

ADOPTION STATEMENT for the RESIDENTIAL CONVERSIONS SUPPLEMENTARY PLANNING DOCUMENT

Date

24th March 2023

Relevant legislation

Planning and Compulsory Purchase Act 2004

Town and Country Planning (Local Planning) (England) Regulations 2012

Adoption details

Reading Borough Council formally adopted the Residential Conversions Supplementary Planning Document on 23rd March 2023.

This document is a Supplementary Planning Document (SPD). It provides supplementary information to support policies in the Reading Borough Local Plan, adopted in November 2019. It relates to the policies of the Local Plan that refer to conversions from houses to flats or houses in multiple occupation, specifically policy H8. It replaces the previous Residential Conversions SPD adopted in November 2013

Any person with sufficient interest in the decision to adopt the SPD may apply to the High Court for permission to apply for judicial review of that decision. Such an application must be made promptly and in any event not later than Friday 23rd June 2023.

The SPD is available for inspection on the [planning policy pages of Reading Borough Council's website](#). A Statement of Consultation, summarising the consultation undertaken, comments received and responses to those comments, can also be viewed on that page. Hard copies are available for inspection at the Civic Offices.

Changes made to the Draft version (published December 2022) can be seen in the following pages of this document.

Further information can be obtained by contacting the Planning Section, Reading Borough Council [by e-mail](#) or by telephone on 0118 9373337.

Further information on planning policy documents can be found on the [planning policy pages of Reading Borough Council's website](#).

Changes

This section lists the changes that have been made to the December 2022 consultation draft of the Residential Conversions SPD to form the adopted version. Changes have been made for a variety of reasons, including to address points raised during consultation, update the document as a result of new information, correct errors, and make clarifications.

Paragraph references in the table below refer to the adopted version unless otherwise indicated, and may have changed from the draft version. Consequential changes as a result of the changes below (i.e. to paragraph or page numbering) are not listed unless they form part of a wider change.

Title and headers

Replace “Draft, December 2022” with “Adopted, March 2023”

Paragraph 1.2

Add a reference to Figure 1 at the end of the sixth sentence.

Paragraph 1.4

Add the following in the first sentence:

“[...] or converted [...]”

Paragraph 1.6

Add the following at the end of the first bullet point:

“[...], falling within the C4 Use Class.”

In the second bullet point, replace:

“[...] it is likely to be classed as a ‘large HMO’ falling outside Use Class C4 and classed as sui generis.”

With:

“[...] it is likely to be considered a ‘large HMO’ classed as ‘sui generis’, meaning within its own class.”

Paragraph 1.7

In the first sentence, replace:

“Note: The Environmental Health, Council Tax and Building Control departments operate under different legislation and requirements [...]”

With:

“It should be noted that the Environmental Health, Council Tax and Building Control departments operate under different legislation and requirements [...]”

Paragraph 1.9

Add the following in the first sentence:

“[...] a ‘sui generis’ use, which is [...]”

Paragraph 1.10

Replace:

“Since the existing Supplementary Planning Guidance on ‘Residential Conversions Supplementary Planning Document’ was adopted in November 2013, there have been several significant changes to national legislation, the GDPO, and the Reading Borough Local Plan.”

With:

“In recent years, there have been several significant changes to national legislation, the GDPO, and the Reading Borough Local Plan regarding residential conversions, in particular for HMOs.”

Paragraph 1.11

In the first sentence, replace:

“Of particular note is policy H8: Residential Conversions and H2: Density and Mix [...]”

With:

“Of particular note are policies H8: Residential Conversions and H2: Density and Mix [...]”

Paragraph 1.13

In the first sentence, delete:

“[...] in particular, [...].”

After the first sentence, replace:

“Planning permission is now required to convert from a house to a small HMO within a defined area and from a house to a large HMO in any part of the Borough.”

With:

“As a result of directions under Article 4 of the General Permitted Development Order (referred to as an Article 4 direction), planning permission is required to convert from a house to a small HMO within these parts of Redlands, Park and Katesgrove wards (since May 2013) as well as Jesse Terrace (since February 2017). These areas are shown on the map in Appendix 2, and further information is on the Council’s website . Planning permission is always required to convert from a house to a large HMO in any part of the Borough under national legislation.”

