

DELEGATED APPLICATION REPORT

Ward: Redlands

App Ref: PL/24/1617 Full planning permission

App Ref: PL/24/1618 Listed building consent

Address: 10 ELDON ROAD, READING, RG1 4DH

Proposal: Change of use from a Surgery E(e) to a 4 bedroom C3 dwelling.

Applicant: Mr M Opal

Received date: 04/12/2024

Extended Target Decision date: 30/10/2025

Case Officer: Nathalie Weekes

1. SITE DESCRIPTION

10 Eldon Road is an attractive three storey semi-detached grade II listed building, with additional basement and parking to the rear. The external elevations constructed of Bath Stone, with glazing bar sashes and casement windows, located on Eldon Road. The main entrance is at the side of the building and fronts onto St John's Road. The building is sited within the Eldon Square conservation area in existing use as a doctor's surgery in use class E (e). The building has been vacant since 25 July 2024 when the surgery was relocated to premises at 2-4 Alexandra Road, Reading around a 7 minute walk away. The Melrose Surgery also relocated to 73 London Road about 200 metres from 10 Eldon Road, opposite the Royal Berkshire hospital..

The official listing description of 8 And 10, Eldon Road:

"ELDON ROAD 1. 5128 (West Side) Nos 8 and 10 SU 7273 7/461 II GV 2. Circa 1840. Probably by Henry or Nathaniel Briant. Bath ashlar pair. Rusticated ground floor and quoins. Band at 1st floor level. Hipped slate roof on deepbracketed eaves, central chimney. 3 storeys and basement, 1st and 2nd floors have 2 windows each, glazing bar sashes, round-headed on 2nd floor, bracketed pediments on 1st floor. Each has a wide 3 light bay with casement windows. Entered from side in porches with Doric piers, cornice and blocking course.

Listing NGR: SU7243073188"

The surrounding area is predominantly residential, with a mix of large detached and semi-detached dwellings. It is in an Air Quality Management Area and residential parking permit zone.



Fig 1: front view of 10 Eldon Road from Google maps

A site visit was conducted with the RBC Conservation officer and the agent on 29 January 2025

2. PROPOSAL AND SUPPORTING INFORMATION PL/24/1617 and PL/24/1618

The proposal is for a change of use of the Grade II listed building from a Surgery in Class E(e) use to a 4 bedroom C3 use residential dwelling. No change in floor print is proposed, no changes to the roof and the external appearance of the building will remain the same. A rear garden with landscaping and revised parking layout are proposed.

Works are proposed to convert the building from its existing Class E (e) use as a surgery and will comprise: the removal of

- existing doctor surgery signage
- bike racks
- handrails on the entrance
- tarmac in the existing parking area to create a garden area
- an existing platform lift
- existing soft furnishings
- toilets and sinks
- modern fittings and wiring associated with the doctor's surgery
- partition walls in the basement front rooms
- partition wall on the ground floor between the hall and reception room.

Reinstatement/refurbishment of:

- the side boundary wall
- external repainting of existing painted areas with permeable paint
- timber windows and doors, to refurbish the existing timber sash windows and door frames with the addition of internal secondary double glazing on the Eldon Road frontage.

Internal refurbishment is proposed to provide C3 residential use to include changes

- to create two en-suite bedrooms on the second floor
- to install a new kitchen in the basement using existing connections
- to install a new boiler to replace the existing with no changes to the existing flue
- to form a larger dining room on the ground floor
- to replace toilets and sinks

Energy saving features proposed include secondary glazing, replacement boiler and radiators, heating controls, additional insulation, introduction of a water metre and energy efficient appliances. The sustainability statement states that a 'comprehensive site waste management plan (SWMP) will be encouraged.

It is proposed that the building will be sold with planning permission for a change of use from Class E (e) to C3 residential accommodation and that the change of use development works are to be undertaken by the new owner of the site.

PL/24/1617 and PL 24/1618

Plans Considered

9403 PL-01 Location Plan

9403 PL-03 Existing and Proposed Block Plan

~~9403 PL-04 Proposed Site Plan~~

9403 PL-05 Existing Basement and Ground Floor Plans

9403 PL-06 Existing First and Second Floor Plans

9403 PL-07 Existing West and South Elevations

~~9403 PL-08 Existing East Elevation~~

~~9403 PL-09 Proposed Basement and Ground Floor Plans~~

9403 PL-10 Proposed First and Second Floor Plans

~~9403 PL-12 Proposed East Elevation~~

9403 PL-11 Proposed West and South Elevations
9403 PL-14 Existing and Proposed Roof Plan

Design and access Statement - Nov 24, Keen Partnership
2134 Heritage Statement, Heritage fusion
Noise and Pollution information Nov 24, Keen Partnership
Sustainability statement, Keen Partnership
Letter from Melrose doctors' surgery to confirm an 'early termination' of the lease and to leave the building before the end of the lease, Dr Nadeem Ahmed, Senior Partner, 73 London Road. October 10 2024
CIL form
CIL form_7_self_build_part_1_exemption_claim
Certificate of ownership Notice under Article 13 of application for planning permission, sent 03.12.24
As received 4 December 2024

Financial Viability Appraisal, S106 Management, 5 December 2024
Schedules combined
As received 14 January 2025

~~9403 PL-04 Proposed Site Plan REV 01~~
~~9403 PL-09 Proposed Basement and Ground Floor Plans REV 01~~
As received 29 April 2025

29/05/2025 Response from S106 management regarding the review of Financial Viability Appraisal, S106 Management, 5 December 2024
Report & valuation, Haslams red book valuation report 15 May 2025
As received 14 January 2025

9403 PL-04 Proposed Site Plan REV 03
Screenshot 2025-07-01 174335
As received 01 July 2025

9403 PL-08 Existing East Elevation Rev 01
9403 PL-09 Proposed Basement and Ground Floor Plans REV 02
9403 PL-12 Proposed East Elevation Rev 01
As received 15 September 2025

Planning history

041065 Entrance steps to be re-formed, and handrail extended Permitted 30/12/2004
190563/LBC Listed Building Consent for maintenance and repairs to external fabric of building Permitted 7 June 2019
191779 Maintenance and repair works to external fabric of Listed building Permitted 18 December 2019
200355/LBC Installation of structural steel work to support front bay window of Listed building
PL 24/1618 LBC Change of use from a Surgery E(e) to a 4 bedroom C3 dwelling.

