

APPENDIX 2: STATEMENT OF CONSULTATION ON THE DRAFT RESIDENTIAL CONVERSIONS SUPPLEMENTARY PLANNING DOCUMENT

March 2023

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1. Introduction

- 1.1 A Draft Residential Conversions Supplementary Planning Document (SPD) was published for consultation in December 2022. This set out further detail to supplement the policies in the Reading Borough Local Plan, adopted in November 2019 regarding conversions of houses to flats and to houses in multiple occupation (HMOs). This statement summarises the consultation that was undertaken on the SPD, and reports on the responses received.

2. Summary of Consultation Measures

- 2.1 The consultation was undertaken between 19th December 2022 and 13th February 2023. The consultation period lasted for eight weeks in accordance with the relevant regulations, the Council's adopted Statement of Community Involvement (SCI) and to allow two weeks additional time in order to account for the Christmas period.

2.2 Consultation involved contacting all those on the Council's planning policy consultation list, which includes a mix of statutory consultees, businesses, voluntary and community organisations and interested individuals, around 1,400 contacts in total.

2.3 The document was also published on the Council's website. Hard copies were made available at the Civic Offices.

3. Summary of Responses

3.1 Written responses were received from twelve individuals or organisations, but five of these were to state that there were no comments. The respondents are set out below:

- Canal & River Trust (no comments)
- The Coal Authority (no comments)
- Historic England
- National Highways (no comments)
- Reading Conservation Area Advisory Committee
- Rushmoor Borough Council (no comments)
- Surrey County Council (no comments)
- John Wilkins
- Cllr Andrew Hornsby-Smith
- Sarah Watchman
- Elizabeth Munro
- Julia Munro

3.2 A total of 49 individual points were made by these respondents. The following points were among those raised by respondents. The full set of representations is set out in Appendix 1.

- A need to make greater reference to the importance of the physical character of an area in terms of the historic environment;
- Concerns that the threshold approach were too little, too late and that a moratorium on new HMOs should be put in place and ideally existing licenses revoked;

- Concerns that the threshold approach is a blunt tool which is used in place of a more balanced judgement;
- The potential to seek financial contributions for cultural development through Section 106 agreements;
- The importance of reviewing conservation area appraisals;
- That national minimum space standards should be applied to proposals for flat conversions;
- A large number of detailed comments on the application of the threshold approach and the accuracy and usefulness of the worked example; and
- A number of further comments on detailed wording.

3.3 Detailed summaries of each individual representation, as well as a response from the Council are included in Appendix 1. These are set out in document order.

APPENDIX 1: SUMMARY OF REPRESENTATIONS AND COUNCIL RESPONSES

The table below includes summaries of the representations received to the consultation, listed in document order. Please be aware that these are not necessarily verbatim comments, rather they are summarised for ease of reference.

Table 1: Summary of representations received and Council responses

Name	Document ref (consultation version)	Representation	Council Response
Canal & River Trust	General	The Trust has no comment to make on the Draft Residential Conversions Supplementary Planning Document.	Noted. No change needed.
The Coal Authority	General	The Coal Authority has no specific comments to make.	Noted. No change needed.

Name	Document ref (consultation version)	Representation	Council Response
Historic England	General	<p>We note the text refers to conversions, either individually or cumulatively, having the potential to have a harmful impact on the character of the area through “unduly diluting mixed and sustainable communities”. While we acknowledge this issue and the link to text in the adopted Local Plan, we flag also the potential for conversions to have a harmful impact on character if they harm the significance of heritage assets, which contribute to local distinctiveness.</p> <p>We note that reinstating a use more appropriate to the significance of a heritage asset is one of the justifications cited for converting flats to a dwellinghouse. Noting this, logic would suggest it is worth articulating that harm to heritage significance is a factor in decision-making regarding the conversion from a dwellinghouse to flats.</p> <p>We advise introducing relevant text to address this point.</p>	<p>Agreed. Change proposed. There should be reference to the particular sensitivity of heritage assets to changes to character. This is adequately covered by policies EN1 and others in the Local Plan so does not require detailed policy in this document, but the issue should be highlighted.</p>

