

Examination of the Reading Borough Local Plan Partial Update

Reading Borough Council Hearing Statement for Matter 1: Legal Requirements and Procedural Matters

October 2025

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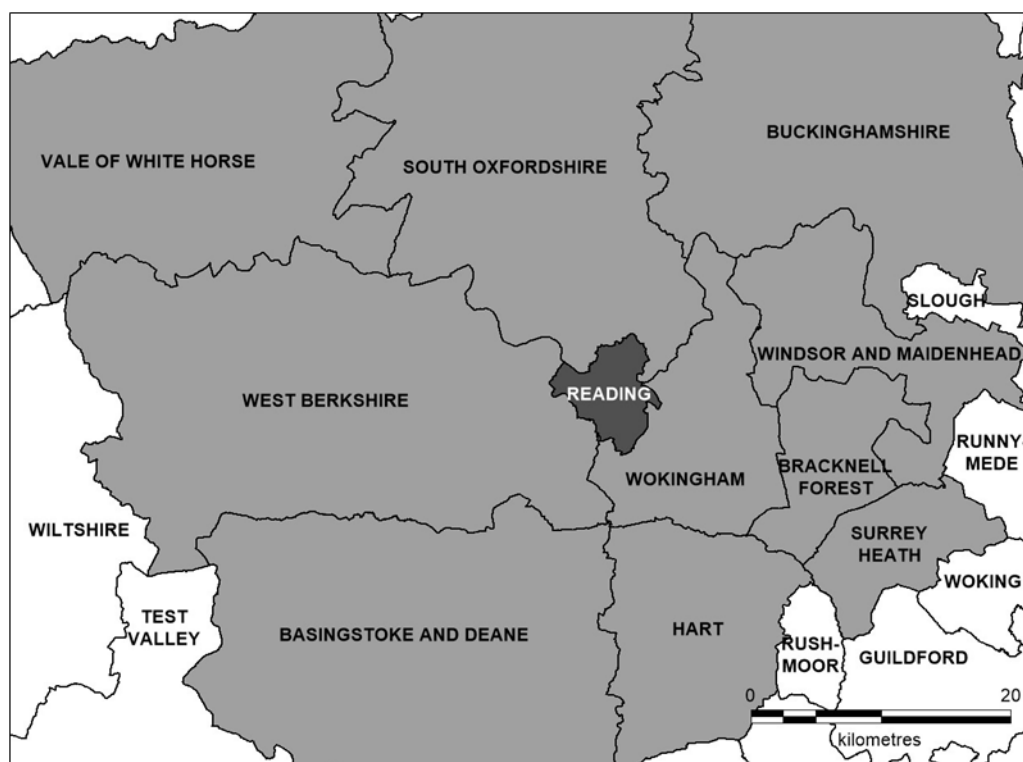
Note: In all Council Hearing Statements, references to the Local Plan Partial Update (LPPU) are to the Pre-Submission Draft Local Plan Partial Update showing tracked changes [LP003b] unless otherwise specified.

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?*
- 1.1.1 The process of making the request to neighbouring authorities is set out within section 2.3 of the Duty to Co-operate Statement [EV001].
- 1.1.2 The process of making the request involved a letter on 23 August 2024 to all local planning authorities within 15 km of Reading's boundaries, totalling nine authorities¹. Although paragraph 2.3.2 of the Duty to Co-operate Statement says that authorities within 10 km were contacted, actually this includes all authorities within 15 km as it includes Surrey Heath. The letter is attached as Appendix 3 to the Duty to Co-operate Statement.
- 1.1.3 The letter set out the position at the time, which covered:
- The background to the LPPU and the existing adopted Local Plan housing figures;
 - The expected basis for the LPPU, i.e. the identified level of need of 735 per year from the Housing Needs Assessment [EV011] and the expected capacity of 825 per year from the HELAA [EV015], resulting in no unmet need;
 - The outcome of the standard method from the 2023 NPPF at the time, which would have been 878 dwellings per year;
 - The level of unmet needs that would arise should the standard method be used as the basis for the LPPU;
 - A request to consider whether the authority would be in a position to accommodate any unmet needs that would arise through use of the standard method.
- 1.1.4 Figure 1 shows the location of the authorities contacted.

