

Reading Borough Council

Examination of the Reading Borough Local Plan Partial Update

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Inspector's Matters, Issues and Questions – Stage 1 Hearings

Introduction

This document sets out the Inspector's Matters, Issues and Questions (MIQ) for Stage 1 Hearings regarding the soundness of the Reading Borough Local Plan Partial Update (LPPU). Prior to hearing sessions, responses are invited from participants on the MIQ for Stage 1 Hearings.

The Examination will be focussed on the tests of soundness set out in paragraph 35 and other requirements outlined in the National Planning Policy Framework (the Framework) published in December 2023 and will be examined against the 2023 Framework. This is consistent with the transitional arrangements set out in Annex 1: Implementation of the Framework (December 2024).

Participants should only respond to the questions which directly relate to the written representations they submitted to the consultation on the LPPU Pre-Submission Draft (November 2024) [LP003b].

The Council has produced a List of Changes to Submission Draft [LP002]. As the Council has confirmed that this list has not been subject to any public consultation, I will not have regard to this document during the Examination.

Please note that an initial letter was issued by the Inspector in June 2025 [EX001]. The Council responded to this letter in July 2025 [EX002 – EX009]. Representors are advised to have regard to these documents when drafting any hearing statements.

Further information about the Examination is provided in the Guidance Note and the Provisional Hearings Programme, which should be read alongside the MIQ for Stage 1 Hearings.

Please respond to the MIQ with separate statements for each Matter, with page and paragraph numbers to allow for ease of reference.

Matter 1: Legal Requirements and Procedural Matters

Issue 1: Duty to Co-operate

- 1.1 The Council's Duty to Co-operate Statement (May 2025) [EV001] states at paragraph 2.3.1 that although the LPPU bases its level of housing need on the findings of the Reading Local Housing Needs Assessment (July 2024) [EV011], which can be fully met within Reading's boundaries, it was nonetheless considered necessary to make a request to neighbouring authorities under the duty to co-operate to understand the position if the LPPU were to be based on the outcome of the standard methodology. What did this process entail? Can the Council point to evidence of constructive, active and ongoing joint working with neighbouring authorities on a) general housing need and b) provision for Gypsies, Travellers and Travelling Showpeople?
- 1.2 What is the position of neighbouring authorities in terms of the planned level of a) housing and b) provision for Gypsies, Travellers, and Travelling Showpeople in Reading? Does the overall provision planned for in the LPPU have any implications for other authorities? If so, what are they and how are these being addressed?
- 1.3 Has the Council been approached by other strategic policy-making authorities to accommodate any unmet needs in the LPPU?
- 1.4 With regard to question 1.3, what were the outcomes of these discussions with other strategic policy-making authorities with unmet needs?
- 1.5 How has the Council considered the likely possible impacts of accommodating unmet housing needs from elsewhere as part of the LPPU's preparation?
- 1.6 With regard to question 1.5, what does this show and how have the results been shared and/or discussed with duty to co-operate bodies?
- 1.7 In determining the need for different types of employment land over the LPPU's plan period, how have inter-relationships with other local authorities in terms of economic growth, travel to work, and employment land provision been taken into account? Does the overall provision planned for in the LPPU have any implications for other authorities? If so, what are they and how are these being addressed?
- 1.8 What progress has been made in respect of a Statement of Common Ground between the Council and National Highways with regard to junction 11 of the M4 motorway? When can this Statement of Common Ground be expected? How does this meet the requirement to engage constructively, actively and on an ongoing basis with relevant authorities to consider strategic matters through the preparation of a development plan document?
- 1.9 Are there other genuinely strategic matters as defined by Section 33A(4) of the Planning and Compulsory Purchase Act 2004 (as amended)? How have those matters been addressed through co-operation and what are the resulting outcomes?
- 1.10 Has the Council engaged with all relevant local planning authorities, county councils and other prescribed bodies in the preparation of the LPPU?

- 1.11 Has the Duty to Co-operate has been complied with on an ongoing basis, actively and constructively on strategic policies/matters so far as the preparation of the LPPU is concerned? If not, why not?

Issue 2: Has the Council complied with the relevant legal and procedural requirements in preparing the LPPU?

- 1.12 Has the LPPU been prepared and publicised in accordance with the statutory procedures of the Planning and Compulsory Purchase Act 2004 and the consultation requirements in the Regulations?
- 1.13 To what extent has the LPPU's production been consistent with the Reading Borough Council Local Development Scheme (June 2024) [PP001]?
- 1.14 Was the LPPU been produced in compliance with the Council's Statement of Community Involvement (March 2014) [PP002], allowing for effective engagement of all interested parties and meeting the minimum consultation requirements set out in the Regulations? Does the Statement of Community Involvement remain relevant and up-to-date? Has all relevant and available evidence been made available for consultation at the various stages?
- 1.15 How do the two Statements of Community Involvement dated March 2014 [PP002] and January 2025 [PP003] differ? Please provide a copy of the adopted Statement of Community Involvement (June 2025) and explain how that differs from the Statement of Community Involvement (March 2014).