3.. 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.

PL24/1617 FULL application

4. CONSULTATIONS

Internal Consultees

The following were consulted:

- RBC conservation officer - No objections to the revised plans with the existing pedestrian access to the side entrance retained and subject to conditions regarding materials and listed building consent.
- RBC Transport – Revised plans were required to demonstrate improved access for the parking spaces to aid highway safety when entering and exiting the site and were considered acceptable. There is no objection to the two parking bays being parking side by side and reversing out onto St John's Road as there is no through traffic onto Eldon Road, prevented by bollards at the junction of Eldon Road/St John's Road. The width of the drop kerb access is also illustrated. Cycle storage has been illustrated, the enclosed storage is acceptable and in accordance with the Council's current standards, the 2 Sheffield stands adjacent to the entrance are not required. Given the location of the site it is recommended that a scaled down version of a CMS is submitted covering points such as parking, delivery and storage of materials etc.
- RBC Planning Natural Environment – It is noted that there is a substantial (but not mature) Sycamore tree in extreme proximity to the rear elevation, which is protected within the Eldon Road Conservation Area. If this tree is proposed to be removed, alternative tree planting should be provided. The creation of a rear garden amenity to replace a section of tarmac is a positive change. Conditions are required and appropriate ground preparation will be required:

Prior to first occupation/use of the building hereby approved, a scheme of hard and soft landscaping shall be submitted to and approved in writing by the Local Planning Authority. This scheme shall specify means of treatment for hard surfaced areas, means of enclosure including mammal gaps where appropriate and soft landscaping details shall include a planting plan, specifications (including cultivation and other operations associated with plant and grass establishment), tree pit specifications (where appropriate), schedules of plants, noting species, planting sizes and proposed numbers/densities where appropriate, an implementation timetable and a maintenance programme detailing all operations to be carried out in order to allow successful establishment of planting.

Planting shall be carried out in accordance with the approved details in the first planting and seeding seasons following the occupation of the building(s) or in accordance with a timetable agreed in writing with the Local Planning Authority. Any trees or plants which, within a period of 5 years from the date of planting, die, are removed or become seriously damaged or diseased shall be replaced in the next planting season with others of similar size and species, to be agreed in writing by the Local Planning Authority.

REASON: In the interest of ensuring that the landscaping of the development enhances the visual local environment and in accordance with Policy CC7 of the Reading Borough Local Plan 2019.

- RBC Ecology – No objections as building works will be mostly internal with no changes proposed to the roof.
- RBC Waste Operations Consultations – The following feedback was provided regarding waste collections, with no objections subject to the following guidance::

This development would need to have space for 1 x 140L general waste bin, 1 x 240L recycling bin and 1 x 23L food waste bin. Residents may require additional recycling or food waste bins. The plans currently only show space for 2 bins in the refuse store.

The bins for the doctors surgery are collected from St Johns Road rather than Eldon Road, and this would need to continue to be the case. The bins would need to be presented for collection on the pavement on St Johns Road at the curtilage of the property, and then returned to the refuse store afterwards. Crews would not retrieve the bins from the refuse store on the plans.

Please note we ask that we are given at least 6 weeks' notice prior to a development being occupied so we can ensure that bins can be purchased, delivered and collections scheduled in with the crews. Bins would need to be purchased by the developer in advance of residents moving into the property.

- RBC Environmental Protection Consultations – No objections were raised
- RBC Valuations - No objections subject to an agreement in relation to the provision of affordable housing based on the information submitted.
- Conservation Area Advisory Committee Consultations – no comment received at the time of writing the report.
- Reading Civic Society Consultations – no comment received at the time of writing the report.
- NHS BOB ICB – The ICB has no objection to this application. As it is a Minor application (under 10 dwellings) the ICB will not be submitting representation requesting mitigation.

A site notice was displayed at the property for the required notice period and an advert was placed in a local newspaper.

A letter of representation and an objection have been received as follows:

- | | | |
|------------------------|--------------|----------------|
| • Neighbour | 8 Eldon Road | Representation |
| • Member of the Public | 8 Eldon Road | Object |

Reasons for the representation and objection included concerns regarding questions about a proposed break in the boundary wall to form a separate entrance as the 'wall is an integral part of the entire property and , any such alteration would be aesthetically harmful and detract from the grandeur of the entire property', regarding works to repair the side boundary of the car park along St John's Road, the proposed situation regarding the tree to the rear of 10 Eldon Road, loft fire compartmentation and the reinstatement of railings. *Case officer comment: Issues relating to material considerations have been assessed. Plans have been amended to remove the revised access and for the retention of the boundary wall. The side boundary wall is proposed to be fixed. Internal fire safety requirements would be covered under building regulations. The reinstatement of railings is not part of the existing proposal. The tree in the rear garden is currently shown on the proposed plans.*

Communications with the agent

Ongoing communications were undertaken with the agent and amended plans submitted to overcome issues in relation to the setting of the listed building, access and parking. Proposed conditions and pre-commencement conditions were agreed with the agent by email.

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 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. A consultation version of the draft updated version of the Local Plan was published on 6th November 2024 and a submission version submitted in May 2025.

Although there is a five-year period for carrying out a review of a plan after it is adopted, nothing in the NPPF or elsewhere says that policies automatically become "out of date" when they are five years old. It is a matter of planning judgement rather than legal fact whether a plan or policies within it are out-of-date. This will depend on whether they have been overtaken by things that have happened since the plan was adopted, either on the ground or through changes in national policy, for example.