¹ Basingstoke and Deane Borough Council, Bracknell Forest Borough Council, Buckinghamshire Council, Hart District Council, Royal Borough of Windsor and Maidenhead, South Oxfordshire District Council/Vale of White Horse District Council, Surrey Heath Borough Council, West Berkshire District Council, Wokingham Borough Council

Figure 1: Location of authorities contacted as part of the Duty to Co-operate request of 23 August 2024



- 1.1.5 Responses were received from eight of the nine authorities contacted, with Surrey Heath the only authority not responding. The responses are included within Appendix 4 and summarised in paragraph 2.3.3 of the Duty to Co-operate Statement. In overall terms, no authority identified any scope to accommodate any unmet needs that would arise.
- 1.1.6 It is important to note that, in line with paragraph 62 of the NPPF, because any unmet need would have arisen as a result of the urban uplift within the standard method, a reliance on neighbouring authorities to meet needs would require a voluntary redistribution agreement to be in place. This would require an active agreement, an appetite for which was not apparent in any of the responses.
- 1.1.7 In terms of constructive, active and ongoing joint working with neighbouring authorities on general housing need, the evidence is again summarised in the Duty to Co-operate Statement. A number of meetings with the authorities with the closest relationship with Reading took place during Autumn 2023². At these meetings, the Council outlined the emerging position on housing needs which included the following:
- a Housing Need Assessment had been commissioned that had identified an emerging local need of 735 homes per year³;

² South Oxfordshire/Vale of White Horse – 6 October; West Berkshire – 18 October; Bracknell Forest – 31 October; Wokingham – 1 November; Oxfordshire – 2 November; Basingstoke and Deane – 30 November.

³ Other than for the SODC/VOWH meeting where a specific need figure had not yet emerged.

- the Council was expecting to rely on exceptional circumstances to justify basing the LPPU on this need;
- the LPPU would likely plan for the capacity of Reading which at the time, before finalisation of the HELAA, was estimated at 800 homes per year; and
- that a duty to co-operate request to understand the position relating to any unmet need under the standard method (the standard method gave a figure of 877 per year at the time) would be made.

Minutes of the following meetings are included as Appendices: meeting with South Oxfordshire and Vale of White Horse – Appendix 1; meeting with West Berkshire – Appendix 2; meeting with Bracknell Forest – Appendix 3; meeting with Wokingham – Appendix 4.

- 1.1.8 The next point at which engagement took place on housing needs followed the Regulation 18 consultation and was as part of the Housing Needs Assessment (HNA) process. A duty to co-operate workshop was held on 19 March 2024 to discuss the emerging conclusions of the HNA including the emerging need figure of 735 per year. Paragraph 2.2.3 of the Duty to Co-operate Statement outlines the invitees and attendees for this meeting.
- 1.1.9 A draft version of the HNA was also circulated on 25 July 2024 to all duty to co-operate partners that had been invited to the stakeholder workshop for comment, but no comments were received.
- 1.1.10 Following this, the duty to co-operate request outlined above was sent on 23 August 2024, giving a deadline of 16 September to respond.
- 1.1.11 The next specific engagement other than as part of the Regulation 19 consultation (November and December 2024) was in drawing up the Statements of Common Ground that are included as Appendices 5 to 8 of the Duty to Co-operate Statement. This outlines the position that the LPPU relies upon need identified in the HNA as a result of the identified exceptional circumstances.
- 1.1.12 Engagement on housing needs has therefore been constructive, active and ongoing across a period from prior to the Regulation 18 consultation right up to submission.
- 1.1.13 In terms of engagement on provision for Gypsies, Travellers and Travelling Showpeople, as this was not a part of the scope of the LPPU, the level of engagement was not as significant as for general housing needs. In the Autumn 2023 meetings, the position regarding gypsy and traveller provision was also set out, as follows:
 - Policy H13 and the overall gypsy and traveller need does not form part of the update.
 - The need for 10-17 permanent pitches remains unmet and the Council will continue to seek provision in neighbouring authorities, and is open to discussion on how this would be resourced.
 - Planning permission has been granted for a site that would meet identified transit needs.

The notes from the relevant meetings are included in Appendices 1 to 4.

1.1.14 The Council has continued to make the point about unmet needs as a representation to the plans of adjoining authorities, including the Regulation 19 consultations from West Berkshire (February 2023), Wokingham (November 2024) and South Oxfordshire and Vale of White Horse (November 2024).

1.1.15 Statements of Common Ground with South Oxfordshire and Vale of White Horse District Councils, Wokingham Borough Council, West Berkshire District Council and Bracknell Forest Council (Appendices 5 to 8 of the Duty to Co-operate Statement) recognise the unmet gypsy and traveller accommodation needs from Reading. The latter three Statements recognise the need to maintain dialogue on this matter.

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?

1.2.1 The position of neighbouring authorities in relation to the planned level of housing and provision for Gypsies, Travellers, and Travelling Showpeople is set out below.

1.2.2 **Housing:** Neighbouring planning authorities have expressed the following positions at Regulation 19 stage regarding housing provision. These are set out in more detail in those authorities' responses in LP007 but are in Appendix 5 for ease of reference.

