

## **DELEGATED APPLICATION REPORT**

**SITE ADDRESS:** 81 London Street, Reading, RG1 4QA

**APPLICATION NUMBER:** PL/25/0564

**PROPOSAL:** Listed Building Consent for the removal of existing modern partitions and addition of new partitions to facilitate a change of use of the first floor from office space to residential (2 x 3-bed flats).

**CASE OFFICER:** Matthew Harding

**TARGET DATE:** 30/06/2025 (Extension of time)

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### **Introduction**

81 London Street is a three storey Grade II Listed Building red-brick terrace building, built in the early 19<sup>th</sup> Century, fronting onto London Street. The site lies within the central area of Reading, the Area Quality Management Area, the Market Place/London Road Conservation Area and an area of archaeological potential. Also, the site and building lies outside of an area covered by an Article 4 Direction.

To the rear of the site there is a large private carpark extending from the rear elevation of the building to the vehicle access road (East Street). The rear section of the building is a later 20<sup>th</sup> Century three storey addition with a central opening in the middle of the building dividing the original and later addition.



**Figure 1** – Site Location Plan



Figure 2: Application Building – Front Elevation



Figure 3: Application Building – Rear Elevation

## Proposal

The proposal seeks listed building consent for internal alterations to the first floor of the building to facilitate a proposed change of use of the first floor from the existing lawful education use to a residential use (2 x 3 bedroom flats).

The proposal includes the removal of and installation of a series of partition / stud walls to facilitate the proposed change of use of the first floor of the building. No external changes are sought to the building.

Figure 4 below shows the new partition walls separating out the various habitable rooms serving the proposed flats.

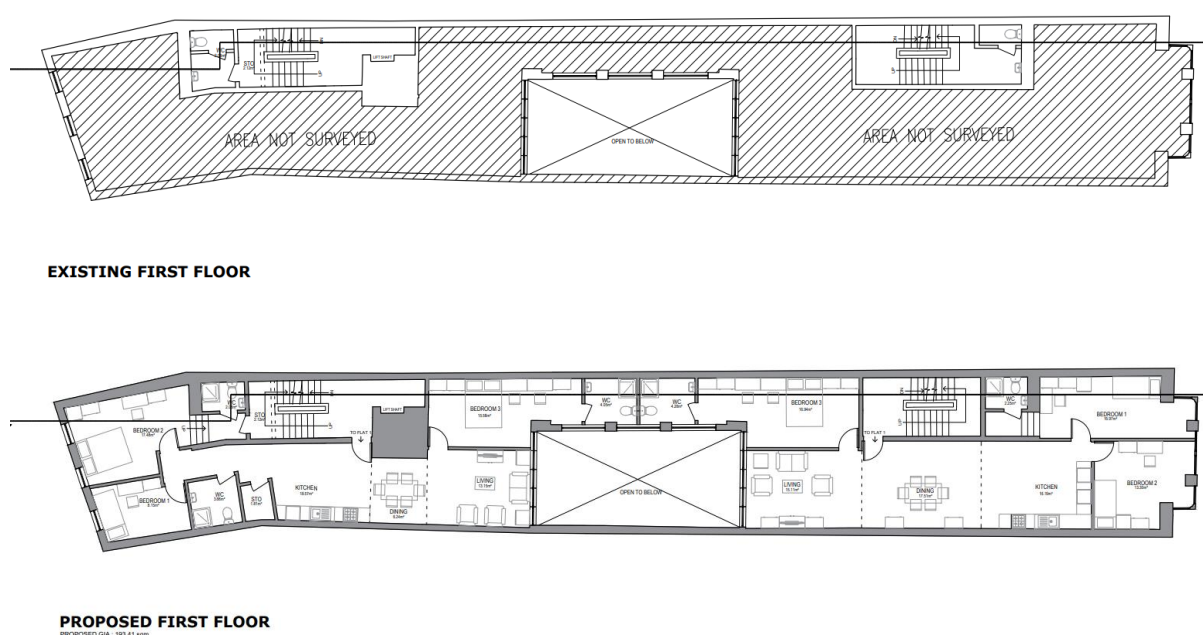


**Figure 4: Existing and Proposed First Floor Plan**

## Information Submitted

The completed application form, including a written summary of the proposed development and the developer's contact details.

## Drawings and Documents ref.

- Listed Building Consent Application Form
- Design and Access Statement
- Heritage Statement
- Location Plan - Planning Portal Reference: PP-13936013v1
- Existing Ground Floor Plan – EX01
- Existing First Floor Plan – EX02
- Existing Second Floor Plan – EX03

- Proposed Ground Floor Plan – PR01
- Proposed First Floor Plan – PR02
- Proposed Second Floor Plan – PR03

Received by the Local Planning Authority on 11 April 2025

### **Policy & Legal 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.

### **National Policy National Planning Policy Framework (NPPF)**

Chapter 16: Conserving and enhancing the historic environment

### **National Planning Practice Guidance (PPG)**

#### Reading Borough Local Plan (2019)

EN1 - Protection and Enhancement of the Historic Environment

#### SPDs

Design Guide to House Extensions SPD 2021

#### Local Plan Update

The current version of the Local Plan (adopted in November 2019) turned five years old on Tuesday 5th November 2024. The Local Plan was reviewed in March 2023 and around half of the policies in the plan are considered still up to date. However, the rest need to be considered for updating to reflect changing circumstances and national policy. The current adopted plan policies, relevant to this proposal as identified above, remain up to date and have full weight in the determination of this application.