Officer advice in respect of the Local Plan policies pertinent to this application listed above is that they remain in accordance with national policy and that the objectives of those policies remain very similar in the draft updated Local Plan. Therefore, they can continue to be afforded weight in the advice given below and are not considered to be 'out of date'. Policies CC2 and CC3 are being updated to reflect developments in climate change and sustainability construction which should be a consideration in the Local Plan review. Policy CC7 reiterates that all development must be of high quality design, to maintain and enhance physical character and context. Policy EN12 includes the addition of wildlife friendly schemes. Policy H1 states that provision will be made for at least an additional 825 dwellings per annum (14,850 over the plan period 2023-2041). Policy H2 identifies that the greatest need for family homes is for 3 or more bedroom houses. Policy H3 will continue to require an affordable housing contribution for any additional new dwelling. Policy OU1 remains unchanged in relation to the provision of healthcare.

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.

The following local and national planning policy and guidance is relevant to this application:

National Policy

National Planning Policy Framework
National Planning Practice Guidance

Reading Borough Local Plan (Adopted November 2019)

CC1 Presumption in Favour of Sustainable Development
CC2 Sustainable Design and Construction
CC3 Adaption to Climate Change
CC5 Waste Minimisation and Storage
CC6 Accessibility and the Intensity of Development
CC7 Design and the Public Realm
CC8 Safeguarding Amenity
H2 Density and Mix
H3 Affordable housing
H8 Residential Conversions

H10 Private and Communal Outdoor Space
EN1 Protection and Enhancement of the Historic Environment
EN3 Enhancement of Conservation Areas
EN14 Trees, Hedges and Woodland
OU1 New and Existing Community Facilities
TR1 Achieving the Transport Strategy
TR3 Access, Traffic and Highway-Related Matters
TR5 Car and Cycle Parking and Electric Vehicle Charging

SPG/SPD

Eldon Square Conservation Area Appraisal (2007)
Residential Conversions SPD (March 2023)
Revised Parking Standards and Design SPD (October 2011)

Other

Reading - A-Guide-to-Tree-Preservation-Orders

6. APPRAISAL 25/1617 FUL application

i) Land use

ii) Impact on the public realm, the historic building and Eldon Road Conservation area

iii) Safeguarding amenity

iv) Transport, Access and parking

v) Natural environment

vi) External lighting

vii) Affordable housing

vii) Sustainability

viii) CIL

i) Land use

The application site has been in existing use as a doctor's surgery.

Policy OU1 requires that *'Proposals involving the redevelopment of existing community facilities for non-community uses will not be permitted, unless it can be clearly demonstrated that there is no longer a need to retain that facility'*

Information provided in the application stated that 10 Eldon Road was no longer fit for purpose as a doctor's surgery as it was not possible to provide an adequate amount of parking, or accessible access into the building. The Grade II listed building did not provide the ability for the medical centre to expand. In this case, there is still a need for medical provision in the area, however in July 2025 the surgery relocated to another premises within 7 minutes' walk of 10 Eldon Road at premises at 2-4 Alexandra Road to provide an expanded provision in an accessible location. As a result, the existing building at no. 10 is currently vacant and no longer operates as a surgery. The NHS BOB ICB had no objections to the loss of provision at 10 Eldon Road and raised no objection and would not be submitting representations for mitigation. Given the surgery has already relocated to a larger premises nearby and the identified deficiencies with the building in providing the facilities needed for a doctor's surgery no conflict with Policy OU1 is identified in this instance. The Design and Access statement states that there has been little interest in leasing the building within Class E use however no evidence of this has been provided.

The applicant confirmed that the 10 Eldon Road surgery moved to *'Melrose Surgery, 2-4 Alexandra Road which is a 7 minute walk away'*.

Other healthcare provision was also identified by the applicant:

- *Melrose Surgery also have premises at 73a London Road, which is 0.1 miles away.*
- *Melrose Surgery is a large practice employing 30 people, 10 doctors, 1 locum, 2 pharmacists, 2 physiotherapists, a paramedic, a nurse practitioner, 2 other practice nurses and a further nursing team of 6.*
- *Eldon Square Surgery, 9 Eldon Square.*
- *Pembroke Surgery, Alexandra Road.*
- *London Street Surgery.*
- *Broad Street Surgery.*
- *Milman & Kennet Surgery.*

It is noted that a doctor's surgery falls under Class E and could in other cases be considered as a prior approval change of use application, but the Reading Local Plan is still given significant weight in terms of the impact on the provision of healthcare in Reading. The change of use would also result in the addition of a four bedroom family dwelling. Policy H2 highlights the need for new dwellings of three or more bedrooms due to a shortfall of provision.

Furthermore, a recommendation should also be based on consideration of the remaining material considerations associated with the proposed change of use from Class E (e) to residential C3 accommodation. The application site is also a Grade II listed building and therefore the change of use must also be assessed in relation to the impact on the historic building, and the impact of the development within the public realm, transport and amenity issues.

ii) Impact on the public realm, the historic building and Eldon Road Conservation area

In accordance with Reading Borough Local Plan policy CC7: Design and the Public Realm, development will be assessed to ensure that it (amongst other matters):

- *Respond positively to their local context and create or reinforce local character and distinctiveness, including protecting and enhancing the historic environment of the Borough and providing value to the public realm;*
- *Are visually attractive as a result of good high quality built forms and spaces, the inclusion of public art and appropriate materials and landscaping*

Policy EN1 states, '*Applications which affect Listed Buildings will not have an adverse impact on those elements which contribute to their special architectural or historic interest including, where appropriate, their settings.*'

Policies EN1 and EN3 of the Reading Borough Local Plan (2019) seek to ensure that the special interest, character and architecture of Conservation Areas are conserved and enhanced. The Eldon Square Conservation Area Appraisal characterises Eldon Road by its tall detached or semi-detached residences faced with Bath stone.

The proposal for a change of use at 10 Eldon Road will not result in any external changes to the historic Grade II building which is surrounded by a predominantly residential area. Signage relating to the former doctor's surgery will be removed and the building refurbished resulting in a future use and retention of a Grade II listed building that has remained vacant since the end of the lease and relocation of the doctor's surgery. The use as a single family household will be less intensive than as a class E retail use. The Heritage Statement submitted detailed the scheme of works proposed and the RBC Conservation Officer has no objections to the proposed changes, subject to condition and separate listed building consent. Most notably the proposals would return the currently vacant Listed building back to its original use which is a heritage benefit.

