

## Reading Borough Council Local Plan Examination

### Matters & Issues for Examination

The following Matters, Issues and questions will provide the focus for the hearings due to commence on Tuesday 25<sup>th</sup> September 2018.

The Programme Officer is Jane Greenway who can be contacted on 07855126484; E-mail: [Programme.Officer@reading.gov.uk](mailto:Programme.Officer@reading.gov.uk); Address: Programme Officer, Planning Section, Reading Borough Council, Civic Offices, Reading, RG1 2LU.

The Council is invited to respond on all issues and questions listed, referring to information in the Submission Documents & Supporting Evidence (limited to 3000 words per Issue).

Other representors should only respond on issues relevant to points made in their original representation(s), without raising new issues, also in statements of no more than 3000 words per matter. Participants may refer to information in earlier representations, but the Inspector only has copies of the representations made at the Pre-submission consultation stage of the Local Plan. It is not a requirement to submit a Statement; participants can rely on their original representation. Statements may only be submitted in response to the Matters and Issues identified for Examination. These should be received by the Programme Officer no later than **Wednesday 12 September 2018 (5pm)**.

Detailed agendas for the hearing sessions will be issued shortly before they commence, based on the Matters & Issues for Examination and the responses received. It is unlikely that the Inspector will introduce new issues or questions that do not arise from the Matters and Issues identified.

Please note, although anyone can attend the public hearings, only those listed on the programme can participate in the relevant hearing session. Normally, only those who made representations on the Pre-Submission Local Plan (November 2017), and that are seeking some change to the plan are entitled to participate in the hearing sessions. **Participants should let the Programme Officer know by 10<sup>th</sup> August 2018 whether they wish to attend a particular hearing session.**

Under the transitional arrangements set out in paragraph 214 of the National Planning Policy Framework (NPPF) July 2018, the Examination will focus on the requirements of soundness set out in the National Planning Policy Framework (2012) and the accompanying Planning Practice Guidance. The starting point is the assumption that the Council has submitted what it considers to be a sound plan. Participants will be expected to explain which aspect of the plan is unsound, why it is unsound and specify how it should be altered, with detailed wording and clear evidence to support any changes. As well as complying with the legal requirements, to be sound, the plan has to be positively prepared, justified, effective and consistent with national policy.

Please see the Inspector's Guidance Note for further advice which is available on the Council's examination webpage. Regard should be had to the Council's list of Schedule of Minor Changes (LP008) and the Council's Response to the Inspector's Initial Comments and Questions (EC001).

## **Matters and Issues**

### **Legal requirements and procedural matters**

#### **Issue 1: Have the relevant procedural requirements been met, including the duty to co-operate?**

Q1. Has the LP been prepared in accordance with the Duty to Co-operate and does it fully meet this legal requirement?

Q1a. What are the key outcomes from the co-operation with neighboring authorities, particularly relating to the shortfall of dwellings and Gypsy and Travellers and Travelling Showpeople accommodation identified within the Reading area, education provision and transport?

Q1b. Is the housing market area and functional economic areas agreed with adjoining authorities, and are they suitably defined?

Q2. Has the LP been prepared to comply with the adopted Statement of Community Involvement (PP002), and does it meet the minimum consultation requirements set out in the Regulations?

Q3. Is the Sustainability Appraisal (LP005) suitably comprehensive, and is it clear how the Sustainability Appraisal influenced the final plan and dealt with mitigation measures? Has it sufficiently evaluated reasonable alternatives including in meeting housing needs including student accommodation and employment provision?

### **Housing Requirement and Five Year Supply of Housing Land**

#### **Issue 2. Is the housing requirement justified and deliverable and has it been calculated in accordance with national policy and guidance?**

Q1. It is necessary to understand whether recent household projections should inform the calculation of the Objectively Assessed Needs (OAN). What should be the starting point for the calculation of OAN, and has sufficient regard been paid to economic growth?

Q2. Has the affordable housing need been calculated in accordance with the guidance in the PPG and is the approach sound? What is the appropriate uplift that would be expected to improve affordability?

Q3. Is the adjustment for London migration sufficient, and if not, what should the figure be?

Q4. Is the housing requirement of 15,433 homes as set out in Policy H1 justified? Is the plan sufficiently flexible to ensure delivery of housing to meet the requirement over the plan period?

Q4a. Are the requirements of Policy H1 relating to working with neighbouring authorities sufficiently robust?

#### **Issue 3. Whether the Council will be able to demonstrate a five year supply of housing land on adoption of the LP?**

Q1. When calculating the five year supply of housing land, is it appropriate in the context of Reading to apply a 5% buffer?

Q2. Is the housing trajectory at Appendix 1 of the LP realistic and does it align with the Infrastructure Plan at Section 10.3 of the LP and EV007?

