

## **Reading Borough Council**

### **Examination of the Reading Borough Local Plan Partial Update**

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19 June 2025

Dear Mr Worringham

### **Inspector's Initial Letter**

1. Thank you for submitting the Reading Borough Local Plan Partial Update (the LPPU) for examination. I am still at an early stage in my preparation and reading. However, I have initial questions for the Council. These questions cover matters of a factual nature, but also relate to legal compliance and matters of soundness. I am not seeking any responses from representors on these initial questions at this point.
2. Your brief responses to my questions will help me to determine how the examination should proceed, and to better focus my Matters, Issues and Questions in due course. These initial questions and requests for information are not exhaustive and further reading may give rise to additional queries relating to soundness and/or legal compliance.
3. All formal correspondence, including this letter, will need to be placed on the examination website in the interests of transparency.

### **National planning policy**

4. A revised National Planning Policy Framework (the Framework) was published in December 2024. This included transitional arrangements for local plans. Paragraph 234 a) and 235 of the 2024 Framework state that where the plan has reached Regulation 19 (pre-submission stage) on or before 12 March 2025, and its draft housing requirement meets at least 80% of local housing need, it will be examined under the relevant previous version of the Framework. The LPPU was submitted on 9 May 2025 following Regulation 19 consultation between 6 November 2024 and 18 December 2024. As such, I am working on the basis that the LPPU will be examined under the Framework published on 19 December 2023. For the avoidance of doubt, any references to the Framework are from the December 2023 version, unless otherwise stated.

### **The scope and extent of the LPPU**

5. Reading has a current Local Plan which was adopted on 4 November 2019, following an examination which commenced in March 2018. The plan period for

the adopted Local Plan runs to 2036. The LPPU is a partial update to the Local Plan with a plan period which runs to 2041. It is necessary for me to be clear what it is I have been asked to examine, e.g. what is in and out of scope.

6. The LPPU is not a schedule of proposed changes to the adopted Local Plan. Instead, it comprises a clean version of the adopted Local Plan with altered text accepted [LP003a] and a tracked changes version of the adopted Local Plan [LP003b]. For the avoidance of doubt, I will refer to the latter tracked changes version of the LPPU throughout the examination, unless otherwise specified.
7. The LPPU confirms at paragraph 1.1.3 that “The local plan is an updated version of the Local Plan adopted in November 2019. With the exception of minerals and waste planning, which was undertaken jointly with neighbouring authorities, all local planning policies are contained within a single document.” However, I have not found any statement from the Council as to what the limitations of the Regulation 19 consultation were. As such, I would appreciate responses from the Council to the following questions:
  - IQ1. Could the Council provide me with a list of all the policies and supporting text etc of the LPPU which are either new or amended as part of the LPPU? Please provide this in a table and make it clear which individual parts of the LPPU the Council considers are or are not in scope and why. Where site allocations are listed as having changed in any way (i.e. deleted, altered site capacity or requirements, or a new allocation), any previous numbers and names by which the site was known in evidence base documents should be listed.
  - IQ2. What written advice did the Council provide to representors with regard to the scope of the LPPU Regulation 19 consultation? Were there set parameters for what representors could respond to or not within the LPPU? Reference should be made to any relevant parts of the evidence base, including document, page and paragraph numbers as necessary.
  - IQ3. If representations were made to parts of the LPPU which were not subject to change, were these representations accepted by the Council as being duly made? If they were, could the Council please indicate which representor/representations these were?
  - IQ4. Are policies in the LPPU capable of being sustained over the plan period to 2041?
8. The submission documents include a List of Changes to Submission Draft [LP002]. It is unclear whether the modifications have been subject to public consultation prior to the LPPU’s submission. If they have not, I will examine the submitted LPPU [LP003b] which has been subject to public consultation. Modifications put forward by the Council will be given due regard during the examination based on whether they are considered by me to be main modifications that are necessary for soundness.

- IQ5. Has the List of Changes to Submission Draft [LP002] been subject to any public consultation? If so, what were the dates of consultation?

