READING BOROUGH LOCAL PLAN PARTIAL UPDATE – SELF-ASSESSMENT TOOLKITS

November 2024

Contents

1. Introduction

1.1 This document contains completed versions of two of the Planning Advisory Service (PAS) Self-Assessment Toolkits (the most recent update of which was in October 2021) relating to the Local Plan Partial Update. The purpose is for the Council to check that it has fulfilled all of the requirements in terms of preparing the Partial Update, and also provides a useful summary of key matters for other parties to understand how these matters have been addressed.

1.2 The following two toolkits are included:

- Local Plan Process Requirements Checklist (Part 3 of the PAS toolkits – see section 2)
- Local Plan Soundness and Quality Assessment (Part 4 of the PAS toolkits – see section 3)

1.3 This version of the toolkits relates to the Pre-Submission stage (Regulation 18), meaning that they are an interim version at this stage. They will be further updated alongside the submission version.

1.4 This excludes the Local Plan Review Toolkit (Part 1). The Local Plan Review was completed in March 2023 and did not use the Toolkit.

1.5 In addition, Part 2, the Local Plan Form and Content Checklist is not included here. The most recent version dates from 2021 and a superseded version of the NPPF. The Local Plan Review (March 2023) examined each policy in terms of whether changes to the NPPF necessitated an update and also looked at whether any new policy areas required coverage as a result. More recent versions of the NPPF were then taken into account in preparing the relevant stages of the Partial Update. An assessment against current NPPF content will be included as part of the policy background at submission stage.

2. Part 3: Local Plan Process Requirements Checklist

2.1 This section deals with the points in the Local Plan Process Requirements Checklist (which is Part 3 of the PAS toolkits). It covers procedural matters for each stage of how the plan has been prepared

2.2 This version accompanies the Pre-Submission version at Regulation 19, so not all stages covered by the checklist have been reached yet.

2.3 The abbreviations used are as follows:

- L = Legal requirements
- PM = Project management reminders
- P&CPA = Planning and Compulsory Purchase Act 2004
- T&CP = Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended)
- EAPP = Environmental Assessment of Plans and Programmes Regulations 2004 (as amended)
- CHSR = Conservation of Habitats and Species Regulations 2017 (as amended)

Table 2.1: Completed Local Plan Process Requirements Checklist – Stage A (Navigating the process of reviewing local plan policies)

Ref	Key questions	Legislation/policy source	Yes/No	Documents demonstrating compliance
1. (L)	Have you consistently kept under review the matters which are likely to affect the development of your area and the planning of its development?	P&CPA Section 13 T&CP Reg 34	Yes	**Annual Monitoring Reports 2019-2023:** The Annual Monitoring Reports produced in December each year report on a range of matters affecting development in Reading, which includes reporting on the Local Plan indicators set out in the adopted Reading Borough Local Plan.
2. (L)	Have you prepared to undertake a review of your local plan policies and complete the review within 5 years of the date of adoption of the current local plan?	T&CP Reg 10A NPPF para 33	Yes	**Local Plan Review, March 2023:** A Local Plan Review was carried out and reported to the Council's Strategic Environment, Planning and Transport Committee in March 2023, well within the five year period from adoption (5th November 2019).

Ref	Key questions	Legislation/policy source	Yes/No	Documents demonstrating compliance
3. (L)	Have you prepared to review your Statement of Community Involvement and complete the review within 5 years of the date of adoption of the current Statement of Community Involvement?	P&CPA Section 18 and 19(3) T&CP Reg 10A	No	The Statement of Community Involvement was adopted on 19th March 2014. A review was carried out during 2019 which found that the SCI required update regarding neighbourhood planning. Proposed changes were subject to consultation but not subsequently adopted. No further review was carried out within 10 years of adoption, but a review was reported to Council on 15th October 2024. This identified that the SCI remained up to date in respect of plan-making but that an update remains outstanding in terms of neighbourhood planning. Council resolved that the SCI remains an up-to-date basis for carrying out consultation on the Local Plan Partial Update. A consultation on revisions to the SCI is to be progressed early in 2025. See 15 October 2024 Council report
4. (PM)	Have you checked your scheme of delegation and engaged with the relevant person(s) who will make decisions on the outcome of any review(s) of the Local Plan policies and the Statement of Community Involvement?	The Council's scheme of delegation	Yes	**Reading Borough Council Constitution:** Full Council is responsible for approving or adopting the Local Plan including any subsequent amendment, modification, variation or revocation. Any part of the Local Plan which is to be submitted to the Secretary of State is also a function of Council. However, carrying out a Local Plan Review does not qualify as any of these matters, and other Planning functions (other than regulatory functions reserved to Planning Applications Committee) are delegated to Strategic Environment, Planning and Transport Committee, which approved the Local Plan Review on 23rd march 2023.
5. (L)	Have you prepared a report for the relevant person(s) deciding on the review of the local plan policies that takes into account the matters that are likely to affect the development of your area and the planning of its development to enable them to make a decision on whether: 1. the policies do not need updating (publishing the reasons for this decision); and / or 2. that one or more strategic policies do need updating (moving to Stage B to update your Local Development Scheme to set out the timetable for this revision)?	T&CP Reg 10A NPPF para 33	Yes	**Local Plan Review, March 2023:** This makes clear the policies that do not need updating and those that do need updating. **Local Development Scheme, March 2023:** This set out a timetable for carrying out a Partial Update of the Local Plan and set out the scope of that update. It has since been amended by more recent versions, most recently June 2024. **Covering report to Strategic Environment, Planning and Transport Committee, March 2023:** This reported the results of the Local Plan Review and recommended agreeing to a Partial Update and approval of the LDS.

Table 2.2: Completed Local Plan Process Requirements Checklist – Stage B (Scoping and preparing for your policies update)

Ref	Key questions	Legislation/policy source	Yes/No	Documents demonstrating compliance
6. (L)	Where an update of the Statement of Community Involvement is required have you prepared, consulted and adopted a revised Statement in accordance with the procedures set out in Part 2 of the P&CPA? Have you ensured that the Statement is up to date and reflects who the relevant consultation bodies are - for all stages of the plan making process - and what actions will be undertaken to involve the community in any updates to the local plan policies?	P&CPA Part 2 T&CP Reg 18 NPPF Para 16	In part	**Covering report and minutes to Council, October 2024:** This report included a review of the SCI adopted in 2014 and identified that the parts of the document relevant to local plan making are up to date and can be used as the basis for consultation on the Local Plan, and the Council agreed this. However, a need for an update regarding neighbourhood planning was identified, and a revised version will be brought forward for consultation in early 2025. The SCI does not list consultation bodies.
7. (PM)	Have you prepared a report for the relevant person(s) who will make a decision on the outcome of the review of the Statement of Community Involvement including where relevant details and justification of proposed changes?	P&CPA Section 18 T&CP Reg 10A	Yes	**Covering report to Council, October 2024:** This report included the outcome of the review of whether or not the SCI is up to date, including the conclusion that the parts relevant to local plan making are up to date and can continue to be used for the Local Plan consultation. **Forthcoming report to Policy Committee, 9th December 2024:** This report will set out the proposed changes to the SCI.
8. (PM)	Have you identified the proposed scope of the update of the local plan by setting out the principal policy areas that will be considered?	None	Yes	**Local Plan Review, March 2023:** Identified the policies to be updated and the reasons. **Local Development Scheme, amended June 2024:** Identifies the scope of the Partial Update in terms of the policy areas to be updated. **Local Plan Partial Update Consultation on Scope and Content, November 2023:** Identified how each of the policies was proposed to be updated.
9. (PM)	Have you drafted a project plan to manage and timetable the development and update of the local plan policies?	None	Yes	**Local Development Scheme, amended June 2024:** Outlines the timetable for the update.
10. (L)	Have you prepared a new Local Development Scheme which identifies the local plan policies update document(s) and the Sustainability Appraisal and timescales for their production?	P&CPA Section 15(2) and Section 19(1)	Yes	**Local Development Scheme, amended June 2024:** Identifies the update document and timetable for its production. Sustainability Appraisal is not specifically identified as a separate stage,

