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Victoria Chapman
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Dear Victoria,

RE: Residential Development, Coton House, Coton Road, Churchover

1. Introduction

- 1.1 JS Conservation Management & Town Planning have been asked to assess the potential for residential development at the above site taking into account supportive evidence from a landowner so that it can inform the Site Allocations Development Plan Document (DPD) preparation process.
- 1.2 This paper only assesses the elements related to the historic environment as it is acknowledged that there are many other considerations in determining the appropriateness of a site allocation, such as sustainability, access to sustainable transport and services, impact to wildlife, etc.

2. Legislative and policy requirements

- 2.1 In determining the appropriateness of any proposed development scheme, special attention shall be paid to the desirability of preserving listed buildings and preserving or enhancing the character or appearance of conservation areas as set out in sections 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990.
- 2.2 Regard should also be given the relevant parts of the National Planning Policy Framework, in particular paragraphs 17 and 126-141, and to the following:
 - **Rugby Local Plan 2011 Saved Policies (post core strategy adoption)**
 - Policy E17: Development affecting parks and gardens and other elements of the Historic Landscape
 - **Rugby Core Strategy 2011**
 - Policy CS16: Sustainable Design
 - Conservation Principles Policies and Guidance for the Sustainable Management of the Historic Environment: English Heritage (2008)
 - Historic Environment Good Practice Advice Notes 2, and 3: Historic England (2015)
 - Heritage at risk study 2015, Historic England (2016)

3. Proposal

- 3.1 The 'subject site' consists of two parcels of land which are located to the north and south of a tree-lined access drive to Coton House and associated estate and buildings. The two parcels of land have been submitted as potential allocations for

residential development. The land is supported by the following documents which form part of this assessment:-

- Indicative sketch illustrating how the site could accommodate residential development;
- Heritage Statement and Appendices, by Heritage Collective, June 2016

3.2 Although it is appreciated that the indicative sketch is a guide to the potential and/or ability for the site to take residential development, this sketch is useful for determining the effect on the significance of the heritage assets. The indicative plan also indicates the inclusion of a round-a-bout at the entrance of Coton House and the two estates accessed off the main access drive into the estate.

4. Background

4.1 The Coton House and Estate is located along the A426, Churchover, and is a formal country house and estate, which has a number of characteristic features of a country house, such as large main dwelling, and ancillary features such as a landscaped formal and informal gardens, a stable block, a game larder, old dairy and associated estate roads with hierarchy dependent upon their use.

4.2 It is believed that the current Country House and Estate is a third development of the site, with historic evidence from archaeological investigations showing that another country house on this site may have existed and previous to that the site was associated with a medieval monastic grange linked to Coombe Abbey.

4.3 Since construction and use of the current estate since the 18th Century, the site has had a number of past previous uses and construction phases, such as a formal country house and estate, from the late 1940s the site was used as a training centre with associated accommodation for students and apprentices working at nearby industrial premises. The site then became the Post Office Management and Training Centre in the 1970s, and a number outbuildings were constructed which were deemed as not being part of the curtilage of the estate given that these were constructed post 1948.

4.4 In 2010, a major fire engulfed Coton House, a Grade II* listed building of national architectural and historic importance.

4.5 A planning application was approved in 2012 (R12/1353) for 60 dwellings within the grounds with the conversion of ancillary buildings into 12 dwellings and the conversion of Coton House itself into 4 dwellings, although this was later changed to 1 dwelling and subsequently implemented.

4.6 In this application, it was deemed that the training centre buildings together with the historic estate buildings represented brownfield land. As part of this application the later outbuildings were removed and new dwellings constructed in their place with a smaller footprint which was considered to improve the setting of the listed buildings within the estate. There were also benefits arising from the restoration of the Coton House, which at the time did not have a roof. The Heritage Statement supporting this application mentions that the dwellings were deliberately placed around the estate like a form of 'workers dwellings.' I am not completely convinced that the dwellings appear like workers dwellings given their size and number, however at the time it was considered that there were benefits in reducing the amount of late 20th Century development for a development believed to be more sympathetic to the setting of the listed buildings as part of the estate.

