

JPPC ref: JS//HV/5543ws
Portal ref: Not submitted via portal
RBC ref: PL/25/0960

Planning Services
Reading Borough Council

Via Email

24th September 2025

Dear Alison Amoah

Application for change from small HMO (C4) to large HMO (sui generis) at 32 Waylen Street, Reading, RG1 7UR

Further to the application reference above dated 30th June accompanied by a letter from us dated 4th July we write to correct errors in that letter.

As before the application seeks planning permission* for the change of use of the above premises from a C4 Small HMO (up to six people living together as a single household) to a Large (HMO House of Multiple Occupation – more than six people). The application is explained (as now clarified) overleaf.

The application includes the following items:

- Application & Certificates
- Location Plan and block plan (updated)
- Existing ground floor plan/site plan (updated)
- Proposed ground floor plan (updated)
- Existing other floor plan (updated)
- Proposed other floor plan (updated)
- Bike Store
- CIL form 1
- Application fee

We will be pleased to answer any questions.

Yours faithfully

Josh Sharp BSc (Hons) MSc
Planner
email: josh.sharp@jppc.co.uk

*In our view planning permission is not needed for what is proposed. This application is made without prejudice.

The John Phillips Planning Consultancy Ltd
(also trading as JPPC)

Registered in England and Wales Company Number: 16286095
Registered address: c/o Gravita Oxford LLP, First Floor, Park Central,
40/41 Park End Street, Oxford



Contact:

Bagley Croft
Hinksey Hill
Oxford OX1 5BD

01865 326823
planning@jppc.co.uk
www.jppc.co.uk

Introduction

1. This statement has been prepared by John Phillips Planning Consultancy (JPPC) in support of submission for the change of use of the premises at 32 Waylen Street which are occupied by six people to allow it to be occupied by seven people. The current use is within Use Class C4 and it is likely that the LPA will consider the proposal to make the site a larger House of Multiple Occupation (Sui Generis- outside of a Use Class) to need planning permission. We note the statement at paragraph 4.4.62 of the Local Plan but the statement is not true and did not likely consider this sort of proposal. The need for planning permission only arises when there is a material change of use, and adding a bedroom into an existing room of a larger building is not certainly a material change of use under section 55 of the Town and Country Planning Act 1990 (as amended), hence the application is without prejudice.
2. In this report we set out why the proposed development should be considered acceptable, with reference to the site history, relevant planning policy, site constraints and material considerations.
3. This report should be read in conjunction with all plans and other documents submitted with the proposal, as listed on the front page of this letter.

Site and surroundings

4. The property is a multi-storey mid-terrace town house situated in central Reading. The property was formerly in use as an office. It was changed to a dwelling under permitted development rights (what was then Part 3 Class J of the Town and Country Planning (General Permitted Development) Order) and was then subsequently changed under other permitted development rights to a small House of Multiple Occupation. The property has seven rooms available to be used as bedrooms but one of these is not used as a bedroom. This application seeks to be able to use that seventh suitable bedroom as such.
5. An application approved on 5th November 2013 was not implemented.
6. The surrounding area is principally residential and has good access to excellent public transport routes, with regular bus routes at the Waylen Street bus stop along Oxford Road, just a 160m walk from the property. Oxford Road is also a main cycle route in Reading.
7. Local amenities such as shops and services are within walking distance on Oxford Road and Reading Town Centre is situated 200m due east from Waylen Street.
8. The site is in the Russell Street-Castle Hill Conservation Area.
9. The site is in flood zone 1.
10. The site is not in an SSSI or of any special ecological merit.

Relevant planning policy

Reading Local Plan 2036 (Adopted 2019) (RLP)

CC1 – Presumption in favour of sustainable development
CC7 – Design and the public realm
CC8 - Safeguarding amenity
H8 – Residential conversions
H10 – Private and communal outdoor space
EN1 - Protection and enhancement of the historic environment
EN3 – Enhancement of conservation areas
EN6 – New development in a historic context
TR5 – Car and Cycle Parking and Electric Vehicle Parking

Russell Street/Castle Hill Conservation Area Appraisal, April 2004

Residential Conversions Supplementary Planning Document (Adopted 2023)

Parking standards and design supplementary planning document (Adopted 2011)

Relevant application history

PL/13/1026 - Change of use from Offices to House in Multiple Occupation. Full Planning Permission. Approved 5th November 2013. Not implemented- later application made.