### **Main modifications**

9. Section 20 of the Planning and Compulsory Purchase Act 2004 (the Act) allows the Council to request that I recommend modifications to the LPPU to make it legally compliant and sound if I find that it is not the case. If that request is made by the Council, Section 23 of the Act requires that any modifications I recommend must be incorporated into the LPPU. If the Council does not request that I recommend modifications, then my conclusion will be either that the LPPU should be adopted or that it should not.

- IQ6. In the event that I find main modifications to be necessary, does the Council wish me to recommend modifications to make the LPPU legally compliant and sound?
10. Please note that if any of my initial questions or Matters, Issues and Questions result in the Council wishing to put forward main modifications to render the LPPU sound or legally compliant, these should be put forward in a clear way with the use of strikethrough for deleted text and underlining for new text. As the LPPU already includes strikethrough and underlined text, there will need to be clear differentiation between the original adopted text, the text consulted on at Regulation 19, and the main modification.

### **Procedural and legal compliance**

11. Representors have noted that the Council did not publish its viability evidence until shortly before the Regulation 19 consultation closed and did not extend the consultation period. Furthermore, the Environment Agency makes repeated references in their representations to the need for a Level 2 Strategic Flood Risk Assessment, sequential testing and a water cycle study. It therefore appears that representors did not have access to all relevant elements of the evidence base during the Regulation 19 consultation. Similar issues may relate to other evidence base documents, including the Full Habitat Regulations Screening Tables, Transport Modelling work, the Infrastructure Delivery Plan, and the Water Quality Assessment Update. This list is not exhaustive.

- IQ7. Were all key supporting evidence base documents made available alongside the LPPU during the whole of the Regulation 19 consultation period? A list of all evidence base documents and the dates on which they were made publicly available on the Council's website should be provided to me.

- IQ8. Was suitable opportunity allowed for representors to comment on the content of such evidence base documents as relevant to the policies in the LPPU during the Regulation 19 consultation?

- IQ9. Is further public consultation required prior to any Matters, Issues and Questions being issued?

- IQ10. Given that parts of the evidence base were not completed and available to the Council or representors during the Regulation 19 consultation, how has the evidence influenced the development of the LPPU?
12. The Council has provided two Statements of Community Involvement dated March 2014 [PP002] and January 2025 [PP003].
- IQ11. When does the Council intend to adopt the more recent Statement of Community Involvement?

### **Duty to Co-operate**

13. I note the provision of the Council's Duty to Co-operate Statement dated May 2025 [EV001]. This provides information about engagement with local planning authorities and prescribed bodies on strategic matters during the preparation of the LPPU in relation to Section 33A of the 2004 Act. Statements of Common Ground are within the Council's Duty to Co-operate Statement.
- IQ12. Has the Council engaged constructively, actively and on an ongoing basis with all relevant organisations on strategic matters of relevance to the LPPU's preparation, as required by the Duty to Co-operate? What mechanisms or formal agreements have been established between authorities on cross-boundary strategic matters? Are these up to date?
- IQ13. Could the Council provide evidence relating to how the requirements of the Duty to Co-operate have been met with regard to prescribed bodies other than local authorities? Please include details of the strategic matters the Council needed to address, what was done to discharge the Duty, what was agreed and what matters, if any, are outstanding.
- IQ14. With regard to housing need, requirement and supply, who has the Council engaged with and how has this been undertaken? What inter-relationships are there with other authorities in respect of the housing market, commuting, migration, and infrastructure provision? How have the above matters been addressed through co-operation, including the housing requirement? What specific outcomes are there? Please make specific reference to any relevant documents, such as Statements of Common Ground.
- IQ15. Have signed Statements of Common Ground now been secured between the Council and all relevant parties? Are there any significant concerns expressed by interested parties regarding the Duty to Co-operate which remain a matter of dispute?