The following features of Eldon Square Conservation Area have been identified as having a negative contribution:

- *Loss of rear gardens to parking and garages*

Although alterations are proposed to provide the required access and parking provision, the amount of tarmac at the site will be reduced. A rear garden is proposed as part of the proposed change of use which is considered to be a positive addition.

No external alterations are proposed to the main building or its footprint as part of this application. As no external alterations are proposed, the development does not alter the existing character and appearance of the surrounding area. The external appearance of 10 Eldon Road will therefore be preserved, with the special interests that contribute positively to the conservation area retained.

The development is therefore in accordance with Policies CC7, EN1 and EN3 of the Reading Borough Local Plan.

iii) Safeguarding amenity

This proposal has also been assessed against Reading Borough Local Plan policy CC8: Safeguarding Amenity, which states that proposals are acceptable where they will not cause a detrimental impact on the living environment of existing residential properties with regard to including factors (amongst others):

- *Privacy and overlooking*
- *Access to sunlight and daylight*
- *Visual dominance and overbearing effects of a development*
- *Noise and disturbance; and*
- *Crime and safety*

The building would have historically been used as residential accommodation. With regards to the impact of the proposed development on adjoining property 8 Eldon Road, the proposed use is not considered to give rise to harmful levels of noise and disturbance. No additional windows are proposed and the change of use would not result in any overlooking or lack of privacy to any neighbouring properties.

The proposed internal layout and garden amenity space is considered acceptable.

Overall, the proposed development is not considered harmful to the living conditions of neighbouring properties or residents is therefore considered in accordance with Policy CC8 of the Reading Borough Local Plan.

iv) Transport, Access and parking

As stated in the response from Transport Development Control, there are no in principle objections to the scheme from a transport or highways perspective. Revised plans proposing two car parking places and cycle storage for a single dwelling, were considered acceptable subject to conditions. Adequate general waste bin storage has been provided for one single dwelling however additional recycling or food waste bins may be required.

A separate licence will need to be obtained if any works are undertaken on the public highway and access.

Subject to conditions, the development is considered in accordance with Policies TR1 and TR3 of the Reading Borough Local Plan (2019).

v) Natural environment

Trees located within the Eldon Square Conservation Area are subject to a tree preservation order and as such any works proposed would require additional permission: <https://images.reading.gov.uk/2023/09/A-Guide-to-Tree-Preservation-Orders.pdf>

The proposal includes the creation of a rear garden and a condition for a hard and soft landscaping and boundary fencing to the rear garden behind the proposed car parking spaces prior to occupation is recommended for additional details to be provided. Insufficient details have been provided for the boundary fencing and a condition is recommended for additional information to be provided regarding proposed the materials, elevations and amount of boundary fencing to be proposed. The character of the Eldon Road Conservation Area is for hedging. The low level walls along the side and front boundaries of the site on Eldon Road and St John's Road are considered an important feature of the listed building and its setting. At the site visit it was observed that there is a substantial sycamore tree (covered by the Conservation Area tree protection order) in close proximity to the rear elevations of 8 and 10 Eldon Road. The hard and soft landscaping garden path would fall within its root protection area of the tree at the rear elevation, as such an arboricultural method statement would be required to show how the works would be undertaken. An informative will also be attached to any approval reminding the applicant the any alterations to the TPO require permission from the LPA.

Therefore, subject to conditions, the development is considered in accordance with Policy EN14 of the Reading Borough Local Plan (2019).

Ecology

The footprint of the building will remain the same and no new housing development is proposed, with the addition of a small cycle shed. The current area to the rear of 10 Eldon Road is tarmac. The site would be exempt as it would meet a de minimis condition as there is only an impact to a small area. The biodiversity of the site will likely be improved due to the creation of a rear garden with grass lawn. A hard and soft landscaping condition is recommended.

vi) External lighting

External lighting is proposed but no additional details have been provided regarding daylight detectors and angling and capping. A condition is recommended for additional lighting information to be submitted.

vii) Affordable housing

Policy H3 states that '*Residential development will make appropriate contribution towards affordable housing to meet the needs of Reading*' and '*on sites of 1 – 4 dwellings, a financial contribution will be made that will enable the equivalent of 10% of the housing to be provided as affordable housing elsewhere in the Borough.*' '*In all cases where proposals fall short of the policy target as a result of viability considerations, an open-book approach will be taken and the onus will be on the developer/landowner to clearly demonstrate the circumstances justifying a lower affordable housing contribution.*'

A viability statement was submitted by the applicant for the scheme which was stated that it was unviable for the development to contribute towards affordable housing elsewhere in the Borough. RBC Valuations dispute some of the findings of the viability statement and based on the information provided consider that the development can contribute towards affordable housing. . As a result of discussions between the applicant and the RBC valuations team an affordable housing contribution of £20, 000 has been agreed to be secured by way of a s106 agreement, . Whilst this contribution is not at a policy compliant level, officers acknowledge, the particular circumstances of this development in terms of the Grade II Listed Building and additional associated costs in converting such as building; as well as the fact that the proposals would facilitate a vacant historic building w being returned to its original use which is considered to be a wider planning benefit.. Accordingly, the proposed affordable housing contribution is accepted in

this instance with this shortfall being outweighed by the benefits to the listed building and conservation area within the overall planning balance.

vii) Sustainability

There are a number of limitations on improvements to the energy efficiency of the listed building that can be undertaken to avoid any resultant harm to the fabric of the listed building however a sustainability statement has been submitted to identify areas in which the building can be improved in line with policy CC2. The works may not fully achieve the level of improvement sought by policy CC2 but are considered an improvement to the historic Grade II Listed Building. Refurbishment works are proposed to increase the energy efficiency of the building including secondary double glazing. Replacement boiler and radiators, heating and loft insulation, with energy saving appliances and the addition of a water meter. The Sustainability statement states, *'The water consumption (L/person/day) for the proposed dwellings show a figure of 107.4l/p/d with the following proposed specification (which is below the 125.00l/p/d allowed under Building Regulations)'*.

viii) CIL

The Council introduced the Community Infrastructure Levy (CIL) on 1st April 2015. CIL is a way of securing financial contributions towards infrastructure from new development, and partially replaces the Section 106 planning obligation regime. It is a set charge per sq m of floorspace for different uses, and, unlike Section 106, it is non-negotiable. It applies to developments which result in at least one dwelling; where the space has not been in lawful use for 6 months within the last 3 years or 100 sq m of new floorspace. If chargeable you will be sent a CIL Liability Notice with the calculated amount soon. CIL becomes payable on commencement of the development or by instalments.