Paragraph 1.14

Replace:

“[...] of the Article 4 Direction [...]”

With:

“[...] of the Article 4 Directions [...]”

In the sixth bullet point, delete “single”:

Paragraph 1.15

Replace:

“This draft SPD is split into two sections; Section A deals with conversion of properties into self-contained flats or for multiple occupation, including both small (C4) HMOs and larger (sui generis) HMOs. The second section (Section B) will focus on how applications that are required as a result of the ‘Article 4 Direction’ that came into force on 16th May 2013, will be assessed. The Article 4 Direction removes permitted development rights to convert from a dwellinghouse (C3 use) to a small house in multiple occupation (C4 use) in parts of Redlands, Katesgrove and Park Wards. It should be noted that applications required as a result of the Article 4 Direction will also be considered under Section A of the SPD.”

With:

“This SPD is split into five main sections; the first (Section 2) deals with all conversions, whether to flats or HMOs. Section 3 deals with proposals for conversions to flats in any part of Reading. Section 4 deals with proposals for conversion to sui generis (large) HMOs anywhere in Reading. Section 5 considers the approach to

conversion to both large and small HMOs within the areas covered by the Article 4 directions controlling small HMOs (shown on the map in Appendix 2). Section 6 sets out the approach to conversions to flat or HMOs outside those Article 4 direction areas.”

Paragraph 1.16

Replace:

“Once adopted, this Supplementary Planning Document (SPD) will be a material consideration in the determination of planning applications. This guidance supersedes the previous ‘Residential Conversions Supplementary Planning Document’ adopted November 2013.”

With:

“This Supplementary Planning Document (SPD) is a material consideration in the determination of planning applications and supplements policy H8 of the Reading Borough Local Plan in particular. This guidance superseded the previous Residential Conversions SPD adopted in November 2013.”

Paragraphs 1.17 to 1.19

Delete paragraphs

Paragraph 2.2

Add the following as the final sentence of the paragraph:

“Areas with significant numbers of conversions also often overlap with areas with particular concentrations of heritage assets such as listed buildings and conservation areas, and there is a particular sensitivity to changes to physical character in these areas.”

Checklist 1

Replace:

“[...] (H8, H9, and CC8) [...]”

With:

“[...] (H8, H9, CC8, EN1, EN3, EN4) [...]”

And make the same change in Appendix 4

Paragraph 2.4

Replace:

“[...] where external alterations, including an extension is proposed [...]”

With:

“[...] where external alterations, including an extension, are proposed [...]”

Replace:

“[...] plus SPD, ‘Design Guide to House Extensions’ (2021).”

With:

“[...] plus the Design Guide to House Extensions SPD (2021).”

Paragraph 2.6

Add the following as the final sentence of the paragraph:

“Policy EN1 deals with the need to conserve the significance of heritage assets, which will have particular sensitivity to external alterations.”

Checklist 2

Replace:

“[...] (CC8, H9, H10) [...]”

With:

“[...] (CC8, H9, H10, EN1, EN3, EN4) [...]”

And make the same change in Appendix 4

Paragraph 2.8

Replace:

“Note: this criteria should be taken into account for any residential conversion. Where the residential conversion relates to the creation of an HMO within the area covered by the Article 4 Direction for HMOs, section 2 of this SPD provides additional detail on how such applications will be considered.”

With:

“Note: this criterion should be taken into account for any residential conversion. Where the residential conversion relates to the creation of an HMO within the area covered by the Article 4 Direction for HMOs, Section 5 of this SPD provides additional detail on how such applications will be considered, and Section 6 provides more detail on applications for either HMOs or flat conversions outside the Article 4 areas.”

Paragraph 2.10

In the first and second sentences, replace:

“[...] reflecting the very high student population which is especially prevalent around the universities. In the vicinity of the universities, a high proportion of the housing accommodates students.”

