

## **People and place**

Are rural Mega prisons in  
the Local Socio-economic Interest?

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on behalf of the Wethersfield Airbase Scrutiny Committee,  
(WASC) Technical Sub-committee

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This paper was written by Richard Sidebottom<sup>i</sup> on behalf of the Wethersfield Airbase Scrutiny Committee (WASC) Technical Sub-committee.

WASC is formed under the statute of the Local Government Act 1972 Section 102 and currently comprises 13 Parish councils<sup>ii</sup>. Its purpose is to actively engage with all stakeholders in connection with development proposals involving Wethersfield Airbase through collaboration between Local Parish Councils. The Technical sub-committee provides research and analysis to facilitate this objective.

The author gratefully acknowledges comments from a range of reviewers and members of the WASC Technical Sub-committee. All errors and omissions remain the author's own.

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## Objectives

Socio-economic benefits of development proposals can be afforded significant weight in the planning decision making process and on occasions, allowed to override other relevant and important planning considerations. However, potential economic impacts are often presented *after* the site has been selected and rely on anecdotal and inappropriate data from other sites, rather than systematic robust analysis of a site's unique social and economic characteristics and the priorities and needs of the local population.

To assess the currently available evidence, this paper asks "*Are rural Mega prisons in the Local Socio-economic Interest?*" with specific reference to the pre-planning proposal to build two Mega prisons housing 3,430 inmates in the remote, agricultural, and rural location of Wethersfield, Essex where no custodial facilities or supporting infrastructure currently exist. It complements a previous paper which asked a similar question from a national perspective<sup>1</sup>.

In terms of scope, this paper focuses on socio-economic impacts, including jobs, incomes and skills. It also highlights potential implications for health, traffic, housing, and crime. However, these, along with wider issues relating to Planning policy, Architecture, Landscape, Ecology, Heritage, Environment and Transport will be addressed in more depth elsewhere.

In pursuit of an objective evidence-based approach, the paper uses a wide range of secondary literature, including Government commissioned research; peer-reviewed academic articles; consultant reports; national, regional and district government strategy documents; submissions to planning applications; data from government websites; a large number of Freedom of Information requests; and previous research conducted on WASC's behalf<sup>2</sup>.

## Executive summary:

### 1. National Planning Policy Framework (NPPF) and Climate Change Act (CCA)

i) The NPPF and the CCA rely on an understanding of sustainable development as that which meets the needs of the present without compromising the ability of future generations to meet their own needs. This mandates policy makers to *promote productive, equitable, and clean economic growth that enhances the skills, livelihoods, and well-being of the population within obvious environmental, physical and infrastructure constraints and in recognition of the needs and character of rural areas.*

ii) This paper outlines a number of areas in which the proposal to construct two (or even one) prison (s) at Wethersfield is in breach of these principles. This is in addition to those in terms of Planning policy, Architecture, Environment, Climate Change, Transport, Landscape, Ecology and Heritage outlined elsewhere.

### 2. Conflation of purpose

i) The inclusion of job prospects in prison planning proposals is a thinly disguised ex-post reverse-engineering attempt to justify site selection.

ii) *A prison's candidature as a rural economic catalyst is a misrepresentation of its purpose, a misunderstanding of its effectiveness and a misdiagnosis of rural economies.* The modus operandi of prisons is not to create jobs, least of all highly skilled ones.

iii) The MOJ has contravened its own site selection criteria and conducted inadequate analysis of alternatives in accordance with Environment Impact Assessment regulations.

### 3. Problem misdiagnosis

i) The MOJ's case is founded on a misdiagnosis of the economic priority as a shortage of jobs of any type. This is completely at odds with National and Regional sustainable economic strategy which recognises that the UK's productivity malaise requires more effective use of labour and land, not simply throwing more resources at the problem.

ii) The local, district and regional interest appears to be better served through highly-skilled employment in dynamic new economic sectors that boost pay and productivity, embrace the Fourth Industrial and Green revolutions, enhance food security, minimise travel, and foster stronger local communities. Provision of relatively low skilled jobs in a remote site adds to existing problems and fails to address existing ones.

### 4. Weak analytical approach

i) The case promoting the economic benefits of a prison is based on an incomplete analytical framework and flawed anecdotal evidence that fails to incorporate the entire site or provide detailed diagnosis of local sustainable development priorities, unintended consequences, or more effective use of taxpayers' resources in more accessible locations. Opportunity cost is a fundamental tenet of economic analysis.

ii) The MOJ's case is extrapolated from limited analysis of urban prisons and fails to recognise that building on an existing prison site is entirely different from at a new one.

iii) MOJ forecasts are dependent upon a range of contradictory and unsubstantiated assumptions and cover vast catchment areas of over 5,000 square miles. Filling vacancies would require a significant influx of people to a remote inaccessible rural area placing an unacceptable and unmanageable burden on road and social infrastructure.

## 5. **The absence of appropriate realistic and credible evidence**

i) *The MOJ has no systematic evidence of local economic benefits in rural areas.* Even in the eyes of their proponents, a prison's effectiveness in terms of prisoner rehabilitation and economic impact are each maximised in accessible urban sites.

ii) *The fact that District and Parish councils near existing prisons have objected to prison planning applications is powerful testament to the absence of local socio-economic benefits and the presence of negative social and environmental externalities.*

iii) This is corroborated by UK Government deprivation data from 100 UK prison sites which shows minimal improvements in local skills and significant and indelible negative social and environmental impacts, including community cohesion, traffic, housing, and crime.

iv) This mirrors decades of American evidence that *prisons do not serve as a catalyst for sustainable rural development because economic multipliers are contingent upon a pre-existing ecosystem of businesses, services, and infrastructure.*

## 6. **The lack of foresight**

i) *The viability of the Wethersfield Airbase site cannot be evaluated simply by focusing on a proposal to develop a small portion of it with no idea whatsoever as to the future of the remaining land; the infrastructure required to support it; or more productive alternative uses.*

To meet requirements of the NPPF and the CCA, a development on this scale requires robust analytical frameworks and rigorous evidence that look beyond the immediate proposal and understands the broad sustainable socio-economic strategy for the region as a whole, including the infrastructure deficit, the need for highly skilled high paid work and the proven long-term inter-relationships between social-well-being, environment, and health.

ii) *Along with each pillar of sustainable development, the interests of local people are not fungible with those living further afield.* Failure to embrace a forward thinking understanding of rural development would be a betrayal of national, regional and district governments' commitments to net zero emissions; the letter and spirit of local empowerment legislation; and the ethos of 'Build Back Better', 'Levelling up' and High Skilled clean growth policy goals.

iii) *Building a mega prison in this rural area is economically inefficient, socially inequitable, and environmentally unsustainable* – as no custodial or transport infrastructure exists. Whilst we as rich Westerners lament the continued destruction of our habitat by those with more restricted choices, let us recognise that we have the luxury to make the right one.

## 1.0 Background

In view of the forecast rise in the UK prison population to nearly 99,000 by 2026<sup>3,4</sup> and with much of its estate deemed unfit for purpose, the Ministry of Justice (MOJ)<sup>5</sup> is under pressure to provide quick short-term remedies. In its haste, **the MOJ has focused on scale, at the expense of a nuanced appreciation of people and place and has thereby replicated historical strategic errors at significant cost to society and the taxpayer**<sup>6</sup>.

According to the UK Government's 2021 Prisons Strategy White Paper<sup>7</sup>, the purpose of a prison is not only to punish offenders, maintain public safety and act as a deterrent to criminal activity but also to facilitate the levelling up of society through rehabilitation of persistent offenders. **Reoffending is estimated by the MOJ to cost society £18 billion per annum, yet this is not factored into prison location decisions**<sup>8</sup>.

Inherent within efforts to break the reoffending cycle is the need to address educational, physical and mental health and substance issues, as well as family support, post-release employment and accommodation<sup>9</sup>. Though there are obvious limitations in achieving these some distance from the judicial network, probation office, prisoners' homes, employment hubs or affordable accommodation, Mega prisons appear to be the MOJ's latest silver bullet<sup>10</sup>. In its efforts to address regional imbalances<sup>11</sup>, the MOJ continues to be impervious to spatial variance in suitability, capacity and accessibility. This reflects continued strategic failings to address the *external* dimensions of prison management, including the importance of prison families, prison staff and the local community<sup>12,13</sup>.

The strategy of building at scale in remote locations also flies in the face of the UK Government's obligations under the Climate Change Act, 2008 and its commitment to a green high wage and highly skill economy<sup>14</sup>, as well as a raft of evidence from Inspectorate reports, Government inquiries and academic research<sup>15</sup>. **This evidence base has consistently criticised prison site choices for being driven by short-term economic expediency, rather than the geographical distribution of prisoner 'supply and demand' and the capacity of sites to effectively fulfil their mandate**<sup>16</sup>. The Carter Review, for example, criticised expansion of rural sites (such as Highpoint) "situated significant distances from large urban centres and without well-developed transport links"<sup>17</sup>.

The build-up of trust between prisoners and staff is hampered by a lack of experienced staff, poor retention and high resignation rates, especially at large category C and rural prisons, including HMP Highpoint. The Farmer Report<sup>18</sup> highlighted that **the maintenance of prisoner family ties is critical to rehabilitation but numerous Prison Inspectorate reports note that this is restricted by rural inaccessibility**<sup>19</sup>.

Given the operational difficulties and hidden costs inherent in running large rural prisons, it is difficult to see how an investment of over £350,000,000 per prison<sup>iii</sup> can be deemed to be in

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<sup>iii</sup> The Full Sutton Category A prison is forecast to cost £400 million which is £277,000 per prisoner. The Category C prison at Glen Parva was completed at a cost of £170,238 per prisoner, 68% over budget. If we allow for 30% inflation since its commissioning, a mid-range estimate of £221,000 per prisoner which would amount to £380 million for each prison excluding financing.

the national interest, particularly when access to labour, families and support facilities are so obviously limited. **Even Mega prison proponents see proximity to urban fringes as imperative.** Moreover, the Policy Exchange sees the prison building programme as a chance to close down inaccessible rural prisons, not build more of them<sup>20</sup>.

The importance of people and place is also critical in evaluating whether a Mega prison can be construed to be in the local interest. The MOJ's failure to do so is vividly illustrated in its proposed siting of a Category B *and* a Category C<sup>iv</sup> Mega prison, each housing 1,715 inmates on a Ministry of Defence (MOD) airfield near the 'Third tier' village of Wethersfield, Essex<sup>21,22</sup>.

The nature of the factual errors in the MOJ's consultation document<sup>v</sup> are symptomatic of an apparent disregard of some basic tenets of rural economic geography. Freedom of Information (FOI) request documentation reveals that the MOJ was informed of more accessible sites elsewhere in the region that fulfilled its criteria (which Wethersfield did not)<sup>vi</sup> but these were dismissed in favour of an MOD owned site with very little detailed analysis of their suitability<sup>vii</sup>.

In its thinly disguised pursuit of cheap real estate, the MOJ's justification of site choice relies on weak anecdotal evidence of local benefits<sup>23,24</sup>, rather than a robust appraisal that the site is fit for purpose (and vice versa). The numbers of prisoners and staff would dwarf the surrounding villages which are situated in a sparsely populated agricultural area that features minimal economic infrastructure, an under-developed road network and ageing demographics. Moreover, Defence Infrastructure Organisation (DIO)<sup>viii</sup> documents obtained through a Freedom of Information request<sup>25</sup> suggest even more extensive ambitions (including housing and hotels, in addition to prisons) to develop the entire site<sup>ix</sup>. They candidly admit that **the prison will be entirely divorced from the local economy**. Its wider development aspirations not only ignore the site's inaccessibility but blatantly trample on the interests of the local community, natural environment, and historical heritage. This is amply illustrated by the MOD's deplorable decision to close the Airbase Museum simply to circumvent potential planning objections. It also repeats previous government failures to learn lessons of UK economic history that demonstrate that productive investments need to be underpinned by appropriate site location, infrastructure and access to labour.

This paper provides evidence that shows it is difficult to see how MOJ or DIO plans can be construed to be in the local socio-economic interest or represent the equitable function of national, regional or district governance.

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<sup>iv</sup> Prison categorisations refer to maximum risk. Category A prisoners are a public threat. Cat. B are long-term and high-security prisoners for which escape should be made difficult. Cat. C are not deemed a threat so are housed in training and resettlement prisons. Low risk Cat. D prisoners spend time outside the prison.

<sup>v</sup> These included incorrect road names and a lack of knowledge regarding motorway exits.

<sup>vi</sup> Wethersfield is in the East (not South East) outside MOJ's limit of Cat. B prisons being 90 minutes from Birmingham; does not have strategic access to public transport or the trunk road network; is not accessible for construction without major enhancement of infrastructure; is not capable of connection to utilities without unreasonable cost; is not brownfield land; is not in an area that would ease staff recruitment; has a number of unknown ground contamination issues; is prejudiced by ecological or historic designations; and is affected by significant issues, such as planning as the site is outside the local development area.

<sup>vii</sup> Oddly MOJ sees itself under no obligation to justify site choice even though opportunity cost is key to any investment decision.

<sup>viii</sup> DIO is the department of the Ministry of Defence responsible for the disposal of the Wethersfield Airbase site. A precis of this document can be found in Appendix I

<sup>ix</sup> The prison proposal covers only 15 percent of the Airfield's 800 acres.



## 2.0 What is the local socio-economic interest?

A critical ingredient missing in the MOJ's consultation paper (and DIO's review) is a clear delineation of 'local' or any *ex-ante* understanding of local aspirations. The *ex-post* exercise since has become a transparent attempt to reframe a pre-designed template as suiting local interests. Whilst MOJ consultants have completed Socio-Economic Impact Assessments for other prison planning applications<sup>26,27,28</sup>, these are more or less identical<sup>x</sup>, rely on limited MOJ research<sup>xi</sup> and fail to relate their 'analysis' of local needs to what solutions a prison actually offers, particularly in rural areas. **Definitions of 'local' are inconsistent or conspicuously absent.** Overall, there is little cognisance of what the local interest actually is or who defined it. **Essentially the solution has been proclaimed before the problem has been defined.**

Clarification of these issues is critical to the equitable functioning of planning and policy making. To gauge local perspectives, we can use data from a range of statistical and administrative geographies, including Lower Super Output Areas (LSOAs), Medium Super Output Areas (MSOAs)<sup>xii</sup>, Electoral ward, Local Government Authority (LGA) and Regional Government Data collated by the Office for National Statistics (ONS).

This data includes (but is not limited to) the UK Government's Multiple Deprivation indices (IMD)<sup>29</sup> and ECC's experimental Community Needs Index (CNI)<sup>30</sup> which each attempt to gauge relative (not absolute) community needs. In the Multiple Deprivation framework, assessments rely on 39 primarily socio-economic indicators<sup>31</sup>. These form the basis for the Index of Multiple Deprivation (IMD) which is the weighted sum of 7 domains<sup>xiii</sup>: *Income* (7 indicators, weighting 22.5%); *Employment* (6, 22.5%); *Education, Skills and Training* (7, 13.5%); *Health and Disability* (4, 13.5%); *Crime* (4, 9.3%); *Barriers to Housing and Services* (7, 9.3%); and *Living Environment* (4, 9.3%)<sup>32</sup>. As these weightings favour economic indicators, they serve both a pro-growth and levelling-up agenda. They can be supplemented by the ECC's CNI<sup>33, 34</sup> which uses ward data to calculate 29 indicators across three broad domains - Civic Assets; Connectedness; and Active and Engaged Community –to gauge non-economic aspects of development.

Each method has conceptual and empirical shortcomings<sup>35</sup> (discussed below) but establish important points of principle.

First, they recognise the **non-divisibility of social, economic and environmental pillars of sustainable development**. Second, they encompass **community empowerment as both a means and an end** that sees 'Levelling up' as *"the opportunity to succeed in life and fulfil their potential; and that all places and communities should be able to share in this"* and *"not about taking away or limiting opportunities from those who already have them"*<sup>36</sup>.

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<sup>x</sup> Place names, for example, have been cut and paste mistakenly from one prison site to another

<sup>xi</sup> In particular a 2013 study by Peter Brett Associates (PBA) for the MOJ which examined three urban prisons.