For more information go to:

http://www.reading.gov.uk/media/2791/Community-Infrastructure-Levy-Advice-to-Applicants/pdf/CIL_Advice_to_Applicants.pdf

7. CONCLUSION

The proposed development has been assessed and an on balance decision considered. The loss of a doctor's surgery providing a community facility would normally be resisted unless there is a clear demonstration that there is no longer a need to retain the facility, in accordance with Policy OU1. In this instance, the existing surgery has already closed and relocated to a larger replacement medical facility nearby with the ability to provide a greater level of service to a larger number of patients, such that no conflict with OU1 is identified.

There are site constraints regarding the level of changes that can be made to the Grade II listed building to enable it to be fit for purpose and to provide accessible access and parking provision without resulting in harm to the fabric of the building. As such the building did not conform to current standards required for a doctor's surgery. The property has remained vacant and the applicant has advised that there has been no interest in the continued use of the building for medical purposes.

The site is also considered an exceptional case in respect of an affordable housing contribution and a financial contribution has been agreed in discussion between the RBC valuations team and the applicant that is not fully compliant with policy H3 Affordable Housing.

On consideration of other materials considerations, the resultant change of use is not considered to be harmful to the Grade II listed building and will restore the historic building to a residential use. The creation of a garden is considered to have a positive impact on the Eldon Road Conservation Area.

It is considered that the planning benefits of the scheme in terms of the addition of a family sized dwelling to the Boroughs housing stock, meeting need identified under Policies H1 and H2, return of a grade II

listed building to its original use within the conservation area (Policies EN1 and EN3) and acceptability of the proposals in other respects, as discussed above in this report, would in this instance outweigh the shortfall of the proposals in respect of Policy H3.

A condition is recommended to require any future change of use, notwithstanding the provisions of the Town and Country Planning (General Permitted Development) (England) Order 2015 (or any Order revoking and re-enacting that Order with or without modification to require a planning permission. This is because the proposals have been assessed on the basis of occupation as a single dwelling and no other use. Other uses could result in issues and policy conflicts such as in terms of impact on the significance of the listed building and conservation area, amenity of neighbours and of transport (parking/access) issues which have not been considered as part of the assessment of the current proposals.

8. RECOMMENDATION

Grant planning permission subject to completion of a s106 agreement and conditions.

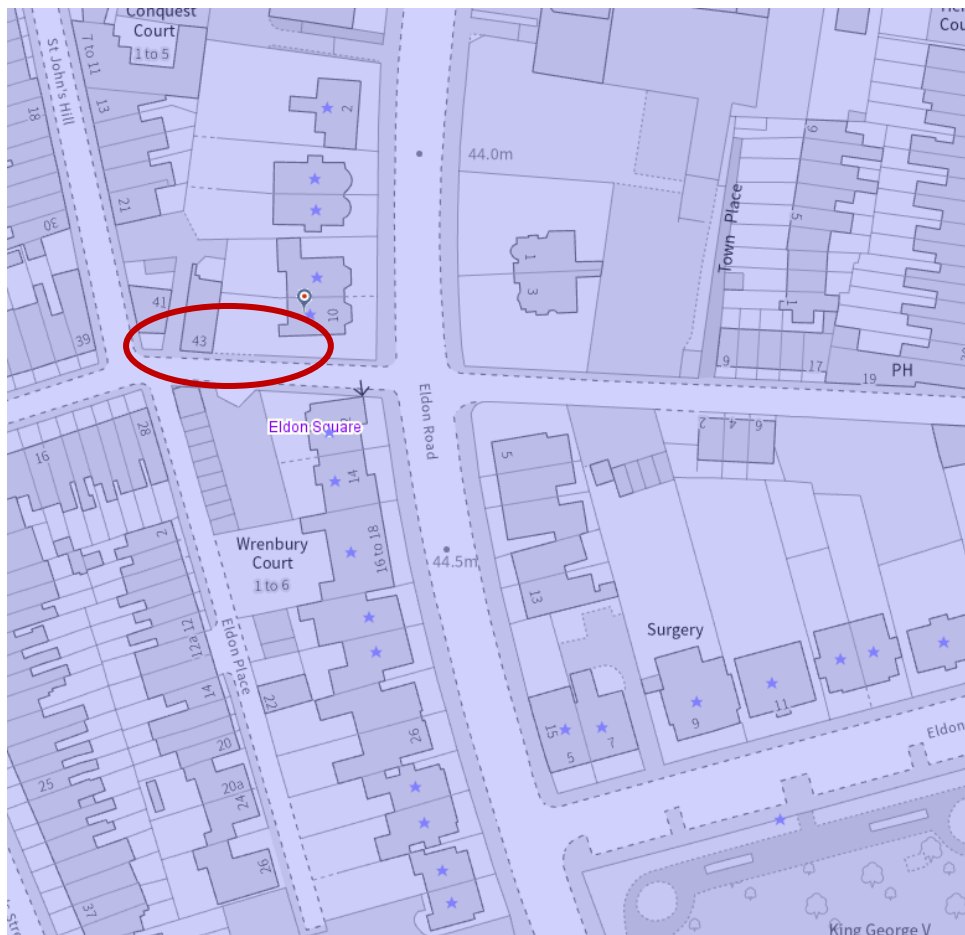
PL24/1618 LBC application

9. CONSULTATIONS

The following were consulted:

- Burcu Can Cetin – There are no objections to the revised plans with the existing pedestrian access to the side entrance retained and subject to conditions.