Name	Document ref (consultation version)	Representation	Council Response
Historic England	General	<p>We encourage the Council to consider the potential role of planning obligations in conserving and enhancing the historic environment, and so link also to policy EN1.</p> <p>To explain our thinking a little further, NPPF paragraph 20 advises that: "Strategic policies should set out an overall strategy for the pattern, scale and design quality of places, and make sufficient provision for: ... c) community facilities (such as health, education and cultural infrastructure); ...".</p> <p>Historic England considers cultural infrastructure to include all heritage assets within the Borough. The importance of cultural infrastructure to the character, authenticity, creativity and general attractiveness is widely and increasingly recognised (e.g. London now has a Cultural Infrastructure Plan), as is the importance of cultural infrastructure to economic activity and the health and wellbeing of communities.</p> <p>A wealth of information on the value of heritage to our economy, society and environment has been published within Heritage Counts.</p> <p>While it is difficult to quantify a requirement for cultural infrastructure, given the importance of cultural infrastructure, as identified in the NPPF, Historic England asserts that it would be reasonable to expect the Council's approach to aim at least to maintain existing levels of cultural assets that exist within the Borough, and to seek improvements to secure the long term future of assets classed as 'at risk'.</p>	<p>Noted. No change needed. This is a wider issue than that with which the SPD deals. Conversions from houses to HMOs and from houses to flats (without extension) are not generally subject to Section 106 agreements, and securing cultural infrastructure is more likely to be relevant to more major development. It is already recognised in policy CC9 of the Local Plan, but giving it a greater prominence within that policy would be a matter for consideration in the Local Plan review.</p>

Name	Document ref (consultation version)	Representation	Council Response
		Clearly, regimes for the protection of heritage assets are already in place. However, for heritage assets that are identified 'at risk', while a range of mechanisms may be used to save these assets, none of these is guaranteed. Therefore, Historic England is keen that any opportunity to save heritage assets is explored.	
Historic England	General	Given increases in the number of conversions to HMOs within Redlands, Park and Katesgrove wards, we wonder if the Council has considered the merits of reviewing and updating, if needed, the Conservation Area Appraisals for the conservation areas within those wards. Several of these are around 15 years old, prepared before the Article 4 Directions came into force. Having an up-to-date CA Appraisal should help the Council's decision-making on planning applications in those areas.	Noted. No change needed. Work is underway on updating a number of Conservation Area Appraisals in Reading through volunteer-led work with the Reading Conservation Area Advisory Committee. This is separate from this process.
National Highways	General	No Comments	Noted. No change needed.
Reading Conservation Area Advisory Committee	General	The current (adopted March 2020) Russell Street/Castle Hill/Oxford Road Conservation Area management plan has a long list of property maintenance issues requiring action which are exacerbated by the high concentration of HMOs/flat conversions: redundant wires, excessive pipes, poor management of rubbish, multiple satellite dishes, loss of boundary walls and railings etc. This SPD should be of assistance in dealing with some of these issues.	Noted. No change needed.
Rushmoor Borough Council	General	We have no comments to make at this time.	Noted. No change needed.

Name	Document ref (consultation version)	Representation	Council Response
Surrey County Council	General	We have no comments to make regarding the Draft Residential Conversions SPD	Noted. No change needed.
Wilkins, John	Paragraph 1.13	I would like to see small HMO covered by a permissioning arrangement.	No change needed. This would require a whole Borough Article 4 direction, which would need to be undertaken separately and would have substantial requirements in terms of evidence.
Wilkins, John	Paragraph 2.16	I do not see why central Reading is not covered by at least some open space requirements.	No change needed. The requirement in policy H10 is that all residential development should provide some functional private or communal open space. However, the specific figures referred to in 2.15 are likely to be unachievable on many sites in central Reading. This is adopted Local Plan policy and the SPD does not have the power to amend these requirements.
Hornsby-Smith, Andrew (Councillor)	Paragraphs 2.20-2.21	I note that the wording in section 2.20 has been tightened up since the original draft. This is welcome. I particularly welcome the reference to the national space standards set out here and in Checklist 7. The current minimum national standard floor to ceiling height is 2.3m (also discussed in Checklist 12). Given that that is the minimum we are looking for, I feel that the wording in 2.21 is still too weak. I would reword the last sentence as 'However, the national standards are important to adhere to, and applications that propose reduced standards must justify why this is the case.' Basically I'm replacing 'should' with 'must' and adding strength to the importance of national standards as being more than just 'useful starting points'.	Partially agreed. Change proposed. It is agreed that use of 'must' as opposed to 'should' makes clearer how applications should be treated. However, whether or not applications should adhere to national space standards would need to be a matter for development plan policy as opposed to SPD, as national policy is clear that it is for Local Plans to opt in to these standards. As such any variation from what the Local Plan currently states would need to be part of the Local Plan review process.

