

21/02851/AOP - HMP Grendon

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Thu 11/11/2021 12:17

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

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

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