Ref	Key questions	Legislation/policy source	Yes/No	Documents demonstrating compliance
11. (L)	Does your Statement of Community Involvement and project plan identify the legally prescribed bodies you will engage with under the duty to cooperate? This should also include each Local Enterprise Partnership and each Local Nature Partnership in the area.	P&CPA Section 20 and Section 33A T&CP Regulation 4	In part	**Duty to Co-operate Scoping Statement, 2018:** Identifies the prescribed duty to co-operate partners and the relevant strategic matters, albeit updates were required, A more up-to-date version of this list is in the Duty to Co-operate Statement, November 2024. The Statement of Community Involvement does not cover the duty to co-operate.
12. (L)	Have you identified the "strategic matters" that will be included in the updated local plan policies and which have / would have a significant impact on your area and at least one other planning area and on which you are required to engage constructively, actively and on an ongoing basis?	P&CPA Section 20 and Section 33A	Yes	**Duty to Co-operate Scoping Statement, 2018:** Identifies the strategic matters and the relevant duty to co-operate partners, albeit updates were required, A more up-to-date version of this list is in the Duty to Co-operate Statement, November 2024.
13. (L)	In addition to the legally prescribed bodies does your Statement of Community Involvement and project plan identify any additional bodies / person(s) who you will engage with on strategic cross-boundary matters and who will be party to your Statement(s) of common ground?	NPPF para 27 and para 35	Yes	**Duty to Co-operate Scoping Statement, 2018:** Identifies the prescribed duty to co-operate partners and the relevant strategic matters, albeit updates were required, A more up-to-date version of this list is in the Duty to Co-operate Statement, November 2024. The Statement of Community Involvement does not cover the duty to co-operate.
14. (PM)	Have you designed a template to record the progress made with the above bodies / person(s). This should document where effective co-operation is and is not happening throughout the plan making process, and the outcomes from engagement. This will also be required as evidence to demonstrate that you have met the Duty to Cooperate.	P&CPA Section 20 and Section 33A NPPF para 27 and para 35	Yes	**Duty to Co-operate Statement, November 2024:** This document records progress with strategic matters and engagement with duty to co-operate partners.
15. (PM)	In line with your Local Development Scheme and project plan have you timetabled relevant meetings / briefings with the authorities senior management team and elected Members (including any relevant Cabinet / Committee) to ensure that there is support for the development of the local plan policies update and that any necessary permissions for publication are obtained?	None	Yes	**Covering report for Strategic Environment, Planning and Transport Committee in March 2023 on Local Plan Review.** Other internal meetings, briefings and reports have also been undertaken and prepared as necessary.

Ref	Key questions	Legislation/policy source	Yes/No	Documents demonstrating compliance
16. (L)	Have you prepared a Scoping Report for the development of your Sustainability Appraisal to inform the update of your plan policies? Have you included a proposed framework for testing local plan policies update options and alternatives using the baseline information and an identified set of sustainability objectives? Have you incorporated the requirements of the Strategic Environmental Assessment?	P&CPA Section 19 and Section 39 EAPP The European Directive 2001/42/EC NPPF Para 32	Yes	**Sustainability Appraisal Scoping Report, 2014** **Sustainability Appraisal of the Local Plan Partial Update Consultation on Scope and Content, November 2023** The Sustainability Appraisal Scoping Report was produced in 2014, and informed the development of the adopted plan, and incorporated the SEA requirements. When appraising the Regulation 18 consultation in 2023, the Scoping Report was considered to still represent a robust basis for carrying out the appraisal, if supplemented by updated baseline evidence. Changes are summarised in 3.4 of the 2023 appraisal. As a result, some changes to objectives against which policies were to be assessed have been made, and this has formed the basis of the appraisals at Regulation 18 and 19 stage.
17. (L)	Have you consulted the statutory environment consultation bodies, and other interested parties, on the scope and level of detail of the environmental information to be included in the Sustainability Appraisal report?	EAPP	Yes	**Statement of Consultation on Scope and Content:** This document details the consultation carried out at this stage, the bodies that were consulted and the representations that were received.

Table 2.3: Completed Local Plan Process Requirements Checklist – Stage C (Developing the update to your local plan policies)

Ref	Key questions	Legislation/policy source	Yes/No	Documents demonstrating compliance
18. (L)	Have you collected in a presentable format the relevant baseline information that will inform and evidence an update to your plan? This may include evidence commissioned by third parties.	P&CPA Section 13 and Section 20	Yes	Various documents: A number of evidence base documents setting out baseline information and other information have been prepared, and some have been finalised and published at the start of the Pre-Submission Draft consultation. This includes the Housing Needs Assessment, Commercial Needs Assessment, Housing and Economic Land Availability Assessment and Infrastructure Delivery Plan. All evidence will be published in full at submission stage.
19. (L)	Have you undertaken early engagement with stakeholders to help develop spatial options, particularly on strategic cross-boundary matters? Have you ensured that you are keeping a continual log of engagement for your Duty to Cooperate Statement of Common Ground?	P&CPA Section 20 and Section 33A NPPF para 27 and para 35	Yes	**Statement of Consultation on Scope and Content:** The Statement of Consultation on the engagement carried out at Regulation 18 stage outlines the early engagement on options. **Duty to Co-operate Statement, November 2024:** The engagement carried out with duty to co-operate partners, including on strategic cross-boundary matters, is summarised in the Duty to Co-operate Statement.

Ref	Key questions	Legislation/policy source	Yes/No	Documents demonstrating compliance
20. (L)	Have you drafted policies / policy options and alternatives based on evidence and engagement? Do the options serve a clear purpose, have they been prepared positively and written in a clear manner and unambiguous?	NPPF para 15 to 34	Yes	**Local Plan Partial Update Consultation on Scope and Content, November 2023:** The alternatives for individual policies are clearly articulated in the Regulation 18 consultation document. **Sustainability Appraisal of the Local Plan Partial Update Consultation on Scope and Content, November 2023:** The alternatives in the Regulation 18 consultation are appraised in the accompanying sustainability appraisal.
21. (L)	Have you taken account of the NPPF requirements for plan content and the Government's planning policy for traveller sites? At the time of publication this was included in the August 2015 DCLG Planning Policy for traveller sites. This policy must be taken into account in the preparation of development plans.	NPPF Planning policy for traveller sites, DCLG August 2015	Yes	**Local Plan Review, March 2023:** The Review assesses the degree to which national policy requirements affect policies to be updated. **Local Plan Partial Update Consultation on Scope and Content, November 2023:** The Regulation 18 consultation provides commentary on how national policy has influenced the proposed approach.
22. (L)	Have you considered plan production processes set out within the NPPF, including: • Plan making provisions set out in section 3 – para 15-37 • Considering transport issues at the earliest stages of plan production – para 108* • Aligning strategies and investments – para 110* • Considering changes in the demand for land – para 126* • Discussing the strategic location of housing growth and any proposed changes to Green Belt boundaries with neighbouring authorities – para 146* • Applying a sequential, risk-based approach to the location of development to avoid flood risk to people and property – para 167* • Allocating land with the least environmental value – para 180* *Paragraph references updated from 2021 version of toolkit	NPPF	Yes	**Local Plan Review, March 2023:** The Review assesses the degree to which national policy requirements have changed and are required to be reflected in updated policies. **Local Plan Partial Update Consultation on Scope and Content, November 2023:** The Regulation 18 consultation provides commentary on how national policy changes have influenced the proposed approach.

Ref	Key questions	Legislation/policy source	Yes/No	Documents demonstrating compliance
23. (L)	Have you developed a clear and robust framework that will allow you to consistently monitor the implementation and impact of the policies in the plan and to enable a review to be triggered where necessary?	P&CPA Section 13 and Section 35 T&CPA Reg 34 EAPP	Yes	**Pre-Submission Draft Local Plan Partial Update, November 2024:** The Monitoring Framework is outlined in Section 10 of the plan itself.
24. (L)	Have you undertaken a Habitats Regulations Screening Assessment to determine whether the update to the local plan is likely to have a significant effect on a European site or a European offshore site (either alone or in combination with other plans or projects)?	CHSR The European Directive 92/43/EEC	Yes	**Sustainability Appraisal of the Local Plan Partial Update Consultation on Scope and Content, November 2023 / Sustainability Appraisal of the Pre-Submission Draft Local Plan Partial Update, November 2024:** The requirement for a Habitat Regulations Screening Assessment has been incorporated into the wider Sustainability Appraisal process as a separate objective against which policies and proposals are scored.
25. (L)	Have you consulted the relevant "nature conservation body" on your Habitats Regulations Screening Assessment and had regard to their representations? Have you also consulted, if considered appropriate, other relevant organisations?	CHSR The European Directive 92/43/EEC	Yes	**Statement of Consultation on the Local Plan Partial Update Consultation on Scope and Content, November 2023:** Relevant organisations have been consulted.
26. (L)	Did the Habitats Regulations Assessment screening assessment determine that the plan is likely to have a significant effect on a European site or a European offshore site? If so you must undertake an appropriate assessment of the implications of the plan (as part of your Habitats Regulatory Assessment (HRA)) for the Plan's policies and site(s) within the context of the European site's conservation objectives.	CHSR The European Directive 92/43/EEC	No	**Sustainability Appraisal of the Local Plan Partial Update Consultation on Scope and Content, November 2023 / Sustainability Appraisal of the Pre-Submission Draft Local Plan Partial Update, November 2024:** No significant effect on a European site identified.
27.	Have you carried out an Equalities Impact Assessment?	Equality Act 2010	Yes	**Sustainability Appraisal of the Local Plan Partial Update Consultation on Scope and Content, November 2023 / Sustainability Appraisal of the Pre-Submission Draft Local Plan Partial Update, November 2024:** The requirement for an Equality Impact Assessment has been incorporated into the wider Sustainability Appraisal process as a separate objective against which policies and proposals are scored.