Name	Document ref (consultation version)	Representation	Council Response
Reading Conservation Area Advisory Committee	Paragraph 2.26-2.27	Checklist Item 11 should be earlier in the list, possibly with the bullet points, as it removes the possibility of planning permission being granted.	Agreed. Change proposed. As this is related to the appropriate location of HMOs it should be moved to after related elements about the character of the area, after paragraph 2.11.
Wilkins, John	Paragraph 2.33 and paragraph 2.36	What is the evidence that less car parking space results in less cars?? It seems to me that it just moves them somewhere else e.g. to clog up residential roads. I recognise that this is an RBC policy but surely it should be reviewed at intervals against some success criteria.	No change proposed. The emphasis of paragraph 2.33 should be on what should be provided under the policy rather than required. Review of parking standards will need to be undertaken as part of the Parking Standards and Design SPD.
Reading Conservation Area Advisory Committee	Paragraph 2.37	In paragraph 2.37 the contribution of original walls, railings and gates to the streetscene should be mentioned alongside the contribution of hedging.	Agreed. Change proposed. There is already a general reference to boundary treatment, but this should be expanded.
Wilkins, John	Paragraph 2.40	Strongly support the need to make sure there is sufficient bin storage for all residents.	Noted. No change needed.
Wilkins, John	Paragraph 2.47	I do not fully understand how the four year rule works but I worry it encourages people to try and get away with unsatisfactory buildings and then try to get permission regularised after 4 years. This just encourages bad practice. If the position is going to be regularised after 4 years the standards applicable to a new application should normally be used.	Change proposed. The four-year rule is part of planning law and is not at the Council's discretion. However, the Levelling-Up and Regeneration Bill, expected to receive Royal Assent later in 2023 would extend this period to ten years, and the SPD should be amended to make this clear.
Wilkins, John	Paragraph 2.50	Proper fire escapes are important in all buildings. If they are going to be ugly permission should be refused rather than the requirement being dropped.	Agreed. Change proposed. This section should refer to impact on character as well as residential amenity to ensure that this consideration is captured.

Name	Document ref (consultation version)	Representation	Council Response
Watchman, Sarah	Section 5	<p>We know there is a problem with HMO conversions, especially in East Reading, and we know the existing policy isn't helping.</p> <ul style="list-style-type: none"> - it is too blunt to simply use a % calculation, - the calculation itself is poorly worded and doesn't take into account flats at all well (for example), - it still allows clusters of HMOs to form provided there are lots of dwellings within the 50m area. <p>The calculation is just one way of assessing the impact of a conversion from home to hmo, not the only way, but the planning process seems to have always used it to the exclusion of all other evidence.</p> <p>The new process proposes changing the calculation to count buildings rather than dwellings to account for flats potentially inflating the numbers, and changing the policy to not allow a home to be 'sandwiched' between two HMOs (although this is terrace houses only) to avoid clusters, but these don't solve the problem of the calculation being simply a blunt tool, they just make the calculation a bit more workable.</p> <p>The revised policy does leave a slightly open door to allow 'other evidence' to be included in the decision, but this is not strong enough to ensure that the planning process does consider other evidence even when it is difficult, and that the calculation is not hard-wired into the system as the only factor in determining conversions.</p> <p>The impact on communities is what matters.</p>	<p>No change proposed.</p> <p>The threshold, at least within the Article 4 area, is laid out in Local Plan policy and a SPD has no power to change or make policy on its own, and must conform with this higher level policy. This is the reason that alternative options were not consulted upon as part of this SPD.</p> <p>The argument that the threshold is a blunt tool is understood, and this is always the risk with any kind of quantitative approach, but at the same time some form of quantitative approach is needed so that applications can be judged on a consistent basis. However, policy H8, which this document supplements, is clear that this is only one of a number of criteria that should be applied in considering conversions to HMOs, albeit this is the main criterion that requires additional guidance within this SPD.</p> <p>In terms of purpose built flats, these are excluded because their existence does not generally dilute an existing mixed and balanced community by reducing the amount of single dwellinghouses available, which is the purpose of the threshold. Purpose built flats include a range of accommodation, and it is not agreed that such accommodation generally functions as an HMO.</p>

