

Memo

To: Anthony Scholes
From: Buju Can Cetin, Conservation Officer
Date: 19/03/2026
Re: Conservation Officer response

Application Number: PL/26/0241 AND PL/26/0243

Application Type: Full Planning Application AND Listed Building Consent

Address: 1 CHRISTCHURCH ROAD, READING, RG2 7AB

Proposal: Proposed change of use of existing Grade II Listed Building Doctors Surgery to three apartments.

Summary

Objection – Clarifications required

The internal layout and landscaping are acceptable in principle, pending the submission of detailed information to the Council. Further clarification is required regarding the new fenestration, and the structural elements should be reviewed by a CARE-registered structural engineer.

Subject to these clarifications and appropriate pre-commencement conditions, I would be able to support the proposed works. With some revisions, additional detail, and agreement on conditions, the proposal has strong potential to comply with Policies EN1, EN3, and EN6 of the Reading Borough Local Plan.

Relevant policies and legislation

From the point of view of the historic environment, the main statutory tests are set out within the Planning (Listed Buildings and Conservation Areas) Act 1990. Sections 16(2) and 66 require that **special regard** be given to the desirability of preserving listed buildings, their settings or any features of special architectural or historic interest which they possess.

Section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 also requires the Council to pay **special attention** to the desirability of preserving or enhancing the character and appearance of designated Conservation Areas.

National Planning Policy and Guidance

The NPPF outlines government policy, including its policy in respect of the historic environment. Chapter 16 of the NPPF '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 which affect *Listed Buildings* are expected not to have an adverse impact on 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 (2019) 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. These may include:***

- *Reducing visual clutter caused by negative factors, such as poles and overhead wires, satellite dishes or unnecessary street furniture;*
- *Restoring original building features;*
- *Removing inappropriate additions or alterations to buildings;*
- *Protecting and encouraging the maintenance of green spaces and important trees, particularly where they are intrinsic to the history and character of the area;*
- *Improving signage and street furniture;*
- *Restoring or re-establishing appropriate paving, railings or walls;*
- *Sympathetic landscaping and planting;*
- *Improving or restoring green spaces, including front gardens, that are appropriate to the historic interest of a Conservation Area;*
- *Signage that reveals and promotes the Conservation Area and its boundaries;*
- *Interpretation panels to inform the public of the area's historical significance."*

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.”

Christchurch Conservation Area Appraisal, November 2024, is also a material consideration in determining development applications.

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”.

Relevant heritage assets

The application site relates to the Grade II Listed Building, Whitley Villa, from the early 19th century ([Whitley Villa, Non Civil Parish - 1113437 | Historic England](#)). Situated on the corner of Christchurch Road and Highgrove Street, the application site is adjacent to the listed terraces at 3-9 Christchurch Road ([3-9, CHRISTCHURCH ROAD, Non Civil Parish - 1154854 | Historic England](#)) and at 11-25 Christchurch Road ([11-25, CHRISTCHURCH ROAD, Non Civil Parish - 1321966 | Historic England](#)) within the Christchurch Conservation Area, designated in 1987, as illustrated below.



Application Site (red circled), listed buildings (starred), buildings and the 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, 2023)

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

The official listing entries of the subject listed building and the adjacent terrace are read as follows.

“Whitley Villa

Details

*CHRISTCHURCH ROAD 1. 5128 (North Side) No 1 (Whitley Villa) SU 7272 9/431 II GV 2. Early C19. 2 storeys red brick with grey brick headers. Slate roof with brick end chimneys, gable ends treated with parapets between chimneys. 2 left hand bays original - glazing bar sashes, lengthened on 1st floor to left for balcony, marginal glazing. Wide segmental headed door surround with channelled quoins and reeded surround, radiating fanlight, 4 panel door. Mid-late C19 canted bay to right (this part plain red brick) with modern casements. Contemporary staircase. Fleur-de-lys railings and gates.
Listing NGR: SU7208672227”*

“3-9, CHRISTCHURCH ROAD

Details

*1. CHRISTCHURCH ROAD 5128 (North Side) Nos 3 to 9 (odd) SU 7272 9/432 II GV 2. Before 1840. Built as part of Whitley Crescent. Altered. Stucco 3 storey and basement terrace, Nos 7 and 9 with band over ground floor. 1 range of glazing bar sashes each originally. Now altered, No 5 and No 3. Segmental headed doorways with recessed doors. Slate roofs with brick chimneys, No 3 hipped to left. Included for group value.
Listing NGR: SU7209472227”*