PL/13/1665 - Change of use of 32 Waylen Street from class B1(a) (offices) to C3 (dwellinghouses) to comprise 1 x 4 bed house. Prior Notification under Class O, Part 3 of Schedule 2 of the Town and Country Planning (General Permitted Development) Order 1995 (as amended). Approved 20th January 2014. **(implemented)**

Planning assessment

Principle of development

11. If it were to need planning permission*, provision of a seventh bedroom does not benefit from permitted development rights and so this planning permission is being made.
12. Policy H8 of the Reading Local Plan states that proposals for the conversion of a dwelling for use as a House of Multiple Occupation are assessed against their impact on the amenity and character of the surrounding area, among others.
13. This property is however already in use for multiple occupation and thus the policy is not wholly pertinent. The proposal should be looked at on its own merits as H8 is more directed to the creation of new HMOs not a swap from one type to another, not least given that the change is from six bedrooms to seven.
14. Nevertheless, for assistance to showing that the proposal is acceptable, we will give our views on the merits of the proposed change of use assessed against the criteria of policy H8 as a proxy. The full wording of policy H8 is included in annex 1, attached to this statement.
15. The first criterion of H8 requires that the proposal respects the physical character of the area in terms of scale, location, materials and design, the arrangement of doors, windows and other principal architectural features.

There are no external alterations proposed at the property; the property will retain its current external appearance, thus respecting the physical character of the area.

16. The second criterion of policy H8 is that the proposal would not, either individually or cumulatively, unduly dilute or harm an existing mixed and sustainable community through the significant loss of single-family housing. The dwelling is currently not in use as a single-family dwelling (C3 use). The change of use from its current C4 use to a larger HMO (Sui generis) will not change the mix to any material extent.
17. The third criterion requires that there are no unacceptable adverse impacts to residents of the scheme or surrounding properties arising from noise and disturbance in terms of the number and layout of units proposed and the proximity to other properties. The property is currently in the same use, just one bedroom is being added. The nature of the use of the building is not changing and no adverse impacts to existing residents or to surrounding properties could occur as a result of the proposal.
18. The fourth criterion states that there should be no inappropriate stacking and location of rooms between units. The additional bedroom will not involve any inappropriate stacking or inappropriate layout of rooms within the HMO. The bedroom will occupy the existing ground floor lounge an existing room utilisable by anyone at any point hitherto. The lounge room could be used for any purpose at any time. A bedroom above a bedroom is acceptable.
19. The fifth criterion states that bin and cycle storage is of an appropriate size and standard for the units proposed and should be located at ground floor level with easy access. The house conversions SPD states that the visual impact of bin storage for house conversions can be lessened by screening the stores and by providing external spaces that are easy to maintain. It states that bin stores should have level access to the public highway to facilitate collection. Finally, bin storage should be located with a maximum carry distance of 9 metres for refuse collectors. The bin storage area will be located no more than 5m from the road, as per the existing arrangement.
20. The bin storage area, as now, will be situated at the property frontage. No additional bins are likely needed for the addition of one bedroom.
21. Bike storage will be situated to the rear of the property and will comply with the requirements set out in TR5 and the parking standards SPD.
22. The sixth criterion is that the resulting properties provide adequate internal floorspace and headroom for residents. The SPD states that the Nationally Described Space Standards (NDSS) are a useful starting point, and that the dwelling should aim to meet these standards where applicable. However, applications (for residential conversions) which propose to provide reduced standards must justify why this is the case.
23. The required standards are as follows:
 - That the dwelling provides at least the gross internal floor area and built in storage set out in table 1. The internal space provision in table 1 of the NDSS lists a maximum of 6 bedrooms over 3 storeys, being 138sqm with 4sqm of internal storage. The internal floorspace at 32 Waylen Street is above 150sqm, inclusive of at least 4sqm of internal floor area. In this instance the dwelling is proposed to be a 7-bedroom 7-person dwelling.