The application site relates to a three-storey semi-detached Grade-II listed building with a basement located on the corner of Eldon Road and St John's Road within the Eldon Square Conservation Area. Dating circa 1840, the subject building, along with other similar listed buildings, lines up along Eldon Road in the centre of the conservation area. The closest neighbouring properties to the north and south are the Grade II listed semi-detached pairs at 4 & 6 Eldon Road and 12 & 14 Eldon Road.



The application site (circled in red), Listed buildings (purple starred) and conservation area (light purple)

Significance of heritage assets

The NPPF defines significance as the “*value of a heritage asset to this and future generations because of its heritage interest.*”

The interest may be architectural or historic, as set out in the Town and Country Planning (Listed Building and Conservation Areas) Act 1990 Section 1.

“Significance derives not only from a heritage asset’s physical presence, but also from its setting.”
(NPPF, 2024)

Historic England assesses significance in a similar manner, referring to evidential, historic, aesthetic and communal values of a place.

The official listing description of 8 And 10, Eldon Road reads as follows:

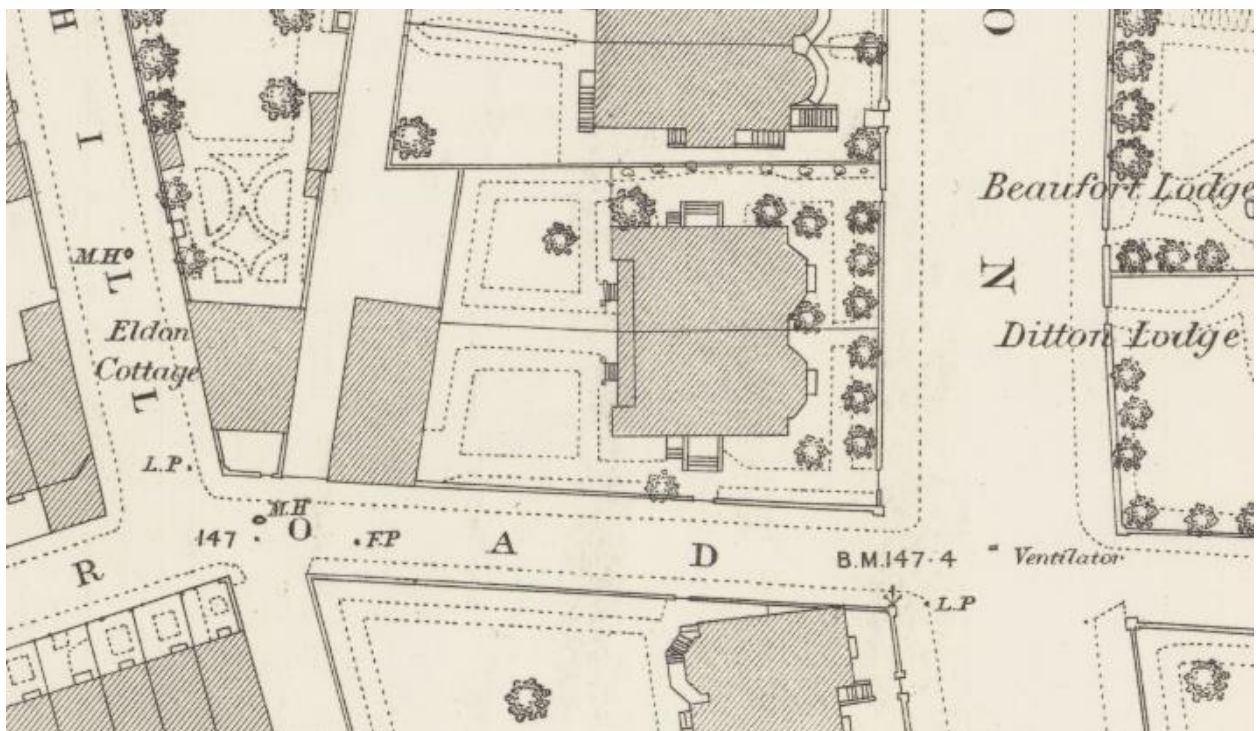
“ELDON ROAD 1. 5128 (West Side) Nos 8 and 10 SU 7273 7/461 II GV 2. Circa 1840. Probably by Henry or Nathaniel Briant. Bath ashlar pair. Rusticated ground floor and quoins. Band at 1st floor level. Hipped slate roof on deepbracketed eaves, central chimney. 3 storeys and basement, 1st and 2nd floors have 2 windows each, glazing bar sashes, round-headed on 2nd floor, bracketed pediments on 1st floor. Each has a wide 3 light bay with casement windows. Entered from side in porches with Doric piers, cornice and blocking course.

Listing NGR: SU7243073188”

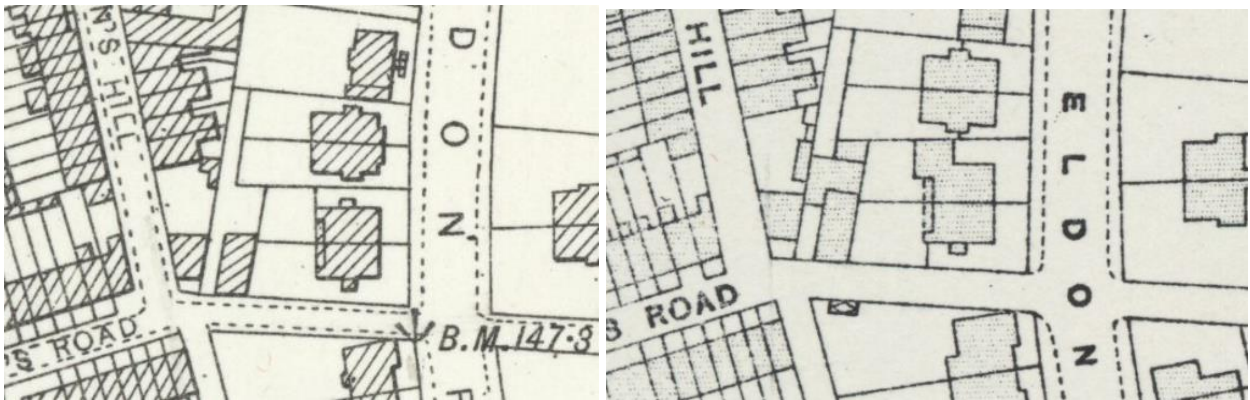
10 Eldon Road, as appears on historic maps below, still retains its original footprint and external features. However, the original boundary treatments and layout of the rear garden, as seen on the OS Map of 1877, have been lost and replaced by the existing tarmac car parking space, causing negative impact on the significance of the building and the conservation area including settings of listed buildings within immediate vicinity.



