



## Reading Local Plan Examination

### Inspector's Initial Comments / Questions to the Council

I have now made progress with my initial preparatory work. I set out below a number of procedural matters and initial questions for the Council.

### Hearing sessions

It is expected that the Hearing Sessions will take place late September 2018 onwards for two weeks with an additional week reserved in mid-October 2018. Please note that the Council should ensure that the start date for the hearing sessions is notified at least 6 weeks in advance of the sessions commencing.

I will be circulating a Matters and Issues paper and a draft Hearings Programme in due course. The examination is based on the Matters and Issues and not driven by the representations.

A Guidance Note has been produced to outline the nature of the hearing sessions. Those who have sought modifications to the Local Plan (LP) and signaled a wish to be heard will be invited to the relevant hearing session(s). There is no formal presentation of evidence or cross-examination; the procedure is an inquisitorial process, with the Inspector asking questions based on the Matters and Issues identified for Examination. The Council and relevant representors will have the opportunity to provide responses to the identified Matters and Issues, to be submitted approximately 2-3 weeks before the hearings commence. There is no need for any legal representation, but lawyers are welcome as a member of a team.

### **Representations**

Copies of the representations are displayed on the Council's website and summarised in documents LP006 and LP007. It is for the Council to decide whether the representations are duly made, and also to decide whether to accept late representations. Late representations which are not formally accepted by the Council are not forwarded to the Secretary of State and the Inspector does not consider them. I have been provided with a schedule of those representors who have already requested a wish to participate at the hearings. There will be a further opportunity for representors seeking a change to the plan to indicate a wish to participate.

### **Initial Questions to the Council**

#### Meeting with representors/Statements of Common Ground

**Q1. Is it the Council's intention to have any further discussions with representors? If so, could the Council please provide details and confirm when any Statements of Common / uncommon Ground are likely to be completed?**

**Q2. It would be helpful if the Council could provide an update on the Memorandum of Understanding with South Oxfordshire District Council?**

## Core Evidence base

I have received the Submission Documents and Evidence-based Documents (and note that these have been provided on the Council's website).

**Q. Is any other substantial work/reports likely to be undertaken for the examination, and if so what is the timetable for such work?**

## Dealing with Changes to the Local Plan

In considering any proposed modifications, I will need to take a view whether any are required for soundness/legal compliance reasons. As you will be aware, in order for me to make such 'main modifications', you would need to formally notify me as to whether you wish to request modifications under section 20(7C) of the Planning and Compulsory Purchase Act 2004 (as amended).

In the absence of a request under section 20(7C), my report would be confined to identifying any soundness or legal compliance failures in the Plan and, if there are such failures, recommending non-adoption of the Plan.

**Q. Please give an indication of the Council's position on main modifications?**

This would be advantageous to the efficiency of the examination process and the expectation of participants. Deferring a decision to request modifications until a late stage of the examination may risk both time delay and incur additional examination costs.

Minor changes that do not go to the question of soundness or legal compliance are made solely by the Council on adoption and not by the Inspector.

**Q. Notwithstanding the wording of the covering note to the schedule of modifications LP008, some of the wording proposed and incorporated into the LP appears to change policy wording or the interpretation of policy. Would the wording changes within the Submission Plan have been apparent to the reader? Could the Council please comment on this?**

## Neighbourhood Plans

**Q. Are there any Neighbourhood Plans in preparation within the Borough? If so what stage have they reached?**

## Whole Plan Viability

**Q. What evidence is there for assessing the effect of the policies on the viability of development where they set out infrastructure requirements or contributions? If this is not available what steps would be needed to rectify this?**

## Housing Supply

**Q. Would the Council be able to demonstrate a five year housing land supply, including an appropriate buffer, at the point of adoption of the LP should it be found sound? Please provide evidence to demonstrate how.**

**Q. Tables on pages 162, 179, 194, 201 and 210 – what is the current position on sites with planning permission?**

**Q. Paragraph 10.2.2 – a number of sites in the table are referred to as being ‘long term’ or ‘unknown’ – for each site (with the exception of Grazeley) could the Council please explain what the reasons are for this?**

#### Supplementary Planning Documents

There are a number of Supplementary Planning Documents and other Guidance Documents referred to in the text of the LP.

