

Planning Statement Addendum 2

Caversham Park, Reading, RG4 8TZ





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Appendices

- 1. Up to date List of Plans and Drawings – see drawing reference 3251.DIS 08.03.24

1. Introduction

- 1.1. This Planning Statement Addendum 2 (PSA2) 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. This resulted in a refresh of the application in August 2023. Following further consultation and feedback from officers further modest changes to the scheme have been made – principally to address the heritage concerns raised.
- 1.2. This PSA2 should be read in conjunction with the existing full Planning Statement (PS) submitted alongside the original applications as well as the Planning Statement Addendum (PSA) submitted alongside the August 2023 submission update. The PSA2 deals with changes that have been made to the scheme since last 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. 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 and PSA. 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 been updated since submission in December 2003, and a section of this report reviews the submission with those changes in mind. Of the changes in the December 2023 NPPF, it is section 5 that is of most relevance to the two applications. Paragraph 60 emphasises that the supply of homes should meet identified housing needs with an appropriate mix of housing types. Paragraph 63 now includes the following additional detail with respect to the sensitive groups within communities that should be catered for, *"including those who require retirement housing, housing-with-care and care homes"*. There is then a greater recognition of the housing needs of elderly people and their care needs at a national policy level.
- 1.4. 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: -
- 1.5. *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.*
- 1.6. Resulting in the final description text: -

- 1.7. *Redevelopment of Caversham Park for assisted living accommodation (Class C2) for over 55's through conversion of Caversham Park House, erection of a care home (Class C2) and age-restricted retirement dwellings (Class C3) including conversion of existing buildings Bursars House and The Lodge. Erection of affordable housing (Class C3 non-age restricted) and refurbishment/extension of existing pavilion to provide changing facilities, café/studio/interpretation hub, sports provision of 1 croquet lawn and 1 cricket ground, refurbishment of tennis court, footpath access to Lowfield Road, associated parking and landscaping following demolition of extensions/outbuildings to the main house (amended description).*

Background to the Site

- 1.8. The proposed development will provide a Care Home, Assisted Living Units, retirement housing for people aged over 55, market dwellings and affordable housing.
- 1.9. 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.
- 1.10. 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.
- 1.11. 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 and is therefore in a highly sustainable location. 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.
- 1.12. 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 2024 Submission

- 1.13. 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.
- **Heritage Assessment Addendum** prepared by Montagu Evans.
- **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 (reviewed but no update required)

Meetings held since the initial submission.

- 1.14. Meetings were held in the Autumn of 2023 with the following parties to discuss the impacts of the latest application submission from August 2023.
- The external heritage consultant CBA following their draft report on the impact to the listed park and gardens from the proposed scheme.
 - The RBC conservation officer
 - The RBC case officer
 - Onsite meeting with ward members – August 2023
 - On site meeting with Berkshire Gardens Trust following their consultation response – November 2023
- 1.15. 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.
- 1.16. These meetings and the written consultation responses have informed this update to the schemes, in order to overcome the objections of the predominantly heritage-based consultations.

Environmental Impact Assessment

- 1.17. 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.
- 1.18. An updated ES addendum (ESA2) 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 addendum from Montagu Evans and the update landscape scheme prepared by Savills. The conclusion is that the scope of the EIA remains valid.

Officer Feedback

- 1.19. Following the meetings with consultees and members in the Autumn of 2023 the case officer provided the following feedback to the development in December 2023:
- There are significant environmental benefits resulting from the increase in the bio-diversity net gain offered by the scheme.
 - That the heritage benefits would result in moderate environmental benefits.
 - That the social benefits of the scheme would significant.
 - Economic benefits resulting from the scheme would be moderate.
 - That the benefits of an access to Lowfield Road would result in a further significant social benefit.
 - That despite the many benefits of the scheme there was an overall planning balance against the identified heritage harms summarised as being between low to high level of less than substantial harm variously to the designated heritage assets.
- 1.20. Again, this feedback and summary has fed into the updates to the scheme submitted under this March 2024 submission.

