

DELEGATED PLANNING APPLICATION REPORT

Ward: Redlands

App Ref: 230980/LBC

Address: The Acacias, 44 London Road, Reading

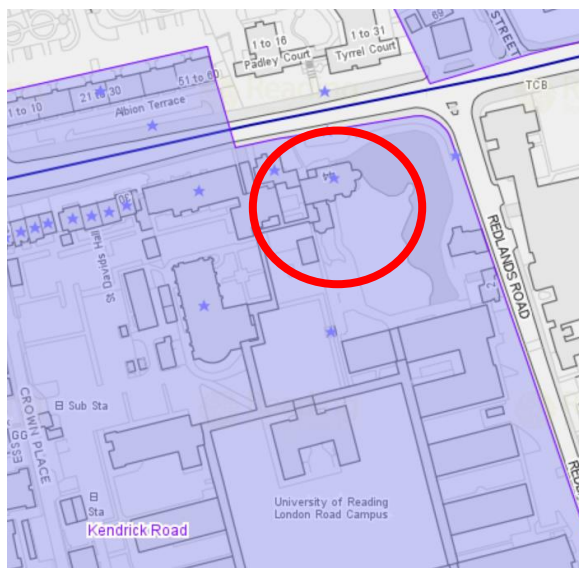
Proposals: Passive fire protection works to mixed use building (List Entry Number: 1113511) involving creation of a dedicated secondary means of escape (from Flat 1), provision of fire-rated lining to existing glazed partition (Flat 1), replacement door and upgrading existing doors with smoke seals. Refurbishment works to Flat 1 including repositioning an internal door opening to bedroom, alterations to levels within bedroom and new kitchenette.

Case Officer: Mrs Alison Amoah

Date received (valid from): 17 July 2023 Target Decision date: 27 October 2023 (Ext)

1. SITE DESCRIPTION

Site visit date: 8/9/23



Site visit photos:

Inside Flat 1 - Lower First Floor



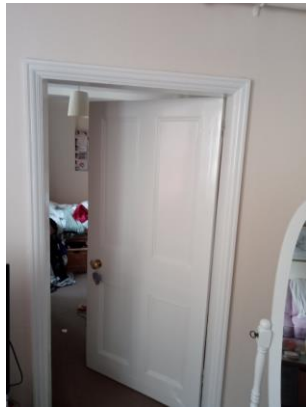
Hall glazed screen and door



Towards stairs



fire escape stairs

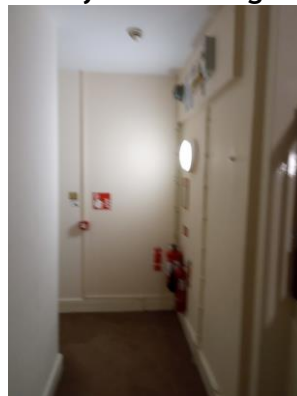


Bedroom Door



Kitchen

2nd floor landing



Location for Proposed Fire Compartment Wall and Door

The proposal relates to internal works only within a residential flat (Flat 1 - Lower First Floor), the landing area (2nd floor) and internal doors to Flats 3, 4 and 5 (2nd Floor) within the 'Acacias', part of the London Road campus of the University of Reading and Grade II listed.

The listing description is as follows:

No. 44 (The Acacias) & railings to street

Designation Type: Listing Grade: II List UID: 1113511

"LONDON ROAD 1. 5128 (South Side) No 44 (The Acacias) and Railings to street SU 7272 9/162 II GV 2. Before 1840 (shewn on Weller map). A detached 2 storey and basement villa of Bath stone with hipped slate roof. Moulded eaves cornice. 3 windows 1st floor, 2 on ground floor, glazing bar sashes with flanking full height pilaster strips. Central door with segmental patterned fanlight. Plain Greek Doric porch on stone steps. East return has 2 ground floor bows which have been attributed to Waterhouse as alterations for William Isaac Palmer (of Huntley and Palmers) who lived there - one has stairs to basement. Good conservatory at rear with an extensive rockery. Linked to Greenbank by 3+3 window 3 storey extension with 2 storey pavilion to right. The interior has a number of reeded features (front door surround, ground floor back room fireplace etc). Excellent contemporary ironwork to street - spearhead railings box panel standards and double gates."

