

Planning Statement Addendum

Caversham Park, Reading, RG4 8TZ



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1. Introduction

- 1.1. This Planning Statement Addendum (PSA) has been prepared by Savills on behalf of Beechcroft Developments Ltd, hereafter referred to as 'the Applicant'. It is submitted in support of the existing full planning application (220409FUL) and listed building consent (220410LBC) currently under consideration by Reading Borough Council (RBC) at Caversham Park, Peppard Road, Caversham, (the Site). Since the submission of the applications there have been detailed discussions between Beechcroft and the Council that have resulted in a number of changes being made to the scheme.
- 1.2. This PSA should be read in conjunction with the existing full Planning Statement (PS) submitted alongside the original applications. The PSA deals with changes that have been made to the scheme since submission, the policy implications and crucially the interplay between key policies CA2, EN1 and the relevant paragraphs within the NPPF and the resulting balance of public benefits against the less than substantial harm to the registered park and garden (RPG).
- 1.3. The planning statement addendum also discusses policy H6 of the RBC Local Plan in detail as the new evidence from the Pegasus Housing Needs Assessment finds that there has been an undersupply of 99 care home spaces combined with a net loss of 57 care home spaces. This has resulted in a shortfall of delivery of 156 care home bed spaces between 2013 and 2022. This is against a stated need in the period for 2013 and 2036 of 253 care homes spaces. The report also finds there is a significant additional need in the 5 miles radius of the site albeit that this includes parts of the neighbouring districts, as well as Reading BC in its entirety. This is a material consideration relevant to the determination of the application.
- 1.4. For clarity the site context has not changed since the original submission, with the BBC maintaining both the house and grounds in the same condition as described in the PS. Changes to the flora and fauna have been captured by updated reports for ecology and arboriculture. The policies detailed in section 5 of the original PS are still relevant as the Reading Borough Local Plan (2019) remains the most recent local policy document. The NPPF has not been updated since submission, though a consultation on changes is currently under review. Of the proposed changes in the emerging NPPF update, it is emphasised in an addition to paragraph 60 that housing delivery should meet local housing needs, in an appropriate mix to meet the needs of the community. This scheme has a robust and up to date housing needs assessment prepared by Pegasus which demonstrates the clear contribution the scheme will make to these locally identified needs.
- 1.5. In light of the changes made to the scheme since the submission of the applications, changes to the description of development have been made as highlighted below:-

- 1.6. *Redevelopment of Caversham Park for 64 65 assisted living units (Class C2) for the over 55's through the conversion of Caversham Park House, 64 bed care home (Class C2), 61 age-restricted retirement dwellings, including conversion of the existing buildings Bursars House & The Lodge and 2 Caversham Park Drive (Class C3), 5 market dwellings (Class C3), 28 27 affordable dwellings (Class C3), and refurbishment and extension of the existing pavilion to provide changing facilities, café/studio and sports provision comprising 2 no. croquet lawns, 2 no. bowling greens, an additional tennis court, refurbishment of the existing tennis court and associated parking and landscaping works following the demolition of extensions and associated outbuildings to the main house.*
- 1.7. Resulting in the final description text:-
- 1.8. *Redevelopment of Caversham Park for 65 assisted living units (Class C2) for the over 55's through the conversion of Caversham Park House, 64 bed care home (Class C2), 61 age-restricted retirement dwellings (Class C3), including conversion of the existing buildings The Bursars House and The Lodge, 27 affordable dwellings (Class C3), and refurbishment and extension of the existing pavilion to provide changing facilities, café/studio/interpretation hub and sports provision comprising 2 no. croquet lawns, 2 no. bowling greens, refurbishment of the existing tennis court and associated parking and landscaping works following the demolition of extensions and associated outbuildings to the main house.*

Background to the Site

- 1.9. The proposed development will provide a Care Home, Assisted Living Units, retirement housing for people aged over 55, market dwellings and affordable housing.
- 1.10. Beechcroft Developments has become one of the UK's leading retirement developers, building high quality homes for the over 55's in some of the most attractive towns and villages in Surrey, Sussex, Hampshire, Hertfordshire, Berkshire, Oxfordshire, Wiltshire, Middlesex, Gloucestershire and Kent.
- 1.11. The Site is approximately 37.7ha in area and is shown edged in red on the site location plan (3251.P.100_C Location Plan). The Site forms part of what was a historic country estate in Caversham with extensive grounds located to the north of Reading town centre and to the north of the River Thames and surrounded by suburban development. The majority of the Site is a Grade II Registered Historic Park and Garden (RPG) and the main House itself, Caversham Park House, is Grade II Listed, along with a number of ancillary structures in the Site.
- 1.12. The Site is located within the northern suburbs of Reading and close to Emmer Green and Caversham which have a range of amenities and facilities. The Site is adjoined by suburban twentieth century residential properties and is bordered to the west by Peppard Road and Lowfield Road, which the latter also adjoins the northern and eastern boundaries of the Site. To the south of the Site is Reading Cemetery and Crematorium.
- 1.13. The proposed development would place the Site into a viable residential use, which is its original use, securing and enhancing the designated heritage assets. The proposed development would ensure the estate's future, by providing for ongoing investment and maintenance.

