#### PROPOSED PRISON AT GRENDON UNDERWOOD

#### **INFORMATION SHEET 8 ON HERITAGE**

**NOTE:** Historic England should be a consultee on the MoJ planning application so this is something to check. They may have been involved at the pre-planning stage and if so their comments should become available to the public on the Planning Portal quite soon after the application has gone live. We should also check what the MoJ planning documents include with respect to heritage assets. One key aspect on heritage in this case is the history of the prison site and the locality due to the timing of when buildings were actually listed vs developments that took place prior to that. Also recently the Bucks Garden Trust issued a report on the Historic Park and Gardens of Grendon Hall (issued in March 2021 and revised in June 2021).

#### PLUS COMBINED IMPACT OF SPRINGHILL PRISON!

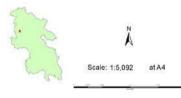
# 1. Objections

As William Morris said of the nearby Cotswolds: 'It matters not who owns this house or that field, the landscape is ours, it is free to all who care to linger and look at its beauty.'

### Harm to Grendon Hall, Lawn House and Gate Piers and Railings

- In heritage terms the history of the site is important. The early history of the site has strong associations with the Forest of Bernwood. Potential for evidence of Roman occupation is high, given the proximity to Akeman Street and archaeological evidence nearby along the route of HS2. The medieval Forest of Bernwood provides this area with a unique heritage, many of the features and place names being a direct legacy of the ancient royal forest. Potential for evidence associated with the forest particularly relates to banks, routes, boundaries and buildings. The area is rich in historic ridge and furrow and potential exists for former features related to the designed landscape since the 1880s, such as buildings, paths, beds, terraces, boundaries, and the lost north drive of Grendon Hall.
- Grendon Hall is a gabled, Jacobethan, red brick house and is dated 1882 on a beam in the chapel. The grounds were laid out alongside the new house at this time and in any case by the late 1890s. The layout comprised a largely typical ensemble of pleasure ground and park (of about 160 acres) for a country house developed in the 1880s, including terrace, informal lawns with mature trees and shrubberies, and parkland. The details of this park have recently been reported (*Ref: Report by the Bucks Garden Trust on Grendon Hall, March, 2021, updated in June 2021*). The 1880s design incorporated hedgerow trees as specimens in the new park and a straight main drive was framed by an avenue. Some of the early specimens survive enclosing the informal lawns within the modest pleasure ground. Elements lost to development include the 7 ha housing estate in the south park and prison buildings east and south of the Hall. The rural setting enjoys views over the Vale of Aylesbury but has been damaged by the large prison development immediately to the east of the Hall. See below an aerial photo and an old map of the historic park and gardens.
- During World War II the site was requisitioned, initially it was used by MI5 and from January 1942 as Station 53 of Special Operations Executive; here new radio communications were developed in conjunction with the new radio station at nearby Poundon House. Towards the end of the war the estate was also used as a fire training centre and then as a school for the daughters of displaced Polish people until 1951. To accommodate more than 300 staff the pleasure grounds to the north of the house were used for accommodation huts, recreation facilities and stores with about ten more in the field beyond, this now forms part of the area occupied by the prisons.





Grendon Hall: 2019 aerial photograph

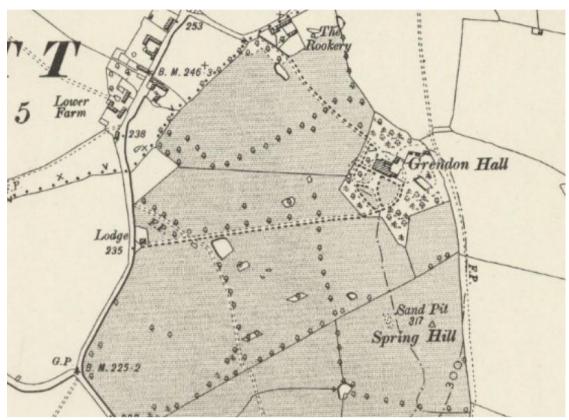
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Produced by the Council Archaeology Service March 2021





Aerial Photograph from 2019 Showing the Historic Park and Gardens of Grendon Hall (outlined in red)



OS Map published in 1900: The shaded area represents the garden and park land of Grendon Hall (Note in this period Lawn House was known as The Rookery). This map also shows the proximity of and the relationship between Grendon Hall and Lawn House (previously The Rookery).