“11-25, CHRISTCHURCH ROAD

Details

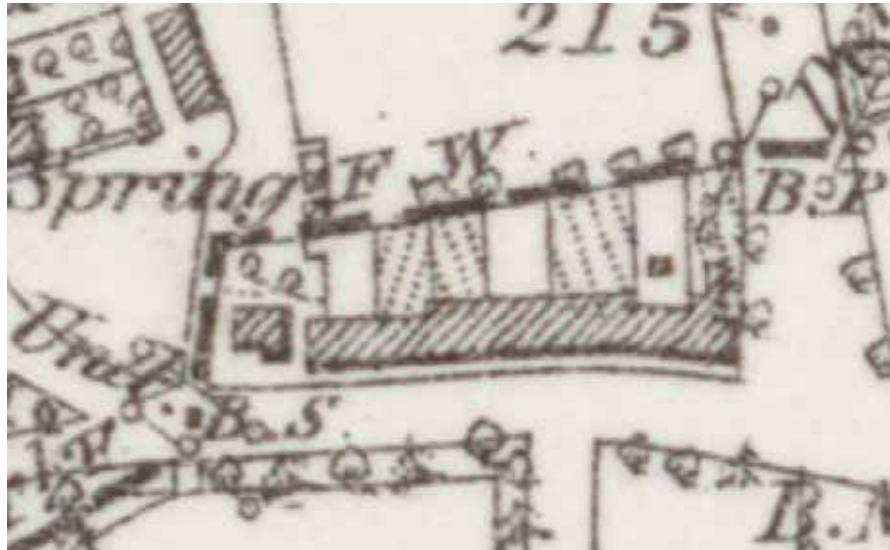
*CHRISTCHURCH ROAD 1. 5128 (North Side) (Nos 11 to 25 odd) SU 7272 9/85 II GV 2. Before 1840, built as part of Whitley Crescent. 2 storeys. Brick with slate roof. Glazing bar sash windows. Each house has 1 range of windows and a door, only Nos 21 and 23 retain their 6-gimnelled doors, rest altered. Small quadrant surrounds with radiating fanlights over. The continuous trellis verandah now retained only before Nos 15 and 17 and Nos 23 and 25. Nos 15-25 retain low arrow head rails with panel standards.
Listing NGR: SU7213772228”*

Christchurch Conservation Area Appraisal lists ‘Significance and Key Positive Features’ of the conservation area among which the following applies for the application site and immediate area:

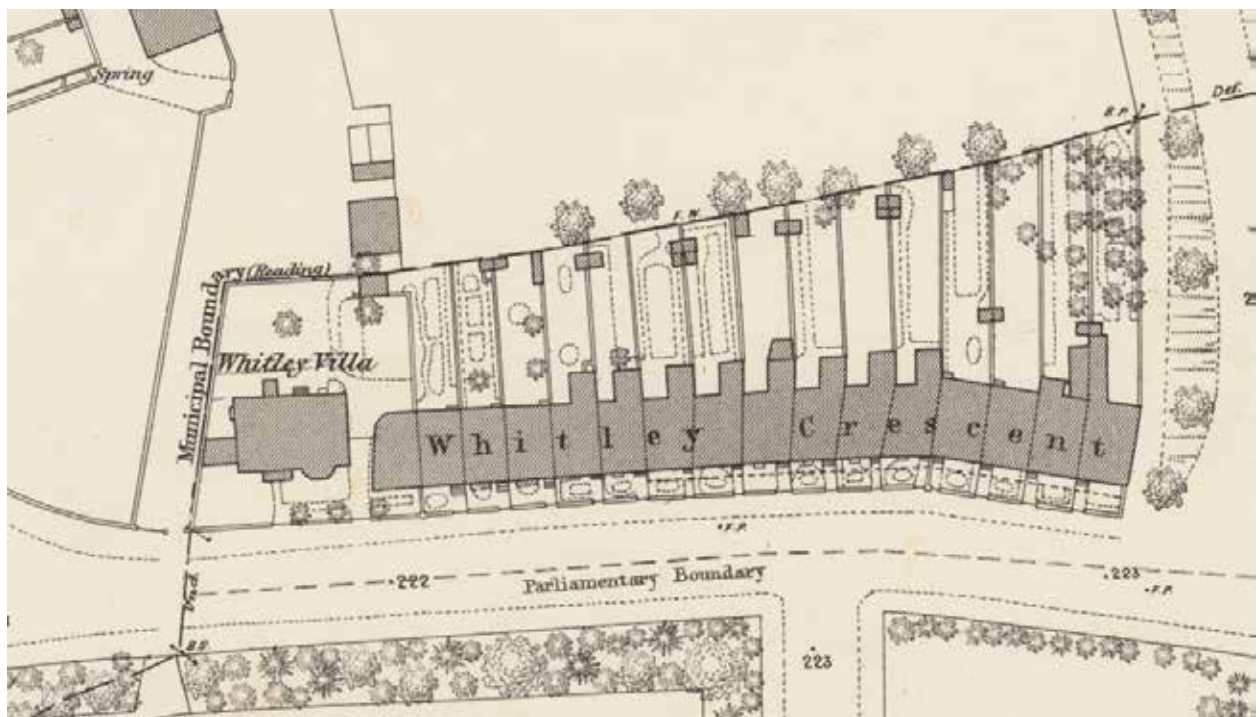
“A group of south-facing Grade II listed houses on Christchurch Road (Nos 1-33) originally known as Whitley Crescent. All properties date from the first half of the nineteenth century apart from 3 Christchurch Road which was added in the late Victorian period.”