The Planning Application 2023 Submission

- 1.14. The extensive technical information submitted with the original applications provides a comprehensive understanding of the Site and has already informed the proposals and Beechcroft's assessment of their associated benefits. A number of these documents have been updated to reflect and respond to the changes made to the scheme:
- **Environmental Statement** update prepared by Savills;
 - **Transport Statement** update prepared by Glanville Consultants;
 - **Framework Travel Plan** update prepared by Glanville Consultants;
 - **Construction Traffic Management Plan** update prepared by Glanville Consultants;
 - **Foul Drainage & Utilities Assessment** update prepared by Glanville Consultants;
 - **Landscape & Visual Appraisal** update prepared by Savills;
 - **Ecological Appraisal** update prepared by Aspect Ecology;
 - **Arboricultural Impact Assessment** update prepared by Aspect Arboriculture;
 - **Flood Risk Assessment** update prepared by Glanville Consultants;
 - **Air Quality Assessment** update prepared by Aether Ltd;
- 1.15. In addition to the originally submitted and subsequently updated technical information, the following new reports and drawings have also been commissioned to support the changes made to the scheme in light of officer feedback and comments from stakeholders and the local community.
- **Heritage Assessment** prepared by Montagu Evans;
 - **Housing Needs Assessment** prepared by Pegasus;
 - **Design and Access Statement Addendum** prepared by BHP Harwood Architects;
 - **Updated application drawings** prepared by BHP Harwood Architects;
 - **Update Habitat Survey & Biodiversity Net Gain** prepared by Aspect Ecology; and
 - **Statement of Community Involvement** prepared by TFA.

Meetings held since the initial submission

- 1.16. A series of meetings were held with key consultees in October of 2022, including Highways, Landscape, Ecology and Conservation officers.
- 1.17. Discussions have also taken place with the Berkshire County Archaeologist after a request was made for trenching pre-determination of the application, in order to determine the possible impact on the scheme on the archaeological features. It was agreed at this meeting that trenching would not be required pre-determination with a comprehensive Written Scheme of Investigation being sufficient detail.
- 1.18. A public event was held at Caversham Park on the 8th December 2022 between 14:00 and 20:00, with members of the public and local politicians attending. See paragraph 1.21 below for more details of this event.

Environmental Impact Assessment

- 1.19. A request for a Screening Opinion was submitted to Reading Borough Council (RBC) on 21 December 2021 in accordance with Regulation 6 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. RBC issued their Screening Opinion on 26 January 2022 which states that they consider the proposal to be 'EIA development'. Accordingly the scope of an Environmental Assessment was agreed with the Council (via their scoping letter dated 26/01/22) and an Environment Statement focussed on Heritage and Landscape impacts accompanied the original submission.
- 1.20. An updated ES addendum has been prepared by Savills EIA Team, in accordance with the Regulations and taking into account the changes to the scheme including reference to the updated heritage assessment report from Montagu Evans and the update landscape scheme prepared by Savills.

Additional Public Engagement

- 1.21. During early December 2022 a second Public Consultation event was held to engage with local residents and stakeholders on the proposed changes and to seek further feedback on the whole scheme. The results of this event are detailed in the accompanying SCI from TFA. In summary the feedback resulting from the event was positive, the main points of feedback being:
- There is an awareness of a shortage of homes for older people.
 - The sensitive restoration of the listed house is important to local people.
 - There was an overall majority (60%) in support of the contemporary design for the care home. There was also overall support for the use of contemporary design in the northern/eastern parcel(75%).
 - All respondents supported the changes to the western parcel.
 - Access and community uses achieved near full support from all respondents.
 - Walking and use of the parkland followed by periodic opening of the communal areas of the house were more popular choices for future use over the sports facilities – which still enjoyed around 30% 'likely to use' in the future.
 - Overall only 14% of respondents did not feel that the refreshed design was positive overall.

- 1.22. A number of respondents felt the western parcel needed to be 'greener' with an open area. This reflected officer advice on the parcel and accordingly Beechcroft has made significant amendments to the scheme in this area in response to this request.
- 1.23. Parking outside of the park by future residents was a concern for some residents along Peppard Road, especially given claimed high volumes of traffic generated by the school. The parking provision for the western parcel has been reviewed to maximise the number and optimise the layout for usability. In addition, an additional 21 car parking spaces have been provided in place of the second tennis court originally proposed.
- 1.24. Lastly, respondents requested that more be made of the history of the site and in response an interpretation hub is now proposed in the extended pavilion building.

Officer Feedback

- 1.25. A meeting was held between the applicant and their consultant team and RBC officers in February 2023 to discuss Beechcroft's proposed changes to the scheme in order that officers could help shape the proposals. The feedback given may be summarised as follows:
- The proposed changes to main house were largely accepted with any outstanding/additional details to be secured by condition. This followed extensive work with officers in the intervening period to shape the changes suggested by Montagu Evans' work on the history of the Site.
 - The layout of the car parking at the care home raised some concerns from officers, being too regimented. In response to this the car parking layout has been re-designed to appear more organic.
 - Officers were largely positive about the contemporary design proposed for the care home and its reduction in massing and impact upon the important views along the canal.
 - Officers were largely supportive of the design and layout changes to the western parcel but did highlight that a more open and greener space within the grouping of dwellings would be more conducive to the setting of the parkland. A re-design of the layout of this element of the scheme has been undertaken in response to these comments.
 - Concerns were raised about the eastern parcel and the encroachment to the north of the existing car park. Beechcroft consider, and have presented evidence to the Council to demonstrate, that there would be a less than substantial harm to the RPG and this view has been reinforced by the new Heritage Assessment prepared by Montague Evans. It was agreed that a heritage consultant would be instructed by the Council to review this level of harm in greater detail. Since the meeting, CBA have been appointed by the Council.

