

DELEGATED APPLICATION REPORT

Ward: Katesgrove

App Ref: PL/25/1228 Full planning permission

Address: Land to the rear of 81 London Street, Reading, RG1 4QA

Proposal: Temporary change of use from private parking to commercial car park for up to 3 years

Applicant: National Car Parks Limited

Received date: 01 September 2025

Target Decision date: 19 November 2025

Case Officer: Anthony Scholes

1. SITE DESCRIPTION

The application site is the external carpark associated with the 3-storey building located on the eastern side of London Street. Land to the rear of the building fronts onto and is only publicly accessible via East Street. The building has previously been used as offices, with ground floor and first floor partly in use as an education use by 'Shichida UK'. The third floor has recently been approved for use as two flats (PL/23/1535). The parking area is presently in private use, with neighbouring land to the south (also accessed from the same access point off East Street) to the rear of 83-85 London Street also used for vehicular parking.

The existing parking area is used by the main building at no.81, with 2 parking spaces required by condition of PL/23/1535; and signage for the now vacant NHS premises within the building existing within the rear carpark. The LPA is clear that the rear carpark is not operated independently to the building at current.

The application site is located within a conservation area and is within the setting of a listed building. No's 67, 73-81 (Odd), and 95-103 (odd) London Street are also Listed Buildings.



Figure 1 - Location of site and Conservation Area Boundary (left) and site photo (right)

The listing describes the building as:

Townhouse, built in the early C19. Significantly enlarged to the rear in the late C20.

MATERIALS: red brick with stucco dressings. Slate roof covering.

PLAN: early-C19, three-storey range facing westward onto London Street, connected to a three-storey, late-C20 range which extends eastwards at the rear, forming a long rectangular plan with a lightwell in the centre.

EXTERIOR: the ground floor of the principal elevation has a modern shopfront with a double-door entrance to the left (north), a large, fixed-pane shop window over a panelled stall riser in the centre, and a glazed door to the south giving access to the shop unit. Each of these openings is framed by full-height pilasters that rise to a fascia shop sign.

A stucco band separates the ground-floor shopfront from the upper floors, which are of red brick laid in irregular Flemish bond. The first and second floors each contain three recessed, six-over-six glazed sash windows with gauged brickwork flat-arch heads. Above the second floor is a stucco entablature and cornice, topped by a broad, plain parapet painted white. The hipped roof of the original building joins to another hipped roof over the late-C20 rear extension. The rear extension is of three storeys. The east elevation contains a bay window at first-floor level which is topped by a jettied box window on the second floor.

INTERIOR: it is understood that the building has been redeveloped behind the façade.

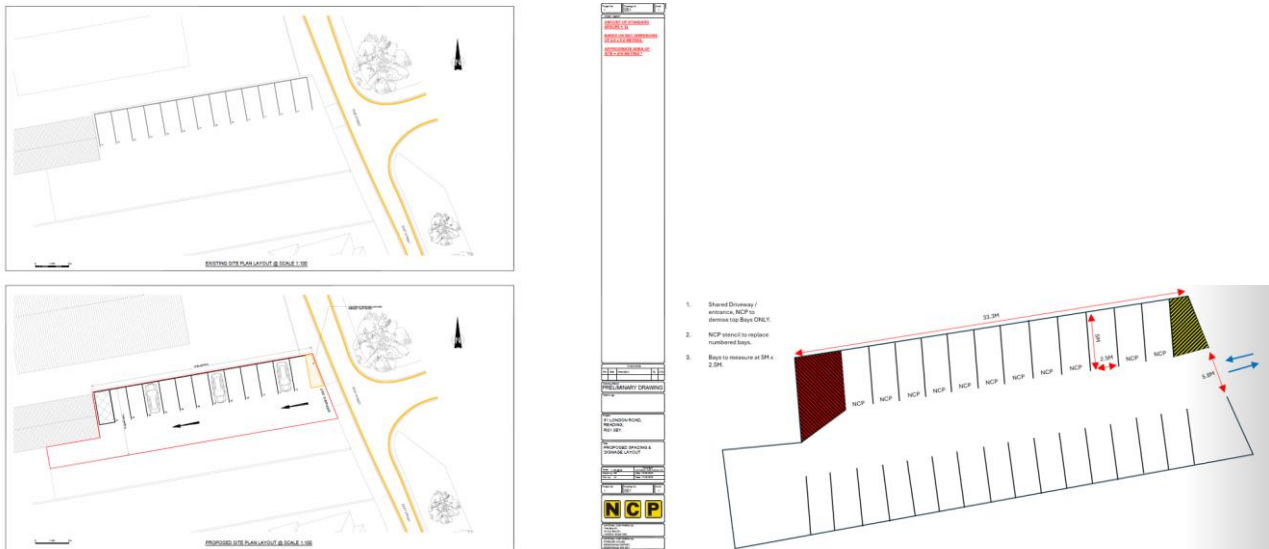
The site is located within the Reading central area and is within an air quality management area.