2. The Amended Scheme

- 2.1. This section of the PSA2 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 and members through the on-site meeting in August 2023.
- 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 removes the mezzanines from all but two of the converted units, of the two remaining the one for plot 21 has been reduced in scale and therefore impact upon the significance of the listed building. Plot 17 also retains a mezzanine to make better use of the space afforded within the former chapel, this is not subject to change under this update.
 - 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. Screening to the south of the building has been added to further protect the views along the east-west transect from and to the Doric temple.
 - 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 remain affordable but with a change in the mix of affordable tenures, with five units offered for discount market sale bringing the mix of discount sales and discount rental to roughly 50:50. There remains an over-provision of affordable units given were the scheme subject to a viability scrutiny it would not be possible to provide any affordable units. Given that the present update results in a net loss of proposed market units against which the affordable units are calculated the continuance of offering 27 units is a **great public benefit** in comparison to the most recent submission in August 2023.
 - Erection of 12 houses on the location to the north of the existing car parking to the north and east of the Main House, 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 20 units previously offered in this area, reducing the impact upon the RPG and the setting of the listed main house, by creating a lower density and a gap between this and the development to the south on the Eastern Parcel. Additional screening is offered on the west of the parcel to better screen it from the main house looking east and from the approach along the drive from the west.

- 9 new homes and 20 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. The scheme has been significantly reduced in size and density with the removal of 8 apartments in the separate block between the retained courtyard, that takes its inspiration from the vernacular of the service yards associated with country houses, and the main house. This leaves a more open area between the parcels of development and results in a reduction to the impact and therefore harm upon the RPG and the setting of the Main House.
- Associated landscaping and car parking on site. There is a reduction in the number of car parking spaces with the removal of the 16 units on the eastern and north eastern parcels. This has led to more open space with four spaces removed below the north east parcel and a further seven removed from the area around the north eastern parcel. Furthermore, with the removal of the L-shaped block between the house and the Eastern Parcel the area here has also been subject to the removal of 13 parking spaces along with cycle parking and refuse containment and other domestic paraphernalia.
- The introduction of a footpath connection to the boundary on the north east with a future link through to the Lowfield Road. This will vastly increase the accessibility of the site during daylight hours, with residents of Caversham and the park able to access the site from this opening. This is a significant public benefit introduced with this update.
- Remove the 2 bowls lawns and 1 croquet pitch and provide a cricket pitch in their place. Retention of the cricket pitch has been highlighted by both local and national consultees as important given the shortage of cricket squares in the area as identified by the Reading playing pitch strategy. A minor tweak to the location of the cricket square has been made in order to retain one of the proposed croquet lawns. This is a significant public benefit – which meets a known need for cricket facilities – introduced with this update.
- No further changes to the layout of the western area, but we will be providing 5no. Discount Market Sales (DMS) units. This will result in the affordable mix changing to close to 50:50 affordable rent and affordable sales.

3. Application of Policies CA2 and EN1

3.1. This section of the PSA2 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 should also be read alongside section 3 of the PSA. It concentrates on the requirements and details of policies CA2 and EN1 of the adopted local plan and the guidance contained within National Policy.

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 206 and 208, which state:

206. 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.*

208. 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 208. This is a very important material consideration in the circumstances as the Montagu Evans report does identify less than substantial harm at the lower end resulting **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 internal heritage balancing exercise. This then needs to be assessed against the significant and vast planning benefits associated with the scheme with further details on this provided later in this PSA2.
- 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 206 and 208 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 updates to the scheme which are discussed in detail below. In addition to these benefit this should be read alongside the benefits as set out in the PSA and summarised in the conclusion in section 6 of this PSA.

Affordable housing

- 4.2. The applicant has previously applied 30% of the new build C3 dwellings to be affordable housing in line with the requirements of Policy H3 of the adopted Local Plan, this resulted in 27 units – all of which are retained following the proposed changes to the scheme under this submission. As the number of C3 dwellings has been reduced under the present scheme the proportion of affordable homes is now above the 30% figure at around 37%. 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, nor is there a policy requirement for affordable dwellings to be provided for C2 schemes. 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.
- 4.3. Whilst 27 units are retained, five of these will change in tenure from affordable rent to Discount Market Sale, another form of affordable provision. This is due to the number of units of C3 housing proposed being reduced. The change in the mix of tenure will result in a split of: -
- Affordable rented accommodation at 'Reading affordable rent' levels (defined as rental levels capped at 70% market rent) – around 50%
 - Affordable home ownership – a maximum of 50%, of which the NPPF (paragraph 65) sets a minimum requirement of 10%.
- 4.4. Note that of the 30% requirement (or 22 units) the split would be in the region of the 60:40 affordable rent to affordable ownership. The scheme is therefore more than compliant on the 30% affordable provision mandated by policy.
- 4.5. 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.