2. The Amended Scheme

- 2.1. This section of the PSA provides an overview of the changes made to the scheme in light of the advice given by the Council's officers. The changes that have been made to the scheme also responds to consultation responses received from statutory consultees and local residents received through the planning application and the public event held in December 2022.
- 2.2. In summary the changes made to the scheme are as follows:
- The conversion of Caversham Park House, which is Grade II Listed, to provide 65 Assisted Living Units (Class C2) in a mix of 23 x 1 beds apartments, 40 x 2 beds apartments and 2 x 2 bed houses, with an additional 2 bed apartment over the original submission. Following detailed discussions with officers the new scheme retains the former Library at ground floor on the south elevation to communal space and relocates the residential units to the former Gallery/Conservatory area. The mezzanine from the former dining room has been removed to better respect architectural details. Removal of the modern ceiling in the Outer Hall. Rationalisation of the demolition to make better use of existing partitions. Reinstatement of the window in the north façade. As before internal and external changes to Caversham Park House are kept to a minimum given its Grade II listed status, with evidence from the Montagu Evans guiding the changes proposed and following detailed negotiation with officers.
 - The construction of a two storey 64 bedroom Care Home (Class C2) to the west of the main house following the demolition of existing buildings. This building has been greatly reduced in mass so as not to 'compete' with the Main House and a more contemporary design places it clearly as a modern addition to the Park. This follows suggestions by the Conservation Officer in response to the original scheme.
 - Erection of 27 new units in the enclosed field to the north of the BBC Records Centre, fronting Peppard Road and to the south of Caversham Park Drive on land lying outside the Historic Park and Garden boundary, referred to as Western Parcel development. All of these dwellings will be affordable and this represents a change in the number of buildings proposed on this parcel reduced by 6 from the 33 originally proposed. The layout has been significantly reviewed to reflect officer comments and the relationship with the adjacent existing housing along Peppard Road is significantly improved, the layout is now also greener and more open.
 - Erection of 20 houses on the location of the existing car parking to the north and east of the Main House extending to a parcel of the park to the north of the car park, identified as an area of the park of less sensitivity to the significance of the RPG having only been laid out in the late 20th century as evidenced by Montagu Evans. These houses would be available to the over 55s only. This part of the updated scheme replaces the crescent of dwellings and two pairs of semi-detached villas originally proposed on the area covered by the existing car park.

- 9 new homes and 28 apartments on land to the east of the main house in the area currently occupied by buildings and communications equipment and related infrastructure referred to as Eastern Parcel development, which would be available to the over 55s only. Originally this was a more traditional layout of detached and semi-detached dwellings, the layout for this part of the scheme has been significantly changed, to reflect a format that takes its inspiration from the vernacular of the service yards associated with country houses of the period appropriate with Caversham Park, in order to reduce the impact upon the RPG and the setting of the Main House.
- Refurbishment and extension of the sports pavilion to provide a café and studio and interpretation hub including the provision of 2 no. croquet lawns, 2 no. bowling greens, and refurbishment of the existing tennis court. Provision has been made for an interpretation hub within the extended pavilion building to help visitors to the site to better understand the history and the context of the buildings and the park. In addition, provision is made for an enlarged area of car parking by the pavilion to accommodate visitors, either using the café or sport facilities, the interpretation hub or accessing the pathways and the rest of the park in daylight hours.
- Associated landscaping and car parking on site. Additional footpaths have been proposed to enable all future residents to walk continuously around the site without having to walk on a roadway. Car parking has been rationalised in line with RBC policy and has been grouped away in smaller parcels to protect views from the house and out across the existing sports pitches to the north following advice from Montagu Evans in their assessment of the RPG and the important views north from the house. Access to the park to the public is now expanded.
- The new tennis court that was proposed in the north lawn has been omitted.
- The approach road/drive will be minimised in width with footpaths spread through the landscape in order to reduce the urbanising character of the existing road.
- Delivery of a new interpretation hub in a new building adjacent to the existing pavilion which will demonstrably improve the ability to appreciate the history and significance of Caversham Park.
- Careful opening up the terracing east and west of the main central lawns by the removal of secondary woodland (not mature – rather modern sycamore). This would form part of a scheme designed to give a better appreciation of, and access to, Switzer's grand landscape design.

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- Digital and physical interpretation – use of QR Codes as well as physical interpretation boards can help visitors better appreciate the history of the site as a trail.
- A commitment to landscape sculpture/art referring to the different phases/ages of the site from the Georgian period to the more recent BBC.
- An educational 'tree trail' identifying trees surviving from Brown's landscaping (if such are identified). Note that as we do not know the details of Brown's planting, an authentic restoration scheme would not be possible.
- A complete list of the updated plans for approval are in Appendix 4

3. Application of Policies CA2 and EN1

3.1. This section of the PSA should be read alongside the corresponding section 5 of the original Planning Statement, which lists in detail all of the policies relevant to the assessment of the scheme. It concentrates on the requirements and details of policies CA2 and EN1 of the adopted local plan and the guidance contained within National Policy. It draws upon legal advice from Killian Garvey of Counsel, which is reproduced at Appendix 1ⁱ.

3.2. Section 70(2) of the Town and Country Planning Act 1990 provides that the decision-maker shall have regard to the provisions of the development plan, so far as it is material to the application. Section 38(6) of the Planning and Compulsory Purchase Act 2004 provides:

If regard is to be had to the development plan for the purpose of any determination to be made under the planning Acts, the determination must be made in accordance with the plan unless material considerations indicate otherwise.

3.3. In this instance the policies in the RBLP that deal specifically with heritage assets EN1 reflects the guidance provided by chapter 16 of the NPPF and in particular paragraphs 200 and 202, which state:

200. Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of:

a) grade II listed buildings, or grade II registered parks or gardens, should be exceptional;

b) assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.*

202. Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.

3.4. RBLP Policy CA2, relates specifically to Caversham Park states in full: -

3.5. CA2: Caversham Park

Caversham Park and Caversham Park House are key features of the heritage and landscape of Reading. Caversham Park is a Registered Historic Park and Garden, and the site contains a number of listed features. These assets will be conserved.