<sup>xii</sup> LSOAs comprise of 1,500 residents on average. MSOAs are made up of several LSOAs and have 7,200 people on average.

<sup>xiii</sup> See Appendix II. Number of indicators and weightings in brackets. Note the weightings are skewed toward economic aspects.

## 2.1 Local needs

### 2.1.1 Regional perspective

In 2021 the UK Census recorded a population of 1,503,300 in the Essex administrative region<sup>xiv</sup>. 37 percent live in three districts Colchester, Basildon and Chelmsford<sup>37</sup> but 25 percent live in sparsely populated areas (Figure 1)<sup>38</sup>.

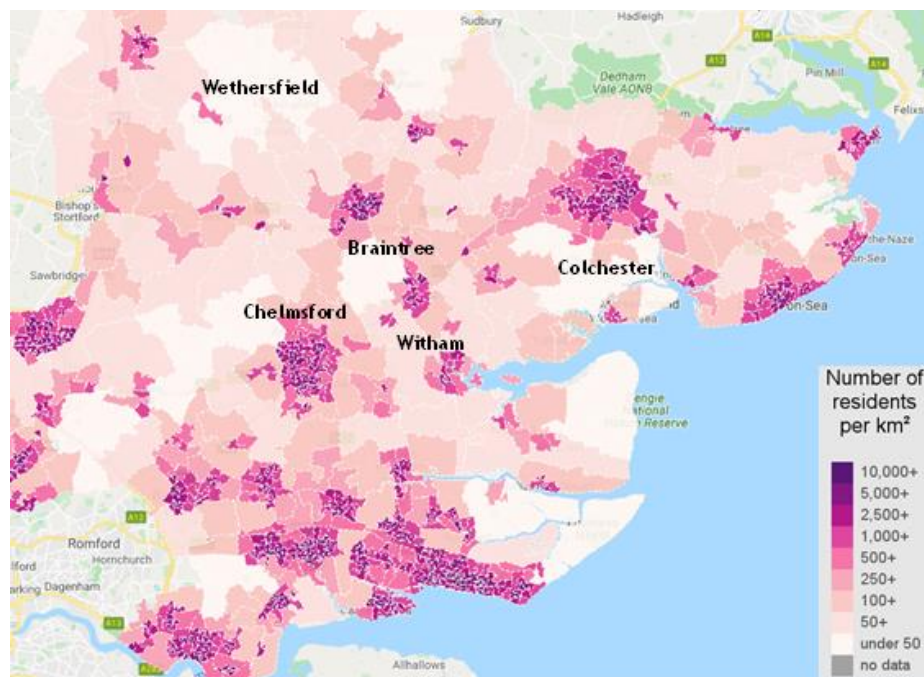


Figure 1: Essex Population density<sup>39</sup>

Annual population growth in Essex of 0.76 percent per annum since 2011 is only slightly above the national average but is particularly high in older age groups<sup>40</sup>. As a consequence, over 50s now account for 39 percent of the region's population<sup>41</sup>.

Along with other parts of the UK, Essex has a number of coastal areas that are relatively deprived<sup>42</sup>. ECC strategy documents recognise that **improving livelihoods depends not just on the magnitude of economic growth but its form**. The need to focus on skills, location and specific highly productive sectors are some of the key lessons learned from the successful economic transformation in countries such as South Korea and Singapore<sup>43</sup>. This can be explored by looking at how Essex compares to the rest of the East of England.

Weekly median full-time employee pay April 2021 to March 2022 was £729 in Cambridgeshire and £705 in Hertfordshire – much higher than in Essex (£634) and Suffolk (£573)<sup>44</sup>. This may be partly attributed to the fact that Hertfordshire and Cambridgeshire have a higher percentage of the workforce in sectors which command earnings premiums and are less reliant on lower paid sectors, such Wholesale and Retail Trade, Health and Social Work or Hospitality.

<sup>xiv</sup> Including 356,700 people in Unitary councils (Thurrock and Southend) geographical Essex region has a population of 1,860,000

There are also differences in skills within and across sectors. Compared to the Eastern region (58.2 percent) and the UK (61.5 percent), a relatively small percentage of the Essex workforce (53.6 percent) have an NVQ3 level qualification or above<sup>xv</sup> (Figure 2)<sup>45</sup>. This may have an impact on the population's earning potential as nationally a person with an NVQ4 qualification earns 50% above the median and NVQ3 16.5%<sup>46</sup>.

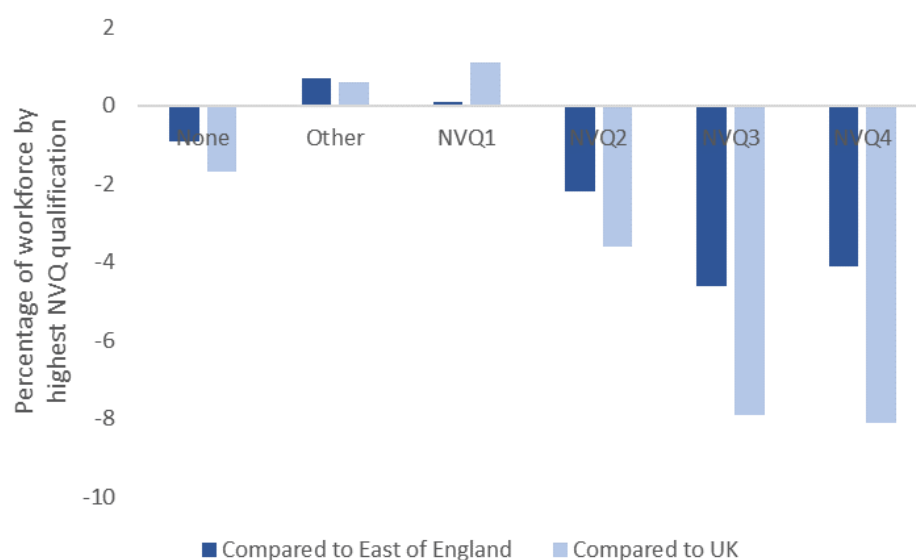


Figure 2: Essex Skill qualifications<sup>47</sup>

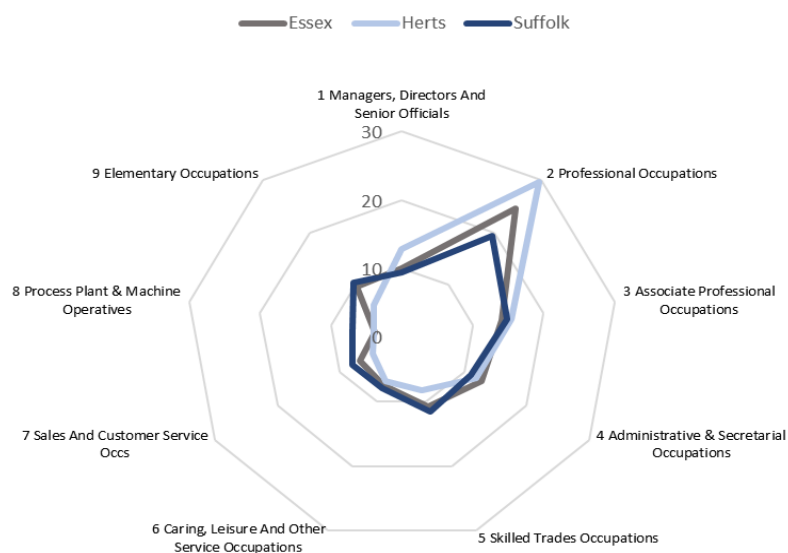


Figure 3: Employment by occupation Essex and neighbouring counties<sup>xvi</sup> April 2021- March 2022<sup>48</sup>

<sup>xv</sup> Level 4 or above (degree level or equivalent); level 3 (2 or more A levels or equivalent); level 2 (5 or more GCSE passes at grades 4 to 9 or equivalent); below level 2 (fewer than 5 GCSE passes at grades 4 to 9 or equivalent)

<sup>xvi</sup> Cambridge (median weekly pay £720) is heavily skewed to professional occupational groups (73.5%).

Irrespective of qualifications, earnings potential may also be limited by the skill required of a particular job. Using Standard Occupational Classifications (SOC), jobs can be grouped by skill level or specialisation<sup>49</sup>. Figure 3 shows that compared to Essex and Suffolk, Hertfordshire has more of its workforce in well paid Professional and managerial occupations and fewer in lower paid groups 4-9, such as skilled trades or sales<sup>50</sup>.

To address the county's need to improve growth, productivity, natural resource efficiency AND household incomes, ECC's Levelling-Up and Sector Development Strategies have outlined the need for a holistic evidence-based approach<sup>51</sup>. This dovetails with the UK Government's 2017 Industrial strategy which focuses on clean growth, skills and social mobility<sup>52</sup> and its current priorities of energy independence, infrastructure and innovation<sup>53</sup>. In the Essex Climate Action Commission's 'Net Zero: Making Essex Carbon Neutral' report, Councillor Leader Kevin Bentley aptly encapsulated the regional interpretation of sustainable development by restating the importance of *"Renewal, Equality and Ambition across Essex, the central pillar of which is climate action"*<sup>54</sup>. The Council's goal of establishing Essex as *"a centre of excellence for innovation in addressing the climate crisis"*<sup>55</sup> appears to recognise environmental imperatives as a social and economic opportunity, rather than a constraint.

To achieve this ECC identifies five growth sectors that offer the potential to raise productivity and pay: Advanced Manufacturing; Construction; Digitech; Energy; and Medtech (Life Sciences) which currently account for 14 percent of the county's employment. Thousands of new 'Green' jobs may be created by 2030, especially in low carbon energy projects, such as Longfield Solar Farm, Rivenhall, Oikos Marine and South Side Development, Bradwell and the A12 Widening Scheme and at the Thames Freeport and Freeport East (Felixstowe and Harwich). Opportunities are also evident in energy efficiency on existing homes in the county, thereby promoting growth and aligning local sustainable development needs in terms of skills and fuel poverty<sup>56</sup>.

The required upskilling will also include the encouragement of community energy schemes, sustainable land stewardship practices and natural habitat corridors that will enable the county's countryside to improve energy efficiency, food productivity, increase carbon absorption and flood management capacity and improve access to open spaces for the country's residents. This latter objective is a key ingredient of ECC's approach to sustainable development, as it **not only has implications for the natural environment but also residents' physical and mental health**. County and National surveys repeatedly highlight how residents value green spaces, children are worried about traffic and pollution near their schools and only 10 percent of people are able to cycle once a week<sup>57</sup>. The key realisation is that this is perfectly complementary to goals of food security and economic growth. The prospect of regional investment zones has also recently been raised to promote these initiatives<sup>58</sup>, though World Bank<sup>59</sup> and United Nations<sup>60</sup> research suggests their success is contingent upon appropriate location and infrastructure. This is echoed in ECC's business surveys which suggest that the most significant growth barriers are a lack of **long-term co-ordinated strategic thinking, skill shortages and poor road access**<sup>61</sup>.

The importance of a strategic focus on what *type* of growth and in what *type* of location is not only important in terms of maximising productivity but also in terms of mitigating the consequences. **According to UK Government statistics, road transport contributes almost half of the county's emissions.** Annual road emissions amount to 2.06 tonnes per Essex resident – 12 percent higher than the UK average and higher than all five neighbouring counties. **37 percent of the county's transport emissions come from minor B roads.** Nearly 12 percent of these arise in the rural district of Braintree<sup>62</sup>.

**It is therefore self-evident that there is a need to address skills training in appropriate strategic sites**<sup>63</sup>. Utilisation of existing growth corridors along the county's main arterial routes, the Thames and Haven Gateways and key low carbon energy sites would maximise economic returns and minimise environmental externalities in accordance with the regional and national government's Economic growth, Levelling-Up<sup>64</sup>, Net Zero<sup>65</sup> and Transport Plans<sup>66</sup>.

### 2.1.2 District perspective

**Intra-regional variations matter.** At 236 square miles, Braintree is the second largest LGA in Essex but also one of its least densely populated<sup>67</sup>. Half of its 155,200<sup>68</sup> population live in three market towns and the rest are spread across sixty villages<sup>69</sup>. Braintree's population has grown more slowly than the East of England but is ageing rapidly. From 2011 to 2021 the number of over 65s in Braintree increased by nearly 30 percent - 1.5 times the national rate<sup>70</sup>. The district's working population is forecast to fall to 54 percent of the total by 2025<sup>71</sup>.

Historically an area of manufacturing and agriculture, Braintree district has seen a decline in highly paid jobs<sup>72</sup> but remains a comparatively prosperous LGA with median incomes and house prices above the national average and a national deprivation ranking of 211 (out of 317) in terms of average LSOA score<sup>73</sup>. Only 2% of its 87 LSOAs are in the most deprived national decile<sup>74</sup> and **Braintree has fewer LSOAs in the most deprived 20% than most other Essex LGAs** (or Unitary councils), including Tendring, Basildon, Southend, Thurrock, Harlow, Colchester, Castle Point and Chelmsford<sup>75</sup>.

Table 1 (below) shows that Tendring, for example, is not only relatively deprived but also one of the most *unequal* in terms of jobs and health. Elsewhere *intra*-district inequalities are most evident in health and income, for example, in Colchester. *Inter*-district inequalities in education and skills may offer partial explanation of income inequality across Essex<sup>76</sup>.

Figure 4 (below) shows that Essex LGAs who have fewer workers with only an NVQ2 qualification level 2 (5 or more GCSE passes at grades 4 to 9 or equivalent) have average higher weekly pay. **In Braintree, the percentage of workers with NVQ2 qualifications or lower is double that of Uttlesford, where pay is over 20 percent higher**<sup>77</sup>. This is partly because rural residents face limited choices of skilled jobs and higher costs of living<sup>78</sup>. ECC survey data suggests that residents' ability to acquire new skills or to exercise more are constrained by cost, time, childcare and transport<sup>79</sup>. **The provision of low skilled jobs requiring long hours of unsociable shift work and a long commute does not seem the ideal remedy.**

Local authority	Deprivation ranked high to low		Weekly pay ranked high to low	Inequality ranked high to low			
	UK decile	Rank in Essex		Income	Health	Education	Jobs
Basildon	4	3	10	3	5	5	1
Braintree	7	7	6	9	8	7	8
Brentwood	10	11	1	12	4	3	4
Castle Point	6	5	9	2	10	9	7
Chelmsford	9	9	7	5	6	6	3
Colchester	6	4	4	1	1	2	6
Epping Forest	7	6	3	7	3	4	5
Harlow	4	2	12	6	7	12	12
Maldon	7	8	8	11	12	8	11
Rochford	10	10	2	10	9	11	10
Tendring	2	1	11	4	2	10	2
Uttlesford	10	12	5	8	11	1	9

Table 1: Average Deprivation, weekly pay and inequality profiles by local authority 2018-19 data.  
(Red shading denotes low pay or higher deprivation)<sup>80</sup>

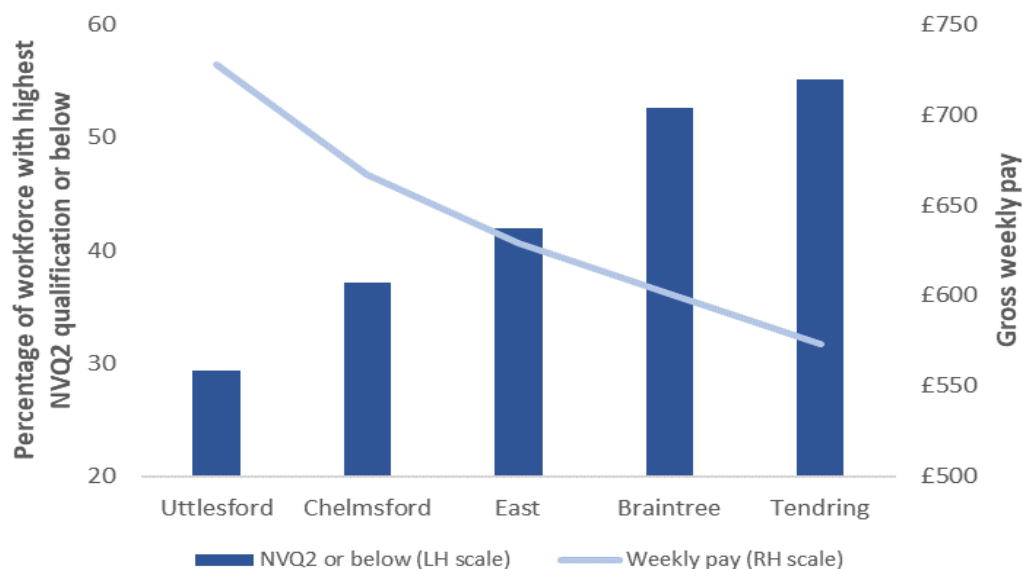


Figure 4: National Vocational Qualifications and Gross weekly pay 2020<sup>81</sup>

Even if people do acquire skills, they may not receive appropriate remuneration due to sector or occupational group skill mismatches<sup>82</sup>. Compared to wealthier districts, such as Uttlesford, Braintree's occupations are overly weighted in less well-paid groups 4-7 (Administration, Skilled trades<sup>xvii</sup> (which include prison officers), Care and Leisure, and Sales) in which pay is between 24 and 40 percent below average (Figure 5 below).

