

**The Planning Department  
Reading Borough Council**

10 April 2026

RBC Ref:  
PE/25/0084

**By email**

Dear Sir/Madam

PLANNING STATEMENT Prepared by Harwood Savin Planning Solutions on behalf of the Applicant

**Site Address: 40 Howard Street, Reading, RG1 7XS, Berkshire**

**Proposal: Retrospective application for removal of chimney stacks**

**Property Type: House in Multiple Occupation (HMO)**

**Conservation Area: Russell Street / Castle Hill Conservation Area**

**In addition to this planning statement the following documents prepared by the applicant are also attached:**

- A : Internal Plan
- B: Planning Harms consideration
- C: Streetscape after removal – photos
- D: Chimney count on Howard St
- E: Views out from Howard St – map and BSANA
- F: Roofer Report
- G: Letter from neighbour at 38B
- H: Letters from tenants (2)
- I: Contribution to the Streetscape
- J: GOV.UK Improving Energy Performance of privately rented homes
- K: Investment plan for future Energy Efficiency measures
- L: Battle Ward Councillors Surgery meeting - notes
- M: Battle Ward Councillors Surgery meeting - acknowledgement
- N: Abbey ward Councillors Surgery meeting – notes
- O: GOV.UK: Policy Paper Warm Homes Plan: Ministerial Foreword

## 1. INTRODUCTION

This Planning Statement has been prepared in support of a retrospective planning application for the removal of chimney stacks at 40 Howard Street, Reading. The property is a licensed House in Multiple Occupation (HMO) providing residential accommodation and plays an important role in meeting local housing demand within Reading Borough.

The works were undertaken as urgent repair and safety works following significant water penetration and internal damp and mould issues affecting multiple occupiers (see Document H). The removal of the redundant chimney stacks was required to address ongoing structural deterioration and to protect the health and wellbeing of residents. (See Document F).

This statement demonstrates that the works:

- Preserve the character and appearance of the Russell Street/Castle Hill Conservation Area
- Improve living conditions for occupiers
- Comply with national and local planning policy
- Align with emerging legal obligations under Awaab's Law, Minimum Energy Efficiency Standards and the Warm Homes Plan

## 2. SITE AND SURROUNDINGS

40 Howard Street is a traditional Victorian terraced property located within the Russell Street/Castle Hill Conservation Area, characterised by brick terraces with varied roofscapes, alterations over time, and a mix of retained and removed chimney stacks throughout the street scene.

The building is in residential use as an HMO. The surrounding area contains a mixture of flats, studios and shared accommodation. Several nearby properties have altered roof forms and removed or reduced chimney stacks, reflecting evolving building standards and maintenance requirements.

## 3. PLANNING HISTORY

No recent planning history relevant to the chimney removal is known. The works were undertaken as a necessary repair and health-related intervention.

## 4. DESCRIPTION OF THE WORKS

The development consists of the removal of redundant and defective chimney stacks above roof level only. The internal chimney breasts remain for structural stability. (See Document A)

The stacks were suffering from:

- Failing mortar joints
- Saturated masonry
- Persistent water ingress

- Penetrating damp
- Mould growth internally
- Falling masonry risk and questionable chimney pot stability

The roof was made good using matching materials appropriate to the age and character of the building.

## 5. JUSTIFICATION – HEALTH AND AWAAB’S LAW

The property operates as a licensed HMO and is therefore subject to heightened housing standards and statutory responsibilities relating to occupant health, including minimising heat loss.

The chimney stacks were identified as the primary source of prolonged penetrating damp affecting multiple bedrooms and communal areas. Moisture tracking through defective stacks created conditions conducive to mould growth. Climate change is increasing the 3 challenges of higher humidity, strong winds and more frequent and intense rainstorms.

Under Awaab’s Law (introduced through the Social Housing (Regulation) Act 2023 and influencing wider housing standards), landlords must address damp and mould hazards promptly and effectively to prevent harm to occupants. Although primarily directed at social landlords, the principles establish clear expectations across all residential accommodation, particularly HMOs where risk to vulnerable occupants is elevated.

Retention of the defective stacks would have risked a Category 1 Housing Health and Safety Rating System (HHSRS) hazard. Removal represented the only reliable long-term solution following professional inspection, as repeated repair attempts had failed due to severe saturation and thermal bridging within the stack structure. Therefore, the works were necessary to:

- Eliminate ongoing damp and mould
- Protect occupant respiratory health
- Prevent enforcement action under housing legislation
- Ensure safe and habitable accommodation
- Improve energy efficiency to meet future MEES requirements

## 6. HERITAGE IMPACT – CONSERVATION AREA

Section 72 of the 36-year-old Planning (Listed Buildings and Conservation Areas) Act 1990 requires special attention to preserving or enhancing the character or appearance of conservation areas.

The Russell Street/Castle Hill Conservation Area is valued primarily for its consistent building line, brick detailing and historic street pattern rather than uniform retention of chimney stacks. The roofscape shows numerous examples of altered or removed stacks.

Of the 21 houses in the Victorian terrace (from 2 Baker St to 6 Howard St), only 9 have front chimney stacks with pots, most accompanied by TV aerials. (See Document D).