5. Historic Environment Considerations

5.1 The subject site is within close proximity to a number of heritage assets, namely:

- Coton House: A Grade II* listed building; and curtilage buildings such as the game larder which also benefits from this listing;
- Stable block approximately 200m West of Coton House: A grade II listed building

- Bowl Barrow approximately 470m west of Coton House: A Scheduled Ancient Monument which has an 'at risk' status; and
- Coton House Park Estate Park and Gardens: a non-designated heritage asset in the form of a park and garden determined by Warwickshire County Council to be of architectural and/or historic interest.

5.2 I consider that if developed for residential development, the subject site would have the potential to affect the significance of each of these assets. As such I consider that the development would be within the setting of each of the above designated and non-designated heritage assets.

6. Appraisal of Heritage Assessment by The Heritage Collective, 2016

6.1 I note that the Heritage Statement by the Heritage Collective makes reference to the Heritage Statement by Woodhall Planning which was used to support the development of brownfield land as part of planning application R12/1353. This assessment by Woodhall Planning, although helpful, should only be read in the context of the application and circumstances for the application for this development.

6.2 It is therefore incorrect to state as the 2016 Heritage Statement does at Paragraph 1.9 that the development approved in 2012 "establishes the principle of residential development on the site." The site where the housing was developed was considered to be 'brownfield' or previously developed land. The subject site put forward for development is clearly greenfield land or undeveloped land. The principle of residential development in my opinion is therefore not established.

6.3 Although it is appreciated that there are many ways of analysing significance, the 2016 Heritage Statement utilises the system of Architectural, Artistic, Archaeological and Historic values as advocated by the NPPF. Historic England have in their Conservation Principles Guidance and Policies document (2008) defined significance as an assessment of Historic, Evidential, Communal and Aesthetic Values, which are reflected in the most up to date Historic England Guidance note for assessing allocations and the setting of historic assets and cover a broader array of elements to significance. It is noted that many of the items contributing to significance in the guidance note are missing from the 2016 Heritage Assessment, as such it is more useful to refer to the Historic England policies and principles in determining significance more appropriately.

6.4 Paragraph 3.47 of the 2016 Heritage Statement describes the current tree lined avenue to the south-west access as a 'servant's access,' whereas noting that the northern access 'track' as the 'main access' to the house. I disagree with this statement as it contradicts the well-known hierarchy of the country house estate. Historic maps dating from 1880 show the main access to the south-west in its current position along the tree lined avenue which is typical of many country houses across the UK. The long driveway was intended to present a grandeur and status of the estate as a whole where one would approach and be impressed by the large parkland and garden, before entering the large estate before coming to settle at the entrance of the main building. This is reinforced by the positioning and orientation of the stable block which acts as the gateway entrance to the estate. It would be illogical to spend so much effort planting an avenue of trees for servants to enjoy and to enter a stable block from the rear. Although there is an access to the north, this is lower in scale and status and is more than likely the servant's or the resident's access (when not receiving guests) given that it has direct access to the dwelling as there would not be a need to be impressed by the grandeur of the estate. The main access (tree lined avenue) therefore does have much greater status than as depicted in Heritage Assessment which will be discussed further in this report.

7. Assessment of significance to the heritage assets

7.1 The policies, principles and guidance to the sustainable development of the historic development define the following values of significance which have been adapted into the most recent guidance note on assessing significance:

- **Evidential value:** *the potential of a place to yield evidence about past human activity.*
- **Historical value:** *the ways in which past people, events and aspects of life can be connected through a place to the present - it tends to be illustrative or associative.*
- **Aesthetic value:** *the ways in which people draw sensory and intellectual stimulation from a place.*
- **Communal value:** *the meanings of a place for the people who relate to it, or for whom it figures in their collective experience or memory.*

7.2 As stated in the Historic England Guidance Note 3 on Site allocations:
“It is important to understand the significance of any heritage assets that would be affected by a potential site allocation. This involves more than identifying known heritage assets within a given distance, but rather a more holistic process which seeks to understand their significance and value. Whilst a useful starting point, a focus on distance or visibility alone as a gauge of impact is not appropriate.”