<sup>xvii</sup> According to research by Pragmatix Advisory, 30 percent of Skilled trades have no GCSEs

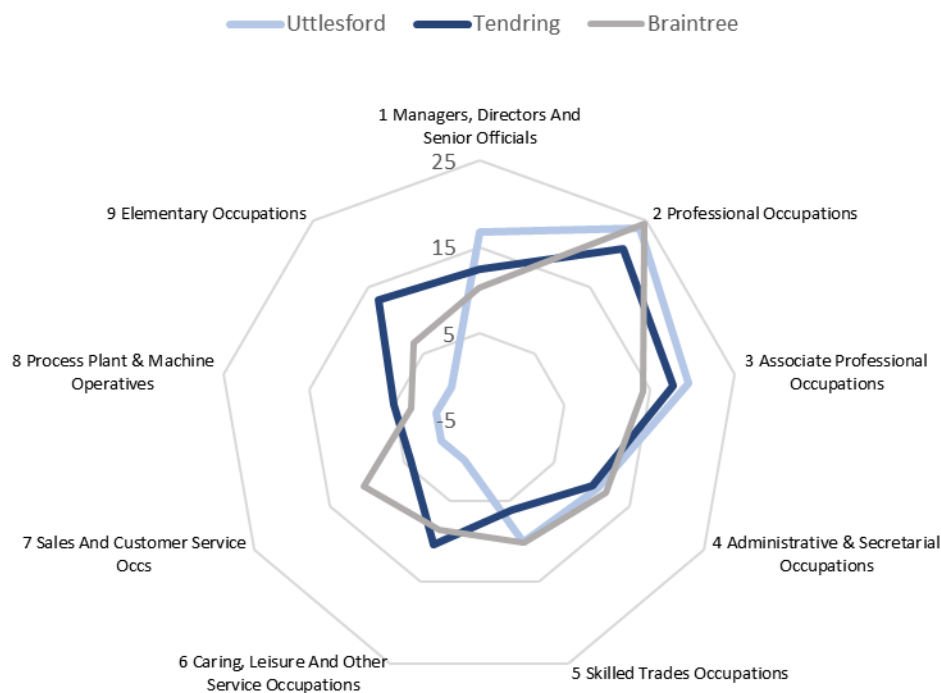


Figure 5: Employment by occupation Braintree, Uttlesford and Tendring April 2021- March 2022<sup>83</sup>

Like many rural areas<sup>84</sup>, there is also evidence that Braintree district's post-manufacturing transition has concentrated in less well-paid sectors and occupations in the value chain. For example, nearly 1 in 5 people work in wholesale, retail or repair, where national data suggests that weekly pay can be as low as £365, roughly half the average of all full-time employees<sup>85,86</sup>.

**Intra-district variations matter** because the incidence of low income and skills is not evenly spread across the district. These in turn contribute to the disparity in health outcomes.

According to ECC research, the average gross weekly pay for those working in the Braintree district is lower than those who work outside<sup>87</sup>. Whilst commuting costs negate some of this disparity, it does suggest **geographical mobility constraints** upon some households' earning power. However, the fact that worker productivity in high growth sectors, such as construction, is lower than county benchmarks also suggest **skill constraints** (as discussed above).

The Braintree LGA features three types of settlement: Rural village and dispersed; rural town and fringe; and urban city and town<sup>88</sup>. Relative deprivation using the IMD or CNI methodology is concentrated in the district's towns and environs, (parts of Braintree, Witham and Halstead), not its rural villages<sup>xviii</sup>. Obviously, there are less fortunate households in all areas but that is not the same as saying an area is deprived per se. The policy implications of this are significant.

<sup>xviii</sup> See Appendix III for detailed deprivation data tables



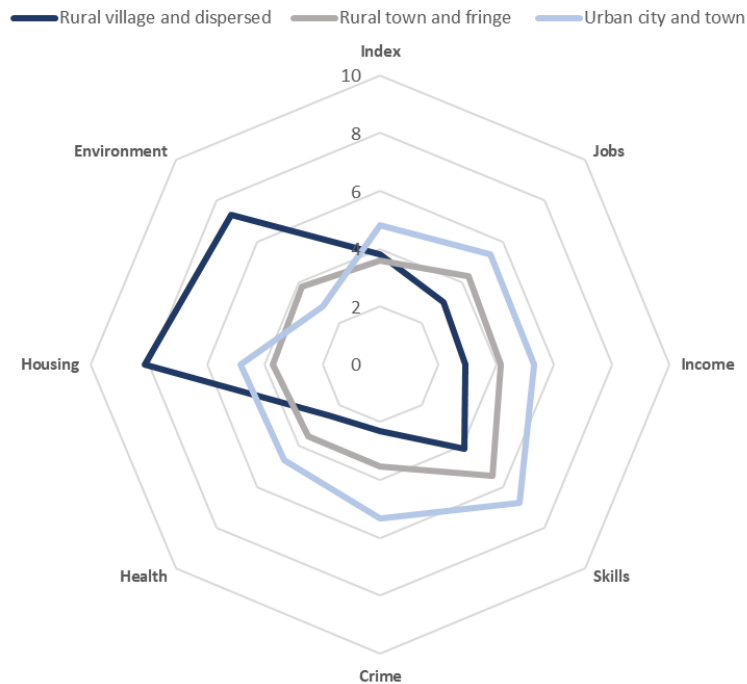


Figure 6: Average relative deprivation using IMD methodology across settlement types<sup>89</sup>  
(Scale centre 0 is least deprived; 10 most deprived)

Moreover, as Figure 6 shows, the dimensions of relative deprivation vary by settlement type. **Rural towns tend to perform worse in terms of *economic* indicators** (especially income and skills for young people) **but villages in terms of certain aspects of the *social* and *environmental* domains** (including access to services and road accidents)<sup>90, 91</sup>.



Figure 7: Relative deprivation using CNI methodology villages and towns  
(Scale centre 0 is least deprived; 10 most deprived)<sup>92</sup>

The Community Needs Index (CNI)<sup>93</sup> also displays intra-district variance. There are examples of **Civic asset deprivation** in towns and villages but **civic engagement is particularly strong in villages** (Figure 7). **'Connectedness'** is problematic in rural areas but has **specific spatial meanings**. Some rural wards rank poorly in *digital and physical* connectedness but the latter is also evident in some towns, where car ownership is lower. *Social* connectedness is also weaker in towns but rural villages have older populations, longer public transport times to



hospital and high fuel poverty. However, on all other indicators (including loneliness, car access and unemployment), rural towns fare far worse<sup>xix</sup>. The point is that, although rural areas share some common problems, location specific remedies are often entirely different<sup>94</sup>.

**Care is therefore needed in designing policy solutions.** There is no obvious linear link between rurality, access to employment or health services and economic deprivation or health. Academic research suggests health outcomes are a function of a complex inter-relationship between natural environment, social relationships, behaviour, and socio-economic status<sup>95</sup>. ECC's research finds that a lack of jobs within market towns may weaken civic engagement and social networks and be especially important for those in fuel poverty or without a car<sup>96</sup>. Research for the Rural Services Network highlights the need for more productive and high paid rural jobs<sup>97</sup>, not just the provision of more low skilled jobs irrespective of accessibility.

The implication for policy is a need is for more investment in people through improved schooling and training<sup>98</sup> and the opportunity to utilise skills<sup>99</sup> for appropriate remuneration in appropriate places<sup>100</sup>.

### 2.1.3 LSOA and Ward perspectives

**Relative deprivation in villages requires careful interpretation.** Deprivation data shows that the LSOAs near Wethersfield and parts of rural Northern Braintree display relatively few issues in terms of economics but a number related to the Living environment (driven by high traffic accident rates), Housing quality<sup>xx</sup> and access to services (Figures 8 and 9).

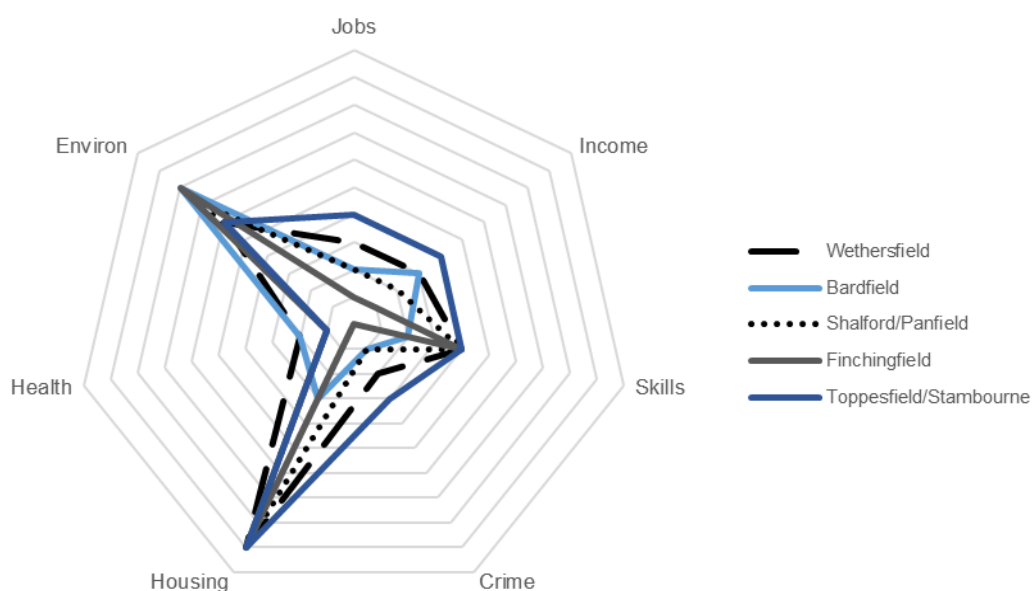


Figure 8: Relative deprivation in LSOAs in Three Fields Ward (scale centre is least deprived) <sup>101</sup>

<sup>xix</sup> See Appendix IV for comparison of IMD and CNI deprivation by settlement type

<sup>xx</sup> This relates to quality, not affordability. Ministry of Housing FOI responses suggest this is due to poor insulation of old homes of which Braintree has many. Braintree Council refused to provide further detail on the grounds it was not in the public interest.

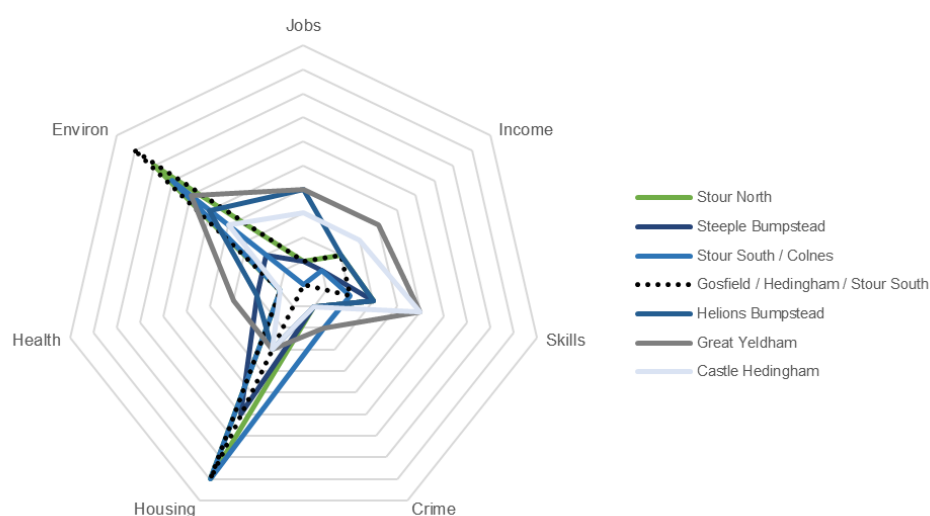


Figure 9: Relative deprivation in LSOAs in Northern Braintree (scale centre is least deprived)<sup>102</sup>

However, it is unclear whether low rural incomes are fully captured<sup>103</sup> or whether accessibility is symptomatic of a problem or simply a rural tautology as there is no clear link with socio-economic outcomes. Several studies also show that education, loneliness, and physical and mental health outcomes are worse in Braintree's towns than in its villages<sup>104, 105, 106</sup>.

Viewed in isolation, rural millionaires would be deemed more deprived than welfare recipients living around the corner from an inner-city supermarket. Such perversities reflect known limitations of the existing dataset<sup>107</sup>. As each deprivation domain is interconnected, the ONS advises that policy makers cannot focus on sub-domains without a clear understanding of the underlying drivers of the data or a robust Theory of Change, such as the "Wider determinants of Health model" that includes a range of factors including behaviour, education, employment, and other social factors, in addition to access to quality healthcare<sup>108, 109</sup>.

**There are major issues with data collection and interpretation, especially in rural areas<sup>110</sup>. Whilst the absence of deprivation does not mean that pockets of deprivation do not exist<sup>111</sup>, the error is to confuse an area of deprived people with an area that has deprived people in it and vice versa<sup>112</sup>. There are a number of other indicators of rural deprivation but the indices cannot be used to quantify it or identify specific deprived households<sup>113</sup>.**

## 2.2 Local ownership, capabilities, aspirations, and priorities

As such, the IMD and CNI methodologies provide a starting point but are by no means sufficient without further disaggregation of rural problems<sup>114</sup> and devolution of solution designs<sup>115</sup>. At the heart of the 2011 Localism Act, is recognition of the need to devolve decision making<sup>116</sup>. This is reflected in ECC's Levelling up White paper which declares "*We don't believe that the Council should specify what 'succeed in life' means for people*". ECC sees enhancement of local participative democracy as both a policy means and end<sup>117</sup>.

The National Planning Policy Framework (NPPF) also explicitly notes the need for development to “*reflect the character, needs and opportunities of each area*”<sup>118</sup>. In an interview on 1<sup>st</sup> October, 2022, Simon Clarke, the Levelling Up secretary reiterated that “*the planning system should most fundamentally be about popular consent*”<sup>119</sup>. It is therefore axiomatic that planning consultation extends beyond sharing partial information of pre-hatched solutions and includes meaningful participation in framing the problems these solutions are purportedly designed to resolve.

To monitor policy impact and to facilitate residents’ ownership and civic engagement with local sustainable development requires recognition of data limitations, distinction between different rural areas, and better understanding of how specific dimensions of deprivation manifest themselves in socio-economic problems that local people recognise<sup>120</sup>.

There is also a dire need to focus on the positives of rural life. Currently, there is a distinct absence of what the Right Honourable James Cleverly has referred to as indicators of *what people value*, rather than what may be deemed a socio-economic problem by policy makers<sup>121</sup>. Far more nuanced research is required to gauge residents’ attachment to place in terms of dependency (what it does for them), as well as identity (what it means to them)<sup>122</sup>. Place identity can be extremely strong in rural areas, where relationships with the wider economy, the natural environment and within communities differ from urban areas<sup>123</sup>.

Failure to understand this can mean that discussions on accessibility, for example, become a tautological exercise that ignores *why* rural residents choose to live outside urban areas in the first place – for example, family relationships, retirement or well-being. Most importantly, there is a need to recognise that from residents’ perspectives, not all apparent ‘problems’ need fixing and that civic, communal and natural assets are not fungible with monetary recompense.