- Bracknell Forest Council (BFC): BFC has no objection to the approach proposed for deriving the local housing need figure, as it is agreed that the 35% uplift for Reading results in a figure which does not fully relate to local need. However, BFC has concerns about how the remaining need (once existing commitments have been deducted) will be addressed in the Plan, specifically due to expressing a capacity range for each site, as, if each site were delivered at the minimum of the range, there would be a shortfall of 1,318 homes against policy H1. Assurance is sought that the identified sites will meet the requirement.
- Oxfordshire County Council (OCC): OCC notes that RBC relies on the level of need from the Housing Needs Assessment and that, if the requirement exceeded 825 pa, there would be unmet need, and there is no agreement with adjoining authorities regarding any unmet need. OCC also notes that RBC's approach differs from adjoining plans (South and Vale and Wokingham) and also notes the letter recommending withdrawal of Oxford City Council's Local Plan due to unmet needs. No comment is made on whether RBC's needs or provision figures are sound. The response notes that RBC's position does not give rise to unmet need or new strategic infrastructure implications that OCC needs to address.
- Royal Borough of Windsor and Maidenhead (RBWM): RBWM notes that the full housing need figure would not be met. However, if the outcome of the examination is to increase the housing target RBWM would not be in a position to assist with meeting any unmet need.
- South Oxfordshire District Council and Vale of White Horse District Council (South and Vale): South and Vale support Reading's proposed housing requirement and believe it to be sound, and support the exceptional

circumstances that justify the alternative approach to the standard method. South and Vale note that there is no expectation of unmet housing need needing to be planned for by neighbouring local authorities.

- West Berkshire District Council (WBDC): WBDC notes that the LPPU is to meet its needs in full based on the alternative approach under exceptional circumstances, and welcomes the intention to deliver 825 homes which exceeds that level of assessed need. However, WBDC recognise that the approach to housing need will come under scrutiny, and use of the standard method (at the time of writing) would result in unmet needs, and WBDC would not be in a position to help with those unmet needs in the plan period.
- Wokingham Borough Council (WBC): WBC supports policy H1 in principle and notes that it exceeds the needs identified in the Housing Needs Assessment. However, WBC expects other parties to promote use of the standard method, and is mindful of advice in NPPF paragraph 62 which would reflect that there is no expectation that authorities should co-operate to meet unmet needs that arise purely from the urban uplift stage of the standard method. Exporting unmet need to Wokingham would require significant use of greenfield land and would be in conflict with the purpose of the urban uplift and national policy.

1.2.3 Gypsies, Travellers and Travelling Showpeople: Neighbouring authorities have made the following representations at Regulation 19 stage regarding accommodation for these groups. These are set out in more detail in those authorities' responses [LP007] but are in Appendix 5 for ease of reference.

- BFC: No update is provided on progress in meeting unmet needs. It is not clear why the target does not match the identified need⁴.
- WBDC: WBDC notes the unmet need and supports inclusion of policy H13. WBDC is commencing work on a Gypsy and Traveller Accommodation Development Plan Document (DPD) to contain policies and allocations to meet needs. At the time of writing, WBDC is unable to accommodate any of Reading's unmet needs but commits to liaise on this matter in producing the DPD.

1.2.4 In terms of housing, the overall provision does not have any direct implications for other authorities in terms of their own housing needs. Where there are implications for authorities these are around the overall level of growth and the need for cross-boundary transport infrastructure. In particular, the Infrastructure Delivery Plan identifies two major transport projects that would require delivery in adjoining authorities, specifically Cross-Thames Travel and park and ride mobility hubs. It should be noted that these infrastructure requirements are not new as a result of the Partial Update but are already in the adopted Local Plan.

1.2.5 Regarding Cross-Thames Travel, there is a Cross Thames Travel Group including the affected authorities to develop options to improve travel across the River

⁴ The Council sought to address this point with an amendment to the Pre-Submission Draft LPPU set out in the list of changes to the submission draft [LP002]. However, as the examination is not expected to have regard to this list, the Council suggests that a Main Modification would be required to change the target for gypsy and traveller provision from "None" to "Up to 17 permanent pitches, Transit site for 5 pitches, 2 plots for travelling showpeople"

Thames, including reviewing opportunities to improve existing routes and to review the need for a new river crossing to the east of Reading and associated mitigation measures.

1.2.6 In terms of park and ride mobility hubs, there are three existing park and ride facilities within Wokingham Borough, but the identified corridors would almost certainly require sites in West Berkshire and South Oxfordshire. However, specific sites have not yet been identified. Once sites are identified, the Council would work with the relevant adjoining authority to progress their delivery. In the meantime, the Council continues to seek recognition of the need to make park and ride provision in adjoining Local Plans.

1.2.7 In terms of Gypsies, Travellers and Travelling Showpeople, the implications of Reading's unmet needs are that the Council considers that provision should be made in neighbouring authorities for the permanent pitch needs of up to 17 pitches to 2036. The Council continues to make this point in every local plan representation to neighbouring authorities and in every duty to co-operate meeting (including all of those listed in Appendix 2 of the Duty to Co-operate Statement [EV001]), and the position is reflected in the Statements of Common Ground agreed with Wokingham West Berkshire and Bracknell Forest in relation to the LPPU.