With:

“[...] reflecting the very high student population which is especially prevalent around the university. In the vicinity of the university campuses, a high proportion of the housing accommodates students.”

Paragraph 2.11

In the first bullet point, replace:

“How it will contribute to an acceptable housing mix, taking into account the thrust of policy H5: Standards for New Housing even where less than 20 new dwellings are proposed and policy CR6: Living in the Central Reading as appropriate.”

With:

“How it will contribute to an acceptable housing mix, taking into account the approach of policy H2: Density and Mix and policy CR6: Living in Central Reading as appropriate.”

Checklist 3

Replace:

“[...] ensuring that, as appropriate, single family housing remains the dominant form of dwelling in the vicinity of the application, and ensuring there is not a detrimental impact on the physical character of the area.”

With:

“[...] ensuring that, as appropriate, single family housing remains the dominant form of dwelling in the vicinity of the application, taking into account the relevant threshold approach, and ensuring there is not a detrimental impact on the physical character of the area.”

And make the same change in Appendix 4

Paragraph 2.12 and 2.13

Move the Section titled ‘Unneighbourly Siting of HMOs (sandwiching)’, formerly paragraphs 2.26 and 2.27, to this part of the document.

Paragraph 2.20

In the first sentence, replace:

“Policy CC8: Safeguarding Amenity recognises [...]”

With:

“Adopted policy CC8: Safeguarding Amenity recognises [...]”

Paragraph 2.21

In the second sentence, replace:

“In this regard properties must be a minimum size as detailed below in order for a conversion to a flat or large HMO to be considered acceptable.”

With:

“In this regard properties must be a minimum size of 120 sq m or have four or more bedrooms in order for a conversion to flats or a large HMO to be considered acceptable.”

Add the following as the final sentence of the paragraph:

“A property must have been of this size for at least ten years before the application is determined, to avoid a situation where homes are extended purely for the purposes of enabling a conversion to flats or HMOs.”

Checklist 7

Replace:

“When calculating the floor area of the property the measurement should be based on the external dimensions as at 1st July 1948 or when built (whichever is the later).”

With:

“When calculating the floor area of the property the measurement should be based on the external dimensions ten years before the application is determined or when built (whichever is the later).”

And make the same change in Appendix 4

Paragraph 2.23

In the final sentence, replace:

“[...] applications that propose to provide reduced standards should justify why this is the case”

With:

“[...] applications that propose to provide reduced standards must justify why this is the case”

Paragraph 2.32

In the second sentence, replace:

“Applications will be considered against the criteria contained in the adopted Sites and Detailed Policies Document, policy DM9: House Extensions and Ancillary Accommodation plus the Council’s SPG on House Extensions [...]”

With:

“Applications will be considered against the criteria contained in the adopted Local Plan, policy H9: House Extensions and Ancillary Accommodation plus the Council’s Design Guide to House Extensions SPD [...]”

Paragraph 2.33

In the first sentence, replace:

“The Council’s parking standards are set out in the adopted SPD ‘Revised Parking Standards and Design’.”

With:

“The Council’s parking standards are set out in the adopted Revised Parking Standards and Design SPD.”

In the fourth sentence, replace:

“[...] developments located close to public transport and local centres will require less parking [...]”

With:

“[...] developments located close to public transport and local centres will provide less parking [...]”

Checklist 14

Replace:

“Parking standards for all residential conversions should be in accordance with the Council’s adopted ‘Revised Parking Standards and Design’ (2011) SPD.”

With:

“Parking standards for all residential conversions should be in accordance with the Council’s adopted Revised Parking Standards and Design SPD (2011) or any successor.”

And make the same change in Appendix 4

Paragraph 2.37

In the second sentence, replace:

“Similarly, if access to off-street car parking is dependent on the removal of boundary walls or other boundary treatment this will not be considered acceptable where the boundary treatment makes a valuable contribution to the character of the area.”

With:

“Similarly, if access to off-street car parking is dependent on the removal of boundary walls, fences, railings, gates or other boundary treatment this will not be considered acceptable where the boundary treatment makes a valuable contribution to the character of the area, as it often does in conservation areas for example.”