As Action with Communities in Rural England (ACRE) suggests<sup>124</sup>, whilst rural residents need more productive opportunities, they may prefer clean jobs, innovative technology and enhanced community capacity, over a countryside homogenised through urban sprawl, retail parks and fast-food drive-ins. This sentiment seems to be reflected in what over 60% of Essex residents rank as the most important aspects of living in the county – a love of its open spaces and concern regarding traffic volumes, road safety and pollution<sup>125</sup>. And herein lies a critical problem in terms of development proposals that fail to account for the nuances of place:

The first issue is that transport already contributes to half of the county’s Greenhouse Gas emissions (GHGs). **Braintree is already the 4<sup>th</sup> largest emitter of GHGs in the county and the largest from rural minor roads.** Excluding the effects of the pandemic, these numbers continue to rise in absolute and relative terms<sup>126</sup>.

The second is the perception that open space has no value. Braintree’s open spaces currently account for nearly one-fifth of Essex’s *negative* carbon emissions derived from land use change and forestry<sup>127</sup>. **In effect, as well as serving as an area to enhance the food security, rural Braintree is partly acting as a carbon sink** to which no ‘economic’ value is currently attached.



Figure 10: Percentage of responses to questions what is good and what needs to be improved where you live?<sup>129</sup>

To address these knowledge gaps regarding the *meaning* of local interest requires us to begin asking the right questions and collect disaggregated data<sup>130</sup> to identify household capabilities, constraints, and aspirations<sup>xxi</sup>. This bottom-up lens is founded on the Capability approach of Nobel prize winning economist Amartya Sen<sup>131</sup> which recognises that the same policy does not afford the same opportunity to all households.

This approach could also inform the formulation of the proposed Joint Neighbourhood Plan of Finchingfield, Wethersfield, Toppesfield and Sible Hedingham Parish Councils affected by the proposed Airbase redevelopment. Introduced under the Localism Act 2011, a Neighbourhood Plan aims to give communities a stronger role in shaping their area and sit alongside the District Local Plan. This would encompass the shared characteristics of each parish from the residents' viewpoint and place sustainability for future generations at its heart. Other community stakeholders are also trying to take the initiative. The North Essex Farm Cluster (NEFC), for example, brings together researchers, landowners and farmers in the River Pant and upper Blackwater catchment area in a ground-up collaborative knowledge sharing forum with the goal of preserving and enhancing the natural habitat and creating a resilient landscape in which to live and work<sup>132</sup>. However, **local voices are largely being by-passed in a process that ignores alternative uses for the Wethersfield Airbase**. As Essex Climate Action Commission's 'Net Zero: Making Essex Carbon Neutral' plan suggests, **there is an urgent need to engage communities in formulating strategic plans that have a clear theory of change, rigorous evaluation monitoring strategy and community ownership**<sup>133</sup>.

<sup>xxi</sup> ECC is currently conducting a survey of rural residents in financial need but it is unclear if this will yield sufficient detail.

### 3. Impact pathways

This section outlines potential pathways through which the socio-economic impact of a new prison may be realised.

#### 3.1 USA evidence

**Based on a range of methodologies, time periods and geographies, American evidence is extensive, and unequivocal.**

*3.1.1 The importance of problem diagnosis.* The acceleration of Mega prison building in rural areas of the USA that began in the 1980s was initially fuelled by their alleged potential to boost economic growth<sup>134,135, 136, 137</sup>. The narrow framing of decline in the rural South as purely an economic problem encouraged local governments to offer tax concessions and infrastructure funding to attract prisons as a vehicle for regeneration<sup>138</sup>.

Much of the early justification was based on purported economic benefits in *urban* areas and failed to address the distribution of jobs within rural communities and across different skill sets. Many studies were either partial, non-random, or anecdotal<sup>139</sup>. A review by the European Services Strategy unit concluded that *"no comprehensive impact studies were undertaken as part of the planning process"*<sup>140</sup>. In effect, prison locations reflected local political expediency, rather than robust problem diagnosis or solution design<sup>141</sup>.

*3.1.2 Prisons are not an effective generator of economic growth.* More recent robust academic evidence has cast doubt on the potency of prisons as an equitable economic catalyst. In 2013, Genter, Hooks and Mosher analysed 30 years of longitudinal data but found **"no evidence that prisons contribute to employment growth"**<sup>142</sup>. This corroborated a 2004 cross-sectional study of prison and non-prison towns, in which King, Mauer and Huling<sup>143</sup> found prisons to be ineffective in creating quality local jobs. Blakenship and Yanarella concluded that economic community-based renewal requires local sourcing, local infrastructure provision and a strategy that is compatible with the community's needs, resilience, and aspirations. This means **jobs should be of a high quality but there was no evidence that prisons provide this**<sup>144</sup>.

*3.1.3 The importance of place.* **Several studies found that benefits were particularly absent in rural areas.** Beale wrote *"it is questionable whether prisons will give rural communities a foundation for longer-term growth"*<sup>145</sup>. Gilmore noted that few prison officers live in the local rural community<sup>146</sup>, whilst Hooks et al. concluded *"in rural areas it is likely that direct effects are dispersed and diluted"*<sup>147</sup>.

*3.1.4 Inequitable growth and unforeseen consequences.* Genter, Hooks and Mosher found that prisons can **"impede the quality and inclusiveness of economic growth, especially if prisons are run privately, wages are low and staff turnover is high"**<sup>148</sup>. One case study in rural Pennsylvania found evidence of such turnover, as rural prisons could not recruit or retain

staff. Another prison in Minnesota showed few spin-off benefits as the prison relied on long distance deliveries. In California, Oregon and Missouri less than 20 percent of jobs went to local people. In 42 different Texas prisons, there were very few sustainable local economic benefits<sup>149,150,151</sup>. Tootle concluded that - ***“prisons appear to have a negligible or perhaps negative impact on economic development in rural communities”***<sup>152</sup>. This was echoed in one sociological study of the harm caused by a new prison in a small rural community through population increase, stigmatisation, and low wage competition from prison-based businesses<sup>153</sup>. Negative impacts are not just economic. Blakenship and Yanarella found that ***“Prisons also have unsettling social consequences for the communities”***<sup>154</sup>. Genter et al suggested these may include crime and housing shortages<sup>155</sup>. Hooks et al. concluded ***“prisons do not solve the problems of rural economic areas but do create new ones.”***<sup>156</sup>

The breadth and rigour of these findings suggests a number of useful pathways through which to evaluate the potential impact of a rural prison in the UK.

### 3.2 UK evidence

**Whilst the USA evidence is notably stark, systematic UK evidence is notably absent.**

Despite a plethora of prison inspection reports suggesting that rural locations present unique logistical difficulties<sup>157</sup>, the MOJ has failed to even try to understand the relationship between prison and place. The only publicly available example is a 2013 study by Peter Brett Associates (PBA) for the MOJ which examined three urban prisons<sup>158</sup>. This report has since been used frequently by MOJ consultants<sup>159,160,161</sup>, as it established a framework to analyse direct and indirect economic impacts. However, it contains a number of problematic assumptions and omissions that they do not seem to have recognised.

**3.2.1 The importance of place:** As PBA presumed that new mega prisons ***“would be located close to the localities which have the largest supply and demand gaps and would therefore expect to be located in urban areas”***<sup>162</sup>, the report completely omitted analysis of rural sites, associated hard and soft infrastructure bottlenecks, labour markets or social and environmental externalities.

Despite its lack of geographical breadth, this report *did* acknowledge that the **benefits of a prison are contingent upon local economic networks** including the capacity of local businesses to fulfil strict contracting conditions. Evidence from the UK<sup>163</sup> and the USA<sup>164</sup> suggests that centralised sourcing of prison supplies means that local economic agents are often entirely by-passed. The impact of indirect employment generated through spending by prison employees and visitors is also unclear, as most household expenditure is in supermarkets, on one-off large purchases and clothing – items not usually bought in a rural setting. Although family visitors may also spend in the local area, PBA found that only 3 local jobs per 1,000 inmates would be created, even in an urban area<sup>165</sup>.

*3.2.2 Problem misdiagnosis and unintended consequences:* One key US finding was that **rural prisons not only fail to fix existing rural issues but also create new ones**<sup>166</sup>.

**A Prison is not a catalyst for a high skilled high wage local economy.** According to the MOJ's own research, most prison jobs are low skilled. However, the implications of this for the local economy are not explored either by the 2013 PBA report or subsequent MOJ analysis<sup>xxii</sup>.

The PBA framework also made no allowance for social or environmental impacts or any attempt to match impacts with local sustainable development needs. It also ignored the possibility of negative linkages. US evidence suggests that a prison may harm local businesses indirectly (through crime and tourism) or directly (through competition using prison labour). Local businesses may be hollowed out, crowded out, or both<sup>167</sup>.

*3.2.3 Forecasting employment projections is liable to error:* The MOJ's 2013 report used a ratio of 0.59 to estimate that a total of 587 jobs per 1,000 inmates<sup>168</sup>. This was a crude average across several prison categories. This is far higher than the current lower security large Category C prisons, such as Berwyn which has a 0.35 ratio or nearly 3 prisoners per staff member<sup>169</sup>. This would equate to a much lower number of 360 jobs per 1,000 inmates.

*3.2.4 Rural labour markets:* PBA's framework estimated that a new prison would generate only 5 local construction jobs per 1,000 prisoners<sup>170</sup>. It is unclear to what extent subsequent MOJ analysis has used the same framework or how they have allowed for the centralisation of manufacturing offsite to reduce costs. The extent to which construction and operating jobs are filled by local residents depends upon the self-containment rate<sup>xxiii</sup> and how we define local. 'Local' is not defined in the PBA report but varies between 25 and 50 miles in various MOJ publications. The number of new jobs may also be affected by internal transfers or use of franchisees<sup>171</sup>. Using data from only 3 urban prisons PBA used a containment rate of 54 percent but USA evidence suggests this can be as low as 20 percent depending upon transport accessibility, labour supply and the quality of jobs offered. **The fact that rural parish and district councils with existing prisons have recently objected to their expansion**<sup>172</sup> **is powerful testament to the absence of tangible truly local economic gains.** One council noted that just 7 parish residents were employed at the prison<sup>173</sup>.

According to MOJ research, the prison service does not tend to recruit unemployed or older workers who may have withdrawn from the labour force. It competes in the labour market for relatively younger low skilled recruits<sup>174,175</sup>. With jobs vacancies at record highs, local labour market competition is a major issue for all employers<sup>176</sup>. Persistent turnover problems indicate that higher salaries alone are insufficient to attract or retain prison staff<sup>177</sup>. Failure to acknowledge these labour market bottlenecks flies in the face of the MOJ's own experience and seems at odds with key tenets of the UK Government's 2021 White Paper<sup>178</sup>.

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<sup>xxii</sup> See Section 4

<sup>xxiii</sup> The extent to which employees are recruited from within the local area, however local may be defined. PBA presumed 54 percent based on 3 urban prisons but did not define what local meant or this definition may vary by place.



## 4.0 Evaluation

This section uses the diagnostic frameworks and impact pathways discussed in Sections 2 and 3 to evaluate whether the construction of two Mega prisons in Wethersfield is likely to be in the local interest. For clarity, this evaluation is broken down into its economic, environmental, and social components.

It is noteworthy that the starkness of local rural economic and geographic limitations at Wethersfield are already well known.

1. This is explicitly acknowledged in the DIO's draft Masterplan for the Wethersfield site in which the authors candidly admit that in terms of the prison - ***"This primary use for the Site would not be connected to the existing rural economy."*** They also concede that *"the Site is located outside of defined settlement boundaries which means development is constrained by countryside protection policies"* and that any form of development was sustainable only if *"supported by infrastructure and facilities"*<sup>179</sup>.
2. Since the publication of DIO's report, Homes England has withdrawn a proposal for extensive housing development **on the basis of the site's remoteness, poor accessibility and a lack of infrastructure.**
3. ECC's extensive consultation response to the MOJ's consultation paper also highlights regional government concerns about **social and hard infrastructure**, including the *"remoteness from a strategic road network"*, *"the large distances from potential visitors"*, *"poor connectivity"* and the burden on rural social and health care<sup>180</sup>. This is particularly concerning in rural areas with an ageing population<sup>181</sup>.
4. There seems to be **little evidence to suggest that HMP Highpoint has led to any positive economic spill-overs in neighbouring rural northern Braintree**<sup>182</sup>, so it is unclear why any would arise in rural Wethersfield.

Unfortunately, these realities have been largely ignored by the MOJ hitherto. Alongside the likelihood of ground contamination and unexploded ordnance, the rather obvious absence of a local economic ecosystem, labour force or resilient road network were conspicuously omitted from the MOJ's consultation paper.

In its place was a weakly disguised attempt to imply that economic benefits at Wethersfield could replicate those apparently evident at Glen Parva<sup>183</sup>, despite the rather obvious fact that the latter is a semi-urban site with an existing prison and close to a network of A roads. The MOJ's myopic approach repeats the historical strategic error of focus on the internal aspects of a prison, at the expense of the external<sup>184</sup>.



## 4.1 Economic aspects

**The potential for a prison to provide jobs has a particular salience with its proponents but this of no benefit if they are the wrong type of jobs or in the wrong place.** The MOJ has forecast new jobs at Wethersfield but does not appear to have conducted *any* due diligence on the willingness and capacity of the local labour market to fill these vacancies. Moreover, **these prospective jobs are low skilled come with substantial caveats in terms of quality, health, and the environment, especially for the immediate local community.** In fact, the DIO's investigations conclude that the prison would yield no local benefits at all - *"This primary use for the site **would not be connected to the existing rural economy**"*<sup>xxiv</sup>.

**4.1.1 Construction jobs:** The contractors for prison construction projects are pre-selected from a small group of national firms who minimise production costs by manufacturing offsite and employing their own specialist trades<sup>185</sup>. Allowing for this, supply chain multipliers and displacement of existing jobs, MOJ consultants estimated only 15 'local' temporary jobs for just 18 months at HMP Glen Parva<sup>186</sup> and just 3 at Gartree<sup>187</sup>. The MOJ's Wethersfield consultation paper includes a confusing infographic that indicates that more jobs were generated at Glen Parva but over two-thirds of these were for those living over 25 miles away and one-fifth for ex-prisoners<sup>188</sup>. The number of apprenticeships is inconsistently recorded but the numbers also appear to be relatively low or below target<sup>189,190</sup>. Extrapolation of the MOJ's 2013 modelling<sup>191</sup> implies that two prisons of 3,430 inmates would generate only 18 local construction jobs. Moreover, this is at the *district*, not the town or village level and makes no allowance for displacement effects. **Given these relatively small benefits and staff and skill shortfalls currently faced by national and local construction firms<sup>192</sup>, the prospects of temporary construction jobs should be given very little weight in a planning decision. They do not address the problem that does exist but do exacerbate one that does.**

**4.1.2 Operating job forecasting assumptions:** The credibility of these forecasts is a function of the robustness of the assumptions which is obviously an unknown. The number of direct local jobs attributable to the prison in its operating phase is contingent upon an array of assumptions, including precise location, staff prison ratios, the operating entity, prison category, the quality of jobs offered and skill availability in the local labour market.

The PBA framework used a staff to prisoner ratio of 0.59<sup>193</sup>. This exaggerates staff projections as it includes data from a Category A prison and does not allow for economies of scale or private management. If we use the 0.45 ratio used by the MOJ in its planning documentation for the new proposed Category B prison at Gartree<sup>194</sup> (778 staff for 1,715 prisoners) and the current 0.35 at Berwyn<sup>xxv</sup> as the Category C benchmark<sup>195</sup>, the estimated prison staff would be 597 in the Category C and 778 in the Category B giving a grand total of **1,375**.

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<sup>xxiv</sup> DIO is the department of the Ministry of Defence responsible for the disposal of the Wethersfield Airbase site. A precis of this document can be found in Appendix I

<sup>xxv</sup> HMP Highpoint is broadly similar (0.37).

These estimates may be reduced further if a private operator extracts further economies of scale or if some vacancies are filled by internal transfers or external franchisees. There is also a significant margin for forecasting error. For example, the MOJ's Gartree consultation and appeal lower<sup>196</sup> and upper<sup>197</sup> estimates differ by as much as 30 percent.