The site is also within the Kendrick Road Conservation Area and there are a number of other listed buildings within the boundary of the overall campus (*the listings for these other buildings and further assessment in the context of those buildings is not included as it is not considered that there would be any effect on the settings of these building as the proposal is confined to internal works only*).

2. PROPOSAL AND SUPPORTING INFORMATION

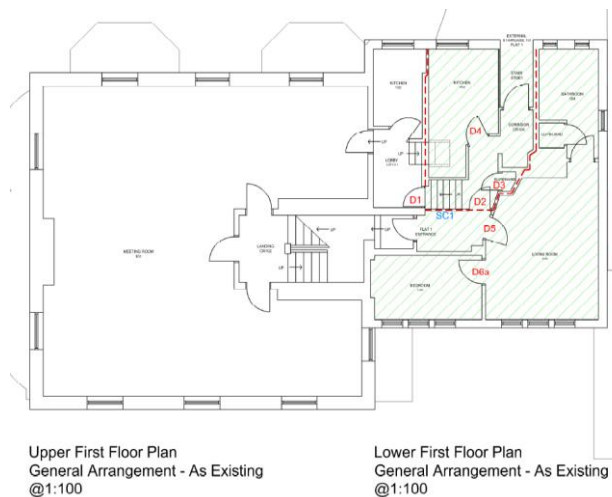
The submitted information identifies that a fire safety assessment has been undertaken which shows inadequacies in fire safety measures. This has driven the proposed works as well as the need to undertake some refurbishment works to Flat 1. No alterations to the external fabric are proposed.

The proposed scheme includes providing fire protection measures for the safety of residents and users. This would include:

- Creating a dedicated secondary means of escape (from Flat 1 and from Flats 2, 3 and 5) without the need to pass through an occupied residence;

Lower First Floor (Flat 1) First Floor

- Upgrade glazed screen (retaining timber panel and glazing bars beneath the supalux boards) and replace door to achieve greater fire protection (Flat 1 entrance hall) between hallway and segregated fire escape area;
- Upgrade existing doors with smoke seals;
- Infill of side screen of living room door retaining existing timber panel beneath the supalux boards.
- As a result of creating a segregated fire escape route enclosure there would be refurbishment works to include relocating the kitchen (to become storage area) to the living room, with services, furnishings and floor coverings (tiles) and associated infill of bedroom door and creating a new door opening to bedroom from the entrance hall reusing the existing bedroom door.
- Alterations to floor levels within bedroom and new kitchenette retaining original floorboards beneath new floor coverings.

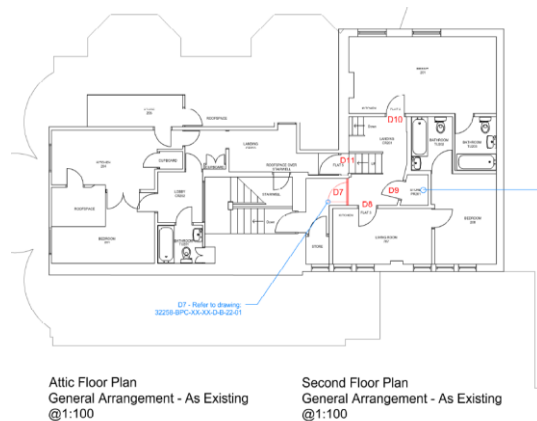


Lower First Floor (Flat 1)

- D1 No works
- D2 Replace with new FD30S doorset
- D3 Remove all contents of cupboard and screw shut door
- D4 Fit new lock and "No Access" sign
- D5 Upgrade existing door to achieve FD20
- D6a Existing door and architraves to be removed and set aside for reuse. Opening to be infilled.
- D6b Form new opening and install original bedroom door (D7a) and reusing original architraves. Upgrade door leaf to achieve FD20.
- Flat 1 New dedicated escape route enclosure to achieve 30 mins fire protection, including upgrading glazed screen between Flat 1 Entrance Hall and escape route.
- Flat 1 Raise floor level in bedroom to meet that of the corridor.
- Flat 1 Install new kitchen within living room.