The site also forms part of the views in the conservation area, faces buildings of townscape merit on the southern side of Christchurch Road, and includes a tree with a preservation order in its front garden.

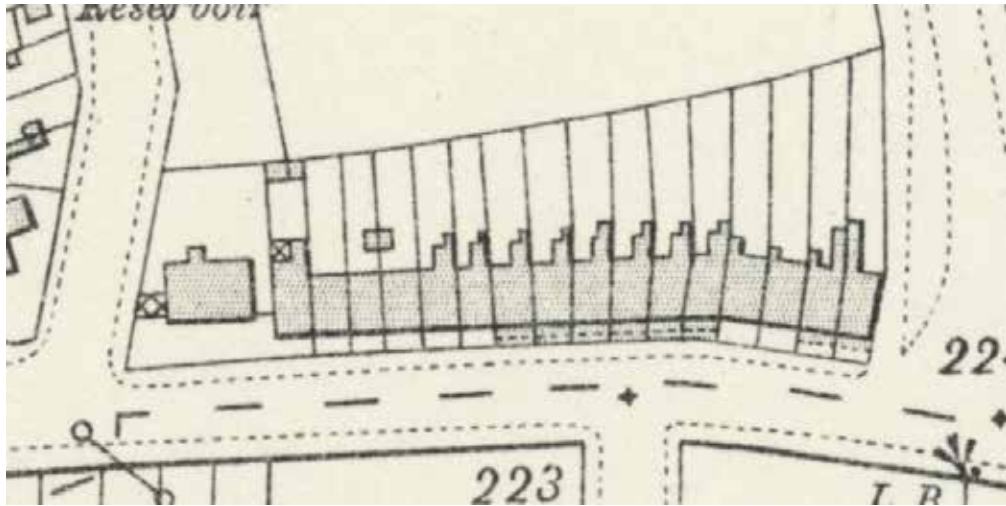
The historic mapping tools and planning history of the heritage asset suggest that the building has undergone many alterations, with the most apparent one being the two-storey rear extension and associated internal works and alterations to the listed curtilage. However, it still constitutes a high survival rate of external elements and features, including the bay window, revealing the historic evolution of the historic fabric.



The OS Map of 1872 to 1877 (published in 1883)



The OS Map of 1877 (published in 1879)



The OS Map of 1910 (published in 1911)



The OS Map of 1957 (published in 1958)



The OS Map of 1971 (published in 1972)



Aerial Photograph from 2002



View of the main entrance on the principal elevation, where the significance of the heritage asset is the highest (March 2025)

Impact of proposal upon heritage asset(s)

Although the property is proposed to have three apartments rather than a single-family dwelling, the proposed use is considered more suitable than the existing use.

Proposed site Layout for the listed curtilage

I appreciate the submitted landscape plan and introduction of a high amount of soft landscaping, including many natural elements/plants into the curtilage, which would all result in a beneficial impact. I also noted the following new elements that details and material specifications are required to be submitted to the Council, or a pre-commencement condition is suggested.