1.3 Has the Council been approached by other strategic policy-making authorities to accommodate any unmet needs in the LPPU?

1.3.1 Since the adoption of the Local Plan, the Council has been approached by four other strategic policy-making authorities to accommodate unmet needs. These are detailed in section 2.6 of the Duty to Co-operate Statement [EV001], together with the Council's position on each. Only one of these requests was received since the LPPU preparation commenced in March 2023, and no further requests have been received since the Duty to Co-operate Statement was produced.

1.3.2 The requests were as follows:

- 27 January 2020 – request from Elmbridge Borough Council relating to unmet housing needs (estimated at 4,000 homes);
- 31 August 2021 – request from Bracknell Forest Borough Council relating to unmet industrial and warehouse floorspace need (48,875 sq m to 2037);
- 13 January 2023 – request from West Berkshire District Council relating to unmet employment floorspace need (estimated at 50,816 sq m of offices and 32,709 sq m of B2/B8);
- 29 November 2023 – request from Wokingham Borough Council relating to unmet need for gypsy and traveller accommodation (estimated at 21 to 26 pitches).

1.4 With regard to question 1.3, what were the outcomes of these discussions with other strategic policy-making authorities with unmet needs?

1.4.1 The outcome of any discussions and updated position is outlined below.

1.4.2 **Elmbridge – housing:** The outcome was that Reading Borough Council (RBC) responded to Elmbridge Borough Council (EBC) on 31 January 2020. This identified

that, based on the position at the time with the adopted Reading Borough Local Plan having an unmet housing need, there was no scope to accommodate any of Elmbridge's unmet needs in Reading.

- 1.4.3 The current position with the Elmbridge Local Plan is that the Inspector provided interim findings on 11 September 2024. These findings were that the plan as submitted was unsound. The letter identifies the scale of the shortfall in meeting housing need as 6,300 homes over the plan period to 2040 and disagreed with the Council's position that there were not exceptional circumstances to amend Green Belt boundaries to meet these needs. EBC formally withdrew the Local Plan on 27 February 2025. The most recent Local Development Scheme states that the pre-commencement period for the New Local Plan will be from March 2025 to February 2026. As such, it is not yet known whether there will be unmet needs as part of this process.
- 1.4.4 **Bracknell Forest – industrial and warehouse:** The initial outcome was that RBC replied to the request on 17 September 2021 to confirm that it did not have scope to accommodate unmet industrial and warehouse needs from Bracknell Forest as meeting its own needs was challenging. Subsequently, a Statement of Common Ground between RBC and Bracknell Forest Council (BFC) to support the Bracknell Forest Local Plan was signed in December 2021 which reflected the unmet need of 33,875 sq m of industrial and warehouse floorspace, and that RBC did not consider that there was scope in Reading to meet these needs.
- 1.4.5 The current position is that the Bracknell Forest Local Plan was adopted on 19 March 2024. There is around 23,000 sq m of employment development which is not accommodated on identified sites in the plan, but the Local Plan does not indicate that this is unmet need to be delivered in neighbouring authorities, but rather that there is considerable future uncertainty over demand and commits to monitoring take up in order to identify any emerging trends which will be responded to through a Local Plan Review. This is reflected in paragraph 4.18 of the Statement of Common Ground between RBC and BFC to support the LPPU, signed on 6 May 2025, and included as Appendix 8 of the Duty to Co-operate Statement [EV001].
- 1.4.6 **West Berkshire – employment:** The intention regarding this request was that the position be set out in a specific Statement of Common Ground. A draft was prepared by West Berkshire District Council (WBDC) on 13 December 2022, prior to the formal request. However, RBC did not provide an amended version of this draft until 20 April 2023, at which point the West Berkshire Local Plan had been submitted. The Statement of Common Ground was never formally signed.
- 1.4.7 The West Berkshire Local Plan Review was adopted on 10 June 2025. It results in a shortfall in meeting identified employment needs totalling 57,531 sq m of offices and 39,796 sq m of industrial space after allocations are taken into account. The plan does not state that this will be provided in other authorities but that it would be addressed at the first five year review of the plan. This position is reflected in paragraph 4.18 of the Statement of Common Ground between WBDC and RBC to support the LPPU, signed on 8 May 2025, and included as Appendix 7 to the Duty to Co-operate Statement [EV001].