Ref	Key questions	Legislation/policy source	Yes/No	Documents demonstrating compliance
28.	Have you considered combining the Sustainability Appraisal, Equalities Impact Assessment and potentially Habitats Regulations Assessment as part of an Integrated Impact Assessment that is developed and updated alongside the plan in order to inform its options? This may not be appropriate in all instances.	Equality Act 2010	Yes	**Sustainability Appraisal of the Local Plan Partial Update Consultation on Scope and Content, November 2023 / Sustainability Appraisal of the Pre-Submission Draft Local Plan Partial Update, November 2024:** The assessments have combined as described in points 24 and 27 above.
29. (L)	Have you assessed the draft plan / policy options against relevant soundness and quality measures?	NPPF Para 35 to 36	Yes	**Local Plan Review, March 2023:** Soundness and legal compliance measures were considered in determining how the plan should be updated. **Duty to Co-operate Statement, November 2024:** Shows how the duty to co-operate has been complied with. **Local Plan Soundness and Quality Checklist:** Section 3 of this document is a completed version of the PAS Local Plan Soundness and Quality Checklist
30. (L)	Are there any policies applying to sites or areas by reference to an Ordnance Survey map or to amend an adopted policies map? If yes, have you prepared a submission policies map?	T&CPA Regs 5(1) (b), 9 (1), 17 & 22(1)	Yes	**Pre-Submission Draft Local Plan Partial Update Proposals Map, November 2024:** All relevant spatial areas are shown on the Proposals Map (Pre-Submission version at this stage).
31. (L)	Is the local plan policies update consistent with any other adopted Local Plan Documents for the area?	T&CPA Regs 8(3) and (4)	Yes	**Central and Eastern Berkshire Joint Minerals and Waste Plan, adopted 2024:** The only other adopted local plan for the area is the minerals and waste plan. The Local Plan Partial Update is consistent with this plan.
32. (L)	Is the local plan policies update intended to supersede any adopted development plan policies, does it state that fact and identify the superseded policies?	T&CPA Reg 8(5)	Yes	**Pre-Submission Draft Local Plan Partial Update, November 2024:** Any policies to be superseded are within the existing Local Plan, and the Partial Update is shown in tracked changes illustrating exactly how each relevant policy will be amended and which parts will be deleted.
33. (L)	Is the local plan policies update (if a London Borough or Mayoral DC) in general conformity with the spatial development strategy?	P&CPA section 24	N/A	N/A – no Spatial Development Strategy

Table 2.4: Completed Local Plan Process Requirements Checklist – Stage D (Consulting and engaging on the policies update)

Ref	Key questions	Legislation/policy source	Yes/No	Documents demonstrating compliance
34. (PM)	Have you obtained the relevant authority permissions to publish the first draft / options for public consultation?		Yes	**Covering Council report and Council minutes for Pre-Submission Draft Local Plan Partial Update, October 2024:** Full Council on 15th October 2024 agreed to the publication of the Pre-Submission Draft for consultation.
35. (L)	Have you notified the following bodies or persons that you are preparing a local plan policies update and invited them to make representations on what the plan should contain? • The specific consultation bodies that may have an interest; • The general consultation bodies that the authority consider appropriate; • Residents or other persons carrying on business in the area as considered appropriate; and • Any other stakeholders that you have engaged with in earlier stages on strategic matters and who will be party to your Duty to Cooperate Statement(s) of Common Ground and are relevant parties pursuant to your duty to cooperate	P&CPA Section 20 and Section 33A T&CP Reg 18 NPPF Para 16, 24-27, and 35	Yes	**Statement of Consultation on Local Plan Partial Update Consultation on Scope and Content:** All of these groups were notified of the Consultation on Scope and Content, and the detail is given in the Statement of Consultation.
36. (L)	Have you made sure that the consultation and invitation to make representations: • Follows the principles set out in your adopted Statement of Community Involvement; • Integrates any involvement with the Duty to Cooperate Statement(s) of Common Ground; and • Is proportionate to the scale of issues involved in the local plan policies update.	P&CPA Section 19 NPPF Para 27 and 35	Yes	**Statement of Consultation on Local Plan Partial Update Consultation on Scope and Content:** This document contains the detail on how the Regulation 18 consultation has been carried out. A similar version will be published for the Regulation 19 consultation when the consultation has been completed. **Duty to Co-operate Statement, November 2024:** This covers any measures relating to duty to co-operate partners.

Ref	Key questions	Legislation/policy source	Yes/No	Documents demonstrating compliance
37. (L)	Have you prepared a draft of your Consultation Statement (a "proposed submission document") that includes a record of: • The individuals or bodies invited to make representations; • How this was done; • The main issues raised; and • In preparation of Stage E (and to be completed in Stage E as outline below) how the main issues have been addressed in the local plan policies update.	P&CPA Section 19 T&CPA Regs 17, 18, 19 and 22 NPPF Para 16, 24-27, and 35	No	Consultation under Regulation 19 has not yet been carried out. Once completed. A Statement of Consultation will be produced which covers these matters.
38. (L/PM)	Have you consulted on the following emerging documents alongside your first draft plan so that they can be reviewed against representations and policy options and alternatives as they are developed? • Sustainability Appraisal; and • Habitats Regulations Screening Assessment (or Habitats Regulations Assessment if one has been developed at this stage)	P&CPA Section 19 and Section 39 EAPP CHSP The European Directive 2001/42/EC	Yes	**Sustainability Appraisal of the Pre-Submission Draft Local Plan Partial Update, November 2024:** This contains the Habitat Regulations Screening Assessment, and it has been published alongside the Pre-Submission Draft Local Plan Partial Update and is available for consultation.

Table 2.5: Completed Local Plan Process Requirements Checklist – Stage E (Developing the submission version of the policies update)

Ref	Key questions	Legislation/policy source	Yes/No	Documents demonstrating compliance
39. (PM)	Taking account of the consultation have you considered whether there is a need for further evidence and / or evidence to be updated to support the policy options set out in your plan?	P&CPA Section 13 and Section 20	Yes	**Various documents:** There was a need for further evidence to be prepared, including on development capacity, commercial development needs, flood risk, water quality, viability and transport impacts. These pieces of evidence are either finalised and published or are in the process of being presented in a final form and will be published when available, but certainly prior to submission.

Ref	Key questions	Legislation/policy source	Yes/No	Documents demonstrating compliance
40. (PM)	Have you considered whether further consultation and engagement is required depending on the nature and significance of any proposed changes to the preferred strategy following consultation and / or further evidence? Where further consultation and engagement is required prior to submission this should be undertaken, recorded and reported in line with the requirements set out above. This includes updating and consulting where necessary on any corresponding amendments to the Sustainability Appraisal and Habitats Regulations Assessment.	P&CPA Section 13 and Section 20	N/A	It is not considered that any further consultation is required other than those that were planned under Regulations 18 and 19, given that this is a Partial Update only and that there were relatively limited changes in direction between the two consultation stages. Further engagement with individual stakeholders has continued where required.
41. (L)	Have you prepared the Sustainability Appraisal report on any revised draft of the local plan policies update? Is it clear how the sustainability appraisal has influenced the plan?	P&CPA Section19(5) EAPP Reg 12	Yes	**Sustainability Appraisal of the Pre-Submission Draft Local Plan Partial Update, November 2024:** The Sustainability Appraisal has been updated to take account of the Pre-Submission draft and published alongside it. The Sustainability Appraisal identified mitigation required, and which has informed the development of the policies.
42. (L)	Have you prepared an Appropriate Assessment under the Conservation of Habitats and Species Regulations 2017 [HRA], or evidence to demonstrate that an Appropriate Assessment is not required and confirmation from Natural England that they concur?	The Conservation of Habitats and Species Regulations 2017 (as amended) The European Directive 2001/42/EC The European Directive 92/43/EEC NPPF Para 32	Yes	**Sustainability Appraisal of the Pre-Submission Draft Local Plan Partial Update, November 2024:** The Sustainability Appraisal incorporates the requirement for Habitat Regulations Assessment screening, and identified that no significant effects on European sites are likely. No full Appropriate Assessment is therefore required. There has not been any confirmation of Natural England's view at this stage,
43. (L)	Have you updated your Equalities Impact Assessment?	Equality Act 2010	N/A	**Sustainability Appraisal of the Pre-Submission Draft Local Plan Partial Update, November 2024:** The Sustainability Appraisal incorporates the requirement for Equalities Impact Assessment, and this has been updated at Pre-Submission stage.

Ref	Key questions	Legislation/policy source	Yes/No	Documents demonstrating compliance
44. (L)	Have you taken account of all of the representations received from all person(s) in response to the consultation(s) in Stage D? Have you recorded how the main issues have/will be addressed in your draft consultation statement?	T&CPA Reg 17, 18 and 22	Yes	**Statement of Consultation on Scope and Content:** The Statement of Consultation summarises each representation received during the Consultation on Scope and Content (Regulation 18) and in each case gives a Council response that sets out how the representation has been considered and what changes, if any, have been made as a result.
45. (PM)	Have you considered whether or not you intend to confirm the housing land supply through the independent examination process? If so, have you clearly stated this within your Regulation 19 Submission local plan policies update and have you ensured that you will engage appropriately with developers and others with an interest in housing delivery on the housing land supply?	NPPF para 75 T&CPA Reg 17, 18 and 22	Yes	The Council does not intend to confirm the housing land supply position through the examination.
46. (PM)	Does your local plan policies update include a trajectory illustrating the expected rate of housing delivery over the plan period? Will your local plan policies update provide for a 5 year supply of deliverable housing sites (incorporating the appropriate buffer) on adoption against the housing requirement (which is informed by a local housing need assessment conducted using the standard method as a starting point)?	NPPF paras 11, 74 and 75	Yes	**Pre-Submission Draft Local Plan Partial Update, November 2024:** A housing trajectory is included as Appendix 1 of the Partial Update that sets out the expected rate of housing delivery over the plan period. This rate allows for a 5 year supply of deliverable housing sites at the point of adoption. As set out elsewhere, the standard method is the starting point but exceptional circumstances have been identified for using an alternative approach.

