

FW: 21/02851/AOP - HMP Grendon

Joanna Horton <Joanna.Horton@buckinghamshire.gov.uk>

Fri 10/12/2021 11:21

To: Danika Hird <Danika.Hird@buckinghamshire.gov.uk>

Hi Danika,

Please find attached brief summary notes with identified key views and features within the park prepared by Dr Sarah Rutherford following our site visit to HMP Grendon & Springill on Wednesday 8th December. I understand that she will be preparing further detailed comments in due course.

The purpose of our visit was to better understand the nature and significance of the historic parkland and its original /current relationship and importance to the setting of the GII listed Grendon Hall buildings. Access to the restricted prison site and GII listed Hall has not been possible until now and therefore some comments may appear to contradict earlier conclusions with a better understanding of this new information.

Please note that in addition to comments provided here, the heritage concerns raised previously in the email thread below remain outstanding.

Conclusions from the site visit:

- There is sufficient retained significance to the parkland for the Park and Gardens to meet HE criteria as a Non-Designated Heritage Asset on the basis of age, historic interest, group value, archaeological value, and artistic interest.
- While some significance has been lost and views are interrupted in some areas due to inappropriate planting (reversible) and development, the relative openness and character of the parkland still provides an important setting to the listed building and frames the key designed views from the front and North side of the building.

Grendon Hall was erected in an elevated position with the clear intention of benefitting from wide panoramic views across the Vale (see attached document). The building's design utilises large bay windows to the front and side which were intended to capture these spectacular views from the inside of the building, and the view from the main entrance is also a key design element. Landscaped features such as the north step (circled in the attached document) which terminates the elongated drive across the front of the building, the gate further to the south and the hill summit provide further opportunities within the park to enjoy the panoramic views. The capturing of these views is the primary reason why the building has been erected and orientated as it is. As such the building's design and significance are directly related to the surrounding park and gardens and the wider landscape which form its setting.

Setting of the GII LB – the proposal would have a detrimental impact on the setting of the GII listed building for the following reasons:

- The proposed woodland planting would obscure the views across the north park and into the wider landscape and partially obscure views to the south park and wider landscape.
- The introduction of a substantial new road with associated lighting, formal and informal planting, sports pitches, suds ponds and acoustic fences will largely eradicate the North park.
- The approach to Grendon Hall along the original drive and through the GII listed gateway would also be harmed by the loss of open parkland to the north side and the introduction of acoustic fencing, lighting and additional planting
- It is acknowledged that the setting of the Hall to the rear has already been compromised by existing development although it should be noted that the design of the building indicates that this area was never considered to form part of the key views for the building.

Therefore the proposals would result in a **high degree of less than substantial harm to the setting of the Listed Building**.

NDHA Historic Park and Gardens – as discussed above the North Park would be largely lost to development and its relationship to the GII listed building and wider landscape would be lost. This section of the park land has a different feel and character to the south park, but is an equally significant part of the whole and serves the same function as the south park in that it frames and softens the views outwards to the wider countryside, provides the setting for the main Hall, as well as a buffer between the house and the wider community leading the eye to the imposing listed building from the village of Edgcott and other surrounding heritage assets towards Perry Hill. Additionally, both parks provided an open parkland aspect to either side of the approach drive, as this has been irretrievably lost to the south (with the introduction of the housing estate) the natural and open nature of the North Park arguably retains more significance in this respect. In conclusion the proposals would result in a **high degree of less than substantial / substantial harm to a key remaining part of the NDHA historic Park and gardens**.

Best regards

Jo

Joanna Horton BA (Hons) Int. Arch, MA Cons, IHBC.
Heritage Officer
Planning, Growth and Sustainability

Ext: 5402

Mob: 07767 915692

Email: joanna.horton@buckinghamshire.gov.uk

From: Joanna Horton
Sent: 11 November 2021 12:33
To: Danika Hird
Subject: FW: 21/02851/AOP - HMP Grendon

Hi Danika,

Also worth noting is that the HS still states that building heights are dependant on final designs – Is it correct that this should no longer be the case?

Thanks

Jo

From: Joanna Horton
Sent: 11 November 2021 12:18
To: Danika Hird
Subject: 21/02851/AOP - HMP Grendon

Dear Danika,

Thank you for reconsulting Heritage on the above application, please accept this email as my formal response.

A revised Heritage Statement has been submitted (06.10.2021) in response to earlier comments which in summary requested:

- A wider assessment radius for heritage assets
- Proposals for repair of GII listed Gates
- 3D modeling of impact and views from the identified heritage assets
- Illustrative analysis of lighting impact to setting

An email from the applicant of the same date confirms their willingness to commit to appropriate repair and preservation of the GII listed gates. This is very welcome and could be **secured by condition**.

The revised HS does now cover a wider radius and an increased number of heritage assets are considered, however the conclusions drawn have not been fully substantiated and evidenced through provision of adequate 3D / wire drawn images from the heritage assets and in particular from Perry Hill which provides the key approach to the site and heritage assets located to the north from the north. Neither has the proposed lighting impact been illustrated. The applicants email dated 6/11/21 which accompanied the revised HS asks us to:

- refer to the LVIA documents for this kind of illustrative material, however, the views considered in the LVIA sections 2 & 3 are not taken from the heritage assets, or the key northern approach to the site from Perry Hill and were produced for a different purpose. As such they are insufficient to enable adequate assessment.
- consider the additional lighting in the context of the existing prison. Section 1 of the LVIA provides night time images of the existing site but does not illustrate the increased impact of a much larger complex or an indication of lighting levels required across different parts of the site i.e. access road & sports field as opposed to housing blocks, parking & service areas. As such the information is inadequate to enable assessment.

My concern is that in heritage terms the increased massing and lighting impact from the much larger development is likely to have a far greater impact on the rural character and setting of the heritage assets identified and will dominate views rather than be seen as an element within a much wider landscape. **Further information as requested both at Pre-app stage and during the course of this application is therefore still required.**

Since my previous comments were made, the potential significance of the historic park and gardens at Grendon Hall have been highlighted and it is very likely that the park would meet the Historic England criteria as a Non-Designated Heritage Asset. It is felt that a further review of evidence is required before conclusions and impact assessments can be fully understood. To that end, I have contacted Sarah Rutherford of the Gardens Trust for more clarification.

Best regards

Jo

Joanna Horton BA (Hons) Int. Arch, MA Cons, IHBC.
Heritage Officer
Planning, Growth and Sustainability

Ext: 5402

Mob: 07767 915692

Email: joanna.horton@buckinghamshire.gov.uk