- 1.4.8 **Wokingham – gypsy and traveller accommodation:** The initial outcome of the discussion on this matter was a letter from Reading Borough Council to Wokingham Borough Council on 30th November 2023. This letter highlighted the extensive work that had gone into seeking to identify land to meet Reading's needs that had not resulted in any sites for permanent pitches being identified, and that no potentially suitable sites had subsequently arisen, and that the Council was not therefore in a position to meet any of Wokingham's unmet need.
- 1.4.9 The updated position is that Wokingham's submitted Local Plan Update plans to meet the need for pitches for gypsies and travellers in full within its own boundaries. A supply of 78 pitches is identified in the plan itself with the remaining 8 required pitches to be delivered as windfalls. As such, there is not currently any unmet need from Wokingham that would need to be met in neighbouring authorities.
- 1.4.10 The position regarding gypsy and traveller accommodation in both authorities is set out in two Statements of Common Ground. One of these, signed on 17 March 2025, is specific to the Wokingham Local Plan Update, whilst the other, signed on 8 May 2025 (Appendix 6 to the Duty to Co-operate Statement [EV001]) is specific to the LPPU. Paragraphs 4.13 to 4.15 of the latter Statement of Common Ground set out the position regarding this issue. The agreement is to maintain an open dialogue on this matter.
- 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?*
- 1.5.1 At the time that evidence on capacity to accommodate needs was being prepared there were not any unmet needs for general housing from other areas that Reading would need to accommodate. The only such request was from Elmbridge, and by the point of detailed consideration of capacity the situation had moved on considerably as described in relation to question 1.3, and in any case Elmbridge is around 30km from Reading and there is very limited functional relationship between the authorities.
- 1.5.2 The scope to accommodate development, whether or not it related to Reading's needs, was considered through the Housing and Economic Land Availability Assessment (HELAA) process, and is detailed in the relevant HELAA documents (EV015 and EV016). As this is an assessment of total capacity and not the ability to deliver a specified level of need, this approach allows consideration of whether there is capacity to accommodate unmet housing needs from elsewhere which would be clear if the level of capacity was higher than Reading's needs.
- 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?*
- 1.6.1 The HELAA shows that there is capacity to accommodate 14,849 dwellings between 2023 and 2041. The needs identified in the Housing Needs Assessment (HNA) [EV011] on which the LPPU is based are for 13,230 dwellings over the same period. Therefore, the HELAA shows that there is capacity to deliver an additional 1,519 dwellings between 2023 and 2041. This additional capacity could potentially be used to meet unmet needs from elsewhere. However, as there were no outstanding

requests at the point of the Regulation 19 consultation, this would instead be a contribution to boosting overall housing supply.

- 1.6.2 Should the LPPU rely on need identified through the standard method of 822 per year, the total need over the plan period would be 14,796 dwellings. Therefore, the HELAA shows capacity to deliver an additional 53 dwellings. This would not be a substantial contribution to any unmet needs from elsewhere, and would more likely be required as a margin for flexibility.
- 1.6.3 The HELAA was not specifically shared with duty to co-operate bodies as a separate exercise, but was available in full on the Council's website from the start of the Regulation 19 consultation stage to inform those bodies' comments. It is worth noting however that it used a methodology agreed jointly with West Berkshire Council, Wokingham Borough Council, the Royal Borough of Windsor and Maidenhead and Slough Borough Council.
- 1.6.4 However, estimates of capacity to accommodate housing development within Reading were shared with relevant duty to co-operate bodies at points throughout the process, as well as how this related to emerging conclusions on need. For instance, by October 2023, preliminary capacity estimates had been arrived at without using the full HELAA process of around 800 homes per year, whilst the emerging HNA process had identified exceptional circumstances for a different approach and a draft figure of 735 homes per year. Therefore, in the following duty to co-operate meetings, RBC advised duty to co-operate bodies that exceptional circumstances had been identified, and that it was expected to plan for a level of supply of 800 homes which outstripped the locally-assessed need for 735 homes:
- Meeting with South Oxfordshire District Council, 6 October 2023
 - Meeting with West Berkshire District Council, 18 October 2023
 - Meeting with Bracknell Forest Council, 31 October 2023
 - Meeting with Wokingham Borough Council, 1 November 2023
 - Meeting with Oxfordshire County Council, 2 November 2023
 - Meeting with Basingstoke and Deane Borough Council, 30 November 2023
- 1.6.5 At the above meetings, the intention to make a duty to co-operate request to understand the position should the LPPU rely on the standard method including the urban uplift was also highlighted.
- 1.6.6 The position regarding levels of need and supply in paragraph 1.6.4 was subsequently confirmed in the Consultation on Scope and Content (under Regulation 18) [LP008] published in November 2023.
- 1.6.7 The position outlined above was once again outlined by the Council in introduction to the duty to co-operate workshop held on 19 March 2024 as part of the HNA process, which was attended by Bracknell Forest Borough Council, Buckinghamshire Council, Hart District Council, Royal Borough of Windsor and Maidenhead, Slough Borough Council, South Oxfordshire District Council, Vale of White Horse District Council and Wokingham Borough Council (and to which many more bodies were invited, including West Berkshire Council).