Second Floor

- New compartment fire wall and fire door and upgrade of the internal entrance doors to Flats 2, 3 and 5 with smoke seals and new hinges.



Second Floor

- D7 Form new fire compartment wall & install FD30S fire door
- D8 Re-hang on new hinges and fit new smoke seals
- D9 Re-hang on new hinges and fit new smoke seals
- D10 Re-hang on new hinges and fit new smoke seals
- D11 Re-hang on new hinges and fit new smoke seals
- Store PR201 Fire stopping to pipe penetrations & voids

Plans considered:

As received 14th July 2023 unless otherwise stated

- Drawing no: 33258-BPC-XX-XX-D-B-02-02 Rev P2, dated July 2023 - Site Location Plan
- Drawing no: 33258-BPC-XX-XX-D-B-02-01 Rev P2, dated July 2023 - Block Plan
- Drawing no: 33258-BPC-XX-XX-I-B-00-01-AB1 Existing Photographs of Internal Doors Lower First Floor & Second Floor
- Drawing no: 33258-BPC-XX-XX-D-B-03-01 Rev T2, dated March 2023 - Existing General Arrangement Plans Door Identification
- Drawing no: 33258-BPC-XX-01-D-B-31-01 Rev T2, dated February 2023 - Proposed Entrance Hall Glazed Screen & Door (D2) Proposed Works
- Drawing no: 33258-BPC-XX-01-D-B-31-02 Rev T2, dated February 2023 - Proposed Living Room Door (D5) Proposed Works
- Drawing no: 33258-BPC-XX-01-D-B-31-03 Rev T3, dated February 2023 - Proposed Bedroom Door (D6a & D6b) Proposed Works, received 31st August 2023
- Drawing no: 33258-BPC-XX-01-D-B-40-01 Rev T2, dated February 2023 - Proposed Finishes Schedule Flat 1, Lower Ground Floor
- Drawing no: 33258-BPC-XX-01-D-B-73-01 Rev T2, dated February 2023 - Proposed New Kitchenette Plans & Elevation
- Drawing no: 33258-BPC-XX-02-D-B-22-01 Rev T2, dated February 2023 - Proposed Second Floor Compartment Partition (D7) Plans, Elevations & Details
- Schedule of Works T1 dated 5/4/23, Document ref: 33258-BPC-XX-XX-SH-B-00-01, received 13th October 2023
- Sample of Supalux, received 16th October 2023
- Promat Supalux Technical Details, received 31st August 2023

3. RELEVANT PLANNING HISTORY

171209/FUL - External repairs, roof replacement and thermal insulation upgrade works to improve the energy efficiency of the building. Proposed works to trees - Approved 27/9/2017

171210/LBC - External repairs, roof replacement and thermal insulation upgrade works to improve the energy efficiency of the building. Proposed works to trees - Consent 27/9/2017

220681/PREAPP - Pre-application advice for proposed Passive fire protection works to mixed use building (List Entry Number: 1113511) involving the proposed replacement of existing, non-fire rated internal doors with new fire-rated doors to match existing profiles, appearance and finishes. Details of works to individual doors highlighted on accompanying plans. Provision of fire-rated lining to existing partition on first floor - Withdrawn 3/11/22

4. CONSULTATIONS

Two site notices were erected - No letters of representation have been received.

Planning Officer Note: During the course of the consideration of the pre-application enquiry (referred to above and withdrawn) it should be noted that advice was sought by officers from Building Control and the Conservation and Urban Design Officer (at that time); the pre-application was withdrawn before such advice was provided. It is included for completeness below and relates to a proposal which included: replacement of 8 no. original doors, including 4 no. 12 panel oak doors; re-use of architrave; new hinges and smoke seals to some doors; removal of oak panelling, install fire-rated (supalux board) and reinstate oak panelling; one door removed and opening infilled.

