

# Heritage Advice Note

## Caversham Park, Peppard Road, Caversham, Reading

August 2019

### Introduction

1. This Heritage Advice Note has been prepared on behalf of the British Broadcasting Corporation ('the BBC') to assist potential purchasers of Caversham Park ('the Site') in understanding the relevant heritage considerations, in light of the pre-application feedback received from Historic England ('HE') (24<sup>th</sup> May 2017)<sup>1</sup>, provided in response to a pre-application concept feasibility study<sup>2</sup>. This Heritage Advice Note should be read in conjunction with the Pre-Application Heritage Statement (March 2017) prepared by Turley Heritage. Further advice on the wider planning and commercial context is provided by Lambert Smith Hampton, including earlier pre-application discussions with Reading Council.

### Heritage Context

2. The Site contains a range of designated heritage assets, and is subject to, a range of heritage designations:
  - Caversham Park (BBC Records) (Grade II Listed Building) ('the principal listed building').
  - Caversham Park (Grade II Registered Park and Garden) (RPG).
  - Inner Park Walls (Grade II Listed Building).
  - Entrance gate and gate piers (Grade II Listed Building).
  - Temple (Grade II Listed Building).
3. None of the heritage assets have been identified as being 'at risk' by HE<sup>3</sup>.
4. There are a number of other structures associated with the principal listed building (Caversham Park), which could conceivably form part of its curtilage or be listed via attachment, even though they are not listed in their own right. Any significance these buildings may have relates to the group value they share with the principal listed building of which they form a part (in legal terms). Further analysis is required to confirm the potential extent of any curtilage listed structures.
5. There are no heritage assets outside of the Site boundary requiring consideration at this stage.

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<sup>1</sup> Ref.: PA00484394

<sup>2</sup> OWAL Architects – Caversham Park Vision Document, Rev B (March 2017), proposed site plan

<sup>3</sup> Heritage at Risk Register 2018 – South East

## **Pre-Application Scheme Presented to Historic England (March 2017)**

6. In this part of the note, a brief summary of the relevant aspects of the HE pre-application feedback is provided for ease of reference and to place that feedback in context.

### **Existing Site**

7. HE largely agreed with the assessment of significance contained in the Pre-Application Heritage Statement, including recognition that the Site and the principal listed building have been significantly altered, in some places, to the detriment of their particular heritage significance.
8. In HE's opinion, the principal listed building is of architectural interest for the quality of its external elevations and the aesthetic value of a small number of elaborately decorated principal rooms on the ground floor. HE also confirms that most of the interior has been altered, with the loss of much of its architectural and historic interest. HE also recognises that the stables and ancillary buildings have also been greatly altered with the arched entrance block being the only positive element block as the principal element of interest in a greatly extended wing and non-descript outbuildings.
9. There is broad agreement with HE that the parkland (RPG) is of interest as a palimpsest of English landscape design from the 17<sup>th</sup> through to the 19<sup>th</sup> centuries and the reciprocal relationships between the designed landscape and the listed buildings contained therein, recognising that its integrity and historic extent have been eroded by 20<sup>th</sup> century alteration. HE places particular value on the remaining elements of the designed, historic landscape as a consequence of that fragmentation and alteration.

### **Pre-Application Proposals**

10. HE agreed that the principal buildings on site are capable of being adapted for a new use, including multiple-residential use, amongst many other potential uses.
11. HE expressed reservations regarding the proposed conversion of the property to a multiple-residential use, on the basis of the potential for perceived harm to the internal aesthetic qualities of the principal listed building (albeit that position has to be considered in the context of HE's view that *'most of the interior has been altered with the loss of most of its architectural and historic interest'*). HE's concerns were focussed on the treatment of the central hall and principal rooms at ground floor as a consequence of such a proposed use. HE also queried the impacts arising from the consequential alterations associated with that form of residential use, such as the need for car parking and the pressure to delineate private amenity spaces (matters which can be addressed at the detailed design stage and via condition/legal agreement).
12. HE advised a form of options appraisal to identify the optimal viable use for the building. There are likely to be a number of potential optimal viable uses – with the focus of policy and guidance being on those uses that deliver a viable use whilst causing the least harm to the significance of the heritage asset.
13. HE identified a high-level of perceived harm to the significance of the RPG from the proposed new housing within the designated area and a degree of harm to the principal listed building (albeit they did not quantify this harm in the same way as the RPG). Irrespective of this comparatively high-level of heritage harm, HE confirmed, with reference to paragraph 134 of the National Planning Policy Framework 2012 ('Framework 2012') (now paragraph 196 of the Framework 2019), that this perceived harm would be less than substantial in policy terms. This