Table 2.6: Completed Local Plan Process Requirements Checklist – Stage E (Independent examination and adoption)

Ref	Key questions	Legislation/policy source	Yes/No	Documents demonstrating compliance
47. (PM)	Have you obtained the relevant authority permissions to publish the submission version of the local plan policies update? You may want to consider including approval to submit this to the Secretary of State (Planning Inspectorate)		Yes	**Covering Council report and Council minutes for Pre-Submission Draft Local Plan Partial Update, October 2024:** Full Council on 15th October 2024 agreed to the submission of the Pre-Submission Draft to the Secretary of State subject to no substantive changes to policy direction.

Ref	Key questions	Legislation/policy source	Yes/No	Documents demonstrating compliance
48. (L)	Have you made clear where and within what period representations must be made?	T&CPA Regs 17, 19, 20 and 35	Yes	**Reading Borough Council website**: all information is specified on the website as well as the e-mail notification. Full information on the consultation to be compiled in Statement of Consultation to be prepared when consultation is completed.
49. (L)	Have you published on your website and made copies of the following available for inspection: • the proposed submission documents • the statement of the representations procedure • statement and details of where and when documents can be inspected Have you checked you have met all other requirements of your Statement of Community Involvement?	T&CPA Regs 19 and 35	Yes	**Reading Borough Council website**: all information is specified on the website as well as the e-mail notification. All SCI tasks complied with. Full information on the consultation to be compiled in Statement of Consultation to be prepared when consultation is completed.
50. (L)	Have you sent to each of the specific consultation bodies invited to make representations under Regulation 18(1): • A copy of each of the proposed submission documents; and • the statement of the representations procedure	T&CPA Reg 19(b)	In part	Required documents and information sent to the specific consultation bodies, albeit Reg 19 does not specify the need to send a copy and therefore only information on where it can be viewed was sent along with a statement of the representations procedure. Full information on the consultation to be compiled in Statement of Consultation to be prepared when consultation is completed.
51. (L)	Have you sent to each of the general consultation bodies invited to make representations under Regulation 18(1): • the statement of the representations procedure; and • where and when the documents can be inspected	T&CPA Reg 19(b)	Yes	Required information sent to the general consultation bodies. Full information on the consultation to be compiled in Statement of Consultation to be prepared when consultation is completed.
52. (L)	Have you, on the day of publication, requested the opinion of the Mayor of London (if a London Borough or Mayoral DC) on the general conformity of the local plan update with the spatial development strategy?	P&CPA Section 24 T&CPA Reg 21	N/A	Not relevant to Reading

Table 2.7: Completed Local Plan Process Requirements Checklist – Stage F (Getting ready for submission to PINS)

Ref	Key questions	Legislation/policy source	Yes/No	Documents demonstrating compliance
53. (PM)	Get ready for submission and examination, this might mean starting the process of appointing a programme officer, securing rooms for a potential hearing and other practical arrangements. Refer to guidance from the Planning Inspectorate.	See PINS Procedure Guide for Local Plan Examinations 2021	N/A	Stage not reached
54. (PM)	Have you obtained the relevant authority permissions to submit the plan to the Secretary of State via the Planning Inspectorate (PINS)		Yes	**Covering Council report and Council minutes for Pre-Submission Draft Local Plan Partial Update, October 2024:** Full Council on 15th October 2024 agreed to the submission of the Pre-Submission Draft to the Secretary of State subject to no substantive changes to policy direction.
55. (L)	Have you collated all of the representations made to the publication draft plan policies update?	P&CPA Section 20(3) T&CPA Reg 22(1)(e)	N/A	Stage not reached
56. (PM)	Does each representation made have a unique ID and contact details? PINs require that these are provided in an electronic database enabling the full text of each representation to be accessed easily in both policy and paragraph number order and representor order. The database should also clearly identify those who have made a request to be heard by the Inspector under section 20(6) of the PCPA	See PINS Procedure Guide for Local Plan Examinations 2021	N/A	Stage not reached
57. (L)	Have you assembled the relevant supporting documents (documents relevant to the preparation of your plan which normally includes or comprises the evidence base)?	P&CPA Section 20(3) T&CPA Reg 22(1)(g)	N/A	Stage not reached
58. (PM)	Do all of the documents that you will submit to the inspectorate have a unique reference listed in an 'Examination Library'?		N/A	Stage not reached

Ref	Key questions	Legislation/policy source	Yes/No	Documents demonstrating compliance
59. (L/PM)	You may need to consider whether you need to redact certain personal details from representations for the website and inspection purposes. However, those who have made representations should be able to contact one another and documents should be provided without details redacted. See the guidance from the Planning Inspectorate.	General Data Protection Regulation 2018 See PINS Procedure Guide for Local Plan Examinations 2021	N/A	Stage not reached
60. (L)	Have you prepared a statement setting out: • Which bodies and persons were invited to make representations under Regulation 18 • How they were invited • A summary of the main issues raised • How the representations have been taken into account	P&CPA Section 20 (3) T&CPA Reg 22(1)(c)	N/A	A Statement of Consultation covering these matters will be prepared when consultation is complete
61. (L)	Have you prepared a statement giving: • the number of representations made under Regulation 22 • a summary of the main issues raised OR • Stating that no representations were made	P&CPA Section 20(3) T&CPA Reg 22(1)(c)	N/A	A Statement of Consultation covering these matters will be prepared when consultation is complete
62. (PM)	Consider what documents need printing to ensure that hard copies are available where necessary for inspection and for the examination library.	See PINS Procedure Guide for Local Plan Examinations 2021	N/A	Stage not reached

Table 2.8: Completed Local Plan Process Requirements Checklist – Stage G (Submission to PINS)

Ref	Key questions	Legislation/policy source	Yes/No	Documents demonstrating compliance
63. (L)	Have you sent the Secretary of State (the Planning Inspectorate) a hard copy and electronic version of: • a copy of the local plan policies update • and (if prepared) policies map Have you sent the Secretary of State (the Planning Inspectorate) an electronic version of: • the Final 'consultation statement' supplemented by or incorporating the documents consultation required under Regulation 22(1) • The Sustainability Appraisal • Copies of representations • 'Supporting documents' Guidance from PINS also highlights other material necessary for the examination which includes: • An Appropriate Assessment under the Conservation of Habitats and Species Regulations 2017 [HRA], or evidence to demonstrate that an Appropriate Assessment is not required and confirmation from Natural England that they concur; • The LPA's current Local Development Scheme; • In London, confirmation that the Mayor has indicated general conformity with the London Plan (note however that the Inspector is entitled to take his/her own view on conformity). • It is also helpful if the LPA provide an Equalities Impact Assessment	P&CPA Section 20(1) and 20(3) T&CPA Regs 22 See PINS Procedure Guide for Local Plan Examinations 2021	N/A	Stage not reached

Ref	Key questions	Legislation/policy source	Yes/No	Documents demonstrating compliance
64.	As soon as practical after submission, on your website, have you published: • The documents submitted to PINS (identified above) including representations made under Regulation 20 (where practicable) taking into account GDPR requirements? • Statement as to where and when these documents are available for inspections (again this should be in line with any requirements in your Statement of Community Involvement)?	T&CPA Regs 22(3) and 35(1)(b)	N/A	Stage not reached
65. (L)	For each general consultation body invited to make representations under Regulation 18(1), have they been sent: • notification that the documents submitted to PINS are available for inspection • details of where and when they can be inspected	T&CPA Reg 22(3)(b)	N/A	Stage not reached
66. (L)	Have you given notice to persons who have requested to be notified that submission has taken place?	T&CPA Reg 22(3)(c)	N/A	Stage not reached
67. (L)	If examination hearings are being held, at least six weeks before its opening has the Programme Officer: • published the time and place of the examination and the name of the person appointed to carry out the examination on your website? • notified those who have made representations on the published DPD which have not been withdrawn of these details?	P&CPA Section 20 T&CPA Regs 24 and 35	N/A	Stage not reached

Ref	Key questions	Legislation/policy source	Yes/No	Documents demonstrating compliance
68. (L)	Have you asked the Inspector to recommend 'main modifications' (changes that materially affect the policies) to make a submitted local plan policies update sound and legally compliant? These modifications should be published for consultation.	See PINS Procedure Guide for Local Plan Examinations 2021 P&CPA Section 20 (7C)	N/A	Stage not reached
69. (L)	Depending on the scope of the modifications, have you considered whether there is a need to undertake further Sustainability Appraisal, Habitats Regulations Assessment, and Equalities Impact Assessment on the modifications.	EAPP The European Directive 2001/42/EC CHSR The European Directive 92/43/EEC Equality Act 2010	N/A	Stage not reached
70. (L)	If the plan policies update is sound, have you formally adopted the plan policies update in a full meeting of the local planning authority?	T&CPA Reg 4(1) and (3) of the Local Authorities (Functions and Responsibilities) (England) Regulations 2000).	N/A	Stage not reached
71. (L)	On adopting a Local Plan policies update, have you made publicly available a copy of the plan, an Adoption Statement and Sustainability Appraisal?	T&CPA Regs 26 and 35	N/A	Stage not reached

3. Part 4: Local Plan Soundness and Quality Assessment

3.1 This section deals with the points in the Local Plan Soundness and Quality Assessment (which is Part 4 of the PAS toolkits). Its focus is on identifying areas where there may be soundness issues or other issues that are likely to need to be explored at examination.