- 1.6.8 The more detailed work as part of the HELAA mostly took place in summer 2024 and incorporated the results of 2023-24 development monitoring. Therefore, by late summer an emerging capacity figure of 825 dwellings was available. This position was set out in the duty to co-operate letter sent on 23 August 2024 (Appendix 3 to the Duty to Co-operate Statement [EV001]), which included the following:

“Reading’s intended position was set out in the Regulation 18 consultation. The position was that the updated policy H1 will be based on the assessed need for 735 homes per year, but will plan to exceed this figure by providing for the assessed capacity of approximately 800 homes per year. This figure has now been refined by more detailed work since the consultation was undertaken using a Housing and Economic Land Availability Assessment (HELAA) based on a methodology agreed between five Berkshire authorities, and is now expected to be 825 homes per year. The intention is that the Regulation 19 version of the Partial Update will plan for provision of 825 homes per year compared to a need of 735 homes per year.”

- 1.6.9 At none of these points did any of the Duty to Co-operate bodies express any interest in any provision being made for their unmet housing needs.

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?

- 1.7.1 The Commercial Needs Assessment (CNA) [EV006] is the piece of evidence determining the level of need for employment land.

- 1.7.2 Section 3 of the CNA, when considering office and industrial markets, is based on a wider understanding of those markets which extends beyond Reading’s boundaries. Generally, the Reading office and industrial markets are understood to include Thames Valley Park, Suttons Business Park, Winnersh Triangle and that part of Green Park that falls outside Reading, all of which are within Wokingham Borough, as well as Arlington Business Park within West Berkshire, in addition to some much smaller areas.

- 1.7.3 In terms of matters such as travel to work, assumptions about increases in home-working which will affect travel patterns are used as a sensitivity test for scenarios in the CNA. Both low (19.4%) and high (30.8%) working from home rates in 2041 are used, sourced from Experian. The effects of differing levels of working from home are much more significant for offices than for industrial, and for the synthesis scenario on which the LPPU is based the results are shown in Tables 73 and 75 of the CNA. However, none of this is specific to the particular travel to work patterns around Reading.

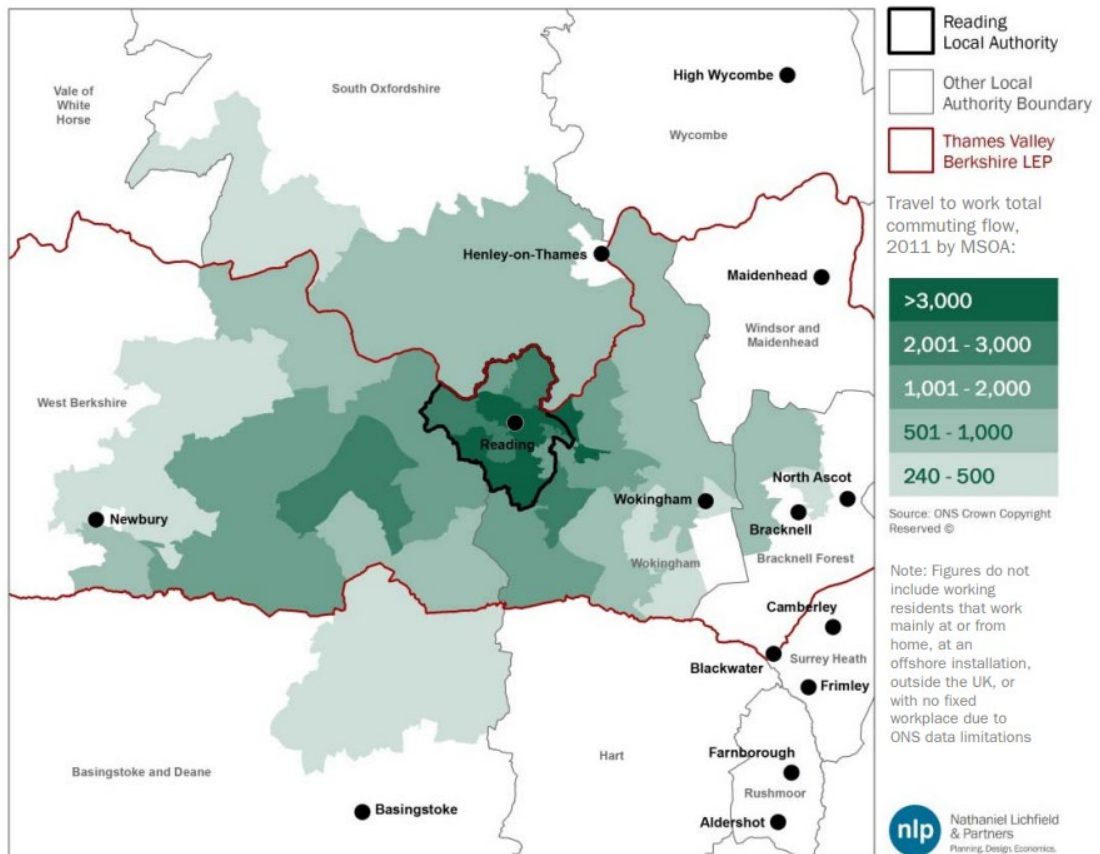
- 1.7.4 Ultimately, as the CNA is to support an update of an existing adopted plan rather than an entirely new plan, it does not particularly look outside Reading’s boundaries, and bases its conclusions on labour demand, labour supply and take-up scenarios which are specific to Reading itself. This was considered a proportionate approach to

support the LPPU, and no representations have suggested that a different approach should have been taken.