7.3 Coton House and curtilage buildings

- **Evidential Value:** The evidential value of Coton House arises as a result of how the estate has been developed over time and why it was developed in the way it was. The house has been deliberately designed at the furthest point of the built up form of the estate in a remote location and with architectural detailing and design to illustrate the status of the house above the buildings within the estate. There is an inherent relationship between Coton House and the estate, the positioning of the buildings and the layout of the landscape and features such as the access drives, and ancillary buildings and gardens such as the games larder and Old Dairy. There is also evidential value in the phases of development which the estate has experienced, although the formal layout of the country park and estate has value, the later phases such as the boarding house and accommodation for apprentices and linkages to Rugby's industrial past as well as the post office training centre also have evidential value, along with the new development today. Albeit some evidential value has been changed by the loss of the buildings as part of the training centre, and the development of 20th Century housing, the housing still maintains a tight and coherent relationship to the built form of the estate which respects the form and structure of how the estate has been developed over time, preserving the remoteness and tranquillity of the built form and association of the main house with the estate.
- **Historic Value:** Coton House follows traditional principles in the designing and arrangement of a country house estate with the house as the highest in the hierarchy of buildings and with the collection of surrounding ancillary buildings such as the old dairy and games larder placed around the house deliberately distant from the main roads. The house also bears historic value due to its attribution to Samuel Wyatt, and any other historic figures which may have visited the estate. There is also historic value in the range of uses the estate has experienced and those linkages to Rugby's industrial past. Although over time this has changed with fire engulfing the dwelling, the historic significance is still present, with the historic integrity and authenticity of the dwelling being maintained in its restoration.
- **Aesthetic Value:** The value of the house from an aesthetic perspective arises from its exterior design being a fine example of a late 18th Century country house of neo-classical inspiration, and internal fixtures and fittings, as well as its positioning and relationship with the greater estate of other buildings of interest such as the games larder and old dairy.
- **Communal Value:** The house is important for how it features in the surrounding community's collective memory and their linkage to the house, for example the house may be the only link to ancestors of persons living today, and how the house is

remembered in memories of persons who may have experienced the property in the past or worked there. This would also be relevant to people still living and who were resident in the building when it was used as a boarding house and hostel for apprentices in the industrial activities surrounding rugby, which plays a crucial role in Rugby's industrial heritage. There have been groups formed such as the 'old Cottonians' who the estate features very prominently in their collective memories. There are also linkages with the estate as a training centre for the post office.

7.4 Bowl barrow approximately 470 metres from Coton House

- **Evidential Value:** The bowl barrow survives well and is believed to include both primary and secondary burials and associated artefacts. These will provide information about the dietary habits, diseases and standards of living of the local population. It is unclear the relationship of the bowl barrow to the Coton House estate, however it is an important monument in the landscape which is visible from the house and surrounding countryside. The bowl barrow has been listed as 'at risk' for a number of years.
- **Historic Value:** Research has shown that the Coton House Estate is perhaps a third generation of building, replacing a former manor house and prior to that, a monastery. The bowl barrow has existed throughout each of these building phases and its long distance views to the monument from the built form to the estate is of historic value.
- **Aesthetic Value:** The aesthetic value of the bowl barrow lies with its appearance of a monument within the landscape. Much of its appearance in the landscape has been affected by the M6 motorway behind and the telecommunications tower behind. The bowl barrow however does bear some association to the estate and the connections to previous built form and is visible from various parts through the landscape and gardens, and access drive.
- **Communal Value:** The ditches and barrow mound are an important visual reference within the landscape and will have been experienced from persons visiting the hall from the main access drive and throughout the estate.