3.2 It is worth noting again the stage at which this version has been prepared, which is prior to the publication of the full suite of evidence documents as part of the submission package. A revised version at submission will be able to point to a fuller range of evidence.

3.3 The scoring is set out in Table 4.1 below. It is worth being aware that at this stage (pre-submission) the scoring will not be perfect for every element because not all of the evidence to justify and explain the position taken has been published. All evidence will be available at submission stage, and there will be a revised version of this document to accompany this stage.

Table 3.1: Assessment scoring

Score	-2	-1	0	+1	+2
Meaning	No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement

Table 3.2: Local Plan Soundness and Quality Assessment – Growth strategy

Ref	Question	Assessment
A	In no more than 100 words (excluding any referencing) summarise your strategy for delivering growth and development in your area	The strategy is to deliver development in line with the capacity of Reading over the plan period, including 825 homes per year. Development will be concentrated on the centre of Reading in particular where opportunities exist for significant development at a high density capitalising on the accessibility by non-car modes, but there are also significant opportunities for growth in South Reading, including to meet industrial and warehouse needs. Development will exhibit an extremely high level of sustainability to help to address the climate emergency.
B	In no more than 100 words (excluding any referencing) identify the key factors which informed the distribution of development in the local plan policies update	The distribution of development is largely informed by the availability of sites and the relative accessibility by walking, cycling and public transport. Reading has minimal suitable greenfield land to develop, so the Local Plan is almost entirely reliant on previously developed sites, which are mainly located in the town centre and to a lesser extent South Reading. The sites in the town centre offer an opportunity to develop at high densities to meet the bulk of Reading's need for residential (as well as uses such as offices) in a location which is among the most accessible locations in the south of England.

Ref	Question	Assessment
C	List each of the main growth areas and strategic sites and the key infrastructure needed to support delivery	The main growth areas are Central Reading and South Reading. Within those areas, six major opportunity areas have been identified as follows: • Station/River Major Opportunity Area • West Side Major Opportunity Area • East Side Major Opportunity Area • Island Road Major Opportunity Area • Land North of Manor Farm Road Major Opportunity Area • Land South of Elgar Road Major Opportunity Area Because development takes place within the existing urban fabric of Reading, specific infrastructure needs for individual sites are not generally identified, rather infrastructure needs relate to the overall volume of development within the town. There are exceptions in the case of CR11d, CR12a and CR13c which have been identified for provision of primary healthcare infrastructure. Otherwise, the key infrastructure needs are those identified in the Infrastructure Delivery Plan, notably primary healthcare, public transport and sustainable travel enhancements, special educational needs and early years provision.
1.	Overall does the local plan policies update clearly articulate the strategy for where and how sustainable development will be delivered and that this is 'an appropriate strategy' within the context of paragraph 35 of the NPPF?	**Score:** +2 **Reason for score:** The Local Plan Partial Update clearly articulates its strategy and demonstrates why it is an appropriate strategy in the context of the NPPF. **Implications of taking no further action:** No implications **Mitigation/action required to move scale to right:** No action **Reviewer comments:** None
2.	Is it clear how the amount of development identified for any growth areas or major site allocations has been determined – and that the level proposed is deliverable and justified?	**Score:** +2 **Reason for score:** This is set out clearly in the Housing and Economic Land Availability Assessment, which follows a clearly described methodology, which includes assessment of suitability, availability and achievability and includes variance rates to deal with any uncertainty around delivery. A range is then set around the output of the HELAA (+/- 20%) to provide an indicative range of appropriate level of growth. **Implications of taking no further action:** No implications. **Mitigation/action required to move scale to right:** No action **Reviewer comments:** None

Ref	Question	Assessment
3.	Is it clear that the local plan policies update provides for the most appropriate level of housing growth using the standard methodology as a starting point? Can you clearly articulate why planned growth levels should not be higher or lower? If you are proposing any material change away from the level of housing indicated by the standard method, can you clearly justify this through evidence? Does the level of housing provide for an appropriate and justified buffer?	**Score:** +2 **Reason for score:** Exceptional circumstances have been identified for using an alternative approach to the standard method. These exceptional circumstances are summarised in the Housing Provision Background Paper, and stem partly from a detailed analysis of the standard method in the Housing Needs Assessment. The basis for the level of housing need identified is set out in the Housing Needs Assessment, and takes account of demographic and market factors as required by the NPPF. The level of housing planned for significantly exceeds the level of need identified in the Housing Needs Assessment and therefore provides a significant buffer. **Implications of taking no further action:** No implications **Mitigation/action required to move scale to right:** No action **Reviewer comments:** None
4.	Is the distribution of development justified in respect of the need for, and approach to, Green Belt release and can you demonstrate that alternatives to Green Belt release have been fully considered? Can you demonstrate that exceptional circumstances exist to justify green belt release?	**Score:** +2 **Reason for score:** There is no Green Belt in or adjacent to Reading and this is not therefore applicable. **Implications of taking no further action:** No implications **Mitigation/action required to move scale to right:** No action **Reviewer comments:** None
5.	Is it clear how sites have been selected and have site allocations been made on a consistent basis having regard to the evidence base, including housing and employment land availability assessments, the Sustainability Appraisal and viability assessment? If not, can you justify why?	**Score:** +1 **Reason for score:** The main piece of evidence that supports the identification of site allocations is the HELAA, in which the suitability, availability and achievability of all sites is assessed. The HELAA also informs the criteria which have been identified within the policy. However, it may not be immediately clear how the allocations have been derived from the HELAA alone, and there is therefore likely a need for a brief narrative to be assembled on how this process has worked for full clarity. **Implications of taking no further action:** Lack of the publication of necessary evidence would make it difficult to demonstrate that allocations are justified and effective. **Mitigation/action required to move scale to right:** Publication of a narrative on how site allocations have been derived. **Reviewer comments:** None
6.	Does the local plan policies update identify a housing requirement for designated neighbourhood areas?	**Score:** +2 **Reason for score:** There are no designated neighbourhood areas in Reading and this is not therefore applicable. **Implications of taking no further action:** No implications **Mitigation/action required to move scale to right:** No action **Reviewer comments:** None

Ref	Question	Assessment
7.	Do site allocations include sufficient detail on the mix and quantum of development, including, where appropriate any necessary supporting infrastructure?	**Score:** +2 **Reason for score:** The individual allocations identify an indicative level of different types of development usually expressed as a range. Applications may be able to justify an alternative level of development based on detailed design, layout etc, and it is not considered appropriate to be restrictive in this regard. Detail on necessary supporting infrastructure is included where relevant, although most allocated sites are small and will not be able to address infrastructure needs on site. **Implications of taking no further action:** No implications **Mitigation/action required to move scale to right:** No action **Reviewer comments:** None
D.	What targets have you set for non-residential floorspace or employment land and, if relevant, the number of jobs to be created over the plan period? List these targets and the evidence source for this 'need' target?	The following targets have been set in policy EM1: Offices – 30,000-86,000 sq m Industrial, warehouse, research and development – 167,000 sq m The needs were based on the results of the Commercial Development Needs Assessment 2024. In the case of offices, the lower end of the range is identified based on the capacity of Reading to deliver against needs as identified in the HELAA. No other non-residential or employment land targets have been set.
8.	Where and how are the targets referred to above to be delivered? Do the sites and indicative capacities that you have identified demonstrate that these targets are achievable? If you are not allocating sites to meet needs identified, can you justify and explain how those needs will be met?	**Score:** +1 **Reason for score:** A mix of allocations and existing planning permissions can meet most of the needs identified. In the case of offices, there are outstanding planning permission that would substantially exceed the level of need identified, but these permissions are not all expected to come forward in practice. The capacity identified in the HELAA is much lower, due to the use of many of these sites for alternative uses, and also likely continued loss of office use for residential. However, it is clear that there is flexibility to deliver a wide range of different levels of office development. In the case of industrial, warehouse and R&D, there are substantial allocations made but these will not meet the need on their own. There will need to be a reliance on intensification within existing employment areas, which is expected to be sufficient to make up any shortfall, but this evidence still needs to be published in full. **Implications of taking no further action:** If the full evidence to support this is not drawn into a comprehensive document, it will not be clear that the plan is justified and effective. **Mitigation/action required to move scale to right:** Publication of an employment provision background paper at submission stage. **Reviewer comments:** None
9.	Does the local plan policies update: (i) identify infrastructure that is necessary to support planned growth; and (ii) enable provision of this infrastructure?	**Score:** +2 **Reason for score:** The Partial Update includes a new summary Infrastructure Delivery Plan, which sets out the infrastructure provision required. A full Infrastructure Delivery Plan including more detail is published as evidence base for the plan. The plan enables provision of the infrastructure where appropriate, through an updated policy CC9, safeguarding of land in e.g. policy TR2 and on a site specific basis in the relevant site allocation policies. **Implications of taking no further action:** No implications **Mitigation/action required to move scale to right:** No action **Reviewer comments:** None