The original footprint and extent of garden walls are visible on the historic map of 1853



Details of the original curtilage layout appear on the OS Map of 1877 (Published in 1879)



OS Maps of 1898 (Published in 1900) (Left) and 1931 to 1932 (Published in 1934) (Right) suggesting no alteration to the footprint and possibly external features of the listed building



OS Maps of 1956 (Published in 1957) (Left) and 1970 (Published in 1971) (Right) showing a similar layout and footprint just before the building's listing date



Map of the 1990s and Aerial view from 2002 (from the Council's Historic Mapping Tool) – The dramatic impact of car park use and unsympathetic hardstanding in the rear garden of the listed curtilage is visible while its pair retains soft landscaping and natural features in its garden as seen on below aerals from 2006 (Left) and 2021 (Right)



From the planning history of the property, it is noted that the building has undergone some minor internal alterations and external repairs. However, as confirmed during the site visit by the officers, it retains most of its internal features, layout and elements, such as decorative plastering in the ceiling of the ground floor front room (in some other rooms as well), chimney breasts, timber skirting boards, picture rails, stairs, door frames and window shutters. As such, although the existing/pre-existing use of doctor's surgery resulted in some alterations via internal partitions and new services, there is a very high percentage of surviving internal features of the building. As such, the majority of its significance lies within its original footprint, remaining garden walls, intact external fabric and surviving internal layout and elements.



Some of the surviving internal features of the listed building, above and below



The application site is in the Character Area 1-Kings Road, Eldon Road and Eldon Square, where most of the conservation area's listed buildings are located. Among the positive and negative elements affecting the historic character of this character area, the following apply to the subject-listed building/curtilage and settings of the aforementioned neighbouring listed buildings.

"... Features that make a positive contribution to the historic character and appearance of the conservation area:

- *The high concentration of listed buildings;*
- *The architectural cohesion of prestigious mid 19th century residential development;*
- *Good quality townscape;*
- *Prevalent use of local stone;*

...Features that have a negative impact on the historic character and appearance of the conservation area:

- *Insensitive alterations to listed buildings e.g. garage door in basement of no. 2 Eldon Road;*
- *Continual disturbance, noise and pollution of traffic;*
- *Loss of rear gardens to parking and garages;*
- *Loss of original front boundary walls and railings."*

As such, any proposed work for this particular site is expected to resolve existing conservation problems by preventing further harm to its character and appearance.

The official listing descriptions for neighbouring properties are also given below:

12 AND 14, ELDON ROAD

"ELDON ROAD 1. 5128 (West Side) Nos 12 and 14 SU 7273 7/462 II GV 2. Circa 1840. Probably by Henry or Nathaniel Briant. Bath stone pair. 2 storeys and basement with 3 storey end pavilions. Slate roof with projecting eaves. Glazing bar sash windows, centre has narrow outer windows and 2 ranges in centre. Outer doors, No 12 in angle, porch with stilted segmental arch. 1 bay end pavilions with shaped surrounds to 1st and 2nd floor windows; round-headed on ground floor with panels below and impost and label moulds; ground floor channelled. Bath stone garden walls to front with

*pierced roundels and moulded coping.
Listing NGR: SU7243473161"*

4 AND 6, ELDON ROAD

"ELDON ROAD 1. 5128 (West Side) Nos 4 and 6 SU 7273 7/460 II GV 2. Before 1840. Probably by Henry or Nathaniel Briant. 2 storeys and basement. Bath ashlar. Hipped slate roof with central chimneys. Deep bracketed eaves. On 1st floor outer small round-headed windows, inner French casements with flanking wall thickenings. On ground floor: tripartite glazing bar sashes in bows with vermiculated dividing quoin strip. Vermiculated voussoirs to outer round-headed doorways. Flanking extensions. Projecting front garden walls terminate in the Eldon Square type of polygonal pier with crested capping.

Listing NGR: SU7242973206"

Impact of proposal upon heritage asset(s)

I fully support the proposed change of use as it would bring back the original use of the listed building which is a main heritage benefit. The proposed development and related works are accompanied by a design and access statement and heritage statement which I welcome and find good/sufficient. However, I have some questions that need further details and clarifications which are in my comments.

Alterations to the listed curtilage/garden:

The proposed works to the garden would create a new garden/private outdoor space for the occupiers of the house by removing the harmful car park use and tarmac surface. The new design, although its details are not clear when compared with the existing one, would have a positive impact on the curtilage of the listed building pair, the settings of neighbouring listed buildings and the significance of the conservation area. It would introduce some soft landscaping, flower beds, following the historic traces of the original garden layout as appears in the 1870s OS Map. However, further details about the surface materials, proposed bike shed and fencing are required to make full assessment. Along with the elevation drawings of the proposed outbuilding and fencing, the quality of materials should be high to easily blend within the natural features of the conservation area, not detracting from its character and appearance but enhancing it. The new cover – natural slate paving – for the existing concrete path may not be necessary. The existing bicycle rails are mentioned to be removed in one statement, but the proposed ground floor plan still includes them. So, clarification is required. There is no objection in principle; details can be conditioned.

Works to the exterior of the building:

No alteration is proposed to the external appearance of the building. However, I noted that secondary double glazing to the elevation of Eldon Road is proposed in the design and access statement. Again, clarification is required. Refurbishment of windows are supported, however, some of the windows may require repair. Therefore, condition assessment and works to the windows should be described.