### **Key considerations:**

- The stacks were not original decorative features of architectural significance

- They were not visible from primary public viewpoints at pedestrian level to a significant degree. The fleeting vista from the Howard /Baker St junction is dominated by the 6-lane IDR cutting, the bottle bank and associated flytipping and antisocial behaviour (see Documents C and E).
- The roof form remains traditional in profile
- Materials were matched appropriately

The works do not harm the character of the conservation area. Instead, they represent a typical maintenance-led alteration commonly found within the area's evolution as can be seen from the images.

As such, the proposal preserves the character and appearance of the conservation area in accordance with statutory duty and national heritage policy principles.

## 7. DESIGN AND VISUAL AMENITY

The removal results in a simplified roofscape but maintains the terrace rhythm and proportions. No incongruous features have been introduced. The repair uses matching slates and appropriate ridge detailing ensuring visual continuity.

The visual impact is neutral and consistent with surrounding alterations across the conservation area.

## 8. RESIDENTIAL AMENITY

The works improve residential amenity (quality, character and amenity of the homes) by:

- Eliminating damp walls and associated odours
- Improving air quality
- Preventing mould exposure
- Reducing cold bridging by conduction and convection (estimate 20% reduction in room heating)
- Improving thermal efficiency

No neighbouring amenity impacts arise from the removal. The development does not create overlooking, overshadowing, or noise impacts. Indeed, the neighbours on the North side share the above benefits through the "party wall". (see Document G).

## 9. STRUCTURAL AND SAFETY CONSIDERATIONS

The stacks posed a risk of masonry failure and falling debris. Removal reduced risk to occupants and the public realm. The roof structure has been properly weather-sealed and structurally stabilised.

## 10. PLANNING POLICY CONTEXT

The proposal has been assessed against the Reading Borough Local Plan policies and relevant national guidance.

National Planning Policy Framework (NPPF) The NPPF seeks to ensure safe, healthy and high-quality homes (Section 8) while conserving heritage assets in a manner appropriate to their significance (Section 16). It supports reasonable adaptation of historic buildings to remain viable and occupied. The removal of defective chimney stacks to resolve damp and mould aligns with these objectives and sustains the building's long-term use. (See Document B).

## Reading Borough Local Plan Policies

Policy EN1 – Protection and Enhancement of the Historic Environment. Development within conservation areas should preserve or enhance their character or appearance. The chimney stacks were not key architectural features, and their removal does not erode the defining characteristics of the Russell Street/Castle Hill Conservation Area, which are primarily derived from building line, brick detailing, fenestration pattern and overall terrace form. The works therefore preserve the conservation area.

Policy EN4 – Conservation Areas Alterations should respect the significance of heritage assets and be proportionate. The works represent minimal intervention necessary to address structural failure and health hazards. Matching materials ensure the roofscape remains visually consistent with surrounding properties where chimney alterations are common.

Policy H5 – Houses in Multiple Occupation (HMOs). The Local Plan supports HMOs where adequate living conditions are maintained. The removal of the defective stacks was necessary to provide safe and habitable accommodation by eliminating damp and mould affecting multiple occupiers. The proposal therefore positively supports the objectives of Policy H5 by improving internal living standards.

Policy CC2 – Sustainable Design and Construction. The works improve thermal performance by removing saturated masonry acting as a cold bridge and preventing ongoing moisture penetration, thereby improving energy efficiency and sustainability of the building.

Overall Compliance. The proposal represents a balanced approach between heritage conservation and ensuring safe residential accommodation. The works are limited, visually neutral and necessary to maintain a viable residential use. The development therefore complies with the Reading Borough Local Plan when read as a whole.

## 10A. HERITAGE BALANCE AND PUBLIC BENEFITS

Paragraph 202 of the National Planning Policy Framework requires that where development results in less than substantial harm to a heritage asset, this harm should be weighed against the public benefits of the proposal. In this case, any perceived change to the roofscape is at most negligible and firmly within the category of less than substantial harm.

The public benefits are clear and significant:

- Removal of a Category 1 damp and mould hazard
- Protection of occupant health in a multi-occupied property
- Compliance with statutory housing duties and Awaab's Law principles
- Securing the long-term viable residential use of a historic building
- Improved thermal efficiency and building longevity

- Alignment with government's Warm Homes Plan to lift 1 million households out of fuel poverty (see Document O), and with the Government Response: Improving the Energy Performance Privately Rented Homes (see Document J)

The works therefore provide strong and direct public benefits which decisively outweigh any minimal visual change. The proposal represents sustainable conservation through continued occupation and maintenance, which is consistent with the overarching objectives of the Planning (Listed Buildings and Conservation Areas) Act 1990 and the NPPF.

## 11. CONCLUSION

The removal of the chimney stacks at 40 Howard Street was necessary, proportionate, and justified due to the risk of serious damp and mould conditions affecting an occupied HMO.

The works:

- Address a significant health hazard in line with Awaab's Law principles
- Preserve the character and appearance of the Russell Street/Castle Hill Conservation Area
- Improve living standards and energy costs for residents
- Do not harm visual amenity
- Represent responsible property management for low income residents

The development therefore complies with statutory duties, national and local government energy and climate change initiatives, national planning guidance, and conservation objectives. Planning permission is respectfully requested.

Yours faithfully



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