does, however, require robust and careful consideration to ensure that a clear and convincing justification is provided that demonstrates how steps have been taken to avoid harm in the first instance, minimise any unavoidable harm and then mitigate residual harm.

14. HE supported the proposal of leaving the land to the south of the house as undeveloped land but have reservations regarding the consequential impacts of a recreational use on its parkland character and have suggested that this remains in agricultural use. How this relates to their earlier stated concerns regarding the current management via an agri-environment scheme and the parkland's associated sensitivity to inappropriate management will need to be clarified in subsequent discussions.
15. HE strongly advocated the preparation of a conservation management plan to provide what they see as an appropriate framework for the management of the Site that will sustain and enhance the significance of its heritage assets.
16. HE considered including the Site on the Heritage at Risk register – a non-statutory document that identifies priority heritage assets that are at risk of damage to/decline of their significance due to a range of factors (see paragraph 3 of this advice note).
17. HE confirmed, at that time, in the event that an application was submitted they would leave the overall planning balance to be determined by Reading Council (as the Local Planning Authority).

## **Current Position**

### **Historic England**

18. HE's south-eastern and London offices merged in 2019, however, we understand that the case officer who prepared the March 2017 pre-application feedback remains in post. It is anticipated that should further pre-application enquiries be submitted regarding the Site, or an eventual application, that he would remain the contact at HE.

### **Legislative and Planning Policy Context**

19. As identified in the following section, in overall terms, the substantive elements of the legislative and planning policy framework for built heritage matters within the Heritage Statement (May 2017) remains valid at the time of preparing this note (July 2019).

#### ***Relevant Legislative Context***

20. There have been no changes to the relevant legislative context regarding listed buildings and RPGs since the Pre-Application Heritage Statement was prepared in 2017.

#### ***National Planning Policy Context***

21. The Pre-Application Heritage Statement was prepared in accordance with the requirements of the Framework 2012, now superseded by the Framework 2019. The Framework 2019 does not comprise significant changes to previous national policy in relation to the historic environment. The following paragraphs are particularly relevant in this instance.
22. Paragraph 189 states that in determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been

consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.

23. Paragraph 192 requires that in determining applications, local planning authorities should take account of:
  - (a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
  - (b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
  - (c) the desirability of new development making a positive contribution to local character and distinctiveness.
24. Paragraph 193 requires that great weight should be given to the conservation of the significance of heritage assets - where conservation remains defined as the process of maintaining and managing change to a heritage asset in a way that sustains and, and where appropriate, enhances its significance. This reflects the requirements of the relevant statutory duties of the Planning Act 1990 and the paragraph further reflects the affirmation provided by recent case law that great weight must be given, irrespective of the degree of harm to significance.
25. Paragraph 194 requires that harm to or loss of significance of a designated heritage asset should have clear and convincing justification. It confirms that substantial harm to or loss of a designated heritage asset should be exceptional in the case of grade II listed buildings or park and gardens; and, be wholly exceptional in the case of more highly graded heritage assets.
26. Paragraph 196 deals with instances of where development proposals will lead to less than substantial harm to the significance of a designated heritage asset. Harm in this category should be weighed against the public benefits of the proposal.
27. Paragraph 197 relates to the effect of an application on the significance of a non-designated heritage asset and states that they should be taken into account in determining the application. Furthermore, in weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.
28. Paragraph 200 relates to opportunities for new development within (inter alia) the setting of heritage assets to enhance or better reveal their significance – noting that proposals that preserve or better reveal elements that contribute positively to the asset should be treated favourably.