Checklist 16

Replace:

“[...] (CC7, H8, H9) [...]”

With:

“[...] (CC7, H8, H9, EN1, EN3, EN4) [...]”

And make the same change in Appendix 4

Checklist 17

Replace:

“[...] (TR5, CC8, H8, TR5) [...]”

With:

“[...] (TR5, CC8, H8) [...]”

And make the same change in Appendix 4

Checklist 18

Replace:

“[...] (H8, H10, H11) [...]”

With:

“[...] (H8, H10, H11, EN1, EN4) [...]”

And make the same change in Appendix 4

Paragraph 2.41

In the third sentence, replace:

“Policy CS5: Inclusive Access re-emphasises this requirement at the local level.”

With:

“Policy CC7: Design and the Public Realm re-emphasises this requirement at the local level.”

Paragraph 2.43

Add the following new subsection:

“Listed buildings

2.43 The locations where conversions to flats or to HMOs take place are often areas where there is particular historic significance, including listed buildings. Where a building is listed, an application for listed building consent will be required to alter

the building in a way that affects its character or appearance as a building of special architectural or historic interest, and this includes both internal and external alterations. Examples might include, but are not limited to, removal of or alteration to original features such as staircases or fireplaces or replacement of windows and doors. It is a criminal offence to carry out works to a listed building without obtaining consent where it is required. Applications for listed building consent will be assessed against Policy EN1: Protection and Enhancement of the Historic Environment of the Local Plan together with national policy.

Checklist 20 (EN1): Proposals that would alter a listed building in a way that affects its character or appearance as a building of special architectural or historic interest will require listed building consent and will protect and where possible enhance the significance of the listed building.”

And add the new checklist point to Appendix 4.

Paragraph 2.44

Delete “etc” at the end of the first sentence.

Paragraph 2.48

In the second sentence, replace:

“For instance, unauthorised house conversions to self-contained flats may claim the ‘four year rule’ and apply for a Lawful Development Certificate (LDC).”

With:

“For instance, unauthorised house conversions to self-contained flats may claim immunity from enforcement after a certain period, currently four years but proposed to be ten years within the Levelling-Up and Regeneration Bill, and apply for a Lawful Development Certificate (LDC).”

In the third sentence, replace:

“[...] for a minimum continuous period of 4 years from a specific date [...]”

With:

“[...] for a minimum continuous period of 4 years or 10 years from a specific date depending on the relevant legislation in place [...]”

Paragraph 2.49

Replace:

“Applications for HMOs will need to demonstrate that the property has been used in that manner continuously for 10 years from the date a specific date unless an applicant is seeking to demonstrate that permitted development rights for C4 HMOs have been exercised.”

With:

“Applications for a LDC for an existing HMO will need to demonstrate that the property has been used in that manner continuously for 10 years up to that point unless an applicant is seeking to demonstrate that permitted development rights for C4 HMOs have been exercised.”

Paragraph 2.51

In the second sentence, replace:

“Where external fire escapes are necessary and do not cause harm to residential amenity [...]”

With:

“Where external fire escapes are necessary and do not cause harm to residential amenity or local character [...]”

Paragraph 3.2

In the final sentence, replace:

“[...] the following considerations should be taken into account when considering planning applications:”

With:

“[...] the following consideration should be taken into account when considering planning applications.”

Paragraph 4.2

Replace:

“[...] as discussed in Section 2 of this SPD.”

With:

“[...] as discussed in Section 2, 5 or 6 of this SPD.”

Paragraph 4.6

Replace:

“See checklist point 6 above, in the general part of the SPD about residential conversions [...]”

With:

“See checklist point 6 above, in Section 2 of the SPD about residential conversions, [...]”

Paragraph 5.1

In the first sentence, replace:

“In Reading, 6.9% of dwellings, which is higher than the national average, are estimated to be Houses in Multiple Occupation (HMOs) [...]”

With:

“In Reading, 6.9% of dwellings, higher than the national average, are estimated to be Houses in Multiple Occupation (HMOs) [...]”