Q3. Are the assumptions and analysis regarding site suitability, availability and achievability and development capacity in the Housing and Economic Land Availability Assessment (EV013-EV015) reasonable and realistic?

Q3a. In particular, is the identified capacity for sites CR12b, CR13c, CR13d, CR14g, SR3, WR3j, ER1c and ER1e justified?

Q4. Does the evidence give sufficient confidence that allocated sites will be deliverable and developable in accordance with paragraph 47 of the NPPF? How would the supply of housing sites be monitored and managed, including those sites where planning permission has expired?

## **General Policies**

### **Cross Cutting Policies**

#### **Issue 4. Are the Cross Cutting Policies justified, deliverable and consistent with national policy?**

Q1. In assessing the viability of the LP has the effect of the requirements of policies seeking contributions and standards (for example in Policy H5) been taken into account, and if so is this robustly demonstrated?

Q2. Whether Policy CC1 is justified and effective having regard to national policy? Does the submitted plan properly reflect the presumption in favour of sustainable development in the NPPF?

Q3. Is there sufficient justification supported by the evidence for applying Policy CC2 to all development within the Borough? Is the approach to BREEAM consistent with national policy?

Q4. Is the plan positively prepared in relation to climate change? Having regard to the Policy CC3, CC4 and other policies within the LP, would the LP be effective and consistent with national policy and legal requirements in relation to climate change?

Q5. Is Policy CC7 justified, effective and consistent with national policy? Is the policy internally consistent and does it avoid undue repetition?

Q6. Is the third bullet in Policy CC8 consistent with the requirements in relation to tall buildings? Is the application of the back-to-back distances sufficiently flexible in relation to town centre residential development?

Q7. Is the requirement for financial contributions in CC9 including monitoring justified and consistent with the Community Infrastructure (CIL) Regulations and paragraph 204 of the NPPF?

Q7a. Has there been sufficient regard for safe access and egress in relation to Flood Risk and site allocations within the LP?

[See Policy EM1 in relation to the provision of affordable housing for employment development].

## **Built and Natural Environment**

### **Issue 5. Are the policies for the Built Environment justified, deliverable and consistent with national policy?**

Q1. Are Policies EN1, EN2, EN3, EN4 and EN6 consistent with national policy? Will the LP be effective in dealing with designated assets including assets at risk, listed buildings, conservation areas, parks and gardens, and non-designated heritage assets?

Q1a. Are the requirements of individual site allocations policies and other policies within the LP (for example CR14c, CR14e and CA2) consistent with these policies?

Q2. What evidence is there for the protection of significant views in Policy EN5? Will the policy be effective?

Q3. How up to date is the assessment of sites for Local Green Space and Public Open Space in Policy EN7, and is it robust? What is the justification for including Public Open Space within the Policy, and is this consistent with national policy?

Q3a. What are the implications of seeking school provision on the site annotated as EN7Nn, and is this proposal consistent with other policies in the LP?

Q4. What is the justification for the standards in the provision of open space in Table 4.3 relating to Policy EN9?

Q5. What is the evidence for the identification of Major Landscape Features in Policy EN13?

Q5a. Do the requirements in Policy EN13 for a Landscape and Visual Impact Assessment apply to all types of development, if so is this is justified?

Q6. Are the requirements of EN14 justified and will it be effective? Is it consistent with national policy?

Q7. Is the approach to air quality within the area as set out in EN15 justified, and will the policy be effective?

Q8. Is EN16 justified and will it be effective including in relation to available capacity within the sewer network and Blakes Lock SPS, and contaminated sites? Will the policy be effective in relation to all potential sources of pollution?

Q9. What is the justification for the noise rating level set out in Policy EN17?

## **Employment**

### **Issue 6. Are the policies for employment justified, deliverable and consistent with national policy?**

Q1. Is the new floorspace provision set out in Policy EM1 justified?

Q1a. Are the requirements for affordable housing in relation to employment development as set out in criterion (a) and (b) of Policy EM1 justified and based on robust evidence?

Q2. Is the identification of the Core Employment Areas in Policy EM2 based on robust evidence?

Q2a. Is the provision relating to non-employment uses within the Core Employment Areas in Policy EM2 justified and will it be sufficiently flexible?

Q2. Is Policy EM3 worded to ensure that it would be effective and provide a clear indication of how a decision maker should react to a proposal? Is the approach consistent with national policy?

Q3. Is Policy EM4 justified and does it effectively cover the needs of small businesses within the area?

## **Housing**

### **Issue 7. Are the policies for Housing justified, deliverable and consistent with national policy?**

Q1. Is the density and mix in Policy H2 justified? Are the requirements in relation to self and custom build based on robust evidence?