### *Sustainability Appraisal*

14. The Council has provided me with Sustainability Appraisal of the Scope and Content of the LPPU (November 2023) [LP009] and the Sustainability Appraisal

Scoping Report 2014 and Sustainability Appraisal of the Local Plan Pre-Submission Draft Partial Update (Regulation 19) (November 2024) [LP005].

IQ16. Please provide the Sustainability Appraisal Scoping Report (2014) and explain why a new separate scoping report was not published as part of the LPPU process.

IQ17. Has the Sustainability Appraisal adequately addressed all changes made to the LPPU, particularly in respect of site allocations?

#### *Habitats Regulations Assessment*

IQ18. Can the Council confirm how the recommendations of the Habitats Regulations Assessment have been taken into account in the LPPU?

### **Housing**

#### *Housing need and requirement*

15. Paragraph 61 of the Framework states that to determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance. The outcome of the standard method is an advisory starting-point for establishing an area's housing requirement. There may be exceptional circumstances, including an area's particular demographic characteristics which justify an alternative approach to assessing housing need; in which case the alternative approach should also reflect current and future demographic trends and market signals. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.
16. Paragraph 62 of the Framework addresses the uplift in the standard method which applies to certain cities and urban centres, as set out in national planning guidance. This paragraph confirms that the uplift should be accommodated within those cities and urban centres themselves except where there are voluntary redistribution agreements in place, or where it would conflict with policies in the Framework. Reading is one of the named locations subject to the 35% cities and urban centres uplift at step 4 of the standard method.
17. The Council's Housing Provision Background Paper (November 2024) [EV012] outlines that using the standard method with a median workplace-based affordability ratio for Reading 2023 and applying the 35% uplift results in a rounded figure of 878 homes per year.
18. However, the Council has sought to depart from the standard method. This is based on demographic issues due to Unattributable Population Change and on Reading's particular circumstances in terms of population, geographic area and extent of urban area outside the authority's boundaries. The Council commissioned the Reading Housing Needs Assessment (2024) [EV011] which

identifies a jobs-led housing need for 735 homes per year or 13,235 homes from 2023 to 2041.

19. The Council's Housing and Economic Land Availability Assessment (HELAA, November 2024) [EV015 and EV016] seeks to identify the amount of housing that could be delivered between 2023 and 2041. The HELAA identified capacity to deliver 14,849 dwellings between 2023 and 2041, with an annual figure of 825 dwellings. The LPPU bases the housing requirement figure in Policy H1 on the capacity for additional dwellings over the plan period of 825 per year.
20. The December 2024 Framework at paragraph 234 deals with which version of the Framework a local plan should be examined against. With regard to paragraph 234 a), reference is made to the draft local housing requirement meeting at least 80% of local housing need. Footnote 83 to this paragraph confirms that the housing requirement is calculated using the standard method in national planning practice guidance published on 12 December 2024.
21. The Council's Housing Provision Background Paper Addendum (April 2025) [EV013] sets out the results of the standard method based on December 2024 Planning Practice Guidance at 997 homes per year. The Council then confirms that this is not relevant as it is based on the December 2024 Framework, which does not apply in this case due to the timing of Regulation 19 consultation.
22. However, the Housing Provision Background Paper Addendum uses the median workplace-based affordability ratio for Reading 2024 and the pre-December 2024 standard method to establish a new figure of 822 homes per year, including the 35% uplift. This figure of 822 homes per year is slightly under the housing provision figure set out in Policy H1 of 825 homes per year.
23. If using the standard method figure (including uplift) of 878 homes per year and comparing that to the Council's Housing Needs Assessment figure of 735 homes per year, this would give an unmet need of some 2,574 homes over the plan period. Taking the Council's capacity-based approach, the housing requirement would be at 825 homes per year, indicating that there would be an unmet need of 954 homes over the plan period to 2041.

IQ19. What efforts have been made to address unmet need using the relevant standard method in line with the Framework?

IQ20. Could the Council explain what the exceptional circumstances are for deviating from the standard method for calculating housing need?

IQ21. What is the justification for taking a capacity-based approach to the housing requirement?