Paragraph 5.2

Replace:

“A map showing the distribution of all HMOs across the Borough, based on Environmental Health data is included at Appendix 1.”

With:

“A map showing the distribution of all HMOs across the Borough, based on Council records is included at Appendix 1.”

Paragraph 5.3

In the second sentence, replace:

“Residential conversions, often in the form of houses in multiple occupation, provides suitable accommodation sought by students who often spend some time at University in shared houses.”

With:

“Residential conversions, often in the form of HMOs, provide accommodation sought by students who often spend some time at University in shared houses.”

In the fifth sentence, replace:

“It is unclear if this trend will continue, given changes to fees on one hand and changes to housing benefits for single people under 35 years on the other, plus other factors including the recession.”

With:

“It is unclear if this trend will continue, given a significant number of changes affecting higher education.”

Paragraph 5.4

In the first sentence, replace:

“The issues surrounding residential conversions including conversions to houses in multiple occupation (HMOs) are complex and often conflicting.”

With:

“The issues surrounding residential conversions including conversions to HMOs are complex and often conflicting.”

Paragraph 5.8

Replace:

“The SPD will be used to assess applications that are required as a result of the ‘Article 4 Direction’ that was made in May 2012. This Direction removes permitted development rights to convert from a dwellinghouse (C3 use) to a house in multiple occupation (C4 use) in parts of Redlands, Katesgrove and Park Wards.”

With:

“The SPD will be used to assess applications that are required as a result of these Article 4 Directions. These Directions remove permitted development rights to convert from a dwellinghouse (C3 use) to a house in multiple occupation (C4 use) in the areas set out above.”

Paragraph 5.9

In the first sentence, replace:

“As set out above in paragraph 4.3, [...]”

With:

“As set out in paragraph 4.3, [...]”

Paragraph 5.10

Add the following as the final sentence of the paragraph:

“The map also shows the Article 4 covering Jesse Terrace which came into force on 1 February 2017.”

Paragraph 5.11

In the second sentence, replace:

“The SPD will provide detail on the interpretation of policy H8 in particular [...]”

With:

“The SPD provides detail on the interpretation of policy H8 in particular [...]”

Paragraph 5.18

Add the following as the final sentence of the paragraph:

“Data from 2021 is not yet available.”

Paragraph 5.19

In the first sentence, replace:

“[...] the proportion of multi-person households has remained virtually the same [...]”

With:

“[...] the proportion of multi-person households remained virtually the same [...]”

Paragraph 5.32

In the third sentence, replace:

“If a part of a building falls within the circle and partly without, then the property will form a part of the assessment.6”

With:

“If a part of a building falls within the radius and partly without, then the property will form a part of the assessment.”

Paragraph 5.36

In the first sentence, replace:

“Where the radius includes entire buildings falling within an A, B, C1 or C2 use class, D or Sui Generis Use Class apart from a Sui Generis HMO [...]”

With:

“Where the radius includes entire buildings falling within a B, C1 or C2 use class, E, F or Sui Generis Use Class apart from a Sui Generis HMO [...]”

Paragraph 5.37

In the second sentence, replace:

“It is anticipated that the information to calculate the percentage will initially be based primarily on environmental health and council tax information.”

With:

“It is anticipated that the information to calculate the percentage will be based primarily on Environmental Health and Council Tax information and Planning records.”

Paragraph 5.39

In the second sentence, replace:

“The concentration of HMOs in the area surrounding the application site is calculated as a percentage of the ‘total estimated number of existing HMOs’ against the ‘total number of residential properties’ [...]”

With:

“The concentration of HMOs in the area surrounding the application site is calculated as the ‘total estimated number of existing HMOs’ expressed as a percentage of the ‘total number of residential properties’ [...]”

Paragraph 5.40

In the first sentence, replace:

“Any extant but as yet unimplemented planning permissions will be counted as being in that use.”

With:

“Any extant but as yet unimplemented planning permissions will be counted as being in the permitted use.”

Below paragraph 5.44

Underneath the box, replace:

“Paragraph 5.31 explains how the radius would be measured and paragraph 5.35 explains how various building uses would be taken into account [...]”