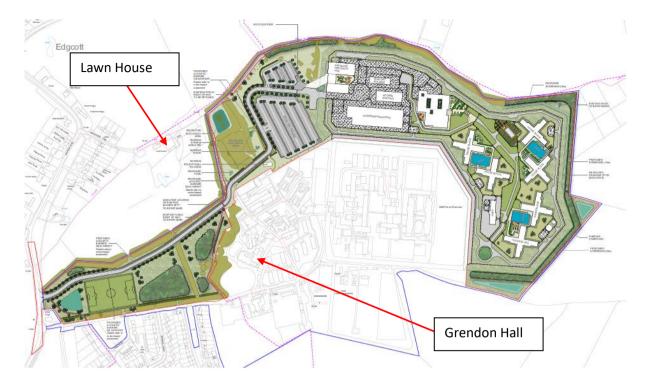
- The Grendon Hall site was purchased in 1953 by the Prisons Commission and HMP Springhill (Category D) became the UK's first open prison. In 1962 HMP Grendon (Category B) opened on the adjacent site.
- In the 1960s Springhill housing estate was built in the area to the south of the approach road to house prison staff. These developments all took place prior to Grendon Hall being listed in 1985 (Grade II). It is inconceivable that the two existing prisons, and the Springhill housing estate, would have been constructed if Grendon Hall had been listed prior to their development. Grendon Prison to the east was noted in 1994 as having bleak buildings of 1962 by the Ministry of Works (Pevsner, N. The Buildings of England Buckinghamshire (1979), 148.). Views remain from the house northeast towards Edgcott and from the pleasure grounds and park south-west towards Mill Hill, Doddershall Wood, and south to the village of Grendon Underwood and Waddesdon Hill in the distance.
- The past construction of HMP Springhill and Grendon, as well as the Springhill housing estate has
  caused considerable harm to the settings and Historic park of Grendon Hall but also the setting of
  Lawn House. This harm includes:
  - Destruction of much of the landscape setting surrounding the two assets;
  - Loss of green field space and a 7 ha area of the Historic Park of Grendon Hall to a housing development;
  - Loss of character of the countryside surrounding the two assets, including some archaeological ridge and furrow land;

- Loss in the nature of the relationship in the setting between the two heritage assets (although built first, Lawn House was once owned by the owners of Grendon Hall);
- Unsightly buildings constructed so close to the two heritage assets;
- Loss of trees and hedging;
- Noise, light and traffic pollution from the operation of the prison and the housing estate;
- Loss of wildlife that was present prior to the developments;
- Increase in smells, mainly from the prison kitchens;
- In terms of the loss of ridge and furrow land, as seen from aerial maps (see example below) the ridge and furrow land appeared, at one stage, to extend across the whole site on which the prison and housing estate was built upon.
- The aerial photo below shows Grendon Hall before the two prisons and the Springhill housing estate were constructed. The photo shows a clear indication of ridge and furrow on the slope leading up to the Hall from Grendon Road but also on the site where the housing estate was later constructed. The ridge and furrow also continues beyond Grendon Hall (right hand side of the image). It would appear that Grendon Hall, and subsequently the two prisons and the Springhill housing estate, were built on land that had previously been ridge and furrow at a time when such a feature was common place and not protected. This image indicates that the ridge and furrow land that remains on the land between Grendon Hall and Grendon Road, and where it is intended to build the new road and locate the football pitch for the new prison, was originally connected to the ridge and furrow on Spring Hill and Mill Hill. Hence it is the remaining section of ridge and furrow related to Grendon Hall and Lawn House and should be protected.
- Lawn House is a seventeenth century timber-framed house with late nineteenth and twentieth century alterations. It was previously known by the names Grendon Hall Farm and The Rookery and appears on old maps by the different names. The house was Grade II listed in 1985.
- At one point Lawn House and its grounds were part of Grendon Hall and the Historic Park associated with the Hall. However, today the grounds of Lawn House extend to 12 acres of garden, a grass field and a wooded area. There are three ponds and the grounds are registered as a great crested newt site. On two sides of the grounds belonging to Lawn House, the site shares a boundary with the prison site. The distance from Lawn House to the nearest prison site boundary is just 115m. From the outbuildings of Lawn House the prison boundary is just 80m away.