- 1.7.5 A draft version of the CNA was circulated for comment to a number of duty to co-operate bodies⁵ on 12 November 2024, prior to the Regulation 19 consultation, including those authorities that had previously been identified as being within Reading's Functional Economic Market Area (see following paragraphs). No comments were received.
- 1.7.6 The point at which more strategic matters around employment land were considered in depth was when the Local Plan was originally prepared. It was supported by a Berkshire Functional Economic Market Area Study (2016), jointly commissioned by the six Berkshire unitary authorities and the Thames Valley Berkshire Local Enterprise Partnership and prepared by Nathaniel Lichfield & Partners. The Executive Summary of this report is included as Appendix 6.
- 1.7.7 In terms of travel to work, the FEMA Study highlights the Travel to Work Areas (TTWAs) defined by ONS based on 2011 Census data. No TTWAs have been produced based on the 2021 Census. A Reading TTWA was defined that includes the entirety of Reading and Wokingham Boroughs as well as most of Bracknell Forest, parts of the south east of South Oxfordshire as well as smaller parts of other authorities. The FEMA Study then also identified the specific Local Travel to Work Area for Reading Borough, which is shown in Figure 2. This shows particularly strong relationships with the eastern part of West Berkshire and western part of Wokingham, and lesser relationships with the south east of South Oxfordshire and the north west of Bracknell Forest.

⁵ South Oxfordshire District Council, West Berkshire District Council, Wokingham Borough Council, Bracknell Forest Borough Council, Royal Borough of Windsor and Maidenhead and Thames Valley Berkshire Local Enterprise Partnership

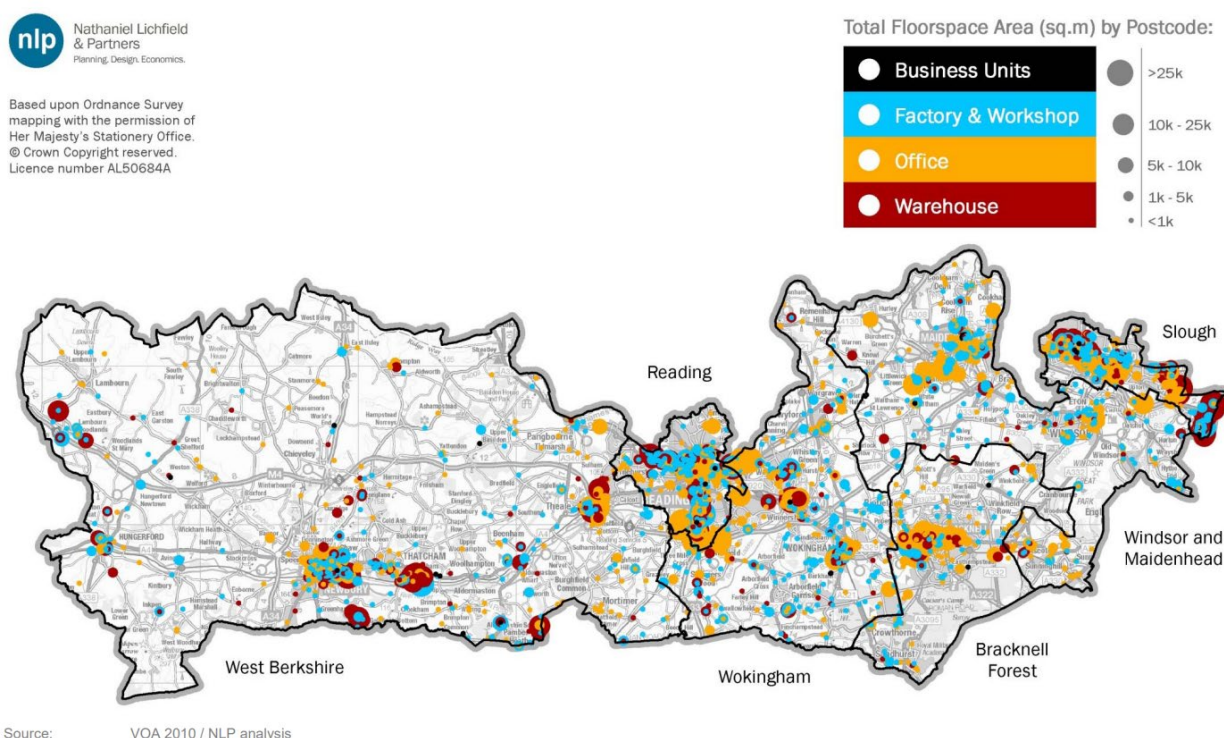
Figure 2: Local Travel to Work Area for Reading 2011 from FEMA Study 2016