Conversion of the house from offices to residential and/or a cultural, community or heritage use, or other suitable use compatible with its heritage, will be acceptable if it sustains the significance of the listed building. It is currently estimated that up to 40-45 dwellings could be accommodated, but the figure will be dependent on more detailed historic assessment of the building and the precise mix of uses.

Any development or conversion proposals should open as much of the park as possible up to public access, including reinstatement of any historic public footpaths where possible and appropriate.

This policy does not allocate the site for additional development over and above conversion of the house. There may be scope for some limited development on previously developed land within the site, which will need to be justified at application stage. Such development must comply with the criteria below:

- No development will negatively affect the significance of heritage assets and their setting;*
- Development will not detract from the character or appearance of the important landscape; and*
- Development will not negatively affect significant trees or areas of biodiversity importance.*

3.6. Policy CA2 identifies that the main focus for development will be the house itself, through its sensitive conversion to a use compatible with its heritage significance, with the level of accommodation being led by historic assessment and impact. Residential use is one of the compatible uses listed. The policy precludes development that, *'will negatively affect the significance of heritage assets and their setting'*.

3.7. Importantly, Policy CA2 also identifies that there may be some scope for an amount of additional limited development on previously developed land within the site. Such development it states would need to be justified and should not result in harm to the heritage assets, detract from the character of the landscape or impact harmfully on the significant trees and existing biodiversity within the park.

3.8. RBLP Policy EN1 relates more generally to the protection of the historic environment with importance placed on the conservation of existing assets, stating that:

Proposals should seek to avoid harm in the first instance. Any harm to or loss of a heritage asset should require clear and convincing justification, usually in the form of public benefits.

Applications which affect Listed Buildings will not have an adverse impact on those elements which contribute to their special architectural or historic interest including, where appropriate, their settings.

Applications which affect Historic Parks and Gardens will safeguard features which form an integral part of the special character or appearance of the park or garden. Development will not detract from the enjoyment, layout, design, character, appearance, features or setting of the park or garden, key views out from the park, or prejudice its future restoration.

- 3.9. Where harm to a heritage asset is identified, Policy EN1 allows applicants to justify this by identifying associated public benefits in the same way that the NPPF sets out at para 202. This is a very important material consideration in the circumstances as the Montagu Evans report does identify less than significant harm in the middle of the range to the RPG from the refreshed scheme. In their report Montagu Evans carry out a heritage balancing exercise, for both the main house, and then the RPG. This exercise takes the enhancements achieved by the scheme and attributes weight to these and then balances this against a similarly weighted list of harms. Whilst the report finds are that the scheme would result in a net enhancement overall in this balance to the main house, Montagu Evans conclude that this results in an overall net harm to the RPG as a result of the balancing exercise.
- 3.10. When looking at the Plan as a whole and also with regards the guidance set out in the NPPF, that despite CA2 stating “no development will negatively affect the significance of a heritage asset”, there remains scope for a balancing exercise of the public benefits of the scheme. These public benefits should be weighed against the identified harm at a less than substantial level under these wider plan policies, namely Policy EN1, which closely follows guidance set out in paragraphs 200 and 202 of the NPPF.

4. Planning Considerations and Public Benefits balance

- 4.1. The public benefits including the environmental, social and economic benefits that contribute towards the achievement of sustainability having regard to the NPPF. These are material considerations of varying weight that together outweigh any harm to heritage assets and conflict with Policies CA2 and EN1. There are a range of public benefits arising as a result of the proposed scheme which are discussed in detail below. A key document in support of this section is the Pegasus Housing Needs Assessment (HNA) submitted with this PSA and the accompanying Appendix to the report: Need Assessment For Specialist Housing For Older People In Reading LPA. These documents set out the up-to-date housing needs for specialist housing in Reading Borough, including affordable housing, sheltered housing, retirement housing and residential care spaces.
- 4.2. The findings of the HNS are that in the midst of the national housing crisis Reading stands out as having become more unaffordable over the last decade than the average rate of increase across the country, with *“the affordability of housing has worsened by 38% in Reading Borough over the preceding decade (2012-22) as compared to 22% across the nation and 35% across the South East”*.
- 4.3. Locally, within Reading Borough, the report finds that housing need is currently at least 907 homes a year when calculated via the standard method, against the RBLP requirement of 695 homes. The report then goes on to find the following:-
- *There is a truly exceptional unmet need for between 4,782 to 7,218 affordable homes across the plan period.*
 - *There is a substantial need for 1,090 or 1,900 care home bedspaces within 5 and 10 miles of the proposed development respectively.*
 - *There is a very substantial need for 1,067 sheltered/retirement homes.*
 - *There is a substantial need for 393 assisted living units.*

Affordable housing

- 4.4. The planning application applies 30% of the new build C3 dwellings to be affordable housing in line with the requirements of Policy H3 of the adopted Local Plan. The C2 assisted living units are all contained in the existing listed house and affordable housing would not be viable or appropriate in this context. Indeed it is extremely likely that, in the current inflationary and high interest environment, were a viability appraisal to be submitted on the site as a whole it would indicate that there is no requirement for affordable housing at all. This is because of the substantial costs of converting the existing house and the cost of delivering the other public benefits. Nevertheless, 27 affordable dwellings are proposed as part of the scheme in accordance with adopted policy within what is described as the western parcel.