Name	Document ref (consultation version)	Representation	Council Response
		<p>It is disappointing to see the Council yet again run a consultation on only their preferred option, rather than detailing a range of options for people in Reading to respond to, as though it were the only option open to a local authority. Others already do things differently.</p> <p>The density calculation itself should be strengthened to below 25%, say 10% like Portsmouth https://www.portsmouth.gov.uk/wp-content/uploads/2022/02/Houses-in-multiple-occupation-HMO-spd-Accessible.pdf</p> <p>When an area is defined as ‘50m from a front door’, it does not take into account the impact in a street, which is usually a linear row, not a circle. A much clearer stance should be taken on ‘other evidence’ being a welcome and vital part of the decision, so that even if the density threshold is not ‘tipped’, the impact on the local community can be properly taken into account.</p> <p>The change to buildings rather than dwellings will help focus on local impact, but a building of non-purpose built flats is to most residents an HMO in all but name. A large home converted into four or five flats will under the new process be counted as one residential building, but it should be counted as one HMO building. That is the impact on the community.</p>	

Name	Document ref (consultation version)	Representation	Council Response
Munro, Elizabeth	Section 5	<p>Having read the proposed changes, whilst I agree with them, they do not go far enough.</p> <p>The proposed changes represent a half-hearted attempt to regulate HMOs, and they are very much too little, too late. In the proposed plans, there are several obvious points that are lacking:</p> <p>1) There should be a total ban on new HMOs in areas like Redlands that are saturated with HMOs. This should also include a total ban on the expansion of HMOs. All landlords are doing is increasing the capacity of existing HMOs to get around the minimal regulations that are supposedly in place. The HMO next door to me has gone from being rented to three students, to four students, to now six students - how is that sustainable?</p> <p>2) HMOs should be exempt from any form of permitted development. This would prevent landlords from knocking up a hideous, boxy loft extension and squeezing in additional, prison-cell-esque, bedrooms and bathrooms. All building works for a HMO should be subject to planning permission, and the views of those living in the vicinity of the property should be prioritised over landlord greed.</p> <p>3) Licenses for HMOs should be actively revoked. There are too many HMOs in Redlands and the community is only going to be re-balanced when some of these licenses are taken away. Without actively revoking HMO licenses these proposed changes are just smoke and mirrors. The council should inspect all current HMOs, and those without a supremely high standard of</p>	<p>No change proposed.</p> <p>The approach to numbers of HMOs within a certain area is set in the Local Plan policy and there is no scope for a SPD to introduce new policy. The policy aims to prevent conversions to HMOs in those areas where it would result in the unacceptable loss of a mixed and balanced community, but a wholesale ban on HMOs would not be appropriate because this remains a valuable form of accommodation for many people that helps to meet their housing needs in an affordable manner. In particular, HMO provision close to the University remains important where there is insufficient purpose built accommodation to house all of those students who need to be accommodated in Reading. The policy aims to stroke the right balance.</p> <p>In addition, planning powers are unable to control internal changes within HMOs unless this would result in a change of use class. A change from three to six unrelated occupants for example would remain in the C4 use class unless there were external alterations requiring permission.</p> <p>The SPD is unable to change the degree to which permitted development rights apply, as these are part of national legislation. Article 4 directions can be used to control permitted development rights where this is justified but these take time to introduce via separate processes and are extremely resource-intensive.</p> <p>The standards set out in policy set out to ensure that a high quality of accommodation is provided.</p> <p>In terms of revocation of licenses, the licensing system differs from the planning system and considers different matters. The Housing Act, and in particular the HMO licensing scheme, is not designed to control the impact</p>