## Planning History

PL/12/1508 – Application for a Certificate of Lawfulness for Existing Use of part of ground floor and all of first floor for education use, including ancillary admin functions. Certificate granted, 26 November 2012.

PL/16/0833 – Listed Building Consent for redecoration of shop front and internal alterations at ground floor level. Granted, 27 July 2016.

PL/23/1535 - Change of Use of the third floor from office space to residential, the creation of two 3-bed flats and the removal of existing modern partitions and the addition of new partitions. Under consideration, June 2025.

PL/23/01536 - Listed Building Consent for the removal of existing modern partitions and the addition of new partitions associated with the change of use of the third floor from office to residential. Under consideration, June 2025.

PL/25/0566 – Change of use of first floor from Class E (commercial) to C3 (dwelling houses) to comprise 2 x 3-bedroom flats. Prior Notification under Class G, Part 3 of Schedule 2 of the Town and Country Planning (General Permitted Development) Order 2015. Under consideration, June 2025.

## Consultations

Conservation Officer: ***No objections subject to conditions AND Clarifications***

***Required*** – The proposal is acceptable only due to the previously approved alterations to the listed building. This could be an opportunity to bring back/reinstate some features of the listed building. However, there is no conservation related works among the proposed ones.

The change to residential accommodation is considered appropriate. As such, I raise no objections on heritage grounds and suggest the condition be included within the decision of LBC.

## Publicity

A site notice was displayed at the application site on 30 April 2025. No comments were received.

## Appraisal

Policy EN1 states that all proposals will be expected to protect and where possible enhance the significance of heritage assets and their settings, the historic character and local distinctiveness of the area in which they are located.

As the building is a Grade II Listed Building, there is a duty imposed by Section 16(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 requiring decision makers, when considering listed building consent proposals, to have special regard to

the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses. This is reflected in Policy EN1 of the Reading Borough Local Plan, 2019.

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; and
- c) The desirability of new development making a positive contribution to local character and distinctiveness.

Paragraph 199 of the NPPF details that 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 212 of the NPPF requires that *'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 paragraph 213 says, *'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 215 requires that *'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...'*

The Council's Conservation Officer has reviewed the proposal and raised no specific objection, commenting that *"the building has had considerable alterations, which caused loss of many original features, layout, and curtilage relationships. However, it still constitutes significance via its retained lines of footprint, roof and front façade with some minimal alterations and reinstatements..."*.

The Conservation Officer goes on to advise that the submitted plans do not include an existing first floor layout, by indicating 'Area not Surveyed' and the Conservation Officer has advised that the existing detailed layout of the first floor should be provided as a professional necessity, with a short statement and a drawing for the proposed stud wall between the front two windows of the building as this would touch on the historic fabric and needs a sensitive approach in terms of the use of materials.

The Conservation Officer's summary of the proposal is that the proposal is potentially acceptable due to the previously approved alterations to the listed building and amounts to an opportunity to bring back/reinstate some features of the listed building. However, the lack of heritage experience and/or survey submitted with the application prevents this. The change to residential accommodation in principle is considered appropriate, although more detailed consideration is required specifically in relation to the proposed internal layout with a full survey of the existing layout required for consideration.

The following condition is recommended by the Council's Conservation Officer:

*Before the commencement of relevant works, details of the stud walls shall be approved in writing by the Local Planning Authority. The work shall be carried out in full in accordance with such approved details.*

*REASON: To protect the special architectural or historic interest of this listed building in accordance with Policy EN1 of the Reading Borough Local Plan.*

Although the principle of the proposed internal works is supported by the Conservation Officer, which is subject to a condition requiring the submission of further details relating to the stud wall, concerns have been raised that a lack of detail has been provided in support of this application, specifically that no detailed existing first floor layout plan has been provided.

In addition, the application has been submitted in connection with a prior approval application (PL/25/0566) for the change of use of the first floor of the building to a residential use under Class G of The Town and Country (General Permitted Development) Order 2015 (as amended). However, the change of use under this related application has been found to require planning permission. Therefore, there is not, at this stage, any supporting permission relating to the residential use of the first floor to support the proposed internal alterations. As such, and with concerns raised by the Conservation Officer, it is concluded that the proposal lacks sufficient details and there is no supporting planning permission in place for the residential conversion of the first floor which the internal partition works are sought for.

A lack of sufficient detail of the existing internal first floor layout and condition of the building has been provided to demonstrate the proposed internal partition works would preserve and enhance the special historic character of the listed building, contrary to Policies EN1 and EN6 of the Reading Borough Local Plan, Section 16 of the Planning (Listed Buildings and Conservation Areas) Act 1990 and the advice contained within the NPPF. Furthermore, there is no supporting permission allowing for the use of the first floor of the building to be used for residential purposes for which the proposed internal works are sought.

**Recommendation:**

Refused, for the following reason:

- 1) Insufficient detail has been submitted to the Local Planning Authority to demonstrate the proposed internal partition works would preserve and enhance the special historic character of the listed building, contrary to Policies EN1 and EN6 of the Reading Borough Local Plan, Section 16 of the Planning (Listed Buildings and Conservation Areas) Act 1990 and the advice contained within the NPPF. Also, there is no accompanying planning permission allowing for the use of the first floor of the building to be used for residential purposes for which the proposed internal works are sought.