#### ***Development Plan***

29. The adopted Development Plan for Reading Council remains unchanged since the preparation of the Pre-Application Heritage Statement.
30. Reading Council are preparing a replacement Local Plan, which is at an advanced stage. On adoption, the Local Plan will replace the current Development Plan (the Core Strategy, Reading

Central Area Action Plan and Sites and Detailed Policies Document) setting out how Reading will develop up to 2036. Following adoption, any subsequent pre-application submissions or applications will be determined in accordance with the Local Plan.

### **Other Material Considerations**

31. A number of relevant guidance/best practice documents have been updated since the preparation of the Pre-Application Heritage Statement:
  - Department of Digital, Culture, Media and Sport Circular: Principles of Selection for Listing Buildings (2018).
  - HE, Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets (Second Edition) (2017).
  - Planning Practice Guidance (2019).

### **Site Context**

32. It is understood that the BBC no longer occupies the Site and the buildings are currently vacant. Further, it is understood that the BBC is maintaining the buildings to ensure no decline in their condition. This is a different context to that in which the 2017 pre-application submission was considered. The potential implications are identified later in this note.

### **Reflections/Implications**

33. Notwithstanding the time that has passed since HE provided pre-application advice and the limited changes in policy and guidance, the substance of HE's position remains relevant for any parties considering the potential purchase of the Site. It provides a clear indication of HE's position with regards to securing a new use for the listed buildings and development within the Site.
34. Potential purchaser's should consider the merits of engaging further with HE at the pre-application stage to discuss the principles informing their bids, prior to submission, in order to understand the likely levels of heritage risk, having regard to the previous work undertaken on behalf of the BBC.
35. In any event, the eventual purchaser of the Site will need to engage with HE (and Reading Council) in an iterative process of pre-application discussions, a normal part of the planning negotiation process. An effective pre-application process, based on a proportionate understanding of the significance of the relevant heritage assets, provides the opportunity to build consensus with HE (and other relevant stakeholders) and narrow any differences in respective positions prior to the formal submission of any necessary applications.
36. The strategic heritage matters to be addressed are:
  - **Securing a new use for the principal listed building(s):** there is broad support from HE for securing a new use for the principal listed building(s) as a matter of principle. This is likely to be reinforced by its vacancy following the BBC's departure. A range of potential uses are likely to be acceptable, being mindful of HE's pre-application position, it will be necessary to demonstrate that an alternative use does not cause harm to the special interest of the principal listed building (or a level of harm that is acceptable as part of the overall planning

balance, having regard to the great weight and importance to be placed on preserving its special interest). Depending on the impact of the proposed use on the significance of the principal listed building, some form of proportionate and robust options appraisal might be necessary to make sure a scheme gains traction from HE and confirms that it represents the optimal viable use.

- **Development within the RPG:** This was the focus of HE’s pre-application feedback and the key matter to be resolved as part of the overall heritage strategy, given the high-level of heritage harm identified from proposed housing within the RPG. There is agreed scope to instead consolidate development to the west of the principal listed building, focussing on the altered stable building, with design quality and the overall impact on the RPG and setting of the listed buildings being key factors. In light of HE’s pre-application feedback, and the assessment contained in the Pre-Application Heritage Statement (March 2017), reconciling additional development within the RPG (and related setting of the listed buildings) requires careful consideration in negotiation with HE (and others) to determine whether an acceptable level of impact from development can be agreed.
- **Long-Term Management of the Heritage Assets:** HE outlined a clear expectation that they will expect the long-term management of the heritage assets to be secured, having regard to their heritage significance and related historic ownership as part of a single estate. One option for demonstrating this is a Conservation Management Plan, to guide the long-term management of the heritage assets and also to inform emerging development proposals. This approach may help to gain traction and build credibility with HE (and others).

37. The continuing vacancy of the listed buildings may result in HE adding the Site (or elements of it) to the Heritage at Risk Register. Being formally identified as being ‘at risk’ means that there is generally a presumption in reaching pragmatic solutions to remove heritage assets from the register as quickly as possible. This objective, a planning priority, can be used as part of an overall planning case. It will need to be demonstrated that measures have been put in place in the interim period, prior to securing consent and commencing works on site, to ensure the maintenance of building fabric and the grounds. This approach will help to avoid claims from HE and Reading Council of deliberate neglect/damage to the heritage assets in an attempt to make it easier to secure consent.

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