Name	Document ref (consultation version)	Representation	Council Response
		<p>accommodation should have their license revoked. Also, any HMO that is sold should automatically lose its HMO license, and no new license should be allowed to be issued for 15 years.</p> <p>4) By revoking HMO licenses on all properties that are sold, you will remove the 'HMO premium' that estate agents add on. If you look on Zoopla / Rightmove / OnTheMarket / etc. you will see that HMOs in the Redlands area (even those in the most disgusting condition) are priced more highly than family homes in the Redlands area. Your crappiest HMO will be listed for at least £375k, whereas a family home on the same street will be listed for £310k (and that's being generous). This over-pricing of HMOs prevents families moving into the area as they cannot afford to buy the homes.</p> <p>5) Landlords should be held to a much higher standard when it comes to the living space they provide for their HMO tenants - SPACE being the operative word. It simply should not be allowed that bedrooms can be created to meet the absolute minimum dimensions, and it should not be allowed to turn every room (bar the kitchen and bathroom) into a bedroom. Students are packed into these deficient properties; the councillors who approve these properties should take stock for a moment and think whether they would want their own child to live in such conditions.</p>	<p>on neighbourhoods, instead it focuses on housing conditions and management primarily for the benefit of the occupants. The Council has a commitment in its corporate plan to review the need for further HMO licensing schemes, if such a scheme was to be introduced it would be subject to a separate consultation.</p> <p>There are no powers to revoke planning permissions once the development is complete.</p>

Name	Document ref (consultation version)	Representation	Council Response
Munro, Julia	Section 5	<p>Whilst I welcome this consultation, it is very lengthy document and not organised in a “user-friendly” way for a lay member of the public. From what I have been able to read through I would support the proposals. However I feel that the proposals are long overdue and are too late for some areas of Reading, especially in Redlands. In Carnarvon Road, for example, there are now many HMOs which cause multiple problems in the area. The extensions enlarge the houses beyond reasonable capacity in my opinion - from 3 bedrooms to 6 or 7. All the problems mentioned in the consultation are rife in the road; parking, rubbish and litter, noise between the walls throughout the house (which have thin walls to start with), lack of privacy in gardens with many windows in extended houses overlooking gardens, increased fire risk, and water use and drainage problems with additional bathrooms, showers and toilets in use.</p> <p>And yet there are still HMOs being extended in Carnarvon Road (and no doubt in other roads in the area) continuing to exacerbate these known problems. And these developments are still permitted even whilst this consultation is underway. Surely a moratorium should have been put in place until the result of the consultation was known?</p> <p>All that has happened is that greedy landlords have been encouraged to develop and extend existing HMOs while they still can - at the expense of all the neighbourhood problems.</p>	<p>No change proposed.</p> <p>Efforts have been made to make this document user-friendly, but it is a complicated topic and it must strike the balance between user-friendliness and containing all of the relevant information. No specific improvements have been suggested.</p> <p>It is agreed that in many locations there has already been significant conversion to HMOs and the proposals in the SPD will be unable to rectify this situation. For small HMOs, there was no ability for the Council to control changes until relatively recently, and as soon as the change was made the Council undertook work to introduce the Article 4 direction and put the threshold policy in place. This SPD is not new policy, at least for the Redlands area, but an evolution of policy that has been in place since 2013, and is set out in the Local Plan adopted in 2019. As such there would be no need for a moratorium on new proposals, and in any case there would be no basis in planning law for this.</p> <p>The standards set out in policy set out to ensure that a high quality of accommodation is provided.</p> <p>In terms of revocation of licenses, the licensing system differs from the planning system and considers different matters. The Housing Act, and in particular the HMO licensing scheme, is not designed to control the impact on neighbourhoods, instead it focuses on housing conditions and management primarily for the benefit of the occupants. The Council has a commitment in its corporate plan to review the need for further HMO licensing schemes, if such a scheme was to be introduced it would be subject to a separate consultation.</p>

Name	Document ref (consultation version)	Representation	Council Response
		It feels as if RBC planning has woken up to this problem in the Redlands area far too late and is now not taking strong enough steps to halt HMO development fast enough. Indeed licences for some HMOs in the Redlands area need to be revoked in order to redress the residential balance in the area, reduce neighbourhood problems of noise, rubbish etc, and also to relieve the pressure on infrastructure such as drainage, water use and the roads. The landlords of remaining HMOs should be held to stringently high standards for planning applications and the provision of accommodation, (including retrospectively) such that they are not taking advantage of their tenants by charging high rents for rooms which just meet minimum standards for living accommodation.	There are no powers to revoke planning permissions once the development is complete.
Wilkins, John	Paragraph 5.7	I would like to see the Direction applied to more areas to prevent problems rather than the current arrangement where it seems to be used after the problem has arisen.	No change proposed. This would require extension of the Article 4 direction, which would need a separate process, and it is not therefore for the SPD to determine.
Reading Conservation Area Advisory Committee	Paragraph 5.10	The map at Appendix 2 also includes Jesse Terrace Article 4 area not just Katesgrove, Redlands and Park as stated in para 5.10. Para 5.10 should be updated to include Jesse Terrace.	Agreed. Change proposed. This should be corrected.

