

Mr Matthew Burns Reading Borough Council Civic Offices Bridge Street Reading Berkshire RG1 2LU Direct Dial: 0207 973 3700

Our ref: L01481914

3 May 2024

Dear Mr Burns

Arrangements for Handling Heritage Applications Direction 2021 & T&CP (Development Management Procedure) (England) Order 2015 & Planning (Listed Buildings & Conservation Areas) Regulations 1990

### CAVERSHAM PARK PEPPARD ROAD CAVERSHAM READING RG4 8TZ Application Nos 220410 & 220410

Thank you for your letters of 18 April 2024 regarding further information on the above applications for listed building consent and planning permission. On the basis of this information, we offer the following advice to assist your authority in determining the applications.

# Summary

Historic England maintains our objection to the proposals because of the high level of harm the scheme would cause to the significance and appreciation of the registered park and garden, and the impact this would also have on the significance of the listed house whose setting is formed of the parkland and gardens. The proposals continue to appear contrary to the Local Plan and therefore should be refused unless the Council has a strong justification for departing from the plan.

# **Historic England Advice**

### East area - amendments

As set out in our letter dated 24 November 2023 the proposed positioning of a 'service wing', now minus the further L-shaped building, remains poor architecturally and is historically an unsuitable location for such a block. Historically this was a pleasure garden that was an important aspect of the landscape design and could be restored. Building here would prevent this ever happening. Furthermore, the current undeveloped nature of the site makes an important contribution to the setting of the



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house. As a country house, surrounding it with buildings compromises one of its key characteristics that of being away from other buildings and people. This harm is exacerbated by poor quality building design that would not (from the elevations) reach anything approaching the sensitive and high-quality architecture that would have been built historically. This poor replication of an historical form would not in any way reduce or mitigate for the harm caused by developing this area of the garden for this intensity of residential development. The removal of the L-shaped building achieves only the smallest reduction in harm, with the proposed main block remaining deeply problematic.

### North east parcel and car parking - amendments

There has been a reduction in the number of blocks in the north east parcel. We don't think this meaningfully address concerns we have raised previously. This area retains a parkland character, despite much of the tree planting being probably 20<sup>th</sup> century, and any remaining character would be entirely destroyed by the proposed residential development. As raised in our previous letters, new car parking to the north of the house and along the driveway would harm the significance of the house (through harmful change to setting) and well as harm to the registered park and garden. It would create an unsympathetic change in the appearance of the sweeping driveway and cause further erosion of the parkland, exacerbating an existing unsympathetic setting to the listed building which is caused in part by the large existing car park, diminishing the significance of the park and one's experience of it in the process.

### Relevant planning policies

Reading's Local Plan Policy CA2 sets out the Council's aspirations for the future of Caversham Park that seeks to avoid harm to both house and garden.

The National Planning Policy Framework sets out at paragraph 205 that great weight should be given to conservation of a designated heritage asset and that any harm to the significance of those assets should require clear and convincing justification (paragraph 206). Where harm would be caused and cannot be avoided (paragraph 201) the harm should be weighed against the public benefits of the proposals as set out at paragraph 208.

# Historic England's position

By causing harm to the Grade II listed building and park these proposals are contrary to the Local Plan.

We query whether some of the benefits (those of public access, cricket pitch and interpretation) could in fact be achieved without the harmful areas of residential



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development.

In line with the NPPF the Council will need to consider where there is a clear and convincing case for the harm that would result from this scheme, and if the provision of the proposed benefits (including the proposed residential units in harmful locations) could be provided elsewhere within the borough and result in less harm to heritage assets than this scheme.

If the Council are minded to approve the scheme we recommend that they robustly secure improvements to the park and garden through a conservation management plan with timetabled improvements, and to consult with the Gardens Trust on all aspects of this.

#### Recommendation

Historic England objects to the applications on heritage grounds.

We maintain our view that the amended proposals would harm the significance of the Grade II listed building and Grade II registered park and that the proposals are contrary to policy CA2 of the Local Plan. We also consider that the proposals do not comply with the NPPF, in particular paragraph numbers 201, 206, and 208.

Your authority should take these representations into account in determining the applications. If you propose to determine the applications in their current form, please inform us of the date of the committee and send us a copy of your report at the earliest opportunity.

If your authority is minded to grant consent for the LBC application in its current form, in light of our objection you should treat this letter as a request to notify the Secretary of State of the LBC application, in accordance with the above Direction.

Please contact me if we can be of further assistance.

Yours sincerely

**Rachel Fletcher** Inspector of Historic Buildings and Areas E-mail: Rachel.Fletcher@HistoricEngland.org.uk

CC:



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