Sustainability Appraisal

- 1.16 How has the Sustainability Appraisal of the Local Plan Pre-Submission Draft Partial Update (Regulation 19)(SA)[LP005] informed the LPPU's preparation at each stage of its development? How were options considered? Is it clear how the SA has influenced the LPPU?
- 1.17 Does the SA adequately and accurately assess the likely effects of the policies and proposals in the LPPU on the SA's objectives? Does the SA test the LPPU against reasonable alternatives where these exist, such as different options for housing and economic growth? Does the SA test for housing growth consistent with the local housing need including the cities and urban centres uplift? Was the testing of the policies and proposals in the LPPU and of the reasonable alternatives undertaken on a like for like basis? Were reasons given for rejecting the appraised alternatives?
- 1.18 Has the SA's methodology been appropriate? What concerns have been raised and how would the Council respond to these concerns?
- 1.19 In overall terms does the LPPU meet the legal requirements of Section 19(5) of the Planning and Compulsory Purchase Act 2004, and the relevant Regulations, and accord with paragraph 32 of the Framework and the Planning Practice Guidance (PPG) with regard to sustainability appraisal?
- 1.20 Were consultation requirements complied with in respect of sustainability appraisal?

Habitats Regulations Assessment

- 1.21 How was the Habitats Regulations Assessment carried out and was the methodology appropriate? Does it meet the requirements of the Conservation of Habitats and Species Regulations 2017 and reflect relevant case law?
- 1.22 What relevant designated sites were considered? What potential impacts of the LPPU were factored in? What were the overall conclusions of the Habitats Regulations Assessment and how have these informed the LPPU's preparation?
- 1.23 Have any concerns been raised regarding the Habitats Regulations Assessment and what are they? How would the Council respond to these concerns?
- 1.24 How and when has Natural England been involved in the Habitats Regulations Assessment process?

Other matters

- 1.25 Is the LPPU sufficiently clear on which policies would be superseded and which would remain extant on adoption?
- 1.26 Does the LPPU include all relevant strategic policies to address the Council's priorities and adequately set out an overall strategy for development as required by paragraphs 20 - 22 of the Framework?
- 1.27 Will the LPPU's strategic policies have a minimum time period of 15 years at adoption, consistent with paragraph 22 of the Framework?
- 1.28 Is the LPPU's relationship to any existing or emerging Neighbourhood Plans justified and reasonable, including the clear identification of strategic policies within the LPPU which Neighbourhood Plans would be required to be in general conformity with?
- 1.29 How does the LPPU meet paragraph 11 a) of the Framework?
- 1.30 Is it clear how the LPPU secures development that contributes to the mitigation of, and adaptation to, climate change in accordance with Section 19(1A) of the Planning and Compulsory Purchase Act 2004?
- 1.31 How have issues of equality been addressed in the LPPU? In particular, in what way does the LPPU seek to ensure due regard is had to the need to achieve the three aims defined in Section 149 of the Equality Act 2010 in relation to those who have a relevant protected characteristic?
- 1.32 Is the geographical illustration of all relevant policies shown on the Policies Map?

Matter 2: Housing Need and Requirement

Issue 1: Is the LPPU positively prepared, justified, effective and consistent with national policy and guidance with regard to housing need and the housing requirement?

- 2.1 What is the minimum number of new homes needed over the LPPU's plan period as calculated using the standard method and including the cities and

urban centres uplift based on the latest available figures at the point the LPPU was submitted? Are the calculations accurate and do they reflect the PPG's methodology and advice?

- 2.2 Having had regard to the PPG, are there any exceptional circumstances in Reading which justify an alternative approach to following the standard method in its entirety, including the cities and urban centres uplift? If so, what are they, are they supported by robust evidence, and what should the housing requirement for Reading be?
- 2.3 The PPG refers to the expectation that the increase in the number of homes to be delivered in cities and urban centres is delivered in those areas, rather than the surrounding areas, unless it would conflict with national policy and legal obligations. Would there be any conflict with national policy and legal obligations if the cities and urban centres uplift was applied?
- 2.4 Do paragraph 11 of the Framework and the policies within footnote 7 of the Framework provide a strong reason for restricting the overall scale, type or distribution of development in the LPPU's area?
- 2.5 Are there any reasonable alternative spatial strategies for Reading which could result in a material difference with regard to any unmet housing need under the standard method which remains to be positively accounted for?
- 2.6 Is the housing requirement figure of 14,850 homes by 2041 (approximately 825 per annum) in Policy H1 justified?

Issue 2: Is the LPPU positively prepared, justified, effective and consistent with national policy and guidance with regard to provision for Gypsies, Travellers, and Travelling Showpeople?

- 2.7 Did the Review of the Reading Borough Local Plan 2019 (March 2023) [LP011] consider whether there was a need to update the Council's evidence base (dating from 2017) on the needs of Gypsies, Travellers, and Travelling Showpeople? If not, why not?
- 2.8 Does the LPPU provide a supply of specific deliverable sites for Gypsies, Travellers, and Travelling Showpeople sufficient to provide 5 years' worth of sites against locally set targets? Have any recent permissions addressed short-term needs for pitches and plots? What provision is made for years 6 to 10 of the plan period, and, where possible, for years 11 - 15? Have any windfall sites come forward in recent years?
- 2.9 How were the accommodation needs of Gypsies, Travellers and Travelling Showpeople considered through the wider site allocation process within the LPPU? Was the site selection process for allocations robust and consistent? Did the site selection process consider all potential sources of sites?

Joanna Gilbert

Inspector

4 August 2025