Building Control: Part B of the Approved Documents deals with Fire Safety and Historic Buildings are mentioned first in the preamble.

“Buildings of special architectural or historic interest 0.10

Where Part B applies to existing buildings, particularly buildings of special architectural or historic interest for which the guidance in this document might prove too restrictive, some variation of the provisions in this document may be appropriate. In such cases, it is appropriate to assess the hazard and risk in the particular case and consider a range of fire safety features in that context.”

Later in when dealing with the actual requirements relating to Fire doors the documents supports retaining and upgrading existing doors:

“2.22 Where it is undesirable to replace existing doors because of historical or architectural merit, the possibility of retaining, and where necessary upgrading, them should be investigated.”

Conservation and Urban Design Officer:

The host building is a very significant stone heritage building from the early to mid 19th century building. It is significant inside and out. It was home to George Palmer, a well known Reading Business personality who founded Huntley Palmer Biscuits.

To start with there are concerns about the proposed replacement with new fire doors etc, as it will mean the removal of a number of original doors. This is considered harm to the heritage listed building in NPPF terms and is not supported.

Historic England has written a general guide for fire doors and this is attached for your information.

Also, I have had brief discussions with Reading Council’s Interim Building Control & Fire Safety Manager, and he confirmed that under building regulations, special considerations can be made for listed buildings, such as this Grade II listed structure. This proposal is not likely to be supported by the Building Control and Fire Safety team.

Further, existing historic doors, can have approximately 30 minutes fire safety ratings. Schemes for heritage buildings using smoke seals etc., and closers can be done. The building is only two storeys plus a basement. Not a distant journey to escape, in the event of a fire.

So, the agents Fire Consultant needs to review their proposal, preferably with a fire safety engineer with experience in historic listed buildings.

If a Listed Building Consent is submitted, it will need to be accompanied by a Heritage Statement, prepared by an experienced heritage consultant. The significance of the existing doors needs to be identified and what the impact of the proposed works will have on that significance. Removal of significant building fabric is unlikely to be approved.

The proposal would cause harm to the interiors of a significant Grade II listed building and as such should be refused. The submission needs major revisions.

Equality Act 2010:

In determining this application the Council is required to have regard to its obligations under the Equality Act 2010. However, there is no indication or evidence (including from consultation on the application) that the protected groups identified by the Act have or will have different needs, experiences, issues and priorities in relation to this particular planning application. Therefore in terms of the key equalities protected characteristics it is considered there would be no significant adverse impacts as a result of the development.

5. LEGAL AND PLANNING POLICY CONTEXT

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that proposals be determined in accordance with the development plan unless material considerations indicate otherwise. Material considerations include relevant policies in the National Planning Policy framework (NPPF) - among them the 'presumption in favour of sustainable development'. The following local and national planning policy and guidance is relevant to this application:

Section 16(2) of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires the local planning authority to have special regard to the desirability of preserving a listed building or its setting or any features of special interest which it possesses.

Section 72 (1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires the local planning authority in the exercise of its functions to pay special attention to the desirability of preserving or enhancing the character or appearance of a conservation area.

National Policy and Guidance

- National Planning Policy Framework (NPPF) - Section 16
- National Planning Practice Guidance
- Managing Significance in Decision-Taking in the Historic Environment, Historic Environment Good Practice Advice in Planning: 2 (Historic England, 2015)
- Conservation Principles, Policies and Guidance (Historic England, 2015)
- BS 7913: 2013 - Guide to the Conservation of Historic Buildings

Reading Borough Local Plan (2019)