Ref	Question	Assessment
10.	Can you demonstrate that the transport and other infrastructure needed to support each growth area or strategic site identified in the local plan policies update: (i) can be funded and delivered; and (ii) is supported by the relevant providers/ delivery agents in terms of funding and timescales indicated? Have you identified the extent of any funding gap? If so, are you able to explain why you are confident that any gap can be addressed?	**Score:** +2 **Reason for score:** This information is set out in the Infrastructure Delivery Plan, a summary of which is included within the plan itself. The IDP has been supported by discussions with infrastructure providers. It is worth noting that, in general, because sites in Reading are geographically small and within the urban fabric of Reading, the infrastructure needs are often in terms of placing greater pressure on existing infrastructure rather than generating a need for site-specific infrastructure. **Implications of taking no further action:** No implications **Mitigation/action required to move scale to right:** No action **Reviewer comments:** None

Table 3.3: Local Plan Soundness and Quality Assessment – Process and outcomes

Ref	Key questions	Assessment
E.	What are the cross boundary strategic matters affecting your local plan policies update? List these.	The following cross boundary strategic matters have been identified in the Duty to Co-operate Statement: Housing needs and provision, needs and provision for gypsies and travellers, needs and provision for economic development and town centres, strategic transport infrastructure needs and provision, strategic education infrastructure needs and provision, strategic healthcare needs and provision, strategic landscape considerations, strategic biodiversity considerations, strategic flooding considerations, climate change and mitigation, open space and recreation provision, historic environment, tall buildings and strategic views, utilities infrastructure needs and provision, University of Reading, planning within the Detailed Emergency Planning Zone for AWE Burghfield, planning for minerals, planning for waste
11.	Does your Duty to Cooperate Statement(s) of Common Ground: (i) identify these issues; (ii) identify the bodies you have engaged with or continue to engage with; and (iii) clearly set out not just the process, but the outcomes of this engagement highlighting areas of agreement and of difference?	**Score:** +1 **Reason for score:** Likely to meet these outcomes, but Statements of Common Ground with key duty to co-operate partners not yet in place **Implications of taking no further action:** Without Statements of Common Ground it will be difficult to demonstrate compliance with the duty to co-operate which would be an issue at examination. **Mitigation/action required to move scale to right:** Signed Statements with at least the authorities bordering Reading, and others where necessary. **Reviewer comments:** None

Ref	Key questions	Assessment
F.	Are there any aspects of the local plan policies update not in conformity with national policy (or where you will be relying on transitional provisions)? Please set these out and provide justification with reference to evidence for these. Are you satisfied you can robustly defend this on the basis of local evidence? For instance, are you seeking to require affordable housing on sites which are below the threshold of major development as defined by national planning policy?	**Sustainability:** A Written Ministerial Statement of December 2023 seeks to restrict the standards that local planning authorities can require regarding the energy performance of buildings. Updated policies CC2 and H5 of the local plan seek to significantly enhance the performance of these buildings in a way which goes beyond the WMS. The Council strongly believes that this approach is justified based on the urgency of the climate emergency and the local circumstances in Reading, but recognises that this will likely be considered in depth at examination. **Housing need:** The Partial Update is based on an alternative calculation of housing need due to exceptional circumstances set out in the evidence base, specifically the Housing Needs Assessment and the Housing Provision Background Paper. The NPPF expects the standard method to be the starting point but allows for an alternative calculation in exceptional circumstances. The Council's view is therefore that the approach complies with national policy, but this will be a matter that is tested at examination. **Affordable housing:** Policy H3 requires provision of affordable housing on sites of less than 10 dwellings. This is an existing adopted policy position to be carried forward, but evidence in the Housing Needs Assessment confirms the continued overwhelming need for affordable housing whilst the Viability Assessment confirms the continued viability of this requirement.
12.	Are there any specific policies in the local plan policies update where there are differences to any policy approach set out in a relevant strategic planning framework (e.g. the London Plan, or a plan produced by a Combined Authority or through voluntary agreement).	**Score:** +2 **Reason for score:** There is no strategic planning framework and this is not therefore applicable. **Implications of taking no further action:** No implications **Mitigation/action required to move scale to right:** No action **Reviewer comments:** None
13.	Is the local plan policies update: • in conformity with any 'higher level' plans prepared by the Council; and • properly reflecting provisions of any made neighbourhood plan?	**Score:** +2 **Reason for score:** There are no higher level Council development plans and no neighbourhood plans, and this is not therefore applicable. **Implications of taking no further action:** No implications **Mitigation/action required to move scale to right:** No action **Reviewer comments:** None
14.	Does your Consultation Statement demonstrate how you have complied with the specific requirements of the Town and Country Planning (Local Plan) (England) Regulations 2012 and the Council's adopted Statement of Community Involvement to date [you should revisit and update this following the publication of your Regulation 19 local plan policies update]?	**Score:** +2 **Reason for score:** The Statement of Consultation published on the Council's website clearly demonstrates how the legal requirements and expectations of the Statement of Community Involvement have been followed. **Implications of taking no further action:** No implications **Mitigation/action required to move scale to right:** No action **Reviewer comments:** None

Ref	Key questions	Assessment
15.	Has the Sustainability Appraisal – incorporating the requirements of the Strategic Environmental Assessment legislation - evaluated all reasonable alternatives? Is it clear why alternatives have not been selected?	**Score:** +1 **Reason for score:** The Sustainability Appraisal has evaluated reasonable alternatives. These are detailed in the Sustainability Appraisal itself. In general, these tie in with alternatives identified in the Consultation on Scope and Content (Regulation 18) document. However, there may be a need to more clearly set out the narrative around how options have been arrived at. **Implications of taking no further action:** May be some lack of clarity around how options have been derived in some cases. **Mitigation/action required to move scale to right:** Improved narrative at submission stage, **Reviewer comments:** None
16.	Does the Sustainability Appraisal adequately assess the likely significant effects of policies and proposals?	**Score:** +2 **Reason for score:** The Sustainability Appraisal adequately assesses the likely significant effects of policies and proposals. Each policy and allocated site is subject to sustainability appraisal to identify effects, and significant effects are highlighted. **Implications of taking no further action:** No implications **Mitigation/action required to move scale to right:** No action **Reviewer comments:** None
17.	Is it clear how the Sustainability Appraisal has influenced the local plan policies update including how any policies or site allocations have been amended as a result and does it show (and conclude) that the local plan policies update is an appropriate strategy?	**Score:** +1 **Reason for score:** This is generally clear within the Sustainability Appraisal itself, although in some cases, in particular where the reason for following a particular option does not result from the appraisal (e.g. where a certain option may not be deliverable), it may not be apparent from the appraisal only. **Implications of taking no further action:** On some sites there may be a lack of clarity on why certain options are chosen. **Mitigation/action required to move scale to right:** Need for an overall narrative about how policies and site allocations have been derived. **Reviewer comments:** None
18.	Is it clear how an Equalities Impact Assessment has influenced the local plan policies update?	**Score:** +1 **Reason for score:** The Equality Impact Assessment has been incorporated within the Sustainability Appraisal process – therefore see answer to question 17 above. **Implications of taking no further action:** See above **Mitigation/action required to move scale to right:** See above **Reviewer comments:** None
19.	Does the Habitats Regulations Assessment consider the local plan policies update in combination with other plans and projects?	**Score:** +2 **Reason for score:** The Habitat Regulations Assessment considers the Partial Update in combination with other plans and strategies as is required in the relevant legislation. **Implications of taking no further action:** No implications **Mitigation/action required to move scale to right:** No action **Reviewer comments:** None

Ref	Key questions	Assessment
20.	If the Habitats Regulations Assessment has identified, through 'Appropriate Assessment' that mitigation measures are required, does the local plan policies update adequately identify the measures required and the mechanisms for delivering them?	**Score:** +2 **Reason for score:** No requirement for mitigation identified through Habitat Regulations Assessment. **Implications of taking no further action:** No implications **Mitigation/action required to move scale to right:** No action **Reviewer comments:** None
21.	Is it clear how the outcomes and conclusions of the Habitats Regulations Assessment have influenced the local plan policies update?	**Score:** +1 **Reason for score:** The Habitat Regulations Assessment has been incorporated within the Sustainability Appraisal process – therefore see answer to question 17 above. **Implications of taking no further action:** See above **Mitigation/action required to move scale to right:** See above **Reviewer comments:** None