- IQ22. Given that the sites within the LPPU have a minimum and maximum capacity range, what assurance can the Council provide that the housing requirement would be met?
- IQ23. Should the LPPU set out any requirement for designated neighbourhood areas in line with paragraph 67 of the Framework?

*Housing supply, including site selection process*

- 24. The evidence base includes several documents relating to the selection and delivery of housing sites, including the Council's Housing Implementation Strategy (April 2025) [EV014] and the HELAA [EV015 and EV016]. The HELAA sets out the site selection methodology. In terms of site selection, I have the following questions:

- IQ24. Were all sites in the 2017 HELAA where development has not been completed reassessed fully using the 2024 methodology?
- IQ25. What underpinning work informed the change in the site capacity ranges for the majority of site allocations within the LPPU?
- IQ26. What evidence is there to substantiate the deliverability and/or developability of the sites comprising the housing supply and the estimated timeframes for their completion?
- IQ27. Why are confidential sites assessed in the HELAA and how does this comply with the requirement of the Planning Practice Guidance that the assessment is made publicly available in an accessible form? How can I as the examining Inspector reasonably consider such sites if they are unmapped and given only opaque names without site addresses?
- IQ28. Please supply any further supporting information/technical work available relating to the suitability, availability and deliverability of the proposed allocations, for example, draft masterplans, technical reports and other evidence.

- 25. In addition, to support my understanding of the Council's housing supply situation, I require the following information/documents:

- IQ29. Provide a list of all housing sites (for all types of housing) submitted by representors which have not been included in the LPPU ('omission' sites). The list of omission sites should be provided with a plan of each site with it clearly outlined and seen in the context of named roads.
- IQ30. Would at least 10% of the housing requirement be accommodated on sites no larger than one hectare? If so, how would that be achieved?
- IQ31. To assist with my consideration of housing supply, I require a detailed housing trajectory over the plan period which takes account of all sources of supply. This should be in an Excel format.

### *Student accommodation*

26. The LPPU refers to a current shortfall in university accommodation of around 1,000 bedspaces for first year students and 3,400 students across all years not being housed in university or private halls in 2021/22.

IQ32. Please can the Council explain how student accommodation needs would be met over the plan period?

### *Provision for Gypsies, Travellers, and Travelling Showpeople*

27. The Government's Planning policy for traveller sites (PPTS) confirms at paragraph 10 that local planning authorities should, in producing their Local Plan: identify and update annually, a supply of specific deliverable sites sufficient to provide 5 years' worth of sites against their locally set targets, and identify a supply of specific, developable sites, or broad locations for growth, for years 6 to 10 and, where possible, for years 11-15.
28. The Council's LPPU Background Paper (May 2025) [EV002] refers to the LPPU not being able to meet the need for gypsy and traveller provision. The evidence supporting the adopted Local Plan identified a need for between 10 and 17 permanent pitches for gypsies and travellers, a transit site of 5 pitches and 2 plots for travelling showpeople. The same paper refers to the Local Plan seeking to meet the need for travelling showpeople. It also asserts that a permission has been granted for transit provision, but this is not expected to be delivered. Furthermore, it confirms that the need for permanent pitches remains unmet, and there are no sites upon which provision can be accommodated. As such, the Council is not proposing any update to the criteria-based Policy H13 on gypsy and traveller provision within the LPPU.
29. No gypsy and traveller needs assessment has been provided as part of the LPPU evidence base. It is unclear what, if any, work has been undertaken in respect of addressing the needs of the local gypsy and traveller population for the coming years by identifying specific, deliverable sites. Indeed, it is unclear what the need is and whether it has increased since Local Plan adoption.

IQ33. Has the Council produced any relevant up-to-date evidence base for gypsies, travellers and travelling showpeople's accommodation needs? If this exists, it should be provided to me. If not, I require an explanation as to why no evidence base has been produced and why no provision has been made within the LPPU.

IQ34. Do the changes made to the definition of gypsies and travellers set out in the PPTS have any implications for the Council's most recent needs assessment?