2. PROPOSAL AND SUPPORTING INFORMATION

The application is for the temporary change of use for up to 3 years of 12 numbered parking spaces (shown on the proposed layout plan submitted - see below; the originally submitted block plan is also shown below) from private parking to a commercial car park (Sui Generis), indicated as being operated by 'National Car Parks Ltd'. The layout plan also specifies car park signage/tariff board, close to East Street, but no details have been provided.

It is acknowledged that the supporting statement by the agent "*Some 10 spaces will be open to public use with the remaining three spaces retained by the landlord*", implying there are actually 13 spaces (but only 12 numbered spaces are shown on the plan), with three spaces not being for commercial use (but the plan submitted does not identify the specific spaces for commercial use and those 'retained by the landlord'). In the circumstances, the proposals are considered on the basis of proposing 12 commercial use parking spaces, as per the numbered spaces on the plan submitted.

The red line boundary also includes manoeuvring space to the south, which is to the rear of No. 83-85 London Street, which is also utilised for parking. Those parking spaces are outside of the red line boundary and not included as part of this application.



The following supporting documents were submitted with the application:

Cover Letter

CIL form

Block Plan (word document)

Location Plan

As Received by the Local Planning Authority on 1 September 2025

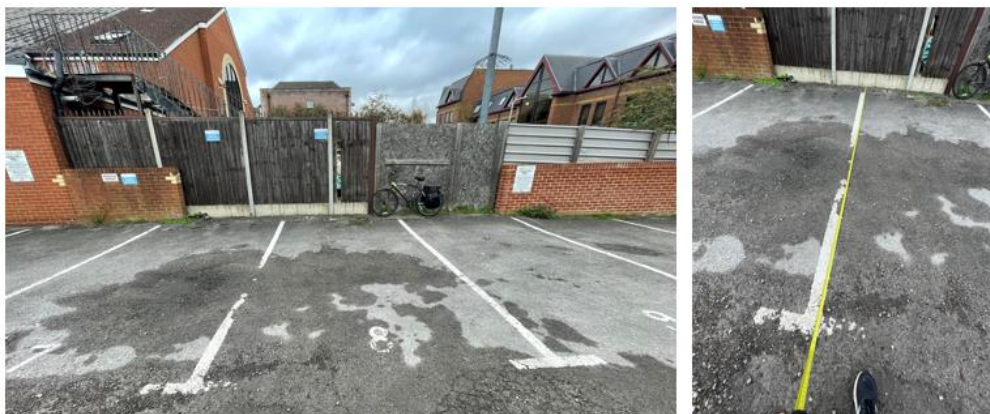
Drawing No: 001 – Proposed spacing & Signage Layout

Location Plan (amended)

The 'Aitchison Raffety', Planning and Heritage Statement, dated September 2025

As Received by the Local Planning Authority on 18 September 2025

It is noted that the proposal plans indicated that all existing spaces are 5m x 2.5m. However, it should be noted that prior to validating the application, the Applicant was advised that the dimensions of the parking spaces, for the most part was <5m in depth. The plans submitted in the revised plan package did not update the existing plans, nor clarified that the proposed plans were accurate. This is reflected on the plans, which stated distances as 'approx'. The accuracy of the plans will be discussed below, though the inaccuracy should be noted, and the dimension of all but 3 spaces, fall short of 5m. The three spaces shown below, partially exceed 5m, whereas the remainder are 4.78m long from the brick boundary wall.



Site visit photos showing 3no. Parking spaces partially 5m long



Figure 2 - Spot measurement showing length of parking spaces

3. CONSULTATIONS

The following were consulted:

Thames Vally Police – Designing Out Crime Officer - Object
RBC Transport Development Control – Object.

Two site notices were placed on the London Street and East Street frontages, expiring on 21/10/2025.

No comments were received.

4. PLANNING HISTORY

PL/23/1535 (FUL) - 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. Approved 5 November 2025

PL/23/1536 (LBC) - Change of Use of the third floor from office space to residential, the creation of three flats and the removal of existing modern partitions and the addition of new partitions. Approved 5 November 2025

PL/25/0564 - 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) Refused 30 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. Refused 30 June 2025.