**Q. For each of these listed below could the Council please confirm the date of production where this is not defined, and also it’s planning status?**

- Sustainable Design and Construction
- Station Area Framework
- Station Hill South Planning and Design Brief
- Kenavon Drive Urban Design Concept Statement
- Dee Park Planning Brief
- Whiteknights Development Plan

#### Built and Natural Environment

**Q. Policy EN12 – in the penultimate sentence what is meant by ‘nationally or locally recognised metrics’?**

**Q. In paragraph 4.2.85 - What is meant by the Council reviewing its approach to air quality, and are there any implications for Policy EN15?**

#### Employment

**Q. Paragraph 4.3.8 - What is the likelihood of a freight consolidation centre coming forward and will it be clear to the decision maker how to react to such a proposal?**

#### Housing

**Q. Paragraph 4.4.13 – what is the latest position on the Register for Self-Build Homes?**

**Q. Policy H5 – what is the evidence for applying the optional technical standards as policy?**

**Q. Policy H6 - what is the status and age of the Housing Strategy referred to within this Policy?**

**Q. Paragraph 4.4.96 what is the evidence relating to student numbers produced by the University?**

#### Gypsy and Traveller provision

The Gypsy and Traveller, Travelling Showpeople and Houseboat Dweller Accommodation Assessment 2017 identifies a need for gypsy and traveller accommodation in the Borough.

**Q. Has the methodology of the Gypsy and Traveller Accommodation Assessment been tested at any other examinations to date?**

**Q. Could the Council please confirm what options were explored for both permanent and transit Gypsy and Traveller sites within the Borough, and the reasons for discounting any sites?**

#### Transport

**Q. Policy TR2 – the policy refers to safeguarding land for high quality bus routes what land would this be?**

Retail

**Q. Paragraph 4.6.6 – what is the previous national guidance referred to, and why is it relevant to Policy RL1?**

**Q. Policy RL6 – what is the latest position on applications for public houses within the Borough to become Assets of Community Value?**

Other uses

**Q. Paragraph 4.7.6 – what progress has been made on identifying a potential site for a new 6 form entry secondary school, and what are the potential implications for the LP if a site is not found?**

**Q. Policy OU2 Figure 4.9 is there any planned development in the Middle and Outer Zones? If so, what are the implications for the LP?**

Central Reading

**Q. What is meant by the '18 hour welcome' and is it defined anywhere?**

**Q. Paragraph 5.4.36 refers to regional policy – what is this?**

Caversham and Emmer Green

**Q. Policy CA1a the first sentence refers to national policy – what particular national policy is being referred to?**

Wind Turbine Development

On 18 June 2015, the Secretary of State published a Written Ministerial Statement regarding onshore wind turbine development. The WMS sets out a consideration to be applied to proposed wind energy development so that local people have the final say on wind farm applications. When determining planning applications for wind energy development involving one or more wind turbines, local planning authorities should only grant planning permission if:

- The proposed development site is in an area identified as suitable for wind energy development in a Local or Neighbourhood Plan; and
- Following consultation, it can be demonstrated that the proposal reflects the planning concerns of affected local communities and therefore has their backing.

In applying these considerations, suitable areas for wind energy development will need to have been allocated clearly in a Local or Neighbourhood Plan. No such areas are identified.

**Q. In light of this WMS, can the LP be regarded as being effective and consistent with national policy in so far as it relates to wind energy related developments? If not, what modifications would be necessary to the Local Plan?**

Other Matters

**Q. Are the policies worded to ensure that they will be effective and that they provide a clear indication of how a decision maker should react to a development proposal? For example phrases such as 'Take account of' (for example Policies ER1d and ER1c) and in Policy EM3 the criteria are questions, these are not requirements that must be satisfied. The Council may wish to consider if modifications are necessary.**

A response to these questions by no later than midday on Monday 23 July 2018 would be appreciated. If this is not possible, could the Council please indicate when I can expect a response?

Louise Gibbons

Inspector appointed to examine the Reading Local Plan