different times of year.



Figure 1: Field adjacent to Edgcott Road with ancient ridge and furrow

2. Discussion

The images in Figure 2 above highlight the following current aspects of this field:

1. It is a tranquil, countryside space that forms a clear and significant green edge between the highway and the adjacent public footpath and the current prisons that are located behind the trees at the top of the field;
2. It contributes positively to the prevailing character and appearance of the immediate area and benefits the whole community whether walking or driving along the road from Grendon Underwood to Edgcott or vice versa;
3. The field also provides a green edge between Grendon Underwood and Edgcott as the Springhill housing estate (just to the right of the trees on the right hand side of the field) is within the parish of Grendon Underwood and Edgcott which is to the left of the field as seen in the images above;
4. The field consists of ancient ridge and furrow which is the last remaining part of a much wider region of this historic agricultural landscape (note the ridge and furrow beyond the wire fence part way up the field runs towards the top of the field and is clearly visible; at the road side of this area the ridge and furrow runs at an angle of around 45 degrees from left to right as was common practice due to the layout of the field and the way in which fields were managed) which was associated with the enclosure of land in Grendon Underwood;
5. The field is one of the remaining parts of the Historic Park and Gardens associated with Grendon Hall, a Grade II Listed property, which itself is situated behind the tree at the top of the field. This field represents a major part of the setting of Grendon Hall;
6. As specified in the Historic England Guideline: The Setting of Heritage Assets Historic Environment Good Practice Advice in Planning Note 3 (Second Edition) 2017, the whole of the prison complex, including the field highlighted here, can be considered to be part of the 'setting' of both Grendon Hall and Lawn House, a nearby Grade II listed property. Hence this has to be taken into account when considering the harm that any development in this area would cause;
7. There are two public footpaths that run across this field and this represents an amenity space and value for local residents. These are of special value as there are not many opportunities for local residents to walk somewhere without passing along narrow footpaths close to busy highways
8. The field represents a 'soft boundary' between the prisons situated on top of the hill and the countryside space shown in the images.
9. It also represents a safe space and 'soft boundary' between the inmates of the open prison HMP Springhill and members of the public. One of the public footpaths runs along the front of Grendon Hall at the top of the field and crosses a boundary fence at the top of the field and passes close to some of the open prison buildings, around an ecology area and then into a large open field beyond that before passing into farmland. The field beyond the ecology area represents the current recreational space for the inmates of HMP Springhill and the public have a clear choice as to whether or not to enter this part of the site or turn round and walk back along the footpath. If they continue into the second field there is the chance of interacting with the open prison inmates, some residents are comfortable with this but at least they have that choice.

The Proposed changes planned to the field:

The following changes to this field are part of the proposed development (see Figure 2 below):

1. A new site entrance and road would be created, the road would be between 600-700m long;
2. The current football pitch located in the recreational space for the open prison inmates would be relocated as shown in Figure 2 below. The football pitch is only being located there because the site is too small to accommodate it anywhere near the current open prison. This emphasises the compromised layout of the site and how inappropriate the site is for the location of a new mega prison;
3. Floodlights would be installed around this football pitch although there are none for the current one;

4. There would be a 'token gesture' of a stretch of acoustic fencing (2m close boarded fencing) between the football pitch and Springhill Road; This would have very little impact on the level of noise pollution from use of this football pitch;
5. In addition some outside gym equipment would also be relocated to this area;
6. A running track would also be built;
7. A SUDS pond would be created;
8. There would be some planting of native, deciduous species as 'proposed' screening;
9. The football field and running track would both be located immediately adjacent to the new road on one side and Springhill Road on the opposite side;
10. This field would become the recreational space for the inmates of HMP Springhill as their current space would be consumed by the proposed development;