- New fencing and gate into the front garden attached to the eastern side of the building
[[RMDL]] detail shown on new drawing CC01:D01 Rev –
- Proposed boundary treatment and gate facing Highgrove Street
[[RMDL]] this is an existing gate and no new works are proposed
- Refuse and recycle storage
[[RMDL]] refuse binstore detail is shown on new drawing CC01:D02 Rev –
- Proposed hard surfacing (for the path, paved sitting area, cycle space, etc)
- Stone retaining wall and steps with handrail

Proposed internal layout (comments based on drawings)

Ground Floor

There would be little harm to the significance of the heritage asset due to the insertion of a kitchen and bathroom inside the original fabric of the building, which would contact the original rear wall. The proposed apartment on this floor would utilise the existing original entrance of the building and would bring secondary glazing for the front-facing windows.

There would be the introduction of an en-suite that would replace the existing WC in the modern section of the building, and new stud partitions to provide noise and fire separation, which are all acceptable.

There are required details, including section drawings, for

- New stud partitions
[[RMDL]] detail shown on new drawing CC01:D01 Rev – shows friction fit stud wall construction to ensure limited fixings into structure
- Secondary glazing
[[RMDL]] detail are shown on the Selectaglaze manufacturer design sheet

Basement

Low degree of harm is expected from the proposed new openings, kitchen and bathroom and removal of sections of walls, which are dated as phase 1 in the submitted heritage statement.

The basement is the main part where structural works are proposed, and as suggested by the 'Design and Access Statement' on page 8, the details and material specifications should be assessed by a conservation engineer. There is a need for a pre-commencement condition for the structural works as well. I assume these works would be 'section of wall to be removed with

structural support over' (for the improvement/increase of the headroom from 1.8m to 2.23m and 2.3m, new openings, and new stairs.

The proposed stairs would also have an impact on the significance of the building, along with an impact on the character and appearance of the conservation area, which I assess in the elevations section.

There is a requirement for external and internal joinery details, floor, wall and ceiling finishes, some of which are covered by the schedule of works, which I also comment on later in the following sections.

First Floor

Similar to the works proposed for the ground floor, inside the historic layout/fabric of the listed building, there would be a conversion of the existing WC into a bathroom, insertion of a kitchen, installation of secondary glazing, along with new/partial partitions and blocking a door opening, resulting in some harm. The proposed en-suite would also touch the original rear wall of the heritage asset, and there would be ventilation through airbricks, whose details are also required. I would raise no objection, subject to the details of the following being provided

- Blocking of the door opening, including a section elevation showing the materials as described in the original wall.
- Airbricks

[[RMDL]] there are existing air bricks on the newer part of the building and it is intended to replicate the same in the new locations

Proposed Elevations/External Works

Western side elevation

Details of the new stairs from the proposed basement apartment, new airbricks, and new windows (as already mentioned for the basement layout).

[[RMDL]] refer to drawing CC01:D01 Rev –

Rear/North elevation

Details of new windows and stairs are required (As mentioned before).

There would be some impacts due to the proposed new openings and stairs; however, that would be minimal with proportions suitable to the original design of the building. I noted from the application form that the new windows would match the existing. However, there is a need for details – external joinery details (1:10 elevation and section drawings) to be submitted to the Council.

[[RMDL]] refer to drawing CC01:D01 Rev –

Eastern side elevation

I would prefer the proposed new tall window not to directly replicate the glazing design of the main building, as this would be a contemporary element. Therefore, for the 'honesty' of the interventions, I would prefer larger glazing sheets.

[[RMDL]] elevations drawing amended with reference to details as shown on drawing CC01:D01 Rev –

I conclude a low degree of harm from the external works to the listed building and significance of the conservation area, while no impact is expected on the settings of adjacent listed terraces.

Section Drawing

It is annotated that 'floor between apartments to be upgraded ...' on this drawing, and the application form for the floors and ceilings states "no changes proposed other than upgrade for noise and fire separation, with existing boards lifted and replaced" and "no changes proposed other than upgrading of floor from top down". Therefore, further explanation and section drawings (including material specifications) are required for floors and ceilings.