The point here is not to try to centre on one particular number or another but to illustrate the pitfalls in relying on MOJ estimates. Given the sensitivity of forecasts to such a wide range of known and unknown variables and the absence of a robust analytical framework, these forecasts should be given relatively little weight in any planning decision.

**4.1.3 Jobs for whom?** This caution is reinforced by the MOJ's apparent inability to specify how many of these jobs may benefit **local people** at the parish or district level. It is telling that a principal reason why Chorley District Council rejected the HMP Garth prison extension application was the absence of local economic benefits from an existing prison. Even if the MOJ's forecasts were accepted, the Planning Inspector deemed them insufficient to outweigh other negative factors<sup>198</sup>.

To pursue their jobs narrative, the sole piece of research MOJ prison planning applications rely on is the 2013 PBA paper which does not define 'local' at all, so its conclusions are unhelpful, particularly in a rural setting. In the apparent absence of comprehensive data for catchment areas for existing prisons<sup>xxvi</sup>, MOJ consultants guesstimate the 'containment' rate for new prisons which is defined as the percentage of staff recruited from within the 'local' area.

In recent MOJ appeal documentation, local catchment areas are defined up to 50 miles away but these are not always used consistently. The justification for such enormous catchment areas is based on the *presumption* that prison staff commuting patterns will mirror those of generic travel to work statistics<sup>199</sup> for all jobs, irrespective of pay, skill, location, or conditions that are based on the 2011 Census. This fundamental analytical flaw is one of the key criticisms levied by Harborough District Council against the HMP Gartree proposal<sup>200</sup>.

ONS evidence shows that the scale and shape of Travel to Work Areas (TTWAs)<sup>xxvii</sup> vary by age, qualification, transport mode and employment type<sup>201</sup>. The TTWA in Braintree for all commuters is bordered by Brentwood, Southminster, Coggeshall, Sudbury, Thaxted and Chipping Ongar which are a maximum straight line distance of 25 miles from Braintree (Figure 11a). However, Figure 11b shows that those with higher skills, travel further but commuting by those with lower skills is far more limited.

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<sup>xxvi</sup> Information on Gartree was explicitly requested in an FOI but the MOJ replied they did not have this information. Despite this Pegasus noted in their evidence to the Gartree appeal, that they obtained their data on local prison jobs directly from the MOJ.

<sup>xxvii</sup> Derived from 228 travel to work areas (TTWAs) in the UK in which approximately 75% of the workforce are also residents.

We can make no presumption as to the willingness or ability of this latter group to join the prison service. They may, for example, prefer self-employment or working from home, have no suitable transport or may not relish a one hour long commute along country roads.

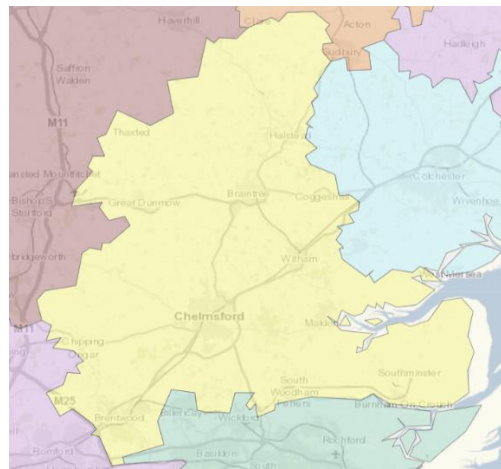


Figure 11a: Travel to Work areas all occupations, transport modes and qualification levels<sup>202</sup>

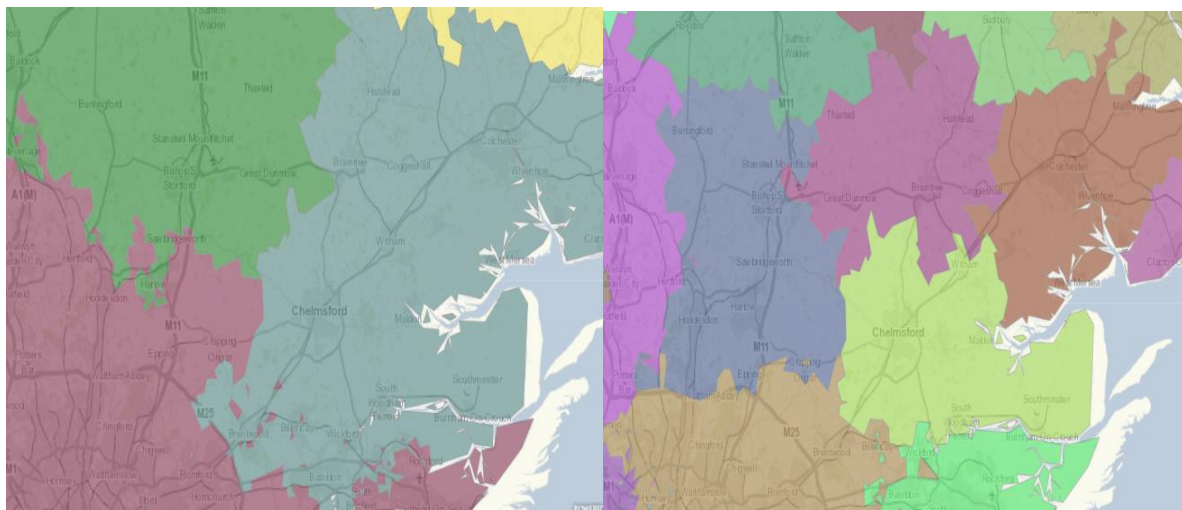


Figure 11b: Travel to Work areas for High skilled (left hand panel) and Low skilled (right hand panel). Colours represent distinct TTWAs<sup>203</sup>

A further analytical problem is that local job estimates are very sensitive to containment area assumptions. The MOJ's Gartree appeal submission<sup>204</sup> suggests a containment rate of 40 percent but US research suggests that rural containment can be as low as 20. These assumptions generate 'local' job estimates (within **40 miles**) of **275** and **550** respectively. According to MOJ metrics, each 'local' commuter is travelling **up to 80 miles per day**! The remainder are travelling even further. As Figure 12 (above) illustrates, a 40-mile radius equates to a vast catchment area including Ipswich, Norfolk, Kent, Cambridge, North London and St Albans of approximately 5,000 square miles. **This bears no relation to current TTWAs for lower skilled workers and is so wide as to render the idea of 'local' entirely meaningless.**

The MOJ has provided no comparable data on containment rates at existing rural prisons. **The scope for error in forecasting ‘local’ employment in Wethersfield is therefore significant. This has major implications not only for the scale of local economic benefits but negative externalities in terms of traffic and pollution** (see Section 4.2).

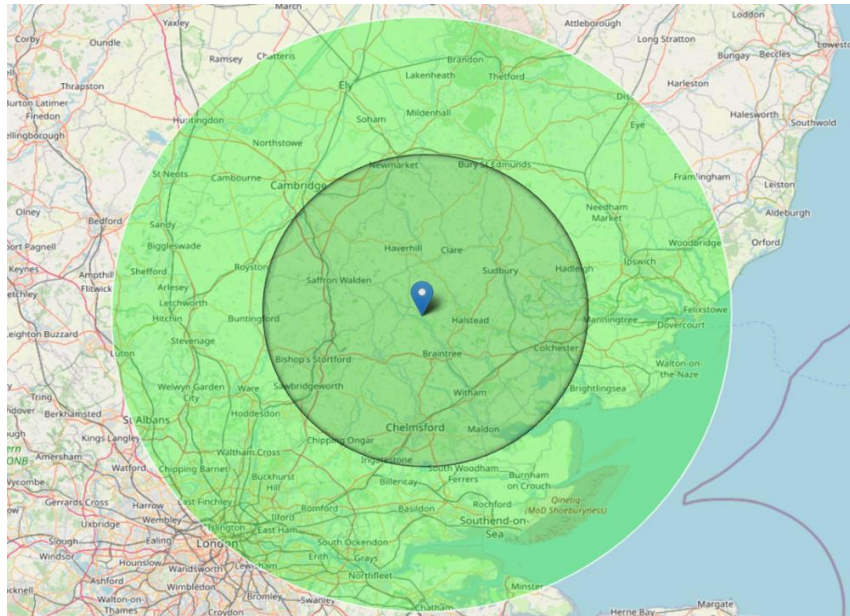


Figure 12: MOJ economic catchment areas: Inner circle is approx. 25-mile radius and outer circle 40 miles<sup>205</sup>

**4.1.4 Weak local multipliers: The scope for local indirect jobs is limited by the absence of a local economic ecosystem.** The MOJ estimates that 4 jobs per 100 prisoners may arise through prison, staff and visitor spending at an urban prison<sup>206</sup>. However, the PBA framework suggests a rural prison would accrue only about a third of these benefits. Coupled with DIO’s admission that a rural prison would be disconnected from the local economy<sup>207</sup>, it is fair to say that indirect benefits may be extremely limited<sup>xxviii</sup>.

**4.1.5 The need for skills and productivity:** Through the NFFP and the CCA, policy makers are obliged to acknowledge that the **quality of jobs** matters, not just the quantity. According to the Howard League for Penal Reform, prison jobs entail long unsocial hours under stressful, dangerous work conditions and employees suffer from relatively low pay and morale<sup>208</sup>.

The MOJ’s PBA 2013 paper<sup>209</sup> showed that 8 out of 10 prison jobs are low skilled and initial salaries relatively low. Prison officer jobs are classified as Standard Occupational Classification (SOC) code 5. The MOJ’s Gartree appeal documentation stated that only 10 percent of prison jobs required an NVQ4 qualification<sup>210</sup>. **This means that as few as 27 jobs could be provided for ‘local’ highly skilled workers and just 12 if only the Category C prison was built.** If the highly skilled jobs were reserved for existing MOJ staff (not an unreasonable assumption given that a new prison cannot employ all new staff), then this number would be even lower.

<sup>xxviii</sup> The MOJ HMP Gartree appeal consultant’s dismissal of the failure of the PBA report to address rural dynamics, is symptomatic of a complete failure to understand the issue.

**There is therefore considerable doubt as to whether the types of jobs available at a prison address local needs** – either at the parish level (which are not economically deprived) or the district level, where **deprivation is manifest in terms of income and skills, not unemployment**. These are not the type of jobs likely to encourage older parish residents to re-enter the workforce or improve the productivity of younger workers in the district. This is not simply a ‘nuance’ but a fundamental regional economic truth. District employment is already **skewed to lower paid occupations** and many workers already experience fuel poverty, especially in coastal towns or urban areas, where car ownership is low and community cohesion suffers from reliance on jobs outside people’s neighbourhoods<sup>211</sup>.

Even if prison entry pay levels which start well below the Braintree average of £37,575<sup>212,213,214,215</sup>, attract recruits, it is difficult to see how remote low skilled jobs help address deficits in income, skills, or community cohesion or how they dovetail with the government’s focus on high skilled economic growth. **This would simply be a reallocation of low paid labour resources, not upgrading of skills or improvement of livelihoods.**

**The fact that the district needs better paid more highly skilled jobs cannot be ignored.** To simply pay lip service to the importance of job quality (not quantity) fails to appreciate that opportunities for people to improve their productivity and livelihoods are central to the United Nations conventions of Sustainable development <sup>216</sup>. **This point is fundamental to sustainable development and levelling up.** Failure to recognise this, risks exacerbating existing socio-economic issues in direct contravention of Planning and Policy mandates.

*4.1.6 Rural labour market bottlenecks:* The type of jobs on offer (and where they are located) both have an important bearing upon the likelihood of recruitment problems.

The working population of all four LSOAs adjacent to the Wethersfield site is only 3,328. Of these 25 percent are self-employed, 50 percent have skills of NVQ3 or higher and only 30 percent are under 40 years old<sup>217,218</sup>. It is therefore **highly improbable that local villages will be a source for new recruits**. Similar age and skill patterns are found throughout rural Braintree<sup>xxix</sup>. As ECC has already highlighted in its observations to the MOJ, most staff would live in market towns as local village housing is insufficient or too expensive<sup>219</sup>. **What this means is that any ‘local’ jobs would be filled by mobile applicants at the district or regional level, not by residents in the vicinity of the prison or those without transport access. It also means the MOJ is competing in a tight regional labour market.**

Entry pay for Band 2 Operational support (OSG) starts at £19,355 and a Band 3 Prison officer earns £21,152 – £25,382 depending on market supplements and hours. These salaries may be lower for private operators (and without the same pension benefits) <sup>220</sup>. Whilst the MOJ claims that salaries and skills may improve through training over time<sup>221</sup>, this pre-supposes that staff stay long enough. According to the HM Prison and Probation Service (HMPPS) statistics, March

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<sup>xxix</sup> Given widespread ethnic homogeneity in the district, it will also be difficult for HMPPS to reach staff diversity targets.



2021-22 saw the resignation rates of 18.3% for band 2 OSG staff; 14.5% for band 3-5 prison officers<sup>222</sup> and rates above 30 percent at some prisons<sup>223</sup>. 25 percent of those who resigned had been in the job less than 12 months<sup>224</sup>. HMPPS is struggling to replace them in the face of ***“acute recruitment and retention issues affecting London and the South East which may be driven by competitive markets or the rural locations of some prisons”***<sup>225</sup>.

The irony is this is nothing new. Although exacerbated by Brexit and Covid, structural staffing issues (especially in rural sites) have been repeatedly highlighted by the House of Commons Justice Committee<sup>226</sup> and numerous HMIP Inspectorate reports<sup>227,228</sup>. Recruitment problems have delayed the full utilisation of new prisons in more accessible locations (such as HMP Berwyn)<sup>229</sup>.

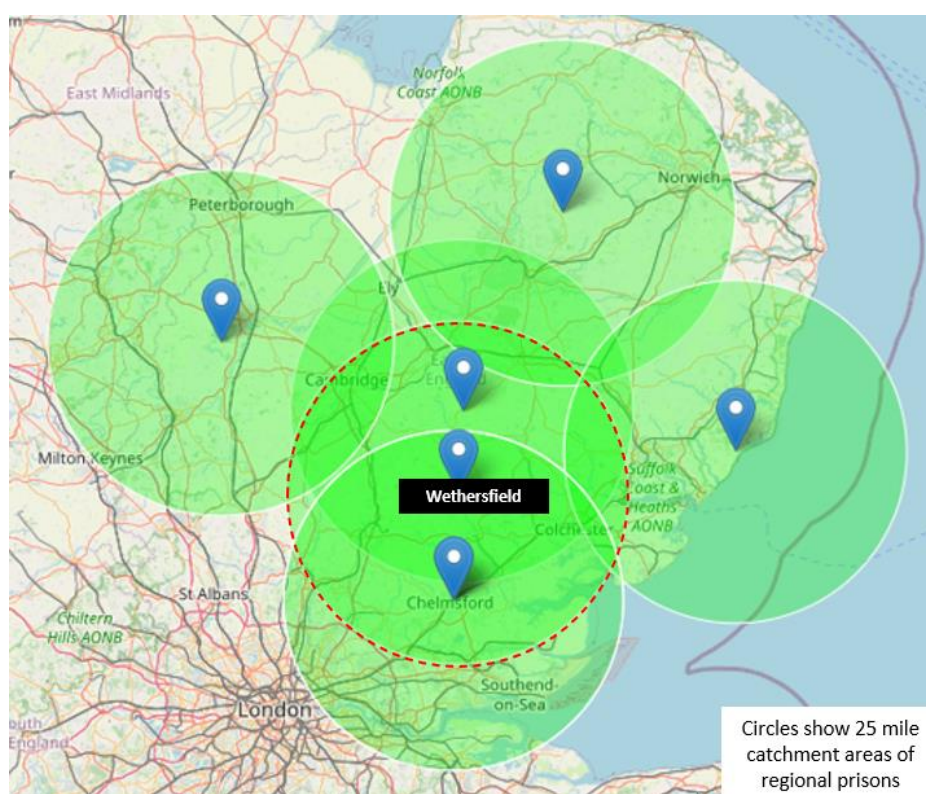


Figure 13: Regional competition for prison staff<sup>230</sup>

Moreover, potential recruits already have a choice of alternative prison sites. As Figure 13 shows, Wethersfield’s 25-mile recruitment catchment area overlaps that of several other prisons. If we used a 40-mile radius, this would be even more apparent. **Competing prisons are already struggling to recruit.** At nearby Highpoint, for example, nearly 1 in 5 of non-uniform posts remain vacant<sup>231</sup>. The MOJ does not dispute this regional competition. Nor can it deny that its efforts to address staffing issues are failing, especially in rural areas<sup>232</sup>. Rather bizarrely, the MOJ seems to presume these issues will not be exacerbated in Wethersfield, where house prices are high, labour in short supply, accessibility poor and fuel poverty high.