24. In addition to the above, the NDSS technical standards are met

- single bedrooms have a floor area of at least 7.5sqm and is at least 2.15m wide. (The lounge room at the ground floor to become a bedroom measures 9.7sqm and is at least 2.15 metres wide).
- a double or twin bedroom have a floor area of at least 11.5m².
- 1 double (or twin bedroom) is at least 2.75m wide and every other double (or twin) bedroom is at least 2.55m wide.

25. In addition to meeting the main criteria set out in policy H8, additional criteria apply to dwellings to be converted to sui generis HMOs, that the property to be converted measures more than 120 square metres gross. 32 Waylen Street does.

26. Finally, there should be sufficient communal space, in accordance with policy H10. The policy wording requires that communal space will respect the size and character of other similar spaces in the vicinity, clearly identify whether they are private or communal spaces, ensure that they are appropriately related to main entrances, enhance safety and the perception of safety for future residents and the general public, and not be compromised by the relationship of other buildings which may be detrimental in terms of overlooking, overbearing or overshadowing.

27. Policy 4.4.87 of RLP states that the amount of private amenity space available to a dwelling must be the equivalent of the size of the gross floor area of the dwelling it serves, measured externally. In addition to the above, paragraph 2.16 of the SPD states that HMOs should have an equivalent level to a house of usable private outdoor space.

28. However, paragraph 2.18 of the SPD states that sites in Central Reading will not always be expected to comply with all of the standards above. It states that open space is required, unless exceptional circumstances prevail, to accommodate modest sitting out areas and clothes drying facilities. The site is in central Reading. The amount of amenity space, as shown on the proposed layout plan, measures 95sqm, which in our view is sufficient in consideration of policies H8, H10, CC8 and the Residential Conversions SPD. No significant extra space is needed to accommodate the seventh bedroom. Planning does not exist to remedy existing matters only to deal with the matters/impacts the proposal directly causes.

Impact to nearby heritage assets

29. Policy EN1 states that development proposals affecting areas of historic importance, including their setting, will be expected to protect and where possible enhance their environment, including conservation areas and listed buildings.

30. Policy EN3 states that the special interest, character and architecture of Conservation Areas will be conserved and enhanced. Development proposals within Conservation Areas must make a positive contribution to local character and distinctiveness.

31. Policy EN4 seeks to protect non-designated locally listed buildings. The council maintains a list of these locally listed buildings, the criteria to qualify a building as locally listed set out in appendix 2 of the Local Plan. The development is not taking place in close proximity to any of the buildings identified as locally listed.

32. Policy EN6 requires that 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.
33. 32 Waylen Street is within the Russell Street-Castle Hill conservation area. The closest listed building is the grade II listed 33-39 Baker Street, opposite the southern entrance to Waylen Street.
34. As No32 is already in use as a small HMO housing six unrelated individuals, this proposal seeks to add an additional bedroom, taking the total number of people able to live in the dwelling from six to seven. The character of the property and activities associated with it are not proposed to significantly change. The continued residential use in this predominantly residential area will not harm the character of the conservation area. The bins will be stored as existing and the bike store will be located in the rear garden, each being discreet and unobtrusive, and are inclusive of the amenities one would expect to see in association with a domestic property.
35. In our view, the proposed change of use will conserve the significance of the conservation area. The change of use and minor operational development will respect the historic environment and will not affect any buildings of historical merit. The proposal is therefore compliant with EN1, EN3 & NE6 of the local plan.

Design

36. Policy CC7 requires that all development must be of high design quality that maintains and enhances the character and appearance of the area of Reading in which it is located. The policy states that development for built form must make a positive contribution to the character continuity of an area, quality of the public realm and legibility.
37. The only element of built form is not significant. A bike store will measure 3.55m x 2m x 2m, located to the rear, and constructed of timber.