Aerial photo taken c. 1950 before HMP Springhill and HMP Grendon Prisons were built

• Construction of a new 'mega' prison on the land behind the two current prisons (see indicative plan below), plus the placement of a new site entrance and road in the field between the current prisons and Grendon Road in Edgcott, would have a significant, irreversible and harmful impact on the settings of both Grendon Hall and Lawn House. In addition there would also be harm to the setting of the Grade II listed gate piers and metal fencing at the current entrance to the prison site. The new prison would be effectively in the 'rear garden' of Grendon Hall and would only be separated by some of the much lower buildings belonging to HMP Springhill, built prior to the listing of Grendon Hall. In addition the new prison would be within 230m of Lawn House itself and the closest buildings would be approximately 100m from the boundary of Lawn House. The green field where the new site entrance and road, plus the relocated football pitch are to be located, is part of the Historic Park and Gardens of Grendon Hall as well as being part of a historic area of ridge and furrow.



#### Illustrative Layout of the proposed 'Mega' Prison

- The harm related to these historically important heritage assets may be regarded in planning matters as *less than substantial* but it would be in the 'upper spectrum' of harm and would outweigh the perceived public benefits. The harm would, for both properties, be as follows:
  - The scale of the development, the size, number and height of the buildings and urban nature of the buildings that would be constructed;
  - A significant urbanising effect by constructing a new mega prison so close to these two heritage assets;
  - The scale of the new mega proposed prison site would irreversibly destroy the landscape and green field space currently in place and surrounding the two heritage assets;
  - The scale of the car park area close to the two heritage assets would have a harmful impact on both properties;
  - Light pollution from the significant increase in lighting that would be required for the operation of a new mega prison and associated car park;
  - Noise pollution from the significant increase in noise from both the construction phase and the operation of a new prison, both from the prison itself and from the car park and the resulting significant increase in traffic;
  - The proposed acoustic fencing is merely a gesture and would have little impact on reducing the noise pollution for either of these two heritage assets;
  - The increase in smells due to the operation of the prison;
  - The access road to the new mega prison would run up the northern edge of the field between Grendon Road and Grendon Hall and this is part of the Historic Park and Gardens of Grendon Hall. Both during construction and afterwards during operation of the prison, the road would run adjacent to land belonging to Lawn House and 180m from the house itself. The noise and light pollution for both Lawn House and Grendon Hall would be considerable and have a further irreversible, detrimental and harmful impact on the

setting of the two heritage assets and the Historic Park and Gardens of Grendon Hall. The new road would run just 110m from Grendon Hall itself.

It is evident that building a new mega prison and the associated site access and road, plus relocating the football pitch, would cause further harm to the Historic Park and Gardens of Grendon Hall, and the setting of Lawn House and the gate Piers and railings as well as other surrounding heritage assets. As stated in the Historic England Document (see Page 4 heading 5, The Setting of Heritage Assets 2017), "the cumulative impact of harm to the settings should be avoided and due consideration should be given, to accord with NPPF policies, as to whether additional change will further detract from or enhance the significance of the asset." Hence the planned proposal is contradictory to Historic England Guidance.

In addition, the following Historic England statement is also relevant in this case.

Cumulative impact (From Historic England Document: The Setting of Heritage Assets Historic Environment Good Practice Advice in Planning Note 3 (Second Edition) 2017)

28: The cumulative impact of incremental small-scale changes may have as great an effect on the significance of a heritage asset as a larger scale change. Where the significance of a heritage asset has been compromised in the past by unsympathetic development to the asset itself or its setting, consideration still needs to be given to whether additional change will further detract from, or can enhance, the significance of the asset in order to accord with NPPF policies. Negative change could include severing the last link to part of the history of an asset or between the asset and its original setting. Conversely, positive change could include the restoration of a building's plan form or an original designed landscape.

It is quite evident that the proposed new prison, and the expansion of HMP Springhill, would have a negative and harmful impact on both Grendon Hall and Lawn House. As a result this would further compromise the unsympathetic developments previously carried out in their setting.

• The construction of a mega prison and car park so close to both Grendon Hall and Lawn House can hardly be described as enhancing the setting of these locally significant heritage assets and would result in further irreversible harm. In addition, constructing a new site entrance and relocating the football pitch as planned on the remaining ridge and furrow land between Grendon Road and Grendon Hall would destroy this remaining section of the important historical landscape as well as impacting on the Historic Park and Gardens of Grendon Hall.