Q2. What is the justification for the affordable housing requirements set out in Policy H3 and for departing from the Written Ministerial Statement (2014)? What evidence is there that demonstrates exceptional need for sites of between 1 and 9 dwellings?

Q2a. Does Policy H3 provide sufficient certainty for the decision maker in terms of tenure and mix for affordable homes? If it does not, what changes to the Policy would be needed?

Q2b. Is an open book-approach to viability justified?

Q3. Are the requirements for Build to Rent Schemes as set out in Policy H4 justified, in accordance with national policy and guidance, and based on robust evidence?

Q4. Are the requirements in Policy H5 (parts a-f) justified, and based on robust evidence in all cases? Are the standards necessary in the light of technical standards and other regulatory requirements?

Q4a. Would the standards apply to student accommodation (particularly internal space) and if so, is this approach justified?

Q5. Are the requirements for Policy H8 justified? What is the basis for the 50m radius set out in the policy?

Q6. Are Policies H6 and H7 consistent with each other in respect of the loss of general housing?

Q7. Will Policy H6 be effective in delivering accommodation for older people?

Q8. What is the justification for Policy H9 considering that there is some duplication with Policy CC7?

Q9. Is Policy H11 consistent with national policy?

Q10. Is Policy H12 justified and based on robust and up to date evidence?

Q10a. Is Policy H12 consistent with other Policies for in the LP and if not, is this approach justified? (For example, is the reference to student accommodation Policy CR13a consistent and if not why not?)

Q10b. Is Policy H12 consistent with Policy OU1 where it relates to education?

Q11. Does the Reading Gypsy and Traveller, Travelling Showpeople and Houseboat Dweller Accommodation Assessment (EV016) provide a realistic assessment of the needs of these communities? Have options for sites been fully explored and is this supported by robust evidence?

Q11a. Is Policy H13 consistent with national policy?

Q11b. What is the effect of withdrawing Policy WR4 (see EC001) on the provision of transit sites within the HMA?

## **Transport**

### **Issue 8. Are the policies for Transport justified, deliverable and consistent with national policy?**

Q1. Does the LP have proper regard to the quality and capacity of the road network and public transport, and is this based on up-to-date evidence including transport modelling? Will Policy TR1 be effective and would the measures be sufficient to deal with any cross-boundary transport issues??

Q2. Are the major transport projects identified in Policy TR2 justified and will they be deliverable?

Q2a. Is it clear from Policy TR2 what land would need to be safeguarded in relation to the development of high quality bus services?

Q3. Is Policy TR3 consistent with national policy, and is it justified considering there is some duplication with other policies in the LP?

## **Retail, Leisure and Culture**

### **Issue 9. Are the policies for Retail, Leisure and Culture justified, deliverable and consistent with national policy?**

Q1. Is Policy RL1 consistent with national policy? Are the boundaries of the Centres identified on the submission Proposals Map justified?

Q2. Is the requirement in Policy RL2 to undertaking a sequential approach for net floorspace gains of 2,500 sq m justified? Is the intention to limit this Policy to the Centre of Reading justified?

Q3. Are the percentages for Key Frontages as set out in Policy RL3 justified and consistent with national policy?

Q4. Is Policy RL4 justified and based on robust evidence? What is the justification for the 150m radius?

Q5. What is the justification for the floorspace of 1,000 m as the basis for considering whether a significant adverse impact on existing town centre uses exists as set out in Policy RL5?

### **Central Reading**

#### **Issue 10. Are the policies for Central Reading justified, deliverable and consistent with national policy?**

Q1. Is the strategy for Central Reading justified?

Q2. Is the area relating to Policy CR1 properly defined and identified? Is the approach to office development and other town centre uses within Policy CR1 consistent with national policy?

Q3. Are Policies CR2 and CR3 justified, and in particular are they necessary in the light of the requirements of other policies within the LP?

Q4. Will Policy CR4 be effective, and is it sufficiently clear as to how a decision maker should react to proposals for regionally significant tourist attractions?

Q5. Is Policy CR6 justified and will it be effective? How will the restrictions set out in paragraph 5.3.27 in respect of serviced apartments be effectively applied?

Q6. What is the evidence justifying the proportion of A1/A2 uses as set out in Policy CR7? Are the boundaries appropriately defined?

Q7. What is the justification for Policy CR9 and why is it considered to be an appropriate mechanism in this particular circumstance? Is the approach consistent with national policy?

Q8. Are the requirements of Policy CR10 justified and up to date?

Q8a. Will the individual elements and areas identified be effective and consistent with other policies in the LP (CR10a, CR10b, CR10c and section (v))?

#### **Site Allocations - Central Reading**

Q9. How is bullet (i) of Policy CR11 intended to be delivered, and will it be clear to the decision maker what is required?