5. EQUALITY ACT

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.

6. LEGAL AND PLANNING POLICY CONTEXT

National Planning Policy Framework

- 2. Achieving sustainable development
- 4. Decision-making
- 7. Ensuring the vitality of town centres
- 9. Promoting sustainable transport
- 11. Making effective use of land
- 12. Achieving well-designed places
- 16. Conserving and enhancing the historic environment

Reading Borough Local Plan 2019

- CC1: PRESUMPTION IN FAVOUR OF SUSTAINABLE DEVELOPMENT
- CC6: ACCESSIBILITY AND THE INTENSITY OF DEVELOPMENT
- CC7: DESIGN AND THE PUBLIC REALM
- CC8: SAFEGUARDING AMENITY
- CC9: SECURING INFRASTRUCTURE
- EN1: PROTECTION AND ENHANCEMENT OF THE HISTORIC ENVIRONMENT
- EN3: ENHANCEMENT OF CONSERVATION AREAS
- EN6: NEW DEVELOPMENT IN A HISTORIC CONTEXT
- EN15: AIR QUALITY
- EN16: POLLUTION AND WATER RESOURCES
- TR1: ACHIEVING THE TRANSPORT STRATEGY
- TR3: ACCESS, TRAFFIC AND HIGHWAY-RELATED MATTERS
- TR5: CAR AND CYCLE PARKING AND ELECTRIC VEHICLE CHARGING
- RL1: NETWORK AND HIERARCHY OF CENTRES

Supplementary Planning Documents

Revised Parking Standards and Design (2011)

Other Documents

The Reading Transport Strategy 2040 (June 2024)

Reading Local Plan Partial 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. A consultation version of the draft update of the Local Plan was published on 6th November 2024. Subsequent to this consultation a submission draft was sent to the Secretary of State on 9th May 2025. At the time of writing, the examination-in-public of the partial update to the local plan is in the process of taking place. Stage 1 hearings were held virtually on 11th and 12th November 2025. Stage 2 hearings will take place in due course.

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 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 determination of this planning application and are not considered to be 'out of date'.

7. APPRAISAL

Preliminary Matters

The proposal has not been shown to adequately fit within the proposal site, or that the existing site plan is accurate. The site plan as existing and being unchanged as per the Applicant's submission is taken as the starting point for the assessment. The proposed carparking spaces are not 5m x 2.5m and are actually 4.8m x 2.5m.

Principle of Development and Heritage Impacts

Sections 16(2) and 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 (LBCA) require the decision maker to have special regard to the desirability of preserving a listed building or its setting or any features of special architectural or historic interest which it possesses. Additionally, Section 72 of the LBCA requires special attention to be paid to the desirability of preserving or enhancing the character or appearance of a conservation area.

Policies EN1, EN3, and EN6 of the Reading Borough Local Plan (RBLP) cumulatively seek to protect and where possible enhance the significance of heritage assets and the local area. All applications within Conservation Areas must make a positive contribution to local character and distinctiveness. This is coupled with Policy CC7 of the RBLP which seeks to preserve and enhance the character and appearance of the area of Reading in which it is located.

Policy TR1 of the RBLP seeks to ensure development contributes towards meeting the objectives of the most up-to-date local transport plan. The Reading Transport Strategy 2040 (June 2024) sets out a broad range of topics, with an overarching aim of supporting alternatives to private cars including supporting public transport, active transport through communication, engagement and appropriate management strategies (i.e. on-street parking management). Paragraph 111 (b) of the NPPF underscores policy TR1 stating: "... *sustainable transport and development patterns are aligned*"

The proposed development seeks the temporary change of use (for up to three years) of the existing car parking associated with 81 London Street, for the operation of a pay and display commercial carpark (or digital parking permit). The proposal would be facilitated by the removal of 1 existing car park to be painted with hatching, for the manoeuvring of vehicles, it has also indicated new signage to the frontage, though such signage would require advertisement consent separately so is not considered as part of this application.

The application site is the rear part of the curtilage of a substantial listed building: No. 81 London Street. It dates from circa 1800, though has undergone significant internal and external alterations over time, including a large 1950's extension (which replaced earlier extensions). It enjoys a reasonable rear area which contained a 'slaughter house' up to ~1950. The relationship between buildings on London Street to the rear of building is similar with parking associated with the main use of buildings.

The red line area is located to the rear of no.81 and 83, fronting East Street. This narrow one-way road contains a mix buildings and uses. There are modern residential developments to the adjoining sites containing a number of flats each.