**The MOJ fails to recognise that labour markets have a spatial dimension. Local areas are therefore unlikely to enjoy economic benefits, yet face significant negative environmental and social externalities.**

## 4.2 Environmental aspects

This section focuses on the potential for direct and indirect deleterious effects of prison traffic from carbon emissions, traffic induced stress and accidents. Wider implications in terms of the natural environment and a deeper analysis of health will be examined in subsequent work<sup>233,234</sup>.

**4.2.1 Carbon emissions** **The construction phase could jeopardise government climate change targets and harm locals' health.** Potential hazards include noise and air pollution, infrastructure and housing damage and consequent health impacts. At HMP Five Wells, 15,183 concrete panels were constructed offsite and transported to site<sup>235</sup>. In the first six months of 2021, there were nearly 9,000 heavy goods vehicle (HGV) deliveries. That is 70 per day on top of over 500 car & van trips<sup>236</sup>. Given the scale of construction at Wethersfield, volumes would be far higher and could see years of squeezing down narrow B-roads, past listed buildings, schools, cyclists, horse riders and walkers<sup>237</sup>. HGVs account for 5% of vehicle miles but 17% of UK greenhouse gas (GHG) emissions and 21% of Nitrous Oxide emissions from road transport. Rural councils already have issues with rural pollution<sup>238</sup>. Braintree has the county's highest level of GHGs on minor roads and Essex is the worst performing regional county<sup>239</sup>.

**4.2.2 Operating traffic** **Traffic volumes during the operating phase will swamp local roads and villages.** Using the MOJ's traffic forecasting model<sup>240</sup>, we estimated that two prisons will lead to nearly *3,000 more daily road trips near the site - more than double current volumes*. ECC have also raised concerns on a tripling of peak flows which may coincide with the opening and closing of several schools en route<sup>241</sup>. **Every route to the airbase has permanent pinch points**, ancient houses, old walls built right up to the road and a number of old single lane bridges. This is in addition to further impacts on roads further afield, such as the A120. Half of all visitors will travel from outside the Braintree district. **No credible mitigation proposals in terms of road widening or public transport can address this reality.** Despite MOJ claims to the contrary, ECC (amongst others)<sup>242</sup> notes how the provision of 1,000 car parking spaces is tacit admission of a limited role for sustainable public transport.

**4.2.3 Accidents** **Rural roads are far more dangerous than trunk routes. Road traffic accidents are already high in villages near Wethersfield.** Essex Police's response to the MOJ consultation in 2021 forecast that this increased traffic would inevitably lead to more accidents on a road network that is completely unsuitable for such traffic volumes, especially HGVs<sup>243</sup>. According to Department of Transport data, Essex already accounts for nearly one quarter of accidents in the Eastern region and concerns about roads already feature prominently in resident surveys<sup>244</sup>. Nearly two-thirds of county accidents are on minor rural roads, which tend to be more serious than on urban roads. Braintree district's accident rates are higher than Uttlesford, Harlow, Maldon, and Rochford<sup>245</sup>. **Accident rates in parishes close to the prison site are already higher than the district average**<sup>246</sup>. The main access road (B1053) from Braintree to the prison site is cited in the Essex Police's response to the MOJ's consultation as one that *already* features a high level of road traffic injuries<sup>247</sup>.

## 4.3 Social aspects

**4.3.1 Crime** features less often as a *current* social concern in Braintree's rural areas but it may well be a *future* one.

In their response to the MOJ consultation in 2021, Essex Police highlighted the likelihood that a prison complex at Wethersfield would attract **Organised Crime Groups** (OSGs) and lead to proliferation of drug-related violent crime in and around the prison<sup>248</sup>. This may exacerbate the spread of drug trafficking through '**County lines**' in Essex's coastal and rural towns and villages<sup>249</sup>. The potentially devastating effects this can have upon our communities have been highlighted by Roger Hirst (Police, Fire and Crime Commissioner for Essex) and Councillor Louise McKinlay (Deputy Leader and Cabinet Member for Community, Equality, Partnerships and Performance, ECC)<sup>250</sup>.

These concerns are reinforced by evidence that staff recruitment difficulties have led to increased crime *inside* prisons as well. As the Prison Reform Trust has noted, *"We know what happens when there are too many prisoners and too few prison staff — more violence, self-harm and suicide, and less rehabilitation"*<sup>251</sup>. Data obtained through a Freedom of Information request reveals that Essex police were called to HMP Chelmsford 912 times from 2019 to 2021 (virtually every day)<sup>252</sup> to deal with "serious assaults, intimidation, internal corruption and drug supply." This is in addition to the likelihood of increased crime in settlements near the prisons, including drugs and property offences. The prison complex at Wethersfield would therefore create additional burdens on already stretched resources in terms of site risk management, forensic investigation, and emergency response, especially as the site is so remote and the road network so poor<sup>253</sup>.

Evidence from elsewhere in the UK suggests that Police fears of higher crime outside prisons are well founded. The absence of longitudinal local crime statistics does not allow for a before and after analysis of a new prison but we can compare cross-sectional data. Figures 14 and 15 show that crime rates in the neighbourhoods of existing rural prisons are higher than Wethersfield and their respective county averages. The crime rate per 1,000 residents in the area immediately adjacent to HMP Highpoint is four times than Finchingfield. At Highpoint there have also been a number of instances of drugs being thrown into the prison<sup>254</sup> and at Wayland in Norfolk a case of gangland intimidation of prison guards<sup>255</sup>.

All neighbourhoods adjacent to the Wethersfield site currently enjoy crime rates far below the Essex average. **In all 5 rural prison neighbourhoods cited in Figure 14, local crime rates are far in excess of their respective county averages.** As the deprivation rankings of these 5 prisons rank from 2 to 6, we cannot presume higher crime rates are due to deprivation. Increased crime and fear of crime will have an obvious detrimental effect on the social well-being of residents in the immediate vicinity of the Wethersfield prison, as well as those in surrounding rural towns and villages. Further analysis of crime is provided in Section 4.4.



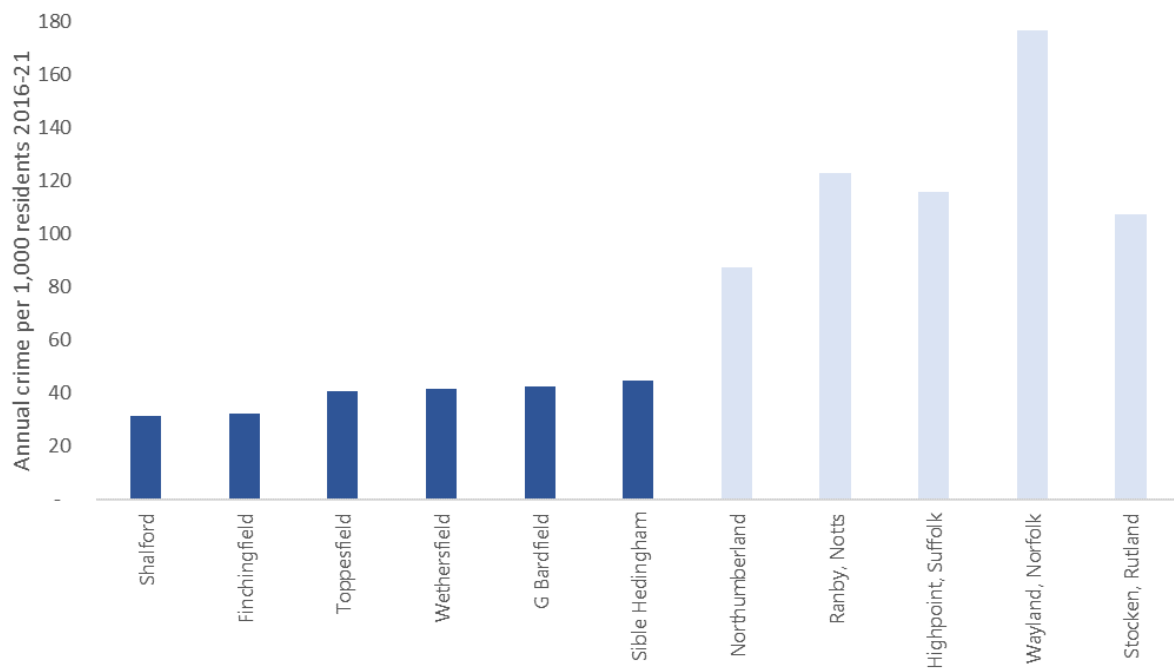


Figure 14: Crime rates per 1,000 residents near proposed Wethersfield prison site and 5 existing rural prisons. Crime rates refer to outside not inside the prison <sup>256</sup>

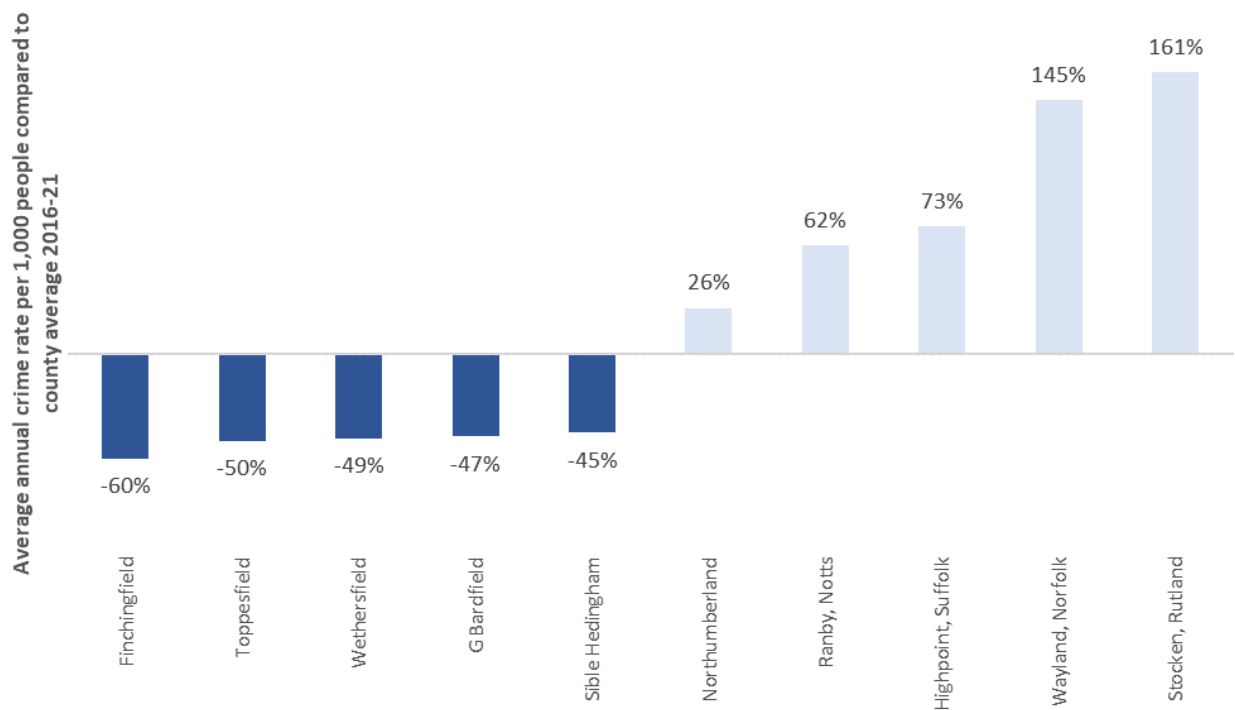


Figure 15: Crime rates versus county average near proposed Wethersfield prison site and 5 existing rural prisons. Crime rates refer to outside not inside the prison <sup>257</sup>

**4.3.2 Housing** Available data allows for some analysis of prices but not supply. Although the effect of a development on house prices does not usually have a significant bearing upon planning decisions, the potential impact of the Wethersfield proposal is exceptional as access to housing and services, are already key issues in rural Braintree.

In its consultation with Wethersfield residents, the MOJ explicitly stated that it was unaware of any evidence that new prisons affect house prices over time. This was based on an outdated Tym and Partners study<sup>258</sup> which used pre-2006 data and conversations with 4 estate agents at just 4 sites<sup>259</sup>. There has been no attempt to update this analysis, despite evidence from the USA of house shortages in some areas or price declines in others<sup>260</sup>. **This is symptomatic of wider failings in the MOJ's framework that simply tries to cut and paste results from one site to another and put forward outdated inappropriate 'evidence' as proof of fact.**

To isolate location specific factors, we analysed ONS MSOA level house price history data from 2012-22 for 108 prison locations and compared these to all other MSOAs in the same district<sup>261,262</sup>. Across 3,062 MSOAs, we identified a statistically significant difference between the observed and expected distributions of price changes<sup>xxx</sup>. Moreover, this relationship had a significant downside skew. **House price increases in MSOAs with a prison were lower than their surrounding district on 62 percent of occasions.** In 45 percent of prison locations, price increases were in the lowest 40 percent of all MSOAs in their respective district (Figure 16). In terms of house price increases, **an MSOA with a prison was 3.5 times more likely to be in the worst performing 20 percent than the best performing 20 percent.**

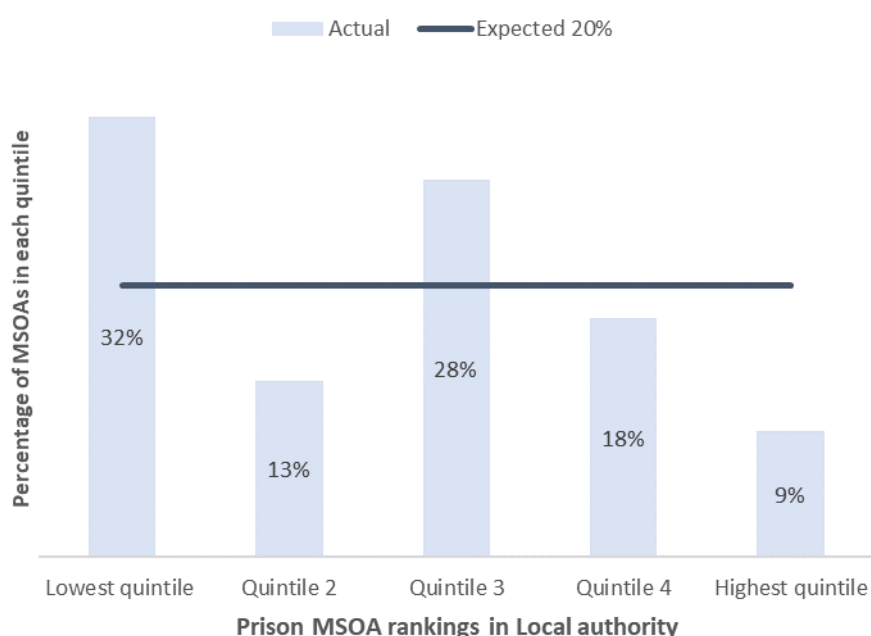


Figure 16: Distribution of prison sites by house price changes 2012-22<sup>263</sup>

<sup>xxx</sup> See Appendix V

As price changes showed no relationship to starting price *level*, this does not imply that MSOAs with a prison are more affordable for prison staff, simply that local residents may experience a lower boost to household wealth and sense of well-being.

Although this exercise does not distinguish by house type or establish causation, it is noteworthy that these affects are at the MSOA level and thereby have a benchmark. At the very least this should cast significant doubt on unsubstantiated predictions of unfettered economic benefits of a prison with no impact on housing. The claim is simply not credible.

**4.3.3 Health and education** Academic research shows that health outcomes are influenced by our built, natural and social environments<sup>264,265</sup>. Local government research suggests that access to open spaces help in addressing obesity, a key problem in the Braintree district<sup>266</sup>.