Internal works

The removal of the existing lift, elements associated with the existing/pre-existing use, some partitions, positions of kitchen and bathrooms, and new stud walls and doorways are acceptable. Because the existing services would be replaced and upgraded, a condition is recommended in line with the suggestions of the submitted heritage statement. The proposed layout would be very close to the original one and cause additional heritage benefits. However, I suggest further conditions to secure the works under conservation principles and prevent any damage to the original internal features.

Overall, the proposed change of use and works to the listed curtilage and fabric would benefit the special historical and architectural interest of the listed building and the character and appearance of the conservation area, including the settings of neighbouring listed buildings. Therefore, the proposal would accord with the heritage policies of the local plan and NPPF and be acceptable on heritage grounds subject to conditions.

- Conservation Area Advisory Committee Consultation - no comment received at the time of writing the report.
- Reading Civic Society Consultation - no comment received at the time of writing the report.

A site notice was displayed at the property for the required notice period and an advert was placed in a local newspaper.

A letter of objection has been received as follows:

- | | | |
|------------------------|--------------|--------|
| • Member of the Public | 8 Eldon Road | Object |
|------------------------|--------------|--------|

Reasons for the objection included the same concerns as for the FUL application as listed above.

10. 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'. However the NPPF does not change the statutory status of the development plan as the starting point for decision making (NPPF paragraph 12). In this regard, the NPPF states that due weight should be given to the adopted policies of the Local Development Framework (LDF) (Core Strategy and Sites and Detailed Policies Document) according to their degree of consistency with the NPPF (the closer the policies in the plan to the policies in the NPPF, the greater the weight that may be given). The Council's adopted Supplementary Planning Guidance and Supplementary Planning Documents are also material planning considerations.

In determining applications for Listed Building Consent, Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires 'special regard' to be had to the desirability of preserving listed buildings or their setting or any features of special architectural or historic interest which they possess.

Conservation Areas

Section 69 of the Act imposes a duty on local planning authorities to designate as Conservation Areas any 'areas of special architectural or historic interest the character or appearance of which it is desirable to preserve or enhance'.

Recent legal cases have established that under section 70(3) the general power to grant planning permission under section 70(1) is expressly subject to section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990. Section 72(1) provides that the local authority has a statutory duty that:

'with respect of any building or other land in a conservation area.....special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.'

The NPPF outlines government policy, including its policy in respect of the historic environment. Chapter 16 of the NPPF (December 2024) 'Conserving and enhancing the historic environment' sets out the Government's high-level policies concerning heritage and sustainable development.

Paragraph 207 states, *"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."* Paragraph 208 says, *"Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal."*

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 weighted against the public benefits of the proposal...'*

National Planning Practice Guidance on Historic Environment provides context to the NPPF.

Local Planning Policy and Guidance

Policy EN1, 'Protection and enhancement of the historic environment' of the Reading Borough Local Plan, sets out the Council's aspirations for the historic environment. The policy requires that all proposals to protect and, where possible, enhance the significance of heritage assets and their settings, historic character and local distinctiveness of the area in which they are located. It echoes the NPPF by stating, "Proposals should seek to avoid harm in the first instance. Any harm to or loss of a heritage asset should require clear and convincing justification, usually in the form of public benefits".

Applications that affect Listed Buildings are expected not to adversely impact the elements that contribute to their special architectural or historic interest, including their settings.

Policy EN3, 'Enhancement of conservation areas' of the Reading Borough Local Plan, requires that development proposals within Conservation Areas contribute positively to local character and distinctiveness. This policy further states, "Positive consideration will be given to proposals which take opportunities to enhance the character of conservation areas."

Policy EN6 'New development in a historic context' also requires "New development will make a contribution to the historic character of the area by respecting and enhancing its architectural and visual qualities and considering how heritage considerations can influence the design of new development. When determining planning applications for new development, the following factors will be taken into consideration:

- a. The positive contribution of the development to the existing historic townscape (scale, height, mass, proportion, plot size, street form, materials, significant vistas and views, and open space);
- b. Sensitivity to historic context;
- c. Reflection of borough-wide major heritage themes that contribute to local distinctiveness (e.g. patterned brickwork or former worker terraced housing);
- d. Whether development promotes and/or improves access to previously undiscovered or neglected historic significance."

Eldon Road Conservation Area Appraisal is also a material consideration in determining applications for development.

Other Guidance

Historic England Advice Note 2 – Making changes to Heritage Assets illustrates the application of policies set out in the NPPF in determining applications for Planning Permission and Listed Building Consent.

English Heritage’s “Conservation Principles” provides policy and guidance for the “sustainable management of the historic environment”.

Planning permission will only be granted where development has no adverse impact on historic assets and their settings. All proposals will be expected to protect and where appropriate enhance the character and appearance of the area in which they are located and for the purpose of ensuring that work is appropriate to the special architectural or historic interest of the listed building.

The following local and national planning policy and guidance is relevant to this application:

National Policy

National Planning Policy Framework (2019)
National Planning Practice Guidance

Reading Borough Council Local Plan (2019)

- EN1: PROTECTION AND ENHANCEMENT OF THE HISTORIC ENVIRONMENT
- EN3: ENHANCEMENT OF CONSERVATION AREAS
- EN4: LOCALLY IMPORTANT HERITAGE ASSETS
- EN5: PROTECTION OF SIGNIFICANT VIEWS WITH HERITAGE INTEREST
- EN6: NEW DEVELOPMENT IN A HISTORIC CONTEXT

SPG/SPD

None.

OTHER

Eldon Square Conservation Area Appraisal

11. APPRAISAL

The proposed change of use and related works to the listed curtilage and historic fabric would benefit the special historical and architectural interest of the listed building and the character and appearance of the conservation area, including the settings of neighbouring listed buildings. Therefore, the proposal would accord with the heritage policies of the local plan and NPPF and be acceptable on heritage grounds with the conditions suggested.

The development is therefore in accordance with Policies EN1 and EN3 of the Reading Borough Local Plan.

12. CONCLUSION

The proposal would not harm and sympathetically preserve/restore the fabric/character of the listed building in accordance with Policy EN1.

13. RECOMMENDATION

GRANT Listed Building Consent