The site is within an area of the Conservation Area that includes a high concentration of listed buildings. These richly detailed high-status dwellings and their formal layout are highly important to the character

and appearance of the area. The secondary or service street adds authenticity to the conservation area and is illustrative of the different people that occupied the area historically. The carpark, as evidenced by existing signage, is used by occupants of the main building (albeit the NHS use that some signage is for has vacated the premises). The most recently approved planning permission (PL/23/1535) required two parking spaces to be provided on-site. The LPA is clear that the existing use of the carpark is associated with no. 81 London Street, which is implicitly mentioned in the applicant's statements and also by way of the agreed description of development.

The proposal would sever the connection between the car park and the listed building to which it relates (forming the curtilage of the listed building). This would strip the listed building of the majority of its rear access and the ability of its occupants to park cars off the road. Given the urban location of the site and the restricted nature of parking in the area, this is a matter that should carry considerable weight, particularly given the increased use of electric cars and the inconvenience of utilising public charging facilities. Information about how the building is currently used is limited, and there is nothing to show whether the whole site has been considered comprehensively to ensure that the listed building has a sustainable future. Removing the parking area, even for a temporary period, would lessen the building's potential to sustain its own future, and in particular its potential to be converted to dwellings, which is most likely to be its optimum viable use. Generally, the risks of neglect and decay of heritage assets are best addressed through ensuring that they remain in active use that is consistent with their conservation. The applicant has therefore failed to demonstrate that the proposal would not harm the long-term conservation of the listed building.

In terms of the Framework the harm would be less than substantial but would nevertheless be of considerable importance and weight. Paragraph 208 of the NPPF establishes that any harm should be weighed against the public benefits of the proposal.

The proposed development would make minimal changes to the application site. Given the plans show 5m parking spaces, and the existing spaces are generally 4.8m, it is possible line marking may be altered. Though no works are included in the proposal. Therefore, there are no benefits associated with the scheme in terms of enhancing the setting of the listed building, nor the conservation area as required by policy EN3.

In terms of other potential benefits, the provision of additional parking within the Reading Central Area may enable more visitors to park in close proximity, however there are no local policies which seek to provide additional parking within the centre and would be counter to other policies and strategies above. The provision of 12 parking spaces would also be small compared to various multi-level parking areas within the vicinity (i.e. Queen's Road Carpark, and the Oracle Carparks). The minor potential benefits are not considered to outweigh the identified harm to the setting of the listed building, or the Conservation Area.

Transport Matters

Policies TR1, TR3, and TR5 of the RBLP seek to ensure that proposals align with the up to date transport plan, do not result in significant harm to the operation of the highway, and provide appropriate parking for the intended use, including electric vehicle charging.

The proposal would utilise an existing shared access for 81 and 83 London Street. As outlined above, the existing parking spaces are 4.8m for the majority. The Applicant has not provided accurate plans to demonstrate that the proposal would be capable of being implemented on the site. The lack of accurate plans introduces uncertainty and prevents proper assessment of impacts with regard to the Local Plan and the National Planning Policy Framework.

Vehicular access will remain as per existing arrangements from East Street. East Street is a one way street running from London Road to South Street. The Highway Authority has requested further information to demonstrate that the proposal will not displace or create additional pressure on the surrounding highway network. It is not clear, how the parking spaces are currently used/allocated and how the loss of these parking spaces will impact on the highway. In addition to the potential highways safety aspects, this loss of parking on-site would likely result in reduce demand for office space in the building, which would result in harm to the ongoing potential for use and maintenance of the listed building.

The existing spaces would fall below the required parking dimensions under the Revised Parking Standards and Design SPD, which seeks 5m x 2.5m for each space, and 6m forecourt depth behind parking spaces for manoeuvring. Even where the plans presented are accurate (which shows "10.2m (approx)") for the combined parking space, and forecourt depth, this would fall short of the 11m required. The officers measurements show approximately 10m between the boundary wall and the parking opposite (4.8m parking space, and 5.2m forecourt), resulting in 1m shortfall compared to the SPD.

The 6-metre depth is designed to ensure vehicles can park and exit in one easy manoeuvre without having to reverse a distance onto the highway, causing congestion at the entrance. Whilst it is acknowledged that the site is already used for parking, the proposed change of use to a commercial car park will create a higher turnover of users and intensify the use of a substandard layout, this would result in harm to the operation of the site, and likely result in vehicles reversing onto the narrow highway land, and result in significant safety concerns for highway users including pedestrians, cyclists, and vehicles.

The Highway Authority objected to the development due to insufficient information has been submitted with the planning application to enable the highways, traffic, and parking management implications of the proposed change of use to be fully assessed.