**Through work stress, a reduction of green spaces, the increase in traffic volumes and accidents and negative impacts on community cohesion, the construction of a massive prison complex at Wethersfield is likely to have a deleterious effect on district health.**

One of the key concerns raised in ECC's response to the MOJ's consultation paper<sup>267</sup> is the potential burden on less accessible specialist **healthcare** services, particularly in view of ageing populations (inside and outside prisons) and the high prevalence of prison drug use.

These concerns mirror those highlighted in a number of Her Majesty's Inspectorate of Prisons (HMIP) reports which detail the problems of healthcare provision inside rural prisons<sup>268</sup>. For example, at HMP Northumberland in 2019 prison officers were required to escort prisoners on overnight hospital stays 108 times<sup>269,270</sup>. Data obtained through a Freedom of Information request reveals that an ambulance was called to HMP Chelmsford 170 times a year on average during the period 2019-2021 and 136 times to HMP Highpoint<sup>271</sup>.

**According to the Essex Residents' survey, healthcare concerns rank only behind traffic and preservation of open spaces as key priorities for those living in rural Braintree, in part due to ageing demographic profiles<sup>272</sup>. It does not seem entirely logical to plant a new small-town in the form of a prison in an inaccessible area with an ageing population and where general and specialist health service access is already problematic<sup>273</sup>.**

The influx of such a large number of workers may also increase demand on schools and childcare. In its response to MOJ's consultation, ECC has already highlighted the shortage of local pre-school facilities in particular and suggested that the high cost of local houses will force staff to engage in lengthy commutes from local market towns<sup>274</sup>. 16 of LSOAs in Braintree's market towns are already in the most deprived national quintile for child skills<sup>275</sup>. This not only **exacerbates traffic issues in the immediate area of the prison site but creates an additional burden upon schools and child care where staff can afford to live**. This lack of policy foresight cannot be considered to be sustainable development in the interests of local people.

## 4.4 Levelling up:

To identify any impact on levelling up (or down), we analysed deprivation data for 100 LSOAs in England and Wales that have a prison to see if these areas were any different to those without one<sup>276</sup>.

We first looked at all five deprivation quintiles. If there was no relationship between having a prison or not, we would expect to see 20 prisons in each quintile across each of the 7 deprivation domains and for the overall index. Any deviation from a normal distribution may be suggestive of some kind of relationship. Using a Goodness of fit Chi-squared test, we found that a prison did appear to affect the distribution in all dimensions, *except employment*.

Whilst the statistical significance of each test can be seen in Appendix VI, we can try to visually represent the statistical patterns in Figure 17. This shows the difference between actual and expected values in each quintile. Overall, Figure 17 shows that the housing and health domains seem to be most affected by the presence of a prison and employment and income the least.



Figure 17: Deviation from expected distribution patterns by deprivation domain

What is particularly interesting is the direction of these deviations. Red denotes deviation from expected observations in the most deprived 20 percent, orange in the next 20 percent, grey in the middle quintile and the two shades of green in the upper two (least deprived) quintiles. **For crime, housing and health, the graph shows there are fewer observations in the least deprived quintiles (green) and more in the most deprived (red and orange).**

As the deprivation methodology is most accurate at the more deprived end of the spectrum, we then focused on the most deprived 20 percent. If there was no relationship between having a prison or not, we would expect to see 20 prisons located in the 20% most deprived areas across each of the 7 deprivation domains and for the overall index. If we found more than 20, this would suggest that areas with a prison are more deprived and vice versa.

The results were significant. **Prison sites are more likely to be in the most deprived decile overall.** In terms of Income and Employment, there are slightly fewer prisons in the most deprived quintile than expected but virtually no effect on skills. So, we can say that **having a prison in your area may have a small chance of higher incomes or more jobs but little effect in terms of skills.** As Section 2 highlighted, this is the key metric in Braintree and Essex.

**The most noticeable patterns are seen in crime, health and housing. Here there is a significant increase in the likelihood of the immediate local area being in the worst 20 percent in the country if there is a prison in that LSOA.**

If we analyse the data at the decile level, we find that **prison sites are three times more likely to be in the most deprived 10 percent in terms of health and housing and nearly twice as likely in terms of crime.**

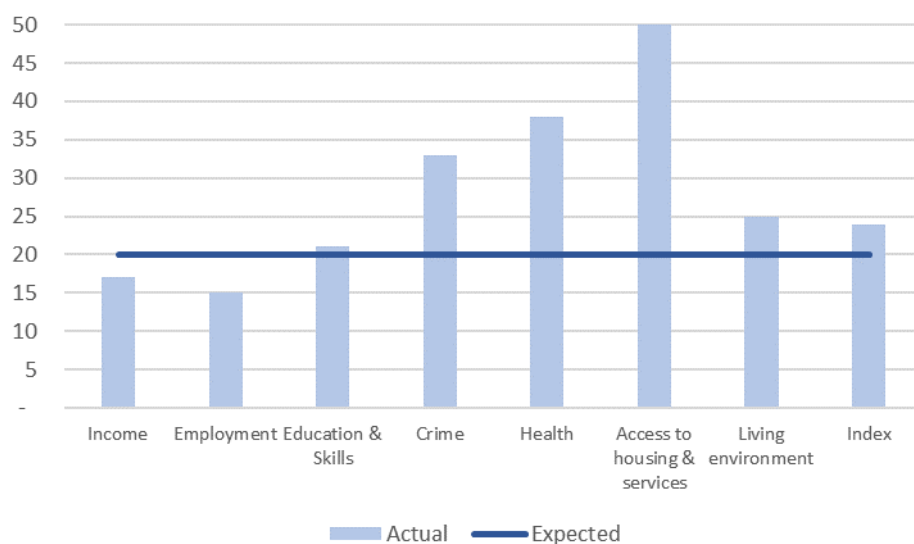


Figure 18: Number of prisons in worst 20 percent of areas

This does not mean we can definitely say that a prison causes any differences from expected values but the strength of these associations suggests a link. They are also consistent with a holistic understanding of local sustainable development problems and evidence from the USA.

**The UK Government's own deprivation data therefore suggests that it is probable that a rural prison would exacerbate old problems for those most in need** (for example, those in Halstead or Tendring). **Moreover, it is highly probable that a prison would create new problems** (for example, in Three Fields Ward). With hundreds of millions of taxpayers' funds at stake and thousands of lives and swathes of countryside likely to be affected, it is difficult to conclude that taking such a risk can possibly be construed to be in the local interest. **Given these wide ranging concerns, to take the number of jobs promised by developers at face value is inadequate. Purported socio-economic benefits of a new prison should be given minimal weight in any planning decision.**

## Conclusion:

If the isolation of the Covid-19 pandemic has taught us little else, it is the importance of our natural surroundings and social relations to our happiness, mental health, and well-being<sup>277</sup>. It is therefore imperative that we adopt the holistic analytical framework upheld at the Glasgow Conference of the Parties (COP) summit in November, 2021<sup>278</sup>, that defines sustainable development as that which *“meets the needs of the present without compromising the ability of future generations to meet their own needs”*<sup>279</sup>.

Achieving this is the essence of the local and national planning system under the NPPF<sup>280</sup>; how we hold local and national governments accountable<sup>281</sup>; listen to our local communities<sup>282</sup>; and evaluate policies to ‘Build Back Better’<sup>283</sup> and ‘Level up’ a post-Brexit and post-Covid Britain at the national<sup>284</sup> and regional level<sup>285</sup>. Whilst it is reassuring to see ECC’s recognition of this and the need for *“immediate meaningful action to tackle climate change”*<sup>286</sup>, the challenge we collectively face is to site major developments to minimise travel and reframe the debate away from buzzwords like ‘mitigation’ and ‘offsets’ towards one that conceptualises social, economic, and environmental pillars of localised sustainable development as an indivisible whole, not fungible substitutes, particularly in under-developed remote rural settings<sup>287,288</sup>.

To be sustainable, equitable, credible, and effective, the criteria for selecting a prison’s location should extend beyond the expediency of land availability. Land cost is a tiny fraction of construction and ongoing costs and even less significant when negative social and environmental externalities are considered. Failure to incorporate these renders the review process and the prison unfit for purpose and society subject to substantial unnecessary costs.

The construction of a Mega prison at Wethersfield would not only fail to address the respective sustainable development problems of the local districts’ villages or its market towns but would also create irreversible damage to the immediate and wider area in terms of community cohesion and the natural environment. There is limited scope for the immediate locality of the Wethersfield prison to derive substantial economic benefits but villagers *would* be subject to significant negative externalities which will have a major detrimental effect on their health and well-being. There are also significant reasons to doubt whether the wider local area would benefit either. The proposal is not consistent with either district or regional economic or infrastructure development priorities; is in direct contravention of the principles of evidence-based policy and the spirit of community based democratic sustainable development; and is not even fit for the MOJ’s strategic purpose.

Shortcomings in the choice of prison location cannot be glossed over by trying to remarket a prison as a vehicle for local economic regeneration. This paper has demonstrated that there is a high degree of uncertainty in forecasts of economic benefits of the proposed Wethersfield prison and presented a large amount of evidence to the contrary. It is extremely problematic to deem such a development to be in the local interest. **Purported economic benefits should be given very limited weight in any planning decision and not deemed to outweigh other negative factors.**

## Appendix I: Precis of Defence Infrastructure Organisation's (DIO) Stage 1 Report on Wethersfield Airbase, June 2021,

### 1) Strategic vision

- a) The document is framed purely in terms of minimising legal liability under Crichel Down rules and maximising economic return. It makes no reference to the interests of the local community or natural environment and therefore can in no way be considered a vision amenable to sustainable development.
- b) The 'Plan' has two options. The first allows for a return to agricultural use and limited development of existing housing but the second considers a range of significant developments with the Ministry of Justice's (MOJ) prisons seen as a catalyst for planning approvals. These include 1,000 new houses for prison staff and a hotel for prison visitors. Clearly, it is not a question of prisons OR houses but prisons AND houses.
- c) Additional suggestions include a boarding School; a zoo (!); a golf course; a race track; a wind farm; a waste to energy plant; Film & TV studio; Data Centre; or a return to agricultural use.

### 2) Local economic benefits

- a) The report admits that employment is already balanced in the surrounding area and that development at the base would result in a massive influx of people.
- b) In terms of the prison, it candidly admits that *"This primary use for the Site would not be connected to the existing rural economy"*.

### 3) Protection of the Natural Environment

- a) The DIO believes the site is Previously Developed (ie Brownfield) Land but the buildings are concentrated in the south west corner of the site. If you watch the SWAP videos, you can clearly see that most of the site is just undeveloped green space.
- b) The report concedes that *"the Site is located outside of defined settlement boundaries which means development is constrained by countryside protection policies"* but tries to suggest how this could be circumvented by claiming that the land was of low agricultural value and that development was "supported by infrastructure and facilities".
- c) Although the report admits there is a designated wildlife site at the airbase, there is nothing in the report that addresses ecological concerns, including 74 species of bird, 271 species of plants and 401 species of invertebrates. There is even a suggestion of selling off the ancient woodland in Park Wood for commercial purposes!
- d) The appendices highlight the *"High risk of ground contamination, asbestos, munitions and Unexploded ordnance (UXO)"* but these are glossed over in the main document.

#### 4) Protection of Historical Heritage

- a) The report notes that Essex Historic Environment Record has found below ground evidence of a Roman road and a Medieval moated enclosure but protection of these is not mentioned.
- b) It is unclear that DIO shares our concerns for our natural heritage. The MOD has already demolished buildings of historic interest, (for example, the control tower) and the report provides estimates for demolishing large parts of the site including the first American Chapel to be built on a UASF base in the UK. There are important hangers which need to be saved and many other buildings which could be put to community use (such as the cinema and gymnasium). The DIO's decision to close the Wethersfield Airbase Museum on the grounds of power supply was clearly an expedient measure to avoid a potential planning problem whereby Braintree District Council (BDC)'s Local Plan would seek to protect such facilities.

#### 5) Inadequate Infrastructure

- a) The document admits that comparative projects *"typically offer far better access to the trunk road network and/or rail stations than is likely to be possible at Wethersfield, without substantial investment in the surrounding local road network"*.
- b) The report notes that Wethersfield is 37 km from the nearest trunk road; 30 km from the nearest motorway and 19km from the nearest primary road. Although these limitations are mentioned repeatedly throughout the document, realistic remedies are entirely absent and excluded from cost-benefit analysis.
- c) By encouraging further major development, however, the report outlines a clear strategy by which to make infrastructure investment viable such that further economic value can be extracted from the site. *"It is also considered that with localised improvements to the road infrastructure and upgrades to utility services, a further larger number of homes and business facilities could be delivered at Wethersfield"*.



## Appendix II: Index data specifications

### Multiple Deprivation Index

1. Income: Adults and children in families on Income Support; Jobseeker's Allowance; Employment and Support Allowance; Pension Credit; Working Tax and Child Credit; Universal Credit families; Asylum seekers.
2. Employment: Claimants of Jobseeker's Allowance; Employment and Support Allowance; Incapacity Benefit; Severe Disablement Allowance; Carer's Allowance; Universal Credit in the 'Searching for work' and 'No work requirements' conditionality groups
3. Education:
  - a. Young people sub-domain: Key Stage 2 and 4 attainments; Secondary school absence; Post 16 education; those under 21 not in higher education
  - b. Adult sub-domain: proportion with no/low qualifications & who cannot speak English well.
4. Health: Years of potential life lost due to premature death; illness and disability; morbidity; mood and anxiety disorders
5. Crime: Violent crimes; burglary; theft; criminal damage
6. Environment:
  - a. Geographical Barriers sub-domain: distance to a post office; primary school; supermarket; GP surgery / Wider Barriers sub-domain: Household overcrowding; Homelessness; Housing affordability
  - b. Indoors sub-domain: no heating; poor conditions / Outdoors sub-domain: air pollution; traffic accidents

### Community Needs Deprivation Index

1. Density of community space assets; educational assets; sport and leisure assets; cultural assets; Green assets: (density of green assets; area of public green space; parks and open space/landscape and natural heritage assets)
2. Travel to-work area jobs; Public transport time to services; No car households; Broadband speed; living alone
3. Local election voter turnout; Charities, Lottery and Grant funding per head; SME lending; Arts Council funding; Self-reported measures of community and civic participation; Leisure and culture participation (culture and heritage; Leisure and cultural participation; participation in sport); strength of local social relationships

## Appendix III: Deprivation data by settlement type

### 1. Rural village and dispersed

Worst 20%	Rural Northern Braintree?	Index	Economic							Social		Indoor & out-door environment								
Best 20%		England decile	Jobs	Income	Income sub-domain		Skills	Skills sub-domain		Crime	Health	Housing	Housing sub-domain		Environment	Env'nt sub-domain				
LSOA Code	LSOA Name				Child poverty	Elderly poverty		Child skills	Adult skills				Access to local services	Wider barriers / access to housing		Indoors - quality of housing	Outdoor air quality / RTAs			
Braintree 001A	Helions Bumpstead	8	6	8	5	4	7	8	7	9	8	7	3	9	5	3	10			
Braintree 001C	Toppesfield/Stambourne	6	6	6	8	8	6	5	5	7	9	1	1	8	4	2	10			
Braintree 002A	Wickham St Paul, Maplesteads	6	9	8	9	6	8	9	7	10	9	1	1	9	1	1	6			
Braintree 002B	Belchamp St Paul	6	9	8	7	2	7	7	6	9	9	1	1	10	2	1	10			
Braintree 002C	Great Henny	8	10	9	6	5	8	8	7	8	9	1	1	9	3	2	7			
Braintree 003A	Gosfield & Greenstead	8	9	9	5	8	8	9	6	5	8	3	1	9	5	3	8			
Braintree 003D	Castle Hedingham	8	7	7	8	10	5	4	5	9	9	7	3	9	6	4	9			
Braintree 005A	Shalford/Panfield	6	8	8	5	4	6	7	6	9	9	1	1	7	3	2	7			
Braintree 005B	Bardfield	8	8	7	8	6	8	8	7	9	8	7	4	8	2	1	10			
Braintree 005C	Finchingfield	7	9	9	7	8	6	6	7	10	9	1	1	7	2	1	8			
Braintree 005D	Wethersfield	6	7	7	4	6	6	6	6	8	8	1	1	9	4	2	10			
Braintree 006C	White Colne	8	7	8	5	6	8	9	7	10	8	3	1	9	4	3	10			
Braintree 006D	Earls Colne	9	10	9	7	7	8	7	8	10	9	5	2	9	5	3	10			
Braintree 007F	Gosfield / High Garret	7	7	9	9	10	6	6	5	9	8	2	1	9	6	4	9			
Braintree 018A	White Notley	6	6	8	3	5	5	6	5	9	9	2	1	9	2	1	7			
Braintree 018D	Hatfield P	8	9	9	1	1	8	9	7	8	7	3	2	8	5	3	9			