- 4.5. The affordable housing has been concentrated in one area of the proposed scheme rather than being distributed throughout for the following reasons. Firstly there are cost implications for future private residents on the ongoing maintenance of the wider site, which could result higher costs levied to the residents of the affordable were they to be distributed across the site. Secondly there are design and layout implications for integrating family housing with dedicated older persons housing, with the proposed solution offering the highest number of affordable family dwellings. Grouping in this manner also makes future management of the housing by a registered provider easier and more cost effective.
- 4.6. This affordable housing proposed offers a mixture of size of units including eleven 2-bed houses and nine 3-bed houses which reflects the requirements of Policy H3 of the RBLP which refers to the priority being homes of two or more bedrooms, with the SHMA finding that over 90% of affordable demand is for two or more bedrooms. Additionally, a further seven 2-bedroom apartments would also be provided. The Pegasus HNA finds that there is a truly exceptional unmet need for between 4,782 to 7,218 affordable homes across the plan period, as the adopted plan only makes provision to meet between 17% and 49% of the calculated affordable need in the Borough. The proposed affordable housing would make a significant contribution towards this identified shortfall.
- 4.7. The proposed mix of affordable units has been selected to meet the needs of the Reading Borough. With respect to tenure the applicant recognises a split of: -
- Affordable rented accommodation at 'Reading affordable rent' levels (defined as rental levels capped at 70% market rent) – at least 62%.
 - Affordable home ownership – a maximum of 38%, of which the NPPF (paragraph 65) sets a minimum requirement of 10%.
- 4.8. We understand that Reading BC have not currently adopted an interim policy specific to provision of First Homes within new developments, with the RBLP having been adopted before the Government published guidance which sought at least 25% of a schemes affordable units to be First Homes. Recent approved schemes within the Borough have not required provision of First Homes and accordingly this form of tenure is not proposed as part of the present application.
- 4.9. It is considered that, despite financial unviability, the applicant's proposals for a policy compliant 30% level of affordable housing, makes a significant contribution towards addressing the Borough's exceptional current need for affordable housing which is clearly not being met by the Local Plan. Accordingly, the affordable housing proposed within the scheme should carry **significant weight** in the planning balance.

Retention, refurbishment and re-use of Caversham Park House

- 4.10. The important designated heritage assets will be secured in the long term through the proposed development for the benefit of present and future generations. The main building is largely redundant and has been for a period of around 5 years at this time, though it is both maintained and used periodically for training and events. Whilst the BBC maintain the building finding a valued use for the future of the building is paramount in its future preservation.

- 4.11. The Montague Evans report has found that the scheme would enhance the significance of Caversham Park House and that this carries great weight.
- 4.12. In the public benefits balance it is considered that the retention and re-use of the main building along with the enhancement of its significance carries **substantial weight**.

Use of Caversham Park to the wider Community and public access

- 4.13. Policies CA2 and EN8 of the RBLP require that any development or conversion proposals should open as much of the park as possible up to public access and replacement open space is provided respectively.
- 4.14. The development will result in public access to the majority of the park for the first time in its history and will allow for appreciation of the historic assets, which have always been in private hands, by the public. Following feedback from public consultation on the original proposals and at public events and meetings with local representatives, the scope of the access has been extended from that in the original submission, which would have limited access to the pathways to the north and south of the main house.
- 4.15. Now it is proposed that access, between dawn and dusk, to the whole of the park with the exception of the areas immediately adjacent to the care home, assisted living units and age restricted dwellings for safeguarding purposes. The proposed pathways encircling the park to both the north and south will include story boards with relevant historical information about the park, and an interpretation hub will be established in the new pavilion building with further details on the history of the park.
- 4.16. Additionally, it is proposed that the Cricket Pavilion will be extended to accommodate a small studio/meeting room and a café in addition to the interpretation hub and that the former Cricket Pitch area will be replaced with 2 no. croquet lawns and 2 no. Bowling Greens as well as the existing refurbished tennis court, all of which will be available for both the use of residents and the local community. Caversham Croquet club have been approached and have shown an interest in relocating the club to Caversham Park as their own site has a limited lease on it. There is the possibility of a future third croquet lawn, which will give the club an opportunity to grow. Additionally, the enhanced pavilion will be available for local meetings / clubs via a booking service.
- 4.17. Historic research of available mapping suggests that no footpaths traversed the current extent of the park. The only public footpath identified lead from just north of the gate lodge, off the Peppard Road, towards the north east, which is shown on the 1892-1914 25 inch OS map of the area (see appendix 3 to this document). This corresponds closely to a route just outside the line of the modern day boundary of the park in this location – continuing on along the line of Lowfield Road further to the north and east, again outside of the modern extent of the park. This path, which is marked F.P. on the map cited above, was bisected by another north to south track which is not marked F.P. and has a different (wider) line width, setting it apart from the clearly marked footpath. This track connected Park Farm from the Main house and would most likely have been for deliveries from the farm to the residents of the main house. This lack of public rights of way in a country house park is commonplace, and owners frequently took steps to re-route roads and paths around the edge of parks to enhance their privacy.

- 4.18. The communal facilities, such as the sports pitches/courts, proposed as part of the scheme will also have the added benefit of drawing the wider community together, creating social cohesion, which adds further weight to this benefit.
- 4.19. The 20th century ownership, first by the school and then by the BBC did not open the park up for any public access – indeed, for both institutions public access would not have been desirable - and therefore no new routes have been opened since that shown in the available historic mapping. Furthermore, the areas surrounding the outside of the park are not controlled by the current owners and it is therefore not possible to establish new entrances to the park under present conditions.
- 4.20. In summary, the park is being opened up for near full access within the reasonable limits resulting from the proposed use; that is to enable the safeguarding of vulnerable future residents. No historic evidence for a publicly accessible footpath can be evidenced within the present footprint of the park and there are limited opportunities to create a new access point given the land under control by the applicant. These provisions will clearly provide a **significant benefit** to the local community and these recreational benefits go beyond the requirements of policies CA2 and EN8 of the RBLP and to a level that exceeds the original submission.

Interpretation hub in the pavilion café

- 4.21. To provide a record of the history of Caversham Park House and the Listed Park and Garden allowing for better understanding of its history and importance. This visitor attraction will provide background and context for those members of the public visiting the park who wish to find out more about its history.
- 4.22. In the public benefits balance it is considered that the provision of a visitors centre with details of the heritage and use of the site carries **significant weight**.