The proposal, should it have been recommended for approval, would have been subject to a condition requiring 10% of the spaces (1 no. space) to be provided with an EV charging point.

Amenity Considerations

Policies CC8, EN15 and EN16 seek to protect the amenity of residents from noise pollution, light pollution, and crime and safety impacts.

Paragraph 135(f) of the NPPF states:

"Planning policies and decisions should ensure that developments create places that are safe, inclusive and accessible... and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience" (Paragraph 135(f), NPPF).

The Applicant has not detailed how the proposal will operate. However, several existing NCP car parks appear to operate in the surrounding area, and are marketed as having 24 hour operation.

Noise and Disturbance

The proposed development, with a presumed 24 hour operation, would give rise to significant noise impacts from vehicles entering and existing the site, and car doors etc. being closed. The Applicant has not demonstrated that the proposed development would not result in significant detrimental impacts on sensitive uses within the area. It is possible that measures could be conditioned to restrict the hours of use to minimise 'nighttime hours' use of the premises (i.e. use between 0700 – 2300 only).

Light, odour and air quality

Similarly, with regard to light, air quality and odour, the Applicant has failed to demonstrate that the proposed development would not result in significant detrimental impacts on the sensitive uses within the area. It is possible that measures could be conditioned to restrict the hours of use to minimise 'nighttime hours' use of the premises (i.e. use between 0700 – 2300 only).

Crime and Safety

The DOCO has provided an objection to the proposed development. This was on the basis that there is a known history of crime, including vehicle crime within the vicinity of the site. The DOCO has suggested security measures be included to minimise the potential of crime occurring within the proposed use. No such information has been provided by the Applicant, and as such, has failed to demonstrate that the proposal will not result in significant detrimental harm with regard to crime and safety. Should lighting be included to mitigate crime and safety issues, that may give rise to further amenity impacts on flats. It is possible that a robust security strategy could be secured by condition to mitigate these impacts.

Conclusion

Overall, the proposal as presumed to operate for 24 hours, will introduce a potentially noisy use which would result in crime and safety concerns which are not mitigated. The proposal would also likely result in light pollution to neighbouring residential uses and no information to demonstrate any aspects would be acceptable has been provided by the Applicant.

8. CONCLUSION

The proposed development, for the temporary change of use for a commercial carpark (Sui Generis Use) (up to three years sought by the Applicant) would create a distinctly separate use of the rear curtilage of the listed building at 81 London Street. The applicant has failed to demonstrate that the proposal would not harm the ongoing conservation of the heritage asset, through inability of the use to operate effectively in its current office/residential/education uses making it less attractive to new tenants. The applicant has reported that the use would enable a future use to be considered. However, it would appear there are ongoing efforts to convert the building to residential use (PL/23/1535 (FUL) & PL/25/0566 (OPA)).

It is yet to be demonstrated through a planning application for that purpose, though the presumed optimal viable use of the building would be for residential, at least above ground floor. The separation of the use, even in a temporary arrangement would prejudice alternative schemes coming forward that could ensure long term conservation of the listed building.

The proposed development does not include significant alterations to the site. With some line marking proposed, albeit the plans are inaccurate to determine this fully. Though the carpark would not change in appearance, policy EN3 requires all development to make a positive contribution to the conservation area, which is not the case for the proposal, both in terms of the proposed use and works to improve the appearance of the conservation area. Separately, as would be required for the use, signage with charging schedules and enforcement fine print would likely be required. This would be subject to a separate advertisement consent, though is likely to detract further from the conservation area.

As outlined above, though there may be some minor benefit from the provision of short-term parking for visitors of the town centre, this would not be considered significant nor sufficient to outweigh the harm to the listed building and conservation area.

The proposed layout, presumed to be unchanged, would not provide sufficiently dimensioned parking areas for the increase turnover of a private parking operator. Even where the parking spaces were adjusted to 5m length, this would only serve to reduce the forecourt depth further. The substandard forecourt depth would result in significant vehicular movements and manoeuvring and also increase risks

to pedestrians, cyclists and highways users where vehicles undertake significant reversing over the site in the event all spaces are full. The proposal also fails to provide any EV charging as required.

The application has failed to demonstrate that the proposal would not result in detrimental impacts on the amenity of nearby residents or other sensitive receivers in terms of noise pollution, light pollution, and crime and safety impacts. Though, conditions could be applied to mitigate these impacts in the event approval was recommended.

Overall, the proposed development represents significant conflicts with the adopted Local Plan, supplementary planning documents and NPPF and is recommended for refusal.

9. RECOMMENDATION

REFUSE.