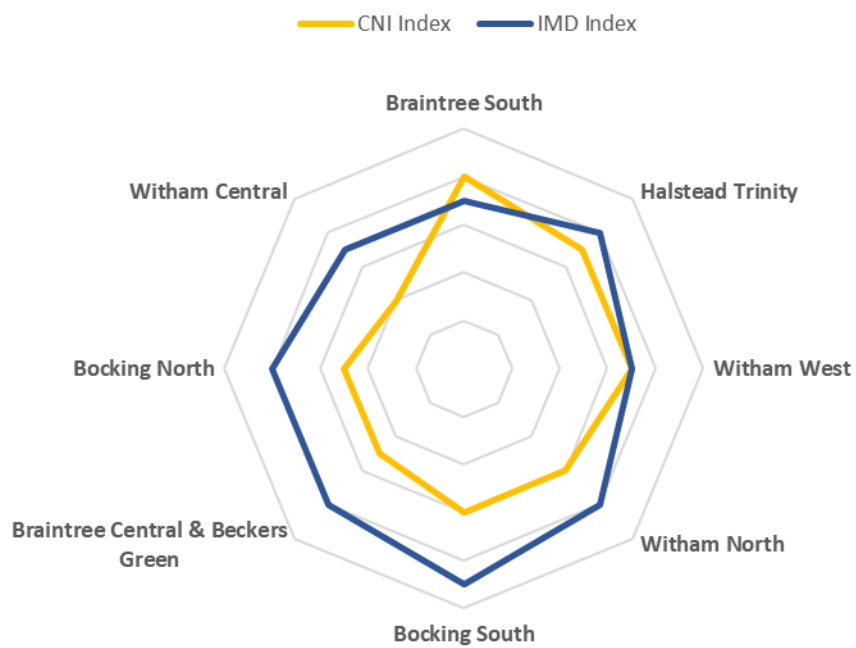
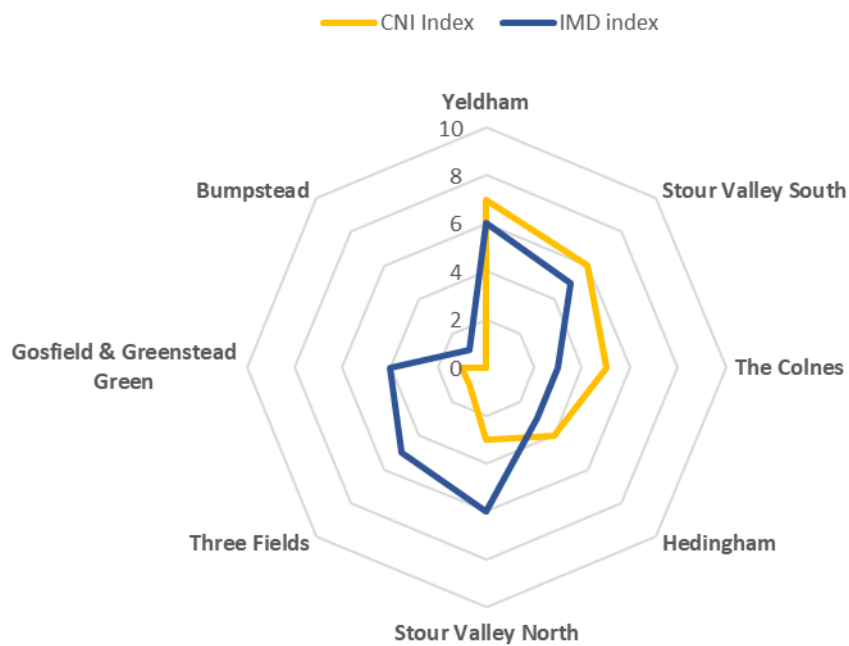
### 2. Rural town and fringe

Worst 20%	Rural Northern Braintree?	Index	Economic							Social		Indoor & out-door environment						
Best 20%			England decile	Jobs	Income	Income sub-domain		Skills	Skills sub-domain		Crime	Health	Housing	Housing sub-domain		Environment	Env't sub-domain	
						Child poverty	Elderly poverty		Child skills	Adult skills				Access to local services	Wider barriers / access to housing		Indoors - quality of housing	Outdoors - air quality / RTAs
LSOA Code	LSOA Name																	
Braintree 001B	Steeple Bumpstead	9	9	9	7	6	7	6	7	9	8	4	2	8	8	6	10	
Braintree 001D	Great Yeldham	7	6	6	7	8	5	6	4	8	7	7	4	8	4	2	10	
Braintree 003B	Sible Hedingham S+E	8	8	7	3	3	6	6	6	8	9	10	8	7	4	3	9	
Braintree 003C	Sible Hedingham West	6	5	5	7	6	3	3	3	7	7	8	5	7	10	9	10	
Braintree 006E	Colne Engaine	5	4	4	9	10	4	3	5	9	5	8	6	5	8	6	9	
Braintree 012A	Braintree / Millenium Way	5	4	4	9	10	2	2	2	6	5	9	9	5	10	9	9	
Braintree 012B	Bradwell	7	8	8	9	7	5	4	5	6	8	3	2	7	4	3	7	
Braintree 013A	Black Notley	8	8	8	6	5	7	6	7	6	8	4	2	8	8	7	7	
Braintree 014A	Coggeshall	8	6	7	7	7	5	4	6	9	8	8	5	7	5	4	7	
Braintree 014B	Coggeshall	6	5	4	8	7	6	5	6	8	7	8	6	6	7	5	10	
Braintree 014C	Coggeshall	10	10	10	6	7	8	7	8	10	10	8	4	9	8	6	9	
Braintree 014D	Feering/Kelvedon	6	5	6	6	6	4	4	4	7	5	9	7	8	6	5	8	
Braintree 014E	Kelvedon	10	8	8	9	9	8	8	8	9	9	10	8	8	9	8	8	
Braintree 014F	Kelvedon	10	10	10	7	7	8	7	8	7	9	7	3	10	8	8	5	
Braintree 015A	Rivenhall	6	5	6	8	5	5	7	4	3	7	3	1	7	7	7	5	
Braintree 018B	Hatfield P	6	5	5	4	6	5	6	4	7	6	9	7	6	8	7	7	
Braintree 018C	Hatfield P	9	8	9	7	7	6	7	5	8	9	9	6	8	8	8	8	

### 3. Urban city and town

Worst 20%	Rural Northern Braintree?	Index	Economic							Social		Indoor & out-door environment						
Best 20%			England dedle	Jobs	Income	Income sub-domain		Skills	Skills sub-domain		Crime	Health	Housing	Housing sub-domain		Environment	Env'nt sub-domain	
						Child poverty	Elderly poverty		Child skills	Adult skills				Access to local services	Wider barriers / access to housing		Indoors - quality of housing	Outdoors - air quality / RTAs
LSOA Code	LSOA Name																	
Braintree 004A	Halstead Broton Industrial Estat	6	5	5	4	4	4	5	4	5	6	9	9	5	4	2	8	
Braintree 004B	Halstead	5	4	4	7	10	3	3	4	7	6	7	6	5	6	5	9	
Braintree 004C	Halstead Trinity	2	2	2	4	3	1	1	2	4	2	7	6	5	9	8	9	
Braintree 004D	Bocking North	5	4	5	7	4	3	2	3	4	6	9	8	6	9	7	8	
Braintree 004E	Braintree NW/Tabor	5	4	5	4	7	3	2	3	5	6	8	6	6	9	7	9	
Braintree 006A	Halstead	8	6	8	6	5	5	4	5	7	6	5	3	7	10	9	9	
Braintree 006B	Halstead	9	9	8	7	7	6	7	5	10	9	6	3	9	10	9	10	
Braintree 007A	Braintree	9	8	8	10	7	5	6	4	8	8	6	3	8	10	9	9	
Braintree 007B	Braintree	10	8	10	10	10	6	8	5	7	9	8	3	10	10	10	8	
Braintree 007C	Braintree	9	10	8	10	8	5	6	5	8	6	7	4	8	9	7	9	
Braintree 007D	Bocking North	6	5	6	7	9	4	3	5	6	6	3	2	6	7	5	9	
Braintree 007E	Bocking North	6	6	6	10	10	4	4	4	5	7	4	2	8	8	6	9	
Braintree 008A	Bocking North	2	2	2	8	4	1	1	1	3	4	2	2	4	10	9	8	
Braintree 008B	Braintree NW/Tabor	5	4	5	8	9	4	5	4	5	7	5	3	7	7	5	8	
Braintree 008C	Braintree NW/Tabor	3	3	2	8	5	2	2	3	4	4	6	6	4	6	5	8	
Braintree 008D	Braintree NW/Coldnailhurst	3	3	3	10	10	1	1	2	3	4	8	8	5	9	8	9	
Braintree 009A	Braintree	7	6	6	7	5	7	7	5	5	7	7	4	8	7	6	7	
Braintree 009B	Braintree, Cogg Rd	7	6	6	10	10	4	4	4	8	7	9	8	5	5	4	8	
Braintree 009D	Bocking South	4	4	4	9	10	4	4	5	3	5	6	6	4	6	5	7	
Braintree 009E	Braintree	7	7	6	8	4	4	3	6	7	6	6	6	4	7	5	8	
Braintree 009F	Braintree Cogg Rd	5	7	6	10	4	4	4	4	3	5	7	7	4	2	2	7	
Braintree 010A	Braintree	10	9	9	5	4	5	5	4	9	9	9	5	9	9	9	8	
Braintree 010B	Braintree	10	8	10	9	7	7	8	7	9	8	6	3	9	9	7	8	
Braintree 010C	Great Notley	9	8	9	10	9	7	7	6	7	9	5	2	8	10	10	8	
Braintree 010D	Rayne	8	7	8	8	9	6	6	6	9	9	4	2	8	8	7	7	
Braintree 011A	Braintree / Millenium Way	4	4	4	9	5	2	2	3	5	6	4	4	4	6	5	9	
Braintree 011B	Braintree NW/Cogg RdTabor	3	2	2	10	10	1	1	1	4	3	7	7	4	8	6	8	
Braintree 011C	Braintree	7	7	6	10	10	2	2	4	7	6	7	4	6	8	6	9	
Braintree 011D	Braintree	6	5	5	10	10	4	3	5	7	7	5	3	6	9	7	9	
Braintree 011E	Braintree / Notley	4	4	4	10	10	2	2	2	5	5	6	5	4	10	9	9	
Braintree 012C	Braintree / Cressing Rd	4	3	4	10	10	2	2	2	3	4	4	3	5	10	10	7	
Braintree 012D	Braintree / Cressing Rd	7	6	6	10	10	4	5	4	7	7	4	3	6	10	9	8	
Braintree 012E	Stisted/Silver End	5	5	5	8	7	6	6	5	3	8	5	3	7	3	3	5	
Braintree 013B	Great Notley	9	7	9	7	6	6	7	6	8	8	3	2	8	10	10	9	
Braintree 013C	Great Notley	10	10	9	10	10	7	7	6	10	10	8	4	9	10	10	9	
Braintree 013D	Great Notley	8	7	7	10	6	6	6	5	8	8	6	3	8	10	9	9	
Braintree 013E	Great Notley	10	10	10	10	10	8	8	8	9	10	4	2	10	10	10	9	
Braintree 015B	Witham	5	5	5	10	9	4	4	3	2	7	3	2	5	8	7	8	
Braintree 015C	Witham North	3	3	2	10	10	2	1	2	4	4	4	4	4	10	9	9	
Braintree 015D	Rivenhall	6	5	6	10	10	4	4	3	5	6	6	4	7	8	7	9	
Braintree 015E	Witham	5	4	4	10	10	5	5	4	5	6	5	4	4	9	8	7	
Braintree 015F	Witham	9	8	9	9	9	6	9	4	4	8	10	7	8	9	9	6	
Braintree 016A	Witham Central	4	4	3	9	8	3	3	2	4	6	5	5	4	10	10	7	
Braintree 016B	Witham West	4	3	4	8	8	3	3	2	6	5	5	3	5	9	8	9	
Braintree 016C	Witham	4	4	4	4	6	2	2	2	3	4	6	5	5	4	2	9	
Braintree 016D	Witham Central	5	4	3	9	7	3	4	2	5	6	9	7	6	9	9	7	
Braintree 017A	Witham	5	5	4	4	1	5	6	4	5	3	7	7	4	8	8	6	
Braintree 017B	Witham	7	6	7	7	7	7	8	5	5	4	8	6	5	6	4	8	
Braintree 017C	Witham	5	5	5	4	2	4	5	3	5	6	3	2	6	8	6	8	
Braintree 017E	Witham	5	5	4	7	5	3	3	2	6	4	8	6	5	9	9	7	
Braintree 017F	Witham	8	7	7	3	1	7	8	6	2	9	9	8	6	8	7	6	
Braintree 017G	Witham	9	9	7	2	1	5	5	6	7	8	9	7	7	10	10	8	
Braintree 017H	Witham	5	4	5	4	1	5	6	4	5	4	7	5	5	7	7	5	
Braintree 018E	Witham	8	7	7	3	2	4	3	5	7	8	8	4	8	9	9		

## Appendix IV: Community needs by ward type



## Appendix V: Chi squared statistical tests for goodness of fit Housing MSOA data

### Chi sq test for goodness of fit: Housing

Quintile	Actual	Expected	Df		4
20	32	20	Chi sq	19.1	
40	13	20	CV 95	9.49	
60	28	20	p	0.001	
80	18	20	sig	95%	
100	9	20			
<b>TOTAL</b>	<b>100</b>	<b>100</b>			

## Appendix VI: Chi squared statistical tests for goodness of fit LSOA deprivation data

Chi sq test for goodness of fit: Income					Chi sq test for goodness of fit: Crime				
Quintile	Actual	Expected	Df	4	Quintile	Actual	Expected	Df	4
20	17	20	Chi sq	11.50	20	33	20	Chi sq	13.50
40	16	20	CV 95	9.49	40	21	20	CV 95	9.49
60	14	20	p	0.021	60	20	20	p	0.009
80	33	20	sig	95%	80	14	20	sig	95%
100	20	20			100	12	20		
TOTAL 100 100					TOTAL 100 100				
Chi sq test for goodness of fit: Skills					Chi sq test for goodness of fit: Health				
Quintile	Actual	Expected	Df	4	Quintile	Actual	Expected	Df	4
20	21	20	Chi sq	30.50	20	38	20	Chi sq	35.10
40	24	20	CV 95	9.49	40	27	20	CV 95	9.49
60	38	20	p	0.000	60	14	20	p	0.000
80	10	20	sig	95%	80	18	20	sig	95%
100	7	20			100	3	20		
TOTAL 100 100					TOTAL 100 100				
Chi sq test for goodness of fit: Housing					Chi sq test for goodness of fit: Employment				
Quintile	Actual	Expected	Df	4	Quintile	Actual	Expected	Df	4
20	50	20	Chi sq	68.50	20	15	20	Chi sq	4.70
40	24	20	CV 95	9.49	40	16	20	CV 95	9.49
60	13	20	p	0.000	60	20	20	p	0.319
80	11	20	sig	95%	80	27	20	sig	NS
100	2	20			100	22	20		
TOTAL 100 100					TOTAL 100 100				
Chi sq test for goodness of fit: Envn					Chi sq test for goodness of fit: Index				
Quintile	Actual	Expected	Df	4	Quintile	Actual	Expected	Df	4
20	25	20	Chi sq	10.60	20	24	20	Chi sq	20.50
40	29	20	CV 95	9.49	40	26	20	CV 95	9.49
60	20	20	p	0.031	60	25	20	p	0.000
80	15	20	sig	95%	80	23	20	sig	95%
100	11	20			100	2	20		
TOTAL 100 100					TOTAL 100 100				

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