- IQ35. Has the Council undertaken any assessment of the needs of houseboat dwellers? If no assessment has been undertaken, why is this the case?

### **Employment**

30. Policy EM1 on the provision of employment development advises that provision will be made for a net increase of 30,000 – 86,000 square metres of office floorspace and 167,000 square metres of industrial, warehouse and/or research and development floorspace to 2041.

- IQ36. Provide a list of all employment sites submitted by representors which have not been included in the LPPU ('omission' sites). The list of omission sites should be provided with a plan for each omission site with the site outlined and seen in the context of named roads.

### **Transport**

31. The Planning Practice Guidance at paragraph 54-001-20141010 confirms that it is important for local planning authorities to undertake an assessment of the transport implications in developing or reviewing their Local Plan so that a robust transport evidence base may be developed to support the preparation and/or review of that Plan. It also highlights the infrastructure requirements for inclusion in infrastructure spending plans linked to the Community Infrastructure Levy, section 106 provisions, and other funding sources.

- IQ37. Did National Highways have access to transport modelling documents [EV018 – EV022] during the Regulation 19 consultation? If not, why not?

- IQ38. What progress has been made on production of a Statement of Common Ground with National Highways?

- IQ39. What consideration has been given to previously allocated housing sites with increased capacities, new site allocations, and employment provision in the modelling? What will the implications of the LPPU's spatial strategy be for the strategic road network?

- IQ40. Is the Stantec Technical Note dated 29 April 2025 [EV022] the relevant final version of that note?

- IQ41. Could the Council provide the most recent Local Transport Plan and Local Cycling and Walking Infrastructure Plan for my reference?

### **Infrastructure and Viability**

32. LPPU Policy CC9 confirms that proposals for development will not be permitted unless infrastructure, services, resources, amenities or other assets lost or impacted upon as a result of the development or made necessary by the development will be provided through direct provision or financial contributions at the appropriate time.

- IQ42. Could the Council explain how the Draft Infrastructure Delivery Plan (May 2025) [EV005] has influenced the LPPU's development and how it relates to Table 10.2 within the LPPU?
- IQ43. The Council should provide a Gantt chart showing the delivery of overall growth over the plan period (including commitments, windfall etc). It should also show each housing, employment, mixed-use and other allocations and the infrastructure necessary to bring forward each site with timescales and phasing, so I am able to see when key strategic items of infrastructure are required to unlock specific development.
- IQ44. What evidence is there to confirm that any likely infrastructure requirements have been taken into account in assessing the effect of LPPU policies on the viability and phasing of development?
- IQ45. The Council should provide full clarification of what policy costs have been considered in the Local Plan Viability Testing Report [EV004].

### **Climate Change**

33. Reading declared a Climate Emergency in 2019 and published the Reading Climate Emergency Strategy in 2020. LPPU Policies CC2 and H5 deal with sustainable design and construction and standards for new housing respectively. Policy CC2 refers to measurement of total energy use and space heating demand, while Policy H5 sets out specific energy efficiency standards for housing, with the general principles of CC2 also relevant to residential development.
34. The Council refers in its Local Plan Partial Update Background Paper (May 2025) [EV002] to the specific figures required in Policy CC2 for site average space heating demand, site average total energy demand and per unit maximum total energy demand being based on the figures recommended by the LETI Climate Emergency Design Guide. The paper further explains that the figures are expressed either as a range or an absolute value with a modest increase from the LETI figures in order to provide flexibility. The LETI Climate Emergency Design Guide has not been provided as part of the examination library. No detailed justification has been provided to explain the Council's approach or outline fully how they have moved on from the LETI figures.
35. Reference is made in the same paper to adopted plan policies elsewhere in Central Lincolnshire, Cornwall and Bath and North East Somerset. However, the aforementioned plans were adopted prior to publication of the Written Ministerial Statement (the WMS) on Planning - Local Energy Efficiency Standards Update dated 13 December 2023, the latest extant statement of national planning policy.