Table 3.4: Local Plan Soundness and Quality Assessment – Housing strategy

Ref	Key questions	Assessment
22.	Can you demonstrate that the policies and proposed allocations in your local plan policies update meet your housing requirement in full and that this can be achieved as a minimum? If not [for instance, because another local authority has agreed to plan for your unmet need], can you explain and robustly justify why?	**Score:** +2 **Reason for score:** There are considered to be exceptional circumstances for basing the housing requirement on a local assessment of needs (Housing Needs Assessment) rather than the standard method, and these exceptional circumstances are detailed in the Housing Provision Background Paper. The HELAA demonstrates how this housing requirement can be met in full, and the methodology for coming to this conclusion are detailed within the HELAA document itself. **Implications of taking no further action:** No implications **Mitigation/action required to move scale to right:** No action **Reviewer comments:** None
G.	Is there any unmet need in neighbouring areas that you have been formally asked to accommodate? If yes, then list the amount by each local authority area.	No unmet need from neighbouring areas
23.	Does your local plan policies update accommodate any of this unmet need where you can sustainably to do so?	**Score:** +2 **Reason for score:** There is no unmet need to accommodate and this is not therefore relevant **Implications of taking no further action:** No implications **Mitigation/action required to move scale to right:** No action **Reviewer comments:** None

Ref	Key questions	Assessment
24.	Is there a housing trajectory which illustrates the expected rate of housing delivery and ensures the maintenance of a 5-year supply during the plan period? Is your strategy for delivery and implementation clearly articulated and justified to support the trajectory?	**Score:** +1 **Reason for score:** The Local Plan Partial Update contains a housing trajectory in Appendix 1 which incorporates a five year supply of sites and allows for this supply to be continued across the plan period. The strategy for delivery is broadly articulated through the plan although the Council intends to submit a Housing Implementation Strategy to provide additional evidence to make this clear. **Implications of taking no further action:** Difficulty in demonstrating 5-year supply at examination **Mitigation/action required to move scale to right:** Publication of Housing Implementation Strategy **Reviewer comments:** None
25.	Can you confirm: (i) that the local plan policies update will provide for a 5-year supply of specific deliverable sites on adoption; and (ii) that beyond this 5 year period sites are developable and (iii) if relevant, you have included a 5 or 20 percent buffer to deal with under-delivery.	**Score:** +1 **Reason for score:** The Local Plan Partial Update would provide a five year supply on adoption, and developable sites beyond that period. A 5% buffer would apply at adoption, and this is incorporated. However, the Council intends to submit a Housing Implementation Strategy in due course to provide additional evidence to make this clear. **Implications of taking no further action:** Difficulty in demonstrating 5-year supply at examination **Mitigation/action required to move scale to right:** Difficulty in demonstrating 5-year supply at examination **Reviewer comments:** None
26.	Does the level of supply provide any 'head room' (that is additional supply above that required) to enable you to react quickly to any unforeseen changes in circumstances and to ensure that the full requirement will be met during the plan period?	**Score:** 0 **Reason for score:** The housing provision figure has been set at the level that is considered to be realistically deliverable for Reading based on the HELAA, in order to significantly boost housing supply in line with the NPPF. The plan incorporates flexibility on individual sites, which does mean that if sites are generally developed at the upper end of the specified range there will be higher levels of delivery, but experience shows that sites can vary in either direction. There are no 'reserve sites' that can be used, all suitable and deliverable or developable sites over the 10 dwelling threshold are allocated unless they have planning permission. **Implications of taking no further action:** There is a risk that Reading could fail to deliver against its housing requirement, leading to 5-year housing land supply becoming a more pressing issue in development management decisions. **Mitigation/action required to move scale to right:** None possible at this stage, but a further review after adoption would take account of progress against housing provision targets and consider whether the targets should be amended. **Reviewer comments:** None
27.	Is the Council reliant on the delivery of any 'windfall' sites (sites not specifically identified in the development plan) during the plan period and if so, how many and when? Is there compelling evidence to confirm that such sites will continue to come forward?	**Score:** +2 **Reason for score:** The housing provision figures in H1 rely on a total of 1,534 small site windfalls being delivered. Small site windfalls are those of less than 10 dwellings, and this is appropriate because 10 dwellings is the cut-off for including a housing site in the plan. The evidence to justify this is set out in the HELAA, but it is based on historic trends and projects forward a reduction to reflect recent evidence that development on small sites is reducing. The plan does not rely on any larger windfall development. **Implications of taking no further action:** No implications **Mitigation/action required to move scale to right:** No action. **Reviewer comments:** None

Ref	Key questions	Assessment
28.	Does the local plan policies update make it clear what size, type and tenure of housing is required?	**Score:** +2 **Reason for score:** Policies H2, H3 and H4 set out clearly the size, types and tenure of housing required. In the case of H3, the update is partly in order to ensure that tenure expectations are clear. **Implications of taking no further action:** No implications **Mitigation/action required to move scale to right:** No action **Reviewer comments:** None
29.	Does the local plan policies update specifically address the needs of different groups in the community?	**Score:** +2 **Reason for score:** The Housing Needs Assessment assessed the need for different groups requiring housing. These needs have been reflected in the various policies, in particular policy H6 which deals with accommodation for vulnerable people. In some cases (e.g. affordable housing, family-sized accommodation) the needs will be extremely challenging to meet in full but the policies nonetheless do what they can to try to meet these needs insofar as is possible. **Implications of taking no further action:** No implications **Mitigation/action required to move scale to right:** No action **Reviewer comments:** None
30.	Can your affordable housing requirements, including any geographical variations, be justified? Does the local plan policies update provide for the delivery of the full need for affordable housing? If not, can you explain and justify why?	**Score:** 0 **Reason for score:** Affordable housing requirements can be fully justified by the evidence base, including the Viability Assessment and Housing Needs Assessment. It is very unlikely that the full need for affordable housing will be delivered, given that it makes up more than 50% of the overall housing need and would require an overall housing figure which there is no capacity to deliver. This is not a change from the existing adopted situation, and the approach of the plan will continue to be sound in this regard. **Implications of taking no further action:** The implications are that the plan will not meet the needs in full, but this is a continuation of the existing situation and is unavoidable. **Mitigation/action required to move scale to right:** No action as it is not realistic to meet the needs in full. **Reviewer comments:** None
31.	Have the needs for travellers and travelling showpeople been adequately assessed in accordance with national policy and have they been based on robust evidence? Does the local plan policies update make adequate provision for the identified needs?	**Score:** 0 **Reason for score:** The Partial Update does not propose any changes to policy H13 on gypsies and travellers. The existing Local Plan was not able to identify any sites to meet permanent needs, and this has not changed. **Implications of taking no further action:** No implications **Mitigation/action required to move scale to right:** No sites are available and no actions will therefore change this outcome. **Reviewer comments:** None

Ref	Key questions	Assessment
32.	Will the local plan policies update provide for a 5-year supply of deliverable travellers and travelling showpeople pitches to meet identified needs?	**Score:** -2 **Reason for score:** The Partial Update does not propose any changes to policy H13 on gypsies and travellers. The existing Local Plan was not able to identify any sites to meet permanent needs, and this has not changed. **Implications of taking no further action:** No implications **Mitigation/action required to move scale to right:** No sites are available and no actions will therefore change this outcome. **Reviewer comments:** None
H.	List any travellers and travelling showpeople sites identified to meet need and the timescales for their delivery	None identified in the Local Plan Partial Update

Table 3.5: Local Plan Soundness and Quality Assessment – Justified approaches to plan policy and content

Ref	Key questions	Assessment
33.	Where thresholds are set in policies which trigger specific policy requirements, are these thresholds justified by evidence and is this clear in the supporting text? [You may wish to check each policy setting a threshold]	**Score:** -1 **Reason for score:** Where thresholds are applied, there is always a justification for that threshold, but that justification is not always set out in full in the supporting text because doing so would sometimes significantly lengthen the document and make it more difficult to use. **Implications of taking no further action:** The policies and supporting text as written are considered to be sound in their current form, however in some cases if no evidence is available to justify thresholds it may make it more difficult to demonstrate that the plan is justified at examination. **Mitigation/action required to move scale to right:** Ensure that the full evidence base is published at submission stage that includes justification for thresholds where necessary. **Reviewer comments:** None
34.	Does the local plan policies update avoid deferring details on strategic matters to other documents? If it does, is it clear why matters will be covered in other Development Plan Documents or Supplementary Planning Documents and why this is appropriate?	**Score:** +2 **Reason for score:** The Partial Update avoids delegating details to SPDs, and there are no other development plan documents planned. In some cases (e.g. H3 and H8) the purpose of the update is in part to incorporate elements into the policy that are currently already delegated to SPDs to resolve this issue. **Implications of taking no further action:** No implications **Mitigation/action required to move scale to right:** No action **Reviewer comments:** None