Q10. Has the potential for high density development in relation to Policy CR11a been fully explored and is the site boundary properly identified? Will Policy CR11a deliver other policy requirements in relation to Central Reading?

Q11. Would the requirements of Policy CR11c, CR13a and CR13c be robust in relation to the potential effects of development on the historic environment?

Q12. In relation to Policy CR11i is there a realistic prospect that the development of the Network Rail depot will be deliverable within the Plan period?

Q13. Is it necessary to identify the potential for delivery of public realm improvements in Policy CR11j, if not why not?

Q14. Will Policy CR12a be effective, and in particular what is meant by being 'designed to mesh into the urban fabric'?

Q15. Would Policy CR12b be effective? Is the requirement to replace 'some' units sufficiently clear and justified?

Q16. Is the requirement for the replacement of the Hexagon theatre in Policy CR12e justified and consistent with the accompanying text set out in paragraph 5.4.17?

Q17. Is Policy CR13b requirements for residential development deliverable and based on robust evidence?

Q18. Are the requirements in Policy CR13d justified?

Q19. Are the requirements of Policy CR14g correctly identified and justified?

Q20. Will it be clear to the decision maker how to react to the references to enhanced pedestrian access and hydropower in Policy CR14m?

Q21. Are the requirements of Policy CR16 justified and will the policy be effective?

## **South Reading**

### **Issue 11 . Are the policies for South Reading justified, deliverable and consistent with national policy?**

Q1. Is the strategy for South Reading justified?

#### **Site Allocations – South Reading**

Q2. Are the requirements in Policy SR1a justified and will they be effective?

Q3. Will Policy SR2 be effective, and is there justification for the general requirements (for example criterion viii and x) if these can be met through the General Policies of the LP?

Q4. What would be the effect on Policy SR4e if the existing permission for offices was implemented?



Q5. Is there robust evidence for the way in which the potential development at Grazeley is approached within the LP? What is the justification for not referring to other potential development sites in adjoining authorities other than at Grazeley?

Q5a. How should the decision maker react to proposals coming forward ahead of its inclusion within other Local Plans, and what would be the effect on Policy SR4f?

Q6. Is the area relating to Policy SR5 and Kennetside leisure and recreation provision properly defined? Is there the potential for proposals to effect the operation of Thames Water Treatment Works and if so, is it clear to the decision maker how to react to such proposals?

### **West Reading and Tilehurst**

#### **Issue 12. Are the policies for West Reading and Tilehurst justified, deliverable and consistent with national policy?**

Q1. Is the strategy for West Reading and Tilehurst justified?

#### **Site Allocations – West Reading and Tilehurst**

Q2. Is the approach towards Park Lane Primary School, the Laurels and Dowing Road as set out in Policy WR2 justified, and will it be effective?

Q3. Are the requirements of bullets 1 and 2 (access and parking) within Policies WR3a and WR3b justified and consistent with the Transport policies in the LP? [This would also apply to Policy ER1f for example].

Q3a. Is the requirement for commercial development on the western edge of the site justified?

Q4. Is the need for comprehensive development as set out in Policy WR3i justified?

Q5. Is there robust evidence that the redevelopment of the Meadway Centre as set out in Policy WR3o will come forward? What is meant by the fourth bullet point of the criterion?

Q6. What is the justification for two separate policies for WR3s and WR3t? Is the allocation of these sites justified and consistent with other policies within the LP?

### **Caversham and Emmer Green**

#### **Issue 13. Are the policies for Caversham and Emmer Green justified, deliverable and consistent with national policy?**

Q1. Is the strategy for the Caversham and Emmer Green justified? Does the strategy appropriately reflect the concerns relating to infrastructure as set out in paragraph 8.2.5 of the LP?

#### **Site Allocations – Caversham and Emmer Green**

Q2. Having regard to the effect on flood risk and the requirement for the relocation of the Boat Club, is Policy CA1a justified?

Q3. Is Policy CA1b justified and consistent with other policies within the LP? Are the site requirements justified by robust evidence? What evidence is there to indicate the future of the golf course will be secured within South Oxfordshire?

Q4. Are the requirements for Policy CA1d justified?

Q5. Having regard to the historic environment is Policy CA2 justified and will it be effective?

### **East Reading**

#### **Issue 14. Are the policies for East Reading justified, deliverable and consistent with national policy?**

Q1. Is the strategy for East Reading justified?

#### **Site Allocations – Caversham and Emmer Green**

Q2. Is the site allocation of ER1h justified and consistent with other policies within the LP?

Q3. Are the requirements for Policies ER2 justified, and will it be effective in terms of delivering student accommodation at the site?

Q4. Are the requirements for Policy ER3 justified and will it the Policy be effective?

#### **Louise Gibbons**

#### **Inspector appointed to examine the Reading Local Plan**