36. The WMS seeks to avoid the proliferation of multiple, local standards (which can add cost and hinder development rates). It makes clear that any planning policies that propose local energy efficiency standards for buildings that go beyond planned building regulations should be rejected at examination, if they do not have a well-reasoned and robustly costed rationale. Any policy must ensure that development remains viable and the impact on housing supply and affordability is considered. Any additional requirement must be expressed as a percentage uplift of a dwelling's Target Emissions Rate (TER) calculated using a specified version of the Standard Assessment Procedure (SAP). Where such policies are proposed, they should be applied flexibly.
37. As drafted, Policies CC2 and H5 do not appear to be consistent with the WMS. Furthermore, there is no detailed local evidence base as to why the Council has chosen to take the approach it has and how the policies would function. Policy CC2 is particularly unclear, as noted by Regulation 19 representations. This does not assist future use of Policy CC2. Additionally, given the apparently late publication of the Local Plan Viability Testing Report (December 2024) [EV004] and the lack of detail therein, I am concerned that the effects of the two policies on viability, and therefore on the deliverability of development in Reading, have not been fully considered by representors or the Council.
- IQ46. Could the Council set out the robust evidence base supporting Policies CC2 and H5?
- IQ47. Could the Council provide a clear explanation as to why the Council does not propose to use the approach set out in the WMS? In what way does Reading differ from other local planning authorities around the country, which would justify the approach outside the parameters of the WMS?
- IQ48. Could the Council clarify how Policies CC2 and H5 would be used together?
- IQ49. As drafted, are Policies CC2 and H5 clearly written and unambiguous?
- IQ50. Have the requirements of Policies CC2 and H5 been fully viability tested?

### **Urban Greening Factor**

38. LPPU Policy EN19 deals with an Urban Greening Factor and requires proposals to demonstrate how an appropriate proportion of green cover will be delivered. Appendix 3 of the LPPU supports the policy.
- IQ51. What is the evidential basis for LPPU Policy EN19 and Appendix 3?
- IQ52. How does this work with requirements for Biodiversity Net Gain?

IQ53. Have Urban Greening Factor requirements been fully viability tested?

### **General questions**

39. Reference is made in various policies to the need to be in accordance with other policies within the LPPU. Furthermore, in several places, reference is made to development needing to be in accordance with all other policies in the plan. It is established in case law that policies can and do at times pull in different directions and a development plan should be read as a whole.

IQ54. Is it necessary to have this cross-referencing of policies?

IQ55. Does the Council envisage any potential issues with requiring development to be in accordance with all other policies?

### **Examination website and paper copies**

40. The examination website refers to an Inspector being appointed in due course. Please update the website to refer to the appointed Inspector. My title, name, and qualifications are provided at the top of this letter.
41. Although I generally work with electronic documents, I have previously requested paper copies of the LPPU [LP003b] and the LPPU Proposals Map [LP004]. These have not yet been provided. I would be grateful if they could be provided as soon as possible. The tracked changes within the LPPU should be amended to a readable bright blue.

### **Hearing sessions**

42. I have previously contacted the Council via the Programme Officer to ascertain the earliest date that hearing sessions might commence. I recognise that the Council has resourcing issues which may affect the timing of hearings. Progress will obviously depend on receipt of the information requested in this letter, which I appreciate is likely to take some time, and then the extent of further questions prompted by further reading.
43. In order to progress matters, the Council is requested to provide a timetable for the provision of all the requested information. In tandem with providing that initial information, the Council should indicate suitable weeks (no more than two weeks) for hearings which allow sufficient time for the Council's team to respond appropriately to Matters, Issues and Questions and prepare for hearings. I understand that it is likely that hearings would be virtual. The Council should indicate how it plans to provide those virtual hearings.

### **Next Steps**

44. I look forward to receiving the requested information, including a timetable for provision of all of the requested information.

45. If you have any questions, please do not hesitate to contact me via the Programme Officer.

Yours sincerely

*Joanna Gilbert*

Inspector