- 4.6. It is considered that, despite financial unviability, the applicant's proposals for an above policy compliant 30% level of affordable housing (37%), 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 **substantial weight** in the planning balance.

Retention, refurbishment and re-use of Caversham Park House

- 4.7. 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 6 years at the time of this report, 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.
- 4.8. The conservation officers report and subsequent written report from the case officer concludes that there is an overall level of less than substantial harm arising from the proposed scheme to convert it, though Montagu Evans dispute this level of identified harm, finding instead a net enhancement. Part of the conservation officers argument is that the proposals are for too many units, with 65 units proposed, whilst the policy CA2 estimates 40-45 units. However, there is a fundamental difference as the present scheme is for assisted living units and not open market housing, which is likely the basis for the drafting of the policy. In addition, the policy was drafted with no background assessment undertaken on how a scheme for residential could be delivered within the building. The applicant has a long record of converting sensitive heritage buildings and the units proposed are appropriate for the use and for the building and the existing fabric. Changes have been made after previous feedback to protect the main ground floor rooms in the most sensitive parts of the building from conversion and the present number of units has long been accepted by officers since the original pre-application discussions.
- 4.9. However, the applicant has revisited the scheme and identified four of the six proposed mezzanines to be removed from the scheme. These were considered by officers as contributing harm to the fabric and character of the building and contributing to the number of service runs required. The two remaining mezzanines have been reduced in scale in the case of plot 21 and also, alongside plot 17, made freestanding.
- 4.10. Some other modest changes have been made to the scheme including:-
- Amendments to the design of the fire lobby in the Hall;
 - Conversion of Store opposite (south) of Plot 12 to a Gym;
 - Cinema Room replace with Bedroom for Plot 23 and a roof light added;
 - Plot 13 changed to a one-bed apartment and new kitchen proposed in the room to the west of the Outer Hall (originally the Private Secretary's room).

- 4.11. Each of these changes is discussed in the Heritage Statement Addendum (HSA) and then summarised in Table 2.1 of that report. The assessment concludes that the proposals when taken as a whole represent a net enhancement to the main house and its setting (2.22 of the HSA). It is considered that the preservation and continued use of the listed building is a public benefit with **significant weight** in the planning balance.

The provision of over-55s housing

- 4.12. 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.
- 4.13. 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.
- 4.14. The revision to the NPPF in December 2023 added further detail to the 'older people' group of vulnerable to paragraph 63 to include specifically those who "*require retirement housing*" and "*housing-with-care*". This adds weight to the level of housing proposed under this scheme.
- 4.15. The proposals would provide 45 age restricted retirement homes that would contribute to the need of over 1000 homes in the borough, this would attract **significant weight** in the public benefits balance.

Use of Caversham Park to the wider Community and public access

- 4.16. 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. On top of the access previously highlighted in both the PS and PSA the present scheme offers a significant additional benefit – access to and from the Site from the Lowfield Road on the north eastern boundary of the park.
- 4.17. Through several round of public engagement and discussions with ward members this have been a request from many participants. The applicant can now confirm that, subject to agreement with the highways authority who's land the planned route adjoins, that access through to the Lowfield Road can now be offered. This will allow both residents of the park and the adjacent community to access the park and open areas and also to pass through and across the park during daylight hours.

- 4.18. This is a clear benefit to the public and would contribute to the **substantial weight** garnered through opening up and making the park accessible to the public for the first time in its history in the public benefits balance.

Proposals impacting the Registered Park and Gardens

- 4.19. Several interventions are proposed to lessen the impact of the proposals upon the character and significance of the RPG, following the higher levels of less than substantial harm identified by the heritage consultants to the LPA. This include:-

- Removal of the L-shaped block in the Eastern Parcel;
- Introduction of additional landscaping to the south of proposed care home to provide additional screening in views from the south;
- Removal of the two blocks to the north of the courtyard building;
- Reduction in the quantum of car parking as a result of the reduction in overall residential units;

- 4.20. The HSA assesses the impact of these changes to the scheme and then offers a conclusion, that when considered as a whole would *“lead to a “Low” level of net less than substantial harm to the significance of the RPG”* (3.25 of the HAS). This follows an internal heritage balance, which balances the net enhancement to the listed building and its setting against the low to medium harm identified and summarised in the Table 3.1 of the HAS.