Removal of poor quality 20th century urban developments

- 4.23. The Site contains various structures and hardstanding, namely satellite dishes, twentieth century structures and extensions and car parks which have resulted in the disruption of the legibility of both the main building and its immediate setting as well as extended setting. These later editions will be removed, which will vastly improve the character and appearance of the estate as a whole and better reveal and enhance the significance of Caversham Park and the registered park and garden. This will only serve to significantly benefit the Site and its historic significance.
- 4.24. In the public benefits balance it is considered that **substantial weight** should be afforded to the removal of the poor quality 20th Century additions.

Enhanced landscaping

- 4.25. The wider estate will be significantly improved through the removal of existing car parks and the introduction of new hard and soft landscaping and a number of measures that will better reveal and enhance the significance of the Site. Additionally, the current surfacing of the driveway and car park, which is not sympathetic to the property, will be improved with a softer more suitable material, which can be agreed with officers during the course of the application, which will enhance the setting of Caversham Park House. Additional planting is proposed around the eastern and western parcels of development and which will help to mitigate any intrusion of development into the openness of the Site. Over time, it will become an attractive feature in its own right which will deserve recognition as such.
- 4.26. The introduction of both new hard and soft landscaping will better reveal and enhance the significance of the Site and safeguard the heritage assets for the future. Additionally, opening up of the terraces south of the main house will help preserve and enhance Switzer's grand landscape design.
- 4.27. In the public benefits balance it is considered that the proposed landscape enhancements carry **significant weight** in the public benefits balance.

A Highly Sustainable Location for Housing

- 4.28. The Site is located within Reading Borough Council's administrative boundary and within a suburb of Reading to the north of the River Thames. The Site is located close to Emmer Green and Caversham, which contain a number of amenities and facilities, including a shop, post office, restaurants, doctors etc, which are within walking distance of the proposed development along well-lit pavements.
- 4.29. Provision of housing against the RBLP identified housing requirement, in the built-up limits of Reading, the main settlement in Berkshire, close to employment, services and facilities and with access to public transport networks. Delivering a total of 153 dwelling new homes that contribute to meeting the Borough Councils housing requirement of 15,847, including 65 assisted living units, 61 new age-restricted retirement dwellings and 27 affordable units.
- 4.30. The Pegasus Housing Needs Assessment (HNA) concludes that the council's current housing requirement far exceeds the current adopted target of 695 homes per annum in response to the calculated need of 720 homes in the evidence for the local plan. This is short of the need calculated by the standard method which currently sits at 906 homes per annum (a shortfall of over 200 dwellings per annum) and also the stated capacity of the Borough to build, which was recognised in the latest Annual Monitoring Report (AMR) as having capacity within the Borough for 800 dwellings per annum. This results in a shortfall of between 893 and 1236 homes in the current five-year period in RBC.

- 4.31. In terms of public transport and travel outside of Emmer Green, there are a number of bus stops available most notably on Buckingham Way. These services provide public transport into Reading town centre. Reading railway station is also accessible by bus from the site with frequent services to London Paddington, Oxford and the West Country.
- 4.32. Overall, it is considered that the Site is in a sustainable location for housing, in accordance with Policy CC6 of the RBLP. The Framework in paragraph 120(c) is clear that '*substantial weight should be given to the value of using suitable brownfield land within settlements*', which is the case of the Caversham Park site, it is therefore considered to carry a **substantial weight** in the public benefits balance given use of brownfield land and the acute shortfall of open market housing relative to housing needs in the current five-year period.

The provision of specialist care housing in a situation of critical shortage

- 4.33. Caversham Park House will be converted under the plans to provide 65 assisted living units (C2 use) which will contributed to the LPA's needs for this form of housing, which is increasing as the age of the population ages over time. This will free up spare capacity in the existing housing stock as family houses in the local area are vacated as the elderly residents move to the development.
- 4.34. Many residents downsizing to retirement dwellings will be able to future proof their older age because of the availability of Assisted Living Units and a Care Home on Site. A downsizer can be described as "*a person who moves to a smaller property, typically after he or she retires*". This allows the different housing options on site to work together to provide a holistic destination for future residents as they age and their health deteriorates.
- 4.35. Local Plan Policy H6: Accommodation for Vulnerable People, sets out provision for care home beds and outlines that '*other special accommodation for vulnerable people will address the identified needs, which are primarily for accommodation that enables occupants to live as independently as possible, particularly for older people and people with physical disabilities*'.
- 4.36. The proposed scheme makes provision for a varied mix of specialist housing, with 61 over-55s age-restricted dwellings, 65 assisted living apartments in the converted main house and a 64-bed Care Home. The assisted living requirement will be secured by contract – with any prospective residents for this type of unit requiring, as a minimum, 1.5 hours of care assistance a week (or in the case of couples, at least one individual will have needs of this level).
- 4.37. The care home will cater for a range of needs for future residents with a balance between those with acute needs and those with lesser needs. The level of care provided to residents will reduce the burden on the local NHS services, by avoiding GP and hospital visits due to the level of personalised care provided. The same is true of the assisted living care, which will happen on site and reduce the number of visits to local NHS services.