Name	Document ref (consultation version)	Representation	Council Response
Reading Conservation Area Advisory Committee	Paragraph 5.15 to 5.30	Paragraphs 5.15 to 5.30 'Defining the Tipping Point' concentrates on the impact of student HMOs within the Article 4 area. However, it is clear from Appendix 1 that there are hotspots of HMOs just to the west of the IDR and between London Road and Queens Road (adjacent to the Article 4 area) showing concentrations of HMOs that are at least as great as parts of Katesgrove that are covered by an Article 4. The wording of these paragraphs should be clarified to address the situation in the Oxford Road area which is within the Russell Street/Castle Hill/Oxford Road CA and between London Road and Queens Road partially within the Eldon Square CA.	No change proposed. This part of the SPD deals with the situation within the Article 4 direction area only, and references to other areas in this part of the document would generate considerable confusion. It is agreed that there are some areas where there are other concentrations of HMOs, but these are also areas with considerable numbers of flat conversions, and dealing with this situation is the purpose of section 6.
Wilkins, John	Paragraph 5.35	Why cannot the adjoining council properties be taken into account? In places the boundary is arbitrary and is based on history rather than a natural boundary.	No change needed. It is agreed that the boundary is arbitrary, but the Council does not hold information on the status of properties outside its boundaries, and this is therefore a practical measure to ensure that the policy does not require significant additional work in determining an application.
Reading Conservation Area Advisory Committee	Paragraph 6.2	In relation to location within the 30% most deprived LSOA's in England, similar boundary issues will arise e.g. Reading 017B is within the 10% most deprived LSOAs is adjacent to Reading 016A which is within the 30% least deprived. As above would a 50% threshold apply if the planning application for a large HMO were within Reading 016A but the 50m boundary extended within 017B?	No change proposed. The threshold to be applied is entirely dependent on whether the application property is within or outside the Article 4 area. The 50m radius would extend to all properties whether inside or outside that area and the calculation made accordingly.

Name	Document ref (consultation version)	Representation	Council Response
Reading Conservation Area Advisory Committee	Paragraph 6.2	In the box at the end of paragraph 6.2 ‘...planning permission will not normally be granted...’ should the first bullet read ‘The proportion of houses...would exceed...’ deleting the ‘not’.	Agreed. Change proposed. This is an error and should be corrected.
Reading Conservation Area Advisory Committee	Paragraph 6.12	When we first accessed the link in the document to communities.gov.uk it was very slow to respond. Having persevered we were able to access the maps and work out how to use them. We could not find a key to the colour coding but there is sufficient information if you click on the area in question. RBC has the same data on its own website as the Berkshire Observatory and although the colour coding for the deciles is inverted this might be a better source? https://reading.berkshireobservatory.co.uk	Agreed. Change proposed. The page is slow, but it is important to link to the national page wherever possible because this will be the location where any changes appear first. The RBC website page link can be added.
Reading Conservation Area Advisory Committee	Section 7	This aspect of the residential conversions document should receive more prominence or it is likely to be overlooked.	No change proposed. Section 7 is a new section in its own right with the same prominence as all other sections. It is not clear how more prominence should be accorded to it.
Wilkins, John	Appendix 1	If the 2021 census data is to be made available during 2023 I suggest the SPD should be finalised when up to date information is available. It seems to me that the HMO position could have evolved quite a lot and paragraph 5.43 states that RBC do not have comprehensive records.	Agreed. Change proposed. It is agreed that more up to date information is required. Census data is available on households within converted or shared housing but this does not appear to accord with planning definitions of HMOs and appears to mainly relate to conversions to flats and bedsits. Census 2021 information on HMOs is not available, so instead maps of concentrations of HMOs according to the Council’s own records should be used. This will result in two maps, one showing flat/bedsit conversions and another showing HMOs.