- 4.21. It is this level of low less than substantial harm, following the internal heritage balance detailed in the HSA that the public benefits should be weighed against.

Provision of a cricket pitch

- 4.22. Both local and national consultees responses highlighted the shortfall in cricket squares and pitches identified in the up to date Reading playing pitch strategy (2021), with no proposal to meet this need by RBC. The proposals have been revised to remove the bowls lawn and one of the proposed croquet lawns, neither of which are identified as having a shortfall in the strategy, and to provide a cricket pitch in the approximate location of the existing/previous one. One croquet lawn is however retained as the applicant has identified a local need for croquet from a local club.

- 4.23. The cricket square will be available for use by the public on a public booking system and will therefore meet an identified public need and carries with it an additional public benefit in comparison to the earlier schemes proposed by the applicant. It is consider that this would carry a **significant public** benefit in the balance.

Technical assessments

- 4.24. A number of the technical assessments have been revised in light of the changes made under this submission.
- 4.25. Transport. Revised transport assessment with the new layouts and levels of parking. Trip generation updated and concludes that around 50 fewer 2-way trips will be generated daily as a result of the changes. The scheme was already considered acceptable from a trip generation aspect – being lower impact than the present permitted use as an office. The proposals therefore represent a further lessening in the impact of the scheme. The travel plan and CTMP have also been revised with the new layout and levels of development.
- 4.26. Landscape. Revised LVIA and supporting illustrative strategy detail plans. Demonstrate the revised plans and the general lessening of impact upon the character of the RPG – especially through the increased level of openness in the eastern and north eastern parcels. Additionally the details of the screening to the west of the north eastern parcel and to the south of the care home are detailed.
- 4.27. Drainage. Updated FRA and Foul Drainage Assessment, taking into account the reduction in the level of development and the layout and intensity of required mitigation. The FRA concludes that the proposals are in accordance with nation planning policies and that they would not result in an unacceptable level of risk of flooding – either within the site or beyond. Similarly the Foul Drainage and utilities report concludes that the scheme, which is reduced in scale from the previous proposals would be acceptable, with existing utilities either sufficient for connections or that new infrastructure could be provided as required.
- 4.28. Arboriculture. The newly revised AIA assesses the impact of the updated scheme and finds that 7 fewer mature trees would be removed as a result of the proposals (107 vs 112). No additional category A or B (the highest respective levels) would be removed as part of the revised proposals. Mitigation remains significant with considerably more trees planted than lost as a result of the proposals.
- 4.29. Overall the technical work results in showing that there are no technical constraints which would prevent the scheme from determination.

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) i.e. 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 number of clear public benefits that have either increased or are in addition to the those detailed in the PS and PSA (see table in the appendix of the cover letter accompanying this application and the short summary below). These are considered to carry at least **significant weight**, with many of them carrying **substantial weight** in the balance, and when weighed against the low level of less than substantial harm to the RPG in the Montagu Evans Heritage Statement Addendum it is evident that the public benefits outweigh the level of harm identified.
- 6.2. Of particular note is the reduced level of harm to the heritage assets, with the conclusion from Montagu Evans being that the overall harm is no at the lower end of less than substantial as a result of the changes to the proposals. The enhanced public benefits detailed above and summarised below are considered to be robust and to outweigh this level of harm.
- 6.3. In section 4 of the previous 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 weight**
 - 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**

In addition to these public benefits the following are enhanced or added through the updates under the present scheme as detailed in the section above: -

- Affordable housing - significant weight to **substantial weight** given the overprovision at 37%
- Retention, refurbishment and re-use of Caversham Park House - **substantial weight** enhanced by the interventions made including the removal of many mezzanines
- Use of Caversham Park to the wider Community and public access (including appreciation of the heritage assets for the first time) - significant weight to **substantial weight** given the new access from the Lowfield Road

- Enhanced Landscaping - **significant weight** enhanced by the additional landscape screening to the north east and to the south of the care home
- Extension of the pavilion + public use of the sports facilities - **significant weight** enhanced with the meeting of the identified need for a cricket pitch

- 6.4. Against these benefits sits the identified less than substantial harm in the low part 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. As such the proposals represent sustainable development in the context of NPPF paragraph 11c and planning permission should be granted.