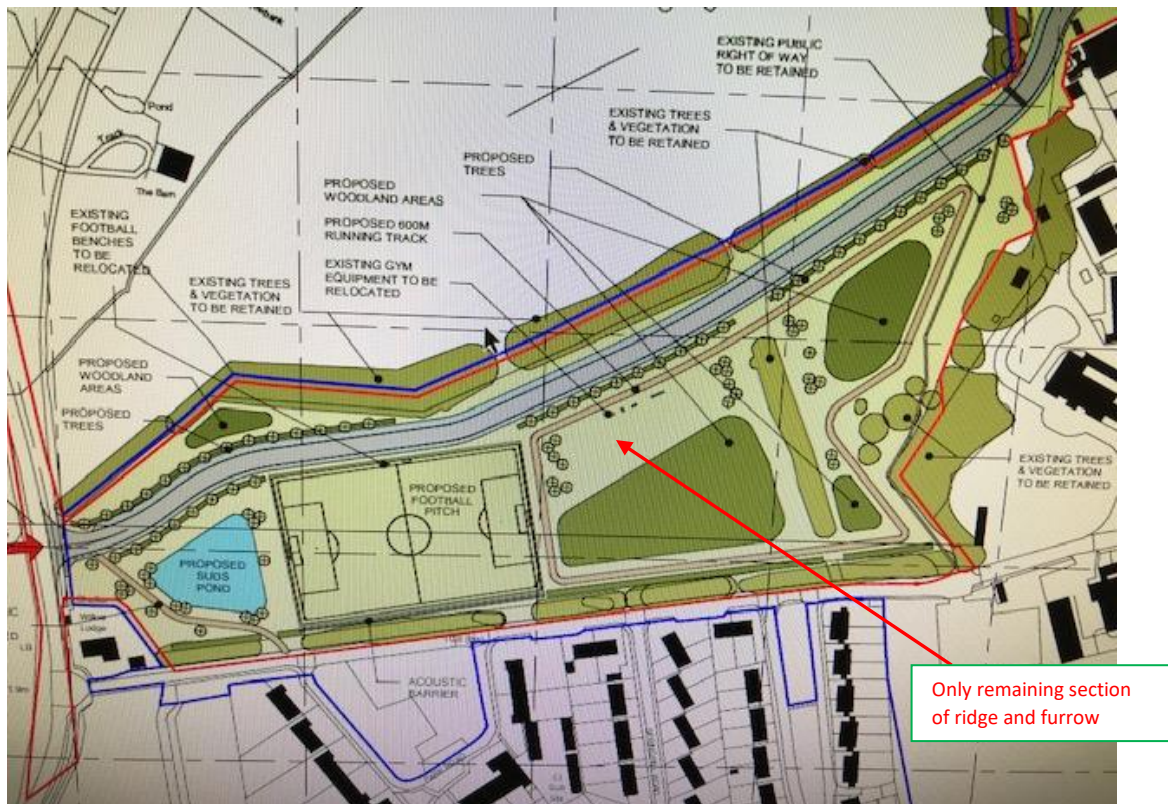


Figure 2: Proposed Changes to the field

3. Conclusions: The consequences of the proposed changes

The consequences of the proposed changes to this field are highlighted below:

1. The proposal would destroy the vast majority of the ancient ridge and furrow in this field see Figure 2);
2. Significant harm would be inflicted on the Historic Park and Gardens which this field is part of as well as remainder of the setting of Grendon Hall and the nearby Lawn House;
3. Result in a significant increase in noise and light pollution due to the new road and the relocated football pitch;
4. The relocated football pitch has no changing, shower or toilet facilities so what happens if inmates need the latter whilst playing football, use the hedge to relieve themselves?
5. Create concerns about safety and security with prison inmates so close to residential property and amenity space;
6. There is currently a low level of confidence in the risk assessment procedure for open prison qualification as a result of recently reported absconds of dangerous inmates from HMP Springhill and in particular a dangerous sex offender being accommodated at an open prison in Lincolnshire;
7. Concerns about inmates retrieving footballs kicked over the hedge and across Springhill Road into public space or residents' gardens;

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8. Result in a loss in the peaceful tranquillity of this part of open countryside;
9. Significant and long standing landscape harm would be inflicted on this part of the site;
10. Result in a level of coalescence between Grendon Underwood and Edgcott;
11. The development would have an undesirable urbanising effect on the local landscape and would result in the irreversible and permanent loss of countryside;
12. Result in a loss of the 'soft boundary' between residents and the inmates from the open prison;
13. Create a potential accident black spot around the new site entrance as this is adjacent to the current entrance to the existing prisons, the Springhill estate, a bend, a bus stop and the road narrowing entrance to Edgcott;
14. The public footpath where the new site entrance will be located will be covered in mud, dust and other debris during the construction period (2-3 years) as well as being a potential accident black spot;
15. During operation there would be anything up to 700 vehicles of some form entering and leaving the site each day. In addition to causing additional traffic issues, this would result in an increased risk to pedestrians crossing the site entrance compared to a situation where at the moment there is no traffic at that point;
16. It has been suggested that the football pitch might be available for use by local residents and/or clubs. There are no planned changing facilities or car parking so any such activity would cause major local issues of parking and waste;
17. It is widely known that drug and other drop offs for HMP Springhill inmates are common. There is a significant risk that the field which is planned to become the inmate recreational space could become a hotspot for such drop offs. This would be an area close to residential property and cause concerns amongst parents that such contraband could fall into the hands of local youths or younger children;
18. An increased level of drug and other drop offs would mean that a large number of undesirables could be parking and visiting the area close to a high density of residential properties and cause further concerns of safety and security;
19. There is also a risk of interaction between open prison inmates and contractors during the operational phase and then staff during the operation of the new prison;
20. There is a risk that open prison inmates could abscond by leaping onto a passing HGV as it leaves the site and be far away before being discovered as missing;
21. How could up to 1,000 contractors a day on site be checked for contraband to ensure that no drugs or other contraband are taken onto site for inmates?
22. There would be significant disruption to local residents and traffic from day 1 if the development was given approval. This would continue on a daily basis throughout the whole construction phase of 2-3 years, during the operation of the prison and for evermore. This is a permanent irreversible change;
23. How would the inmates from HMP Springhill and HMP Grendon prison cope with all the noise and disruption during the construction phase in particular? This part of the development will last 2-3 years so what damage will it do to their mental health and rehabilitation? Perhaps this aspect will be mitigated by re-housing all the current prisoners to alternative locations whilst the new mega prison is constructed.

Compiled by the Grendon Underwood and Edgcott Parish Council's Joint Working Party, 24th February 2022