Name	Document ref (consultation version)	Representation	Council Response
Reading Conservation Area Advisory Committee	Appendix 1	Is it possible for Appendix 1 to updated with the new wards or are wards linked to 2011 census data?	Change proposed. In providing the update referred to in the response above, Census output areas are used. As these were set in 2021 they predate the new wards and do not correspond to their boundaries. For this reason, the amended maps do not show wards at all but try to include a map base for orientation.
Reading Conservation Area Advisory Committee	Appendix 3	We are very aware of the need for clarity of this calculation and the difficulties that this presents as evidenced in recent planning applications. The sources of information needed to calculate the number of HMOs appear not to be available to anyone outside Reading Borough Council (RBC). We note para 4.4.69 of the Local Plan at Appendix 5 in this regard but there is a public register of HMOs available on RBC's website so what is the status of this in relation to the planning system?	No change proposed. The list of licensed premises is one source of information on the location of HMOs, but the licensing definition does not correspond to the planning definition, and there will be a number of situations where a HMO for Planning purposes, particularly a small HMO, does not require a licence, so the Council needs to also refer to Council Tax records and planning history.
Reading Conservation Area Advisory Committee	Appendix 3	The SPD sets out that only existing dwellings and attached garages, or parts thereof, within the 50m radius are to be included within the threshold calculation. To be consistent with the inclusion of HMOs/flats with planning permission but not implemented within the 50m radius, we wondered if planning permissions for extensions and conversion to HMOs/flats which would bring part of the building within the radius should also be included?	No change proposed. Whilst it is agreed that this might be appropriate in an ideal world, in practice the extent of an extended building is not mapped on a source that is easily available to the planning officer until after the building is built, and including this would create a significant amount of work at application stage without necessarily making much difference to the calculation.

Name	Document ref (consultation version)	Representation	Council Response
Reading Conservation Area Advisory Committee	Appendix 3	The SPD mentions the impossibility of taking into account HMOs/flat conversions across borough boundaries. In practice we are not sure if this currently affects any decisions but it must be in the interests of all boroughs to co-operate in these matters and wondered if anything could be done?	No change proposed. In an ideal world this would be appropriate, but in practice this would add a considerable amount of time on to the determination of an application by making requests for information that there is no guarantee would be responded to. In practice, there are relatively few locations where this is likely to be an issue, restricted to the very eastern edge of the Borough.
Reading Conservation Area Advisory Committee	Appendix 3	Within the RBC area there are boundaries which might affect threshold calculations and wondered if any hierarchy rules were required to determine how the threshold would apply? For example, if planning permission were requested for a large HMO outside an Article 4 area (with a 25% threshold) but within an area where a 50% threshold would apply and the 50m radius stretches to the Article 4 area which threshold takes precedence? (Para 5.34 deals with the situation where a property is within the Article 4 area and the radius extends outside.)	No change proposed. The threshold to be applied is entirely dependent on whether the application property is within or outside the Article 4 area.
Reading Conservation Area Advisory Committee	Appendix 3	The text of the SPD (Section 5) in relation to the Article 4 area talks about HMOs only within the threshold calculation of 25%. Para 5.36 is very confusing. The example in Appendix 3 aggregates flat conversions and HMOs. HMOs alone only reach 24% of residential properties after the conversion of 28 Oak Road which would be below the threshold and the two together only reaches 48% which is below the 50% threshold. Para 6.4 talks about including flat conversions only outside the Article 4 area and para 6.7 refers to Appendix 3.	Agreed. Change proposed. This appendix requires reworking to provide greater clarity.

Name	Document ref (consultation version)	Representation	Council Response
Reading Conservation Area Advisory Committee	Appendix 3	It would be helpful is ALL properties on the map were numbered. In a typical Reading street there could be an infill property e.g 27a (as shown with 40b Willow Avenue) or continuous numbering 1,2,3 etc on some streets and alternate numbering on other streets 1,3,5. If the numbers cannot be seen this is very confusing as it is necessary to count along the road to see which properties are being referred to.	Agreed. Change proposed. Property numbers should be added.
Reading Conservation Area Advisory Committee	Appendix 3	Step 2 is actually two steps 2a) to identify the number of properties and 2b) to identify the number of residential buildings. It would be helpful if the list of properties was for ALL properties as otherwise the message in para A3.8 is not clear.	Agreed. Change proposed. The worked example should be amended to make this step clearer.
Reading Conservation Area Advisory Committee	Appendix 3	We suggest that table A3i is amended as below (or similar) to show all the workings in counting the properties which are to be used in calculating whether the threshold will be exceeded or not. Step 3 to identify the number of buildings that are HMO or flat conversions should then be found by an additional columns in the table.	Agreed. Change proposed. The table requires significant amendment for clarity to show how the calculation would work in practice.
Reading Conservation Area Advisory Committee	Appendix 3	The example includes a flat over a shop as not a conversion, 43 Willow Avenue. This should mean that the shop was a purpose built shop with living accommodation above. What would be the planning treatment be for conversion of living accommodation above this shop from use by the tenant/occupier of the shop (which might also apply to the landlord of a pub) and conversion to say two self contained flats or a small HMO?	No change proposed. This would be a fairly unusual situation, and it is true that the policy does not explicitly anticipate this. The current approach to the threshold would not treat a loss of a purpose built flat as resulting in an impact on the mix and balance of the community, and the threshold would not apply. However, other elements of the policy and SPD would need to be considered in this case.