[[RMDL]] refer to revised schedule of works with the details added at the end of the document

About all the works listed above, the submitted '**Specification notes & Schedule of Works**' provides some information; however, the following still needs clarifications

- Section drawing for item 2.2 – existing floorboards to be upgraded

[[RMDL]] refer to revised schedule of works with the details added at the end of the document

- Condition for roof insulation as item 3.1 states 'if required' – please see HE's guidance

[[RMDL]] There is existing insulation within the roof void and no further insulation will be required. – Schedule item corrected to exclude additional work

- Section drawing for item 4.2 – upgrade existing partitions that touch the historic fabric/walls

Refer to the Timber stud wall upgrade sheet from celesta

- Section drawing for item 5.1 – new non-loadbearing partitions

[[RMDL]] refer to drawing CC01:D01 Rev –

- From section 6, I noted there would be use of galvanised steel for lintels and beams as structural elements – this is ok – stainless steel, I assume, and we would need them to be included in the structural engineer's statement, drawing for the new openings as well.

[[RMDL]] can this be a condition item with information provided once the structural Engineer has been appointed

- 7.1 – we should know the exact materials proposed for the new openings – the Council cannot approve the material specification with wording of 'generally'. Although I noted that under 40.1 Works Basement floor to create apartment A advises "New windows to be timber hardwood frames to match profiles as close as possible to the existing window and door profiles."

[[RMDL]] refer to drawing CC01:D01 Rev –

- 7.2 – trickle vents – how this would look like – this is not a requirement for historic buildings (under building reg.), so some concerns would be raised

[[RMDL]] refer to drawing CC01:D01 Rev –

- 7.3 – is there any original internal wall? We need internal joinery details (condition)

[[RMDL]] as the original building was being used as a doctors surgery, the door are already installed as self closing fire doors, and it is understood that very little upgrade work to doors will be required. Can accept a condition to state that "any upgrade work or replacement doors to be approved prior to implementation".

- 7.4 and 7.5 – do these include the existing entrance door? Is this door original?

[[RMDL]] no works intended to existing entrance doors

- Section 8 – Does this include original windows? If so, how would this be carried out?
Details required
[[RMDL]] this is not required, and is a general Building regulations comment relating to low level glazing – can delete this section?
- Section 9 – details required for extractor fans, air bricks
- Section 10 – we need details about the heating system, including the location of the boiler and flues – heating design layout? Where is it? We can put a condition for this
[[RMDL]] can this be a condition item with information provided once the sizes of boilers and pipe runs are confirmed?
- Section 40 – About works to the basement floor, details for “Existing door into the basement to be fixed and locked shut.” Material spec of external steps
[[RMDL]] as the door is not to be used as an entrance into the basement as part of the new layout, then it is proposed to keep the door as it is and just lock it up...
- Extractor fans, ducting the underside of the ceiling
- Section 50 – Ground floor works
- Rooms G6/G9 – wall appears original in the Heritage statement, so I do not think the use of a concrete lintel would be appropriate. Revise and submit the section elevation for this wall.
[[RMDL]] can this be a condition item with information provided once the structural Engineer has been appointed

I appreciate the submitted ‘Heritage Statement’ and find the significance assessment section very important and helpful.

Under ‘Architectural and artistic interest’ it is stated that the architectural value of the listed Whitley Villa derives from the following:

“• *The remaining original sash windows*

• *The triple sash windows to both the ground and first floors suggest a desire for high connection*

to the south aspect of the house.

• *The delicate ironwork to the balcony and the ‘pagoda’ style canopy connecting the architecture to the Regency period which creates an aesthetic connection with similar details to Whitley Crescent*

• *The polychromatic brickwork to the south elevation*

• *The painted ‘Whitley Villa’ sign on the west elevation”*

However, apart from the decoration of the original and existing fenestration, I would prefer to see some conservation works, related to the items listed above by the statement, such as the reinstatement of ‘Whitley Villa’ signage, as beneficial works of the proposed scheme.

The proposed internal layout and landscaping are also acceptable, subject to the details to be provided by the Council. The proposed new fenestration needs further clarification, and the structural works should be assessed by a CARE-registered structural engineer. I could accept the proposed works subject to further clarifications and some pre-commencement conditions. The proposal has a high potential to be acceptable under the policies EN1, EN3 and EN6 of the

Reading Borough Local Plan after some revisions, clarification and agreement on pre-commencement conditions.

Conservation response

- ☐ No objections
- ☐ No objections subject to conditions attached
- ☒ Clarification required
- ☐ Object

Contact details

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