- 4.38. There is a pressing local and national need for specialist housing, as demonstrated in the Pegasus HNA accompanying this submission, with shortfalls in all areas of specialist housing being provided by this scheme. The care home and assisted living provision will reduce the number of falls and minor accidents and will help identify health issues early when treatment can be simpler and less burdensome – providing quality of life and health benefits to the residents.
- 4.39. Policy H6 of the RBLP outlines the provision of accommodation for vulnerable people in the borough identifying an additional 253 residential care bed spaces for elderly people between 2013 and 2036. The Pegasus HNA has found there has been an under provision of 156 care beds in the plan period to 2022 and the 64 beds proposed within this scheme will contribute significantly to meeting the identified and up to date needs of the Borough's most vulnerable residents. This is reflected in paragraph 62 of the Framework which seeks to identify the specific needs for different groups in a community.
- 4.40. There are many health care benefits, both for the future residents, with a greatly increased level of day to day care and also for the local community with the reduced burden on the local health care infrastructure. The Pegasus HNA calculates that there is a critical need for 393 assisted living units across the plan period, calculated using the most up to date information available, and this scheme would significantly contribute to this identified level of need. It is considered that these public benefits carry **very substantial weight** in the balance against the identified heritage harm.

The provision of over-55s housing

- 4.41. The Berkshire Strategic Housing Market Assessment (SHMA) 2016 found that in Reading Borough itself the population aged over 65 years is expected to increase by 63.5% and for the 85+ cohort the increase is 130.6%. The Pegasus HNA, which uses more up to date information, confirms that in light of this demographic change there is a requirement of an additional 1,067 sheltered/retirement homes across the plan period.
- 4.42. The applicant has found that in their experience, as a provider of specialist housing for the elderly, that the average age of a resident in over-55s housing in the properties they manage to be around 74 years, which is considerably higher than the over-55s moniker might suggest. The addition of assisted living accommodation and the care home on site provides a full range of facilities and options for residents to enable them to keep living within the same wider development and to avoid the upheaval of moving away from partners and family.
- 4.43. The proposals would provide 61 age restricted retirement homes that would contribute to the need of over 1000 homes in the borough, this would attract **substantial weight** in the public benefits balance.

The provision of care home spaces

- 4.44. The Pegasus HNA finds that there has been an under-delivery of care home bedspaces and homes more generally even against the adopted housing requirement which is far too low to address housing needs. Over the period 2013-22 there was a net loss of 57 care home bedspaces, as compared to the need for 99 bedspaces over this period in the authority.

- 4.45. The Inspector in the appeal ref APP/K3415/W/20/3264280ⁱⁱ found that in similar circumstances that significant weight for the provision of housing that met '*demand for accommodation suited to serve the varying needs of an ageing population*'. However, in this case there is a demonstrable net loss of bed spaces in the previous decade, further exacerbating the need in RBC.
- 4.46. Given this historic under provision, and in the backdrop of an aging population, there is a clear and pressing requirement for care home beds in the authority. The proposals would include a 64-bed care home that would significantly contribute to the delivery of this kind of specialist housing for the most vulnerable residents in the borough. This would therefore attract **substantial weight** in the public benefits balance.

Release of existing housing stock

- 4.47. Part of the demand for specialist housing arises from a desire by elderly people to downsize from larger family houses. One very positive effect of providing specialist accommodation is that larger family accommodation is released back into the market and contributes generally to boosting the supply of housing.
- 4.48. As noted above the unique offering under this scheme is with varying levels of care the development would provide significant choice for residents. There was significant interest from local residents in the development during the December 8th 2022 public event for when housing might become available, lending credence to the likelihood that it will ease the pressure on local housing in the Borough.
- 4.49. Regardless of whether a five year housing land supply can be demonstrated by Reading Borough Council, any increase in housing availability within one of the least affordable areas of the country is of benefit and the provision of further housing, which is in accordance with its spatial strategy, is of significance. The release of existing housing stock would attract **significant weight** in the public benefits balance as it significantly boosts the delivery of new housing in accordance with NPPF paragraph 60.

Employment provision and economic benefits

- 4.50. There will be employment created during the period of construction of the development with the construction of over 85 new homes, the conversion of the main house and the 64 bed care home. The build out is likely to be across 2-4 years and will support a number of FTE jobs in the local economy in the process, supporting existing local suppliers and construction firms involved in the scheme.
- 4.51. In the order of 60+ FTE jobs would be created in the Care Home once completed to care for the elderly residents. Further jobs will be created across the estate for facilities and management of the Park and the historic buildings within it. Additionally, new residents of the Site will contribute to additional local spending and will utilise and support local services and facilities helping to ensure their viability. The Framework at paragraph 81 advises that significant weight should be placed on the needs to support economic growth and productivity.
- 4.52. The levels of employment provision and local economic benefits resulting from the net influx of new residents into the local area which is considered to attract **significant weight** in the public benefits balance.

Creation of a thriving sustainable community

- 4.53. Creation of a new community within the established residential area of Caversham, adding to the diversity of the area and creation opportunity for existing residents to continue to live in the area.
- 4.54. There would be opportunities for integration of the community, with the park open daily for visitors and for use of the sport facilities on site through a booking system. The future residents will have opportunities both within the park development and without in the local area to develop community ties, making use of existing facilities and groups.
- 4.55. The applicant is working with the local Caversham Croquet Club to see if the club could re-locate to the use the facilities and this would provide further opportunities to integrate the new community with the existing one.
- 4.56. The creation of a thriving new community that would complement and integrate successfully with the surrounding residential community would attract **significant weight** in the public benefits balance.

Extension of the pavilion + public use of the sports facilities

- 4.57. Provide additional space for use by residents and by the wider community to come and visit. Opening up for the first time public access to the sports facilities at Caversham Park that will be enhanced to include a second tennis court, croquet and bowls facilities. The pavilion will be available to be booked for community use as a space for events.
- 4.58. The public use of the sports facilities would attract **significant weight** in the public benefits balance.