## **EXPANSION OF HMP SPRINGHILL**

- From reading the Outline Planning Documentation (OPA) (Traffic Assessment Appendix L) it is very clear that, in addition to building a new 'mega' prison on the Grendon Underwood site, the MoJ intends to expand HMP Springhill by 120 places. The expansion of HMP Springhill was mentioned in the second consultation document issued in December 2020 as a possibility which was being considered. However, there is now clear evidence in the OPA that the HMP Springhill expansion will be the next development on this site. Although no application has yet been submitted for this extension, it is justifiable to consider the harm to the heritage assets that will result from the cumulative impact of the new prison and the extension of HMP Springhill. In fact HMP Springhill is closer to both Grendon Hall and Lawn House and hence the harm of the extension is particularly pertinent to the settings of both of these properties.
- As HMP Springhill is situated even closer to Grendon Hall and Lawn House than the proposed new 'mega' prison will be, any extension to that prison would undoubtedly cause significant harm to

the setting of both properties. The expansion of HMP Springhill would also impact on public amenity space, landscape and visual impact, as well as landscape and character of the site and the need for additional car parking.

# Impact on Edgcott Church, Manor House, Manor House Cottage, Rectory Farmhouse and Converted Barns

- The landscape between St Michael's Church in Edgcott and the proposed new prison is one of rolling hills. Both the church at Edgcott and the prison site are located on top of a hill and there is a sweeping valley in between. Hence the church can be seen from the prison site and vice versa and this is an uninterrupted view. Hence the new prison would impact on the local setting of St Michael's Church and also other listed buildings close to the church, i.e. Manor House, Manor House Cottage and Rectory Farmhouse.
- The distance from St Michael's Church to the nearest new building on the proposed prison site is 475m and 440m between the same part of the prison site to Manor House.

### Impact on Heritage Assets in Grendon Underwood

- St Leonard's Church, Grendon Underwood is located 865m from the car park field and 1,200m from where the closest new building would be for the proposed prison. Even though the new mega prison will be some distance away from the Grade II\* listed Church, it will have a harmful impact on the panoramic setting of the Church. In addition there will be a more direct impact due to the significant increase in traffic, and especially the HGVs passing directly past the Church on the windy road that passes the Church.
- There are a number of Grade II Listed properties which line the Main Street of Grendon Underwood. The new mega prison will be visible from most of those situated on the northern part of Main Street, especially those at the eastern end of the village. Hence the countryside views from these properties will be tarnished by the site of large buildings situated on top of the local hill.

## 2. Background Information

There are a number of Heritage assets in the local area and the ones most relevant to the new prison proposal are as follows.

Table 1: Listing of Heritage Assets in Edgcott and Grendon Underwood

Property	Location	Listing	Date Listed
Grendon Hall	Springhill, Grendon Underwood	=	1985
Gate Piers, gates and railings to Grendon Hall*	Edgcott Road, Grendon Underwood	II	1985
Lawn House	Lawn House Lane, Edgcott	II	1985
Lower Farm	Grendon Road, Edgcott	=	1984
St Michael's Church	Church Lane, Edgcott	II*	1966
Old Manor House	Church Lane, Edgcott	Ξ	1951
Manor House Cottage	Church Lane, Edgcott	П	1951
Rectory Farmhouse	Church Lane, Edgcott	П	1951
Lower and Upper Barn	Church Lane, Edgcott	II	
Rectory Farm and Barn	Church Lane, Edgcott	П	

St Leonard's Church,	Grendon Underwood	II*	
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There are other properties listed in Edgcott which were originally farm barns but these have been converted to dwellings for human occupation. In addition to the Heritage Assets in Edgcott, there are a number of listed buildings in Grendon Underwood. These include St Michael's Church (Grade II\*), Lower Greatmore Farm and barn, and several listed buildings spread down Main Street (all Grade II listed). Those on the North side of Main Street in particular will be exposed to the change in landscape and light pollution resulting from the construction of a new, mega prison.

None of the heritage assets would be physically modified in any way by the construction of the proposed new prison. However, the settings of all these properties would be impacted by the construction of a new prison.