Access and transport

38. Policy TR4 requires that developments will be expected to make full use of opportunities to improve access for cyclists to, from and within the development and to integrate cycling through the provision of new facilities. Development of new facilities for cycling, such as cycle hire points and cycle parking, will be acceptable.
39. Policy TR5 requires that development should provide car parking and cycle parking that is appropriate to the accessibility of locations within the Borough to sustainable transport facilities, particularly public transport.
40. The dwelling is increasing by one bedroom, capable of housing up to seven people. There is an existing parking area to the rear of the property, capable of accommodating up to three parked cars, with the spaces compliant with the recommended standard dimensions. In accordance with policy TR5 and the parking standards SPD the minimum provision is for 0.25 car parking spaces per bedroom per HMO dwelling. In this instance the required car parking provision is exceeded.

41. The parking standards SPD states that cycle parking and storage should be designed with consideration for the following objectives: It should be conveniently located in relation to the trip origin and destination. Additionally, it should be easy to use, secure and covered. The requirements for number of spaces for residential properties with four bedrooms or more is a minimum of two spaces. In this instance the minimum number of spaces is exceeded and policy TR5 complied with.
42. In addition, the cycle parking provision is exceeded. The cycle parking is designed to standards and will be located to the rear of the property, to which there is direct access to and from Waylen St via an existing side gate and side passage. Alternatively, there is access from the rear.

Safeguarding Amenity

43. Policy CC8 requires that development will not cause a detrimental impact on the living environment of existing residential properties or unacceptable living conditions for new residential properties, in terms of: Privacy and overlooking; Access to sunlight and daylight; Visual dominance and overbearing effects of a development; harm to outlook; noise and disturbance; Artificial lighting; Vibration; Dust and fumes; smell, crime and safety; or wind, where the proposals involve new development of more than 8 storeys.
44. There will be no external operational development taking place to the dwelling itself, with minor additions in the form of bike and bin stores. The residential use of the property will remain, however with only an increase in the number of occupants within the property increasing by one. The residential use will remain compatible with the predominantly residential area, therefore.

Conclusion

45. As assessed above, the change from C4 HMO to sui generis HMO is compliant all relevant criteria, including H8 if it is relevant, and advice contained in the residential conversions SPD.
46. The historic environment is unimpacted and the visual amenity of the area is maintained.
47. In compliance with policy requirements, there will be sufficient car and cycle parking.
48. The change to add a bedroom will not cause any harm to the amenity of neighbours or existing occupants, in accordance with policy requirements.
49. The proposal is sustainable development.
50. We trust officers will agree with the above assessment and grant planning permission without delay.

Appendix 1 – Policy H8 of Reading local Plan 2036

H8: RESIDENTIAL CONVERSIONS

Proposals to convert buildings into self-contained flats or for multiple occupation will be assessed against the impact on the amenity and character of the surrounding area, particularly in terms of intensification of activity, loss of privacy, loss of external amenity space, the provision and location of adequate on-site car parking and the treatment of bin storage areas and other related servicing.

Proposals to convert properties into self-contained flats or for multiple occupation will only be acceptable where:

- *The proposal respects the physical character of the area in terms of scale, location, materials and design, the arrangement of doors, windows and other principal architectural features;*
- *The proposal would not, either individually or cumulatively, unduly dilute or harm an existing mixed and sustainable community through the significant loss of single family housing;*
- *There are no unacceptable adverse impacts to residents of the scheme or surrounding properties arising from noise and disturbance in terms of the number and layout of units proposed and the proximity to other properties;*
- *There is no inappropriate stacking and location of rooms between units;*
- *Bin and cycle storage is of an appropriate size and standard for the units proposed and should be located at ground floor level with easy access; and*
- *The resulting property or properties would provide adequate internal floorspace and headroom⁸⁶ for residents.*

Additionally, in the case of conversions of houses to self-contained flats:

- *The property to be converted measures more than 120 square metres gross;*
- *At least 25% of the units formed and, where there are 4 or fewer units at least one unit of accommodation, should be suitable for family occupation with a minimum of two bedrooms.*

Additionally, in the case of sui generis houses in multiple occupation (HMOs):

- *The property to be converted measures more than 120 square metres gross;*
- *There is sufficient communal space⁸⁶.*

Additionally, in areas covered by an Article 4 direction that restricts changes of use from Class C3 to Class C4:

- *Planning permission will not normally be granted where the proportion of HMOs (either C4 or sui generis) will result in HMOs representing 25% or more of the residential properties within a circle of 50m radius measured from the application site.*