Ecology benefits

- 4.59. Extensive surveys of the existing park and its ecology have been carried out throughout the preparation and submission of the application. The RBLP in policy EN12 states that there should be an overall net gain in Biodiversity, though it predates legislation in the Environment Act (2021) and does not commit to the forthcoming 10% statutory minimum. Beechcroft are in any event committed to providing a minimum of 10% BNG as a result of the scheme and are in the process of calculating that level possible following the recent re-design of the scheme.
- 4.60. A net gain for biodiversity, particularly where this would be in excess of 10% versus the existing baseline, would attract **significant weight** in the public benefits balance.

5. Planning Balance

- 5.1. Paragraph 11 of the NPPF (2021) deals with the presumption in favour of sustainable development. Part C of paragraph 11 states that decision takers should approve '*development proposals that accord with an up-to-date development plan without delay*'. The assessment in the earlier sections of this statement demonstrate that the proposals do accord with the adopted Reading Borough Local Plan when taken as a whole and that the proposals should not be measured against Policy CA2 in isolation. In accordance with the NPPF, Policy EN1 allows for any harmful impacts on the Registered Park and Garden to be balanced against the public benefits associated with the proposals. In taking the Local Plan as a whole, other policies are also relevant, including those set out below (all of which the proposals also comply with):
- H2: Density and mix
 - H3: Affordable housing
 - H6: Accommodation for vulnerable people
 - CC7: Design and the public realm
 - EN6: New development in a historic context
 - EN8: Undesignated open space.
- 5.2. The proposals should therefore be approved without delay.
- 5.3. Notwithstanding the above, should officers find that there is a conflict with the local plan as a whole, due to the conflict with Policy CA2, then paragraph 11d) of the Framework is engaged. Under 11d)i the designated heritage assets within the Site, including most prominently the grade II listed Caversham Park house and the RPG, fall within the definition of part (i) ie that of *particular importance*. We believe that the identified heritage harm is outweighed by the benefits of the proposal (applying paragraph 202 of the NPPF) and thus this identified harm does not provide a clear reason to refuse permission.
- 5.4. Moving to paragraph 11(d)(ii) the relevant paragraphs of the Framework are 200 and 202, as these paragraphs seek to protect designated heritage assets, with harm requiring *clear and convincing justification*. It follows that the significant and substantial public benefits detailed in section 3 of this report would be weighed against the less than substantial harm identified and which is at a level in the middle of the spectrum of less than substantial harm. We would contend therefore that if paragraph 11(d)(ii) is engaged then the harm does not significantly and demonstrably outweigh these benefits.

6. Conclusion

- 6.1. Overall, the above sections have demonstrated that there are a large number of clear public benefits that all carry at least significant weight, with many of them carrying substantial weight in the balance, and when weighed against the less than substantial harm to the RPG in the Montagu Evans Heritage Statement it is evident that the public benefits outweigh the level of harm identified.
- 6.2. Of particular note is the up to date evidence provided by the Pegasus NHA report which concludes that all four of the specialist housing types being proposed under this application, as well as housing numbers in the Borough more generally, are not meeting the identified and up to date needs of the borough's residents. This gives credence to the very substantial weight attributed to the provision of specialist housing and for housing in general against this need – which is described as being at least a '*substantial unmet*' need and on the case of affordable housing a '*truly exceptional unmet need*' by the report's author.
- 6.3. In section 4 of the PSA we have set out the detailed public benefits that weigh in favour of the proposals, in summary these are:-
- Affordable housing - **significant weight**
 - Retention, refurbishment and re-use of Caversham Park House - **substantial weight**
 - Use of Caversham Park to the wider Community and public access (including appreciation of the heritage assets for the first time) - **significant benefit**
 - Interpretation hub in the pavilion café – **significant weight**
 - Enhanced Landscaping - **significant weight**
 - A Highly Sustainable Location for Housing - **substantial weight**
 - The provision of specialist care housing in a situation of critical shortage – **very substantial weight**
 - The provision of over-55s housing - **substantial weight**
 - The provision of care home spaces - **substantial weight**
 - Release of existing housing stock - **significant weight**
 - Employment provision and economic benefits - **significant weight**
 - Creation of a thriving sustainable community - **significant weight**
 - Ecology benefits - **significant weight**
 - Extension of the pavilion + public use of the sports facilities - **significant weight**

- 6.4. Against these benefits sits the identified less than substantial harm in the middle of the range to the Caversham Park Registered Park and Garden, which it is acknowledged carries great weight in the planning balance.
- 6.5. The scheme largely accords with policy CA2 which seeks to guide redevelopment of Caversham Park and to protect the important heritage assets. Limited harm has been identified due to some additional development proposed beyond that specified in the policy which does result in elements of conflict with Policy CA2. However, when taking the Local Plan as a whole, Policy EN1 allows for a balancing exercise against an identified harm and this assessment has shown that the harm is outweighed in the overall balance. The development proposals are appropriate to the design guidance and policies outlined within policies CA2, EN1, EN6, CC7, H2 and H6 of the RBLP and with the Local Plan taken as a whole on this basis.
- 6.6. All other identified impacts can be avoided, mitigated or addressed through planning conditions and/or obligations.
- 6.7. The development proposals accord with the development plan when read as a whole and, in the absence of material considerations indicating otherwise, should be approved in accordance with S38(6) of the PCPA 2004. Notwithstanding that, the proposals also represent sustainable development having regard to the social, economic and environmental objectives and policies of the NPPF. As such the proposals represent sustainable development in the context of NPPF paragraph 11c and planning permission should be granted.
- 6.8. In the alternative, if it was thought that there was conflict with the plan as a whole, paragraph 11(d)(ii) of the NPPF is engaged. Within this context, the harm does not significantly and demonstrably outweigh the benefits and thus permission should be granted also on this alternative basis. A

ⁱ Killian Garvey Opinion (pp9 - 10, paras 4.1 - 4.7)

ⁱⁱ Appeal Decision APP/K3415/W/20/3264280 (pp8, para 42)