Ref	Key questions	Assessment
35.	Where the local plan policies update defines a hierarchy do policies throughout the Plan consistently: (i) reflect this hierarchical approach; (ii) make clear the level of protection afforded to designations depending on their status within the hierarchy; and (iii) is the approach consistent with National Policy? [For example, hierarchies could relate to nature conservation, heritage assets, town centres/retail, settlements.]	**Score:** +2 **Reason for score:** There are relatively few hierarchical approaches within the plan, limited to matters such as biodiversity and hierarchy of centres. There are also some sequential policies including for student accommodation. These are generally in line with other development management policies, and allocated sites generally reflect this approach unless there are clear reasons for an alternative approach. **Implications of taking no further action:** No implications **Mitigation/action required to move scale to right:** No action **Reviewer comments:** None
36.	Where policies seek to limit certain uses, is this justified by evidence and is the rationale clear in the supporting text to the policy and in the evidence. [For example, policies relating to town centres, employment or retail may seek to limit certain uses.]	**Score:** +2 **Reason for score:** The Partial Update seeks to further limit certain uses in certain locations, for instance gaming establishments and HMOs. In each case the rationale is clearly expressed in the supporting text. **Implications of taking no further action:** No implications **Mitigation/action required to move scale to right:** No action **Reviewer comments:** None
37.	Is it clear that any standards proposed for development are justified and deliverable, taking into account the scale of the development? Where relevant, are they consistent with the principles set out in the National Design Code and National Model Design Code? [For example, onsite provision of open space, optional technical standards, internal and external space standards.]	**Score:** +1 **Reason for score:** All standards are considered to be justified and deliverable, otherwise they would not have been included in the plan. In some cases, the justification and demonstration of deliverability will still require publication of additional evidence at submission stage. **Implications of taking no further action:** Without publication of the full evidence base it will be difficult to demonstrate that policies will be justified and effective at examination. **Mitigation/action required to move scale to right:** Publication of full evidence base at submission. **Reviewer comments:** None

Table 3.6: Local Plan Soundness and Quality Assessment – Deliverability

Ref	Key questions	Assessment
38.	Has the viability of the local plan policies update been suitably tested and does this testing cover all requirements including in respect of any required standards, affordable housing provision and transport and other infrastructure needs and if relevant the implications of CIL?	**Score:** +1 **Reason for score:** The requirements of the plan have been suitably tested in accordance with national policy and this has covered any required standards that are relevant to viability. However, although testing has been carried out, the final report is still in production at the time of writing and will be published when finalised. **Implications of taking no further action:** Not publishing the Viability Assessment will fail to provide the level of evidence required to demonstrate that the relevant paragraphs of the NPPF have been complied with. **Mitigation/action required to move scale to right:** Publication of final Viability Assessment **Reviewer comments:** None
39.	Does the local plan policies update reflect the conclusions and recommendations of your viability evidence? Is it clear the viability and delivery of development will not be put at risk by the requirements in the local plan policies update?	**Score:** +2 **Reason for score:** The requirements of the Local Plan including the Partial Update have been assessed within the Viability Assessment, which demonstrates that development in overall terms will not be put at risk as a result of the plan requirements. The Viability Assessment report is being finalised and will be published shortly. **Implications of taking no further action:** No implications **Mitigation/action required to move scale to right:** No action **Reviewer comments:** None
40.	Does the monitoring framework clearly set out what matters will be monitored, and the indicators used? Are these measurable and can the data be readily secured/captured?	**Score:** +2 **Reason for score:** The monitoring framework clearly sets out what will be monitored. These are measurable and the data are readily available. The indicators are broadly continuations of indicators that are already monitored for the adopted Local Plan. **Implications of taking no further action:** No implications **Mitigation/action required to move scale to right:** No action **Reviewer comments:** None
41.	Does the local plan policies update and monitoring framework identify a clear framework for plan review? Where triggers for plan review and/or update are identified are they justified and proportionate?	**Score:** +1 **Reason for score:** Section 11, and paragraphs 11.1.3 and 11.1.4 in particular, provide general commentary on how monitoring will be taken into account in deciding whether the plan should be reviewed or updated. There are no set triggers that will automatically lead to a review/update, rather this will be a decision to be made on all the evidence. **Implications of taking no further action:** It could be argued that more certainty could be provided on when a plan review is required, but this is not considered to be the appropriate approach. **Mitigation/action required to move scale to right:** Provide defined triggers for review, but as above this is not considered the appropriate approach. **Reviewer comments:** None

Table 3.7: Local Plan Soundness and Quality Assessment – Plan effectiveness (and associated policy clarity)

Ref	Key questions	Assessment
42.	Does the local plan policies update clearly set out the timeframe that it covers? Is it clear which policies are strategic? Will the strategic policies provide for a minimum of 15 years from adoption? Does the evidence relied on to support those policies correspond/cover this whole period? Where larger scale developments are proposed as part of the strategy, does the vision look further ahead (at least 30 years)?	**Score:** +1 **Reason for score:** The Partial Update clearly specifies the plan period in the first paragraph of the plan. As long as the document is adopted by 2026, this will provide for 15 years from adoption. It is clear which policies are strategic from the policy title. The evidence covers the whole period, but the whole evidence base has not yet been published, so this reduces the score from +2. No larger scale developments are included that requires a longer-term vision. **Implications of taking no further action:** No further action would mean that the full evidence base was not published, and this would make it difficult to demonstrate that the plan is sound. **Mitigation/action required to move scale to right:** Publication of full evidence base at submission stage. **Reviewer comments:** None
43.	Does the local plan policies update clearly set out which adopted Development Plan policies it supersedes?	**Score:** +2 **Reason for score:** The Partial Update does not supersede policies, rather it updates them. The tracked changes format of the plan makes it entirely clear which elements of policies are deleted/superseded. **Implications of taking no further action:** No implications **Mitigation/action required to move scale to right:** No action **Reviewer comments:** None
44.	Are the objectives the policies are trying to achieve clear, and can the policies be easily used and understood for decision making?	**Score:** +2 **Reason for score:** The policies in the Partial Update have been drafted to be clear and easily used and understood in decision making. **Implications of taking no further action:** No implications **Mitigation/action required to move scale to right:** No action **Reviewer comments:** None
45.	For each policy area you have designated or defined in the Plan: (i) are these clearly referenced and explained in the Plan; and (ii) clearly defined on the Policies Map? Where you have included maps or graphics within the local plan policies update are these legible and is it clear if and how they are to be used in decision making?	**Score:** +2 **Reason for score:** Where a policy applies to a specific spatial area these are clearly shown on the Proposals Map, and, where there are several areas within a policy e.g. for development allocations, accorded a reference which is shown on the map. Maps and graphics are intended to be legible, and, where they appear in relation to policies, their implications for decision making are outlined. **Implications of taking no further action:** No implications **Mitigation/action required to move scale to right:** No action **Reviewer comments:** None

Ref	Key questions	Assessment
46.	Does each local plan policies update policy: (i) make clear the type of development it will promote; (ii) use positive rather than negative wording?	**Score:** +1 **Reason for score:** Policies make clear the type of development which it concerns, whether that is promotion or another policy approach. Policies use positive wording wherever possible, but in some cases wording needs to be clear where a restriction is being applied otherwise it will not be entirely clear how a policy will be used in practice. **Implications of taking no further action:** No implications **Mitigation/action required to move scale to right:** No action **Reviewer comments:** None
47.	Do policies make clear where they are intended to be applied differently for the purposes of decision-making dependent on (i) scale; (ii) use; or (iii) location of development proposed. [Note: If you have said 'all development' this implies equal application irrespective of the development scale/use/location and this may not be either justified or deliverable]	**Score:** +2 **Reason for score:** Policies are clear where they are to be applied differently dependent on scale, use or location. In the case of location, where a specific area is identified this links to a definition on the Proposals Map. **Implications of taking no further action:** No implications **Mitigation/action required to move scale to right:** No action **Reviewer comments:** None
I.	State how many policies are in your local plan update? Can you list any policies within the local plan update that: (i) repeat parts of other policies within the plan; (ii) replicate or repeat paragraphs in the NPPF (iii) cross reference other policies.	The adopted Local Plan contains 90 policies. Of these, the Partial Update updates 49 policies and includes 3 additional policies. There are therefore a total of 52 policies forming part of the Partial Update. No policies within the Partial Update repeat parts of other policies. No policies within the Partial Update replicate or repeat parts of the NPPF There are some policies that include cross-references to other policies in the plan, specifically EM4, H4, H5, H6, H15, CR15 and CA1. These cross-references are necessary for the policy to be understood and are included so as not to need to repeat policy that is set out elsewhere.
48.	Based on the above, have you tried to avoid unnecessary repetition (of the NPPF or other policies within the local plan policies update) and cross referencing in policies? If you find duplication or repetition you may want to take minute to consider whether this is appropriate.	**Score:** +1 **Reason for score:** There is no duplication of the NPPF and other policies. Cross-referencing is in some cases required precisely in order to avoid repeating policy from elsewhere. **Implications of taking no further action:** No significant implications **Mitigation/action required to move scale to right:** Not required, it is considered that the appropriate approach has already been taken. **Reviewer comments:** None
49.	Do policies avoid duplicating other regulatory requirements (for example, building regulations)?	**Score:** +2 **Reason for score:** The policies deliberately avoid duplicating other requirements. One of the updates is proposed specifically to remove an element of policy TR5 that is now no longer necessary due to building regulations **Implications of taking no further action:** No implications **Mitigation/action required to move scale to right:** No action **Reviewer comments:** None

Ref	Key questions	Assessment
50.	Does the wording of plan policies avoid ambiguity? Are requirements clear to the decision-maker?	**Score:** +2 **Reason for score:** The policies are worded to avoid ambiguity and make requirements clear to the decision maker. **Implications of taking no further action:** No implications **Mitigation/action required to move scale to right:** No action **Reviewer comments:** Consultation responses typically highlight where there is ambiguity or where it is not clear how a decision-maker should apply the policy, and any such responses will need to be considered in preparing the submission version.