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Reading Conservation Area Advisory Committee	Appendix 3	It would be useful if the example included purpose built flats and another commercial building e.g. a pub.	Agreed. Change proposed. This will be a frequent issue and should be factored into an amendment to the appendix.
Reading Conservation Area Advisory Committee	Appendix 3	It would be useful if the example included a property which might be a house converted to an HMO with a self-contained flat in the garden.	No change proposed. This is not a common scenario and it is not clear that this would aid understanding.
Reading Conservation Area Advisory Committee	Appendix 3	To highlight the point the table should include a property with planning permission granted but not yet implemented (para A3.12).	Agreed. Change proposed. This will be a frequent issue and should be factored into an amendment to the appendix.
Reading Conservation Area Advisory Committee	Appendix 3	This calculation is for a 25% threshold so 28 Oak Road must be within an article 4 area. If so the introduction to Appendix 3 should make this clear and state if the same rules apply when calculating for a 50% threshold. However section 5 (see our comments in para 2.5 above) is very confusing on this.	Agreed. Change proposed. The appendix should be amended to ensure that it is clearer.
Reading Conservation Area Advisory Committee	Appendix 3	18 Willow Avenue looks as if it should be 1a Willow Avenue from the map.	Agree. Change proposed. This is an error that requires correction.
Reading Conservation Area Advisory Committee	Appendix 3	A3.15 28 Oak Street should be 28 Oak Road.	Agree. Change proposed. This is an error that requires correction.

Name	Document ref (consultation version)	Representation	Council Response
Reading Conservation Area Advisory Committee	Appendix 4	<p>The checklist at Appendix 4 should include reference to Local Plan policies EN1 (Protection and Enhancement of the Historic Environment), EN3 (Enhancement of Conservation Areas) and EN4 (Locally Important Heritage Assets) for the items listed below:</p> <ul style="list-style-type: none"> • Checklist 1 ‘respecting the physical character of the area’ (EN1, EN3, EN4) • Checklist 16 ‘removal of boundary treatment’ (EN1, EN3) • Checklist 18 ‘refuse containers’ (EN1, EN3, EN4) 	<p>Agreed. Change proposed.</p> <p>There should be additions to the checklist points to reference EN1 in particular, because this is the overarching policy relating to impacts on existing heritage assets. EN3 deals with enhancements to conservation areas as opposed to impacts, but it is agreed that this is relevant to some of these points.</p>
Reading Conservation Area Advisory Committee	Appendix 4	<p>The SPD should draw attention to the need for listed building consent for works relating to residential conversions, internal and external, on listed buildings including removal of features such as staircases, fireplaces and replacement of windows and doors. This should be added as an item in the checklist at Appendix 4.</p>	<p>Agreed. Change proposed. A new paragraph and checklist point needs to be added.</p>
Reading Conservation Area Advisory Committee	Appendix 4	<p>The first paragraph of Appendix 4 (checklist) could be clearer - maybe with a flowchart or decision tree with YES/NO answers and where to access the information for Article 4 areas or 30% most deprived areas in England.</p> <p>Ultimately applicants or members of the public worried about what is going on with a property in their area may have to consult the planning department but more initial clarity in the otherwise clear instructions in this Appendix would help.</p>	<p>Partly agreed. Change proposed. It is agreed that this paragraph is confusing, in part because it appears to prioritise one aspect of the assessment that is already covered in headline terms by checklist 3. It is considered that, instead, this paragraph should highlight the elements that relate to whether a building is suitable for conversion in principle, as if these cannot be fulfilled there is little point in proceeding with detailed elements. A decision tree would not be appropriate as this is not how the criteria-based policy on which this SPD is based works.</p>