CC1: PRESUMPTION IN FAVOUR OF SUSTAINABLE DEVELOPMENT

CC2: SUSTAINABLE DESIGN AND CONSTRUCTION

CC3: ADAPTATION TO CLIMATE CHANGE

EN1: PROTECTION AND ENHANCEMENT OF THE HISTORIC ENVIRONMENT

EN3: ENHANCEMENT OF CONSERVATION AREAS

SPD

Sustainable Design and Construction (2019)

Other Local Documents

Proposed Kendrick Conservation Area Character Appraisal, RBC

Equality Act 2010:

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APPRAISAL

Protection and Enhancement of the Historic Environment

The NPPF sets out a presumption in favour of sustainable development and a key dimension of 'sustainability' is defined as '*...protecting and enhancing our...historic environment*'

Paragraph 197 of the NPPF states:

"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;....."*

The NPPF details in Paragraph 199: *"When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance."* Paragraph 200 goes on to state: *"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."*

Paragraph 202 states:

"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."

The National Planning Practice Guidance(Paragraph: 020 Reference ID: 18a-020-20190723) states that public benefits *"could be anything that delivers economic, social or environmental objectives as described in the National Planning Policy Framework (paragraph 8)"*

In accordance with Reading Borough Local Plan policy EN1: Protection and Enhancement of the Historic Environment, proposals affecting Listed Buildings are acceptable where it will not:

- *Have an adverse impact on those elements which contribute to their special architectural or historic interest including, where appropriate, their setting.*

The submitted Heritage Statement is considered to have been undertaken to a suitable standard in accordance with the requirements of Para 194 of the NPPF and states that *"... it is clear that the main significance of the building is derived from its historical, communal and aesthetic values. It is considered that the heritage asset is of high significance."*

The proposed scheme is set out in summary in Section 2 above; further detail is on the submitted plans and within the schedule of works. The basis of the scheme is to provide a dedicated escape route enclosure in the case of fire. In order to create this area within existing Flat 1 results in the need to make adjustments to the layout of the flat and install a kitchenette within the existing living room with associated works, upgrade some doors for fire safety, replacement of one door and fire resilient upgrades to existing glazed and timber screens. At the second floor a new fire safe compartment is proposed and upgrade of internal doors.

It is considered that the fire safety and related works would create some harm to the existing fabric, but the proposed scheme has been developed to limit the harm through upgrading

existing doors and reusing fabric where possible, matching as many details of existing fabric where replacements are proposed and feasible, retaining historic fabric within or beneath new measures, and limiting the works to an area of the building which has a lower value. It is considered that the works would cause less than substantial harm to the significance of the heritage asset and no harm to the Conservation Area. In accordance with National Policy (Para. 202) this less than significant harm has been weighed against the public benefits of improved fire safety for current and future users of The Acacias. Historic England acknowledge that *“The vast majority of our heritage assets are capable of being adapted or worked around to some extent without a loss of their significance.”*¹

It is considered that any less than substantial harm that may occur from the proposal would be outweighed by the public benefits of improving fire safety for residential occupiers and other users. As the proposed works are internal it is not considered that the works would have any adverse impact on the setting of the listed building, nor would they have any detrimental impact on the character and appearance of the listed building nor the Conservation Area. Overall, therefore, the proposal is considered to accord with Policies EN1 and EN3 of the Reading Borough Local Plan (2019) and the NPPF.

Conclusion

There would be some limited harm to the original fabric of the Listed Building, however, this has been weighed against the public benefits of fire safety improvement, and therefore, it is considered that the proposed works would be acceptable.

The proposed development has been assessed and the proposed works are considered to be in accordance with the above relevant policies and Listed Building Consent can be granted.

RECOMMENDATION

GRANT LISTED BUILDING CONSENT subject to the following conditions:

Time Limit
Approved Plans
Materials

INFORMATIVES

1. Terms
2. Building Control
3. Complaints about Construction
4. Positive and Proactive working

¹ <https://historicengland.org.uk/advice/hpg/generalintro/heritage-conservation-defined/#:~:text=The%20vast%20majority%20of%20our,it%20continues%20to%20receive%20investment.>