With:

“Paragraphs 5.31 to 5.33 explain how the radius would be measured and paragraphs 5.34 to 5.36 explain how various building uses would be taken into account [...]”

Below paragraph 6.2

In the first bullet point in the box, replace:

“The proportion of houses within a 50m radius of the application site that are in use as HMOs or which have been converted to flats would not exceed 50%.”

With:

“The proportion of houses within a 50m radius of the application site that are in use as HMOs or which have been converted to flats would exceed 50%.”

Paragraph 6.5

In the second sentence of the first bullet point, replace:

“Purpose-built flats are to be excluded, as are any uses not within use classes C3, C4 or sui generis HMOs.”

With:

“Purpose-built flats are to be excluded, as are any buildings wholly within use classes other than C3, C4 or sui generis HMOs.”

In the fifth bullet point, replace:

“Any extant permitted conversions to flats or HMOs will be counted as being in that use for the purposes of the threshold.”

With:

“Any extant permitted conversions to flats or HMOs will be counted as being in the permitted use for the purposes of the threshold.”

Paragraph 6.6

Replace:

“[...] this will count as a HMO for the purposes of calculating the threshold.”

With:

“[...] this will still count as a HMO for the purposes of calculating the threshold.”

Footnote 12

Add at the end of the footnote:

“or Berkshire Observatory - Reading - Deprivation - Map”

Appendix 1

In the title, replace:

“Distribution of HMOs across the Borough (based on 2011 Census data)”

With:

“Distribution of HMOs and converted houses across the Borough”

Delete previous map and note.

Add new Figure A1.1 titled “Map showing ratio of HMOs to households by Census output area, 2021” with the following note:

“This map compares the number of HMOs according to the Council’s records from Licensing, Council Tax and planning permissions compared to the number of households in the 2021 Census. This ratio is expressed as a percentage. However, it is important to note that it is not analogous to the proportion of HMOs within an area according to the calculation method in this SPD and is intended to broadly show the main concentrations only.”

Add new Figure A1.2 titled “Map showing proportion of households living in a converted or shared house by Census output area, 2021” with the following note:

“This map shows data from the 2021 Census on the proportion of households living in a converted or shared house. Please note that the definition of a shared house for Census purposes differs from the Planning definition, and this map therefore largely shows the location of conversions to flats or bedsits rather than HMOs.”

Appendix 2

Add new caption to the map:

“Figure A2.1: Boundary of Article 4 Directions relating to changes of use to small HMOs”

Appendix 3

Redraft entire Appendix to include two worked examples (one within the Article 4 area, one outside), show five steps, include new maps, include additional information in table A3.1 and make clearer how the approach is to be applied.

Appendix 4

In the introductory text, replace:

“Prior to engaging in the assessment developers and officers should first consider for developments in areas not covered by an Article 4 direction relating to small HMOs, planning permission for a conversion of a dwellinghouse to flats or to a large HMO whether the following applies:

- The proportion of houses within a 50m radius of the application site that are in use as HMOs or which have been converted to flats would not exceed 50%;*
- The application is for an HMO and the area falls within the 30% most deprived areas in England according to the Indices of Multiple Deprivation; or*
- There is other evidence of dilution or harm of a mixed and sustainable community.*

As such development will not normally be granted permission as they would harm or dilute the mix and sustainability of the community.”

With:

“Attention is drawn in particular to checklist items 3, 4 and 7 which relate to the principle of the suitability of a building for conversion, as if these cannot be fulfilled then the proposed use is unlikely to be acceptable in principle. Further guidance is included in sections 2, 5 and 6.”

In Checklist 25, replace:

“Checklist 24 (H8): [...]”

With:

“Checklist 25 (H8) for conversions to flats: [...]”

In Checklist 26, replace:

“Checklist 25 (H8): [...]”

With:

“Checklist 26 (H8) for conversions to sui generis HMOs: [...]”

In Checklist 27, replace:

“Checklist 26: [...]”

With:

“Checklist 27 for conversions to sui generis HMOs: [...]”