7.5 Stable Block approximately 200m from Coton House

- **Evidential Value:** The stable block has evidential value in that it is specifically designed within the estate as a 'gateway' to the group of buildings which make up the estate and is the first and main focal point along the main tree lined avenue. The stable block's positioning as a gateway building is important in this context. This prominence in the estate was also prevalent through the development of 20th Century buildings as part of the training centre and use as a hostel for apprentices. Although 20th Century housing has increased the built form of the estate behind the stable block, the building still maintains the grand focal entrance point to the greater estate.
- **Historic Value:** The relationship of the stable block to the greater estate is important as it reflects the layout and hierarchy of buildings which is still reflected today with the new built development. There are also attributions to Samuel Wyatt as its designer, and any other historic figures which may have visited the estate. There are also historic linkages to how the stable block was used in association with the 20th Century uses as a training centre and boarding house.
- **Aesthetic Value:** The building itself is a fine example of a stable block constructed in the late 18th Century and its presence as a gateway entrance to the greater estate has group value. The prominence and positioning of the stable block is still maintained today, despite the new housing development currently being constructed.
- **Communal Value:** The stable block will have featured in many memories and collective experiences in experiencing the Coton Park estate, being a large and dominant gateway to the estate, not just by the residents of the country estate but the 20th Century uses in association with the training centres.

7.6 Coton House Estate Park and Garden

- **Evidential Value:** Although the park and garden which make up the grounds of the estate have not been attributed to anyone, it is clear that the Coton Park Estate has

been deliberately designed in a remote location away from main roads and surrounded by parkland and gardens. The parkland is essential to the character and appearance of the greater estate, and is essential for reinforcing the experience and authenticity of the estate, sense of grandeur and occasion of arrival. The features such as the tree lined avenue and the remote setting of the estate in amongst the park and garden is especially significant in this respect and reflects their historic function.

- **Historic Value:** The way in which the parkland and grounds surrounding the estate are experienced is particularly important to the appearance of the estate within the countryside. The estate is viewable from public rights of way (R105) to the front of the estate, and the parkland forms a key component of the setting of the estate and the hierarchy of buildings within it in that it shows why the estate was designed like it is.
- **Aesthetic Value:** The park and garden are essential to the setting of the Coton House estate as it shows how the estate has been designed and the experiences contained once entering the estate. When within the estate, the parkland enables a clear delineation of where the estate commences and the rural aspect beyond.
- **Communal Value:** The parkland would feature in the collective memories of those who utilise the parkland today and public rights of way, as well as the functioning and use of the parkland in relation to the previous events which have taken place within the grounds of Coton House.

8. Assessment of harm to the significance of the heritage assets as a result of the proposed residential scheme

- 8.1 Harm to heritage assets in planning case law is defined predominantly in three categories – ‘substantial harm,’ ‘less than substantial harm,’ and ‘no harm.’ Previous cases involving the assessment of harm depict that ‘substantial harm’ is generally exceptional, and would require the complete removal of one of the values of significance. Paragraph 133 of the NPPF would be read in conjunction when this harm is caused.
- 8.2 Where ‘less than substantial harm’ harm is caused, there may be mitigation employed or matters of public benefit as a result of the development which may outweigh the harm caused. Although harm can be ‘less than substantial’ to the significance, the harm can still be significant enough to warrant the refusal of an application or appropriateness of a development. In a case of ‘less than substantial’ harm, Paragraph 134 of the NPPF would be applied.
- 8.3 In assessing harm there is also the consideration in local planning policy as advocated through the development plan. Saved Policy E17 of the Rugby Local Plan 2011 is specific to development affecting parks and gardens and the historic landscape, where planning permission will not be granted for development, which would adversely affect the character, appearance, or setting of a Park, or Garden registered as being of Special Historic Interest, or any other element of the Historic Landscape, or Parks or gardens of acknowledged local importance.
- 8.4 Policy CS16 of the Rugby Core Strategy 2011 is also relevant to the consideration of harm where “*new development should seek to complement, enhance and utilise where possible, the historic environment and must not have a significant impact on existing designated and non – designated heritage assets and their settings.*”
- 8.5 An assessment of the harm caused to the values identified in Section 7 are detailed below:-

Coton House and curtilage buildings:

- 8.7 The 2016 Heritage Assessment compiled by The Heritage Collective identifies the harm as:

“a slight adverse effect on the significance of the grade II listed Coton House due an effect on the openness in which the building is appreciated in and a change to building’s the rural setting. The level of harm is considered to be low due to the limited contribution the proposed area for allocation makes to the significance of Coton House and the preservation of key elements of the building’s setting. There would be no change to the identified key views of Coton House.*

- 8.8 As highlighted above, the significance of Coton house and the curtilage listed buildings such as the games larder is both intangible and tangible, it is not just about what can be seen from key views, but about the authenticity of the scheme and experience of the estate from both within and outside of the estate.
- 8.9 The proposed scheme of residential development either side of the access would essentially eradicate the evidential and historic values of the estate by removing the remoteness and isolated feel of the house and estate and the visual separation from the house and estate from the road to what effectively would be a country house and ancillary estate buildings located on the edge of a large housing estate.
- 8.10 This key design feature of the tree lined avenue is essential to the positioning and reason why the estate was designed like it was in the first instance. The views from the house itself would be detrimentally affected in that the house is positioned to be able to look over the entire estate and the countryside beyond which would be significantly urbanised if the subject site was developed for housing. As such, I consider that the proposed residential scheme would cause ‘substantial harm’ to the significance of the Coton House and its relationship with the greater estate and surrounding landscape.

Bowl Barrow

- 8.11 The bowl barrow is not assessed in the Heritage Statement undertaken by the Heritage Collective. The monument which has an ‘at risk’ status is a key feature in the landscape and is viewable from many points within the estate, particularly when driving along the main tree lined access and from the house itself. Views to the monument would be cut off along the access road from the placement of dwellings, urbanising the current environment and landscape. Although it is appreciated that there is still some physical separation, the bowl barrow would essentially be cut off from the greater landscape, due to the amount of infrastructure already surrounding the monument.
- 8.12 The bowl barrow is currently at risk, the Historic England guidance Note 3 advocates the improvements to structures which are detailed as at risk, it is likely that the further severing of the monument from its context on the landscape will have further adverse risks to the monument which is noted as being ‘at risk.’
- 8.13 In my opinion, the main impacts are therefore to the evidential and aesthetic values, to which I consider there to be ‘less than substantial’ harm caused. However the harm is significant in that the bowl barrow would fall into the background of the housing development and would potentially fall into greater disrepair.

Stable Block

- 8.14 The assessment of harm by the Heritage Collective is noted as:
“the development of the area proposed for allocation would be unlikely to result in any harm to the significance, or ability to appreciate the significance, of the grade II listed Stable block due to lack of intervisibility and current contribution of the site.
- 8.15 As stated previously in Section 6, there is a failure to recognise the contribution that the stable block has in relation to the greater design and hierarchy of the estate as also advocated by Historic England in their Guidance note which is quoted in Section 7.2 of this report.

- 8.16 The new built form approved respects the positioning of the stable block as the gateway to the greater estate. The proposed development would compete with this status, completely engulfing the gatehouse which would lose its status as the gatehouse of the estate.
- 8.17 There is clear harm caused to the historic, aesthetic and evidential values which would be completely eradicated as a result of the proposed residential scheme. The stable block is a key landmark for the estate and its contribution to the estate would be lost as a result of an urbanisation of the environment into a housing estate. Taking this into account, I consider there to be 'substantial harm' caused to the significance of this heritage asset as a result of the development.

Park and Garden:

- 8.18 The assessment of harm to the park and garden is assessed by The Heritage Collective as:
"Although within Coton Park and part of the non-designated parkland, the area proposed for allocation is of limited interest and low sensitivity to change. Parkland features such as sporadically spaced trees have been lost and the site is now separated, visually and physically, from the remaining parkland to the east. The development of the area would bring about a change to part of the non-designated parkland. In accordance with paragraph 135 of the NPPF a balanced judgement is required in regards to the scale of harm and the significance of the heritage asset. In this case the harm incurred will be minimal and the significance of the non-designated parkland is low."
- 8.19 Although the parkland is a non-designated heritage asset, this does not mean that it is insignificant for its contribution to the greater Coton House estate. As shown in the Parks and Gardens selection guide, by Historic England many parks and gardens around country houses are designated as of national significance if they can be attributed to a famous designer or have elements such as walled gardens, historic boundaries etc. This may be the reason that it was felt that the park and garden is of local listing quality due to the contribution the park and garden makes to the house.
- 8.20 The building is still however a non-designated heritage asset in the form of a park and garden and the impacts on its significance need to be considered as advocated in the Saved Policy E17 of the Local Plan and Policy CS16 of the Rugby Core Strategy. As detailed in Section 7 of this report, the landscape, park and garden is quite crucial to the overall design and layout of the estate and provides the visual separation and remoteness of the estate from the road.
- 8.21 One of the main impacts to the parkland occurs as a result of the loss and interpretation of the main tree lined access. Although I appreciate the sketch submitted is indicative, the erection of a round-a-bout at the primary access to the estate would be highly detrimental to the character of the estate, urbanising the access to something more akin to a modern housing estate. There is also a loss of grandeur heading along the avenue, with a complete urbanisation of a road which was designed deliberately to be uninterrupted and lead to the Coton House estate. Under the proposed scheme the meaning of the main access would be lost, particularly with roads to the estates leading off the main access, and the burying of the stable block amongst a sea of housing.
- 8.22 The current housing development was on brownfield land and was closely related to the built form of the estate. There were also benefits to the restoration of the Coton House. This interpretation of the estate as belonging to Coton House would be lost via the built development. Taking this into account, I consider that the harm to the evidential, historic and aesthetic values of the park and garden to be 'substantial.'

Assessment of benefits

- 8.23 The public benefits of a proposed development of housing arise predominantly from the provision of additional housing, affordable housing, and the associated short term employment opportunities. This is however not a substantial public benefit which can be solely provided by the subject site, given that there are many other more suitable sites identified in the SHLAA which can be potentially allocated as advocated in the Historic England practice Guide No.3.
- 8.24 The harm caused by the development is predominantly the complete loss of historic interpretation of the site as a Country House estate, which would lose its context and be relegated to a place where there are a couple of historic buildings amongst a large modern housing estate. On a number of levels, the proposed residential development proposed in my opinion would lead to 'substantial' harm to the significance of the designated heritage assets, none of which can be outweighed by a residential development which would maintain the same benefits if situated elsewhere.

9. Conclusion

- 9.1 The purpose of this report is to assess the harm to the significance caused by the potential allocation of the subject site for residential development from a historic building conservation perspective, and to analyse evidence base which is put forward to support a proposed residential scheme.
- 9.2 A key starting point in my opinion is that the principle of residential development on the site is not established by the granting of a planning permission in 2012 which was constructed on brownfield land. Although additional dwellings were approved, these were designed, located and were of a density which meant that they were smaller in footprint than the existing built form and they appeared more like a small estate of dwellings situated around the main country house, together with the restoration of the Coton House, which were seen as benefits of the permission.
- 9.3 Each of the four heritage assets were assessed for their significance and their overall value and contribution and associated linkages which contribute to the significance of the Coton Park estate as one entity. This was an assessment of their evidential, historic, aesthetic and communal value as advocated by the policies principles and guidance developed by Historic England.
- 9.4 It was found that the proposed development would cause harm in a number of instances, which are a mix of substantial harm and less than substantial harm individually, however in addition as a result of the allocation, the entire context and interpretation of the Coton Park Estate would be lost.
- 9.5 An assessment was then taken to assess the benefits of the development against the harm caused in association with Paragraph 133 and 134 of the NPPF. It is found that although there are benefits to the allocation and provision for housing, these benefits are not specific to this site, and could be provided elsewhere through a different allocation of land away from the estate.
- 9.6 The overall assessment of the subject sites are that the development of these sites for residential development would not be appropriate as a result of the harm caused to the heritage assets as outlined throughout this report.

Please contact me should you have any questions.

Regards,

A handwritten signature in black ink, appearing to read 'John Somers', written in a cursive style.

John Somers
JS Conservation Management
& Town Planning Ltd