Source: Census 2011 / NLP analysis

- 1.7.8 In terms of commercial property markets, a Core Thames Valley area is identified incorporating the markets of Reading, Maidenhead, Bracknell and Wokingham, which are similar in terms of value, accessibility, labour force and the importance of technology-driven business parks. Synergy between the Reading and Newbury markets is also noted. Figure 3 shows the location of employment floorspace within the Berkshire authorities, and shows that Reading is a primary focus within the Core Thames Valley area but that the floorspace provision spills beyond Reading's boundaries, and that Bracknell, Maidenhead and Newbury are secondary foci. Slough is a major employment centre but is outside that Core Thames Valley area. There has been little change in employment floorspace provision in the area since that date that changes that overall pattern.

Figure 3: Spatial distribution of employment floorspace in Berkshire from FEMA Study 2016



- 1.7.9 Taking account of this and other matters, specifically the housing market areas, consumer market areas and transport and connectivity, the FEMA study identifies three FEMAs covering the Berkshire authorities. A Central Berkshire FEMA is identified that covers the authorities of Reading, Wokingham, Bracknell Forest and Windsor and Maidenhead, but Windsor and Maidenhead also falls within an Eastern Berkshire FEMA also consisting of Slough and South Bucks, reflecting the overlapping nature of these areas. West Berkshire is considered to be a separate FEMA, albeit with some synergy between Newbury and Reading.
- 1.7.10 The Council considers that those FEMAs identified in 2016 remain relevant and have underpinned the approach to the duty to co-operate, with the three other authorities covered by the Central Berkshire FEMA being key partners, as well as West Berkshire due to the identified synergies and the fact that floorspace making up part of Reading's commercial property market is within West Berkshire.
- 1.7.11 The Council recognises the role of Reading as the economic centre of the FEMA as well as the wider Thames Valley, and this is reflected in the vision of the Local Plan. The adopted Local Plan also notes that delivery of office floorspace over and above Reading's own needs could be a contribution to the wider FEMA. However, the availability of land to meet employment needs is constrained, and the HELAA demonstrates that, in terms of industrial and warehouse floorspace there is only capacity to meet Reading's needs (together with the scope for intensification identified in the Employment Area Analysis [EV010]) and there is capacity to meet office needs subject to existing permissions being built out. There is therefore no capacity to meet needs from the wider FEMA or other areas.

- 1.7.12 The overall provision planned for in the LPPU does not have direct implications for other authorities in terms of provision and need for employment land. No authorities are relying on provision in Reading to meet any of their unmet needs, and no unmet need arises that needs to be met outside Reading. The most likely indirect implications are in terms of transport impacts, and the Transport Modelling report [EV018 and appendices] does not highlight significant impacts on adjoining authorities.
- 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?*
- 1.8.1 The Council contacted National Highways on 10 July to enquire about the principle of entering into a Statement of Common Ground but has not yet received a response.
- 1.8.2 The Council has commissioned Stantec to provide further evidence to address National Highways' points regarding Junction 11 of the M4 which were highlighted in response to IQ13 of the Council Response to Initial Questions (part 1) [EX002] with a view to reaching an agreement that would be reflected in a Statement of Common Ground. Stantec produced a Technical Note outlining the proposed methodology which was provided to National Highways on 9 September. National Highways had one comment on the proposed methodology, that assessments should use demand flows rather than assigned flows unless there are good reasons not to, which Stantec is taking into account. Work on this additional evidence is progressing, and the Council intends that this will inform a signed Statement of Common Ground.
- 1.8.3 Engagement with National Highways can only be meaningful if it is on the basis of the kind of detailed information on impacts on the strategic road network that are contained in the Transport Modelling [EV018-EV021], and as such needs to take place primarily when that information is available. Information was provided as soon as it was available in April 2025. The Council regrets that this information was not provided at an earlier stage. However, the Council ensured that the LPPU was not submitted until such time as National Highways and other relevant duty to co-operate bodies had had a chance to provide comments on the draft.
- 1.8.4 It was not anticipated that the LPPU would have been likely to lead to significant impacts on the strategic highway network, which is why this had not been specifically flagged to National Highways at an earlier stage. This is because almost all of the new allocations were on sites which have existing uses and associated trips, and the majority of the new sites and existing sites with uplifted development potential would be in the town centre where they would be highly accessible by public transport, walking and cycling and would have low levels of car parking. Whilst clearly engagement under the duty to co-operate was required with National Highways, impact on the strategic highway network was not expected to be as significant a strategic matter as, for instance, housing needs.

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?

1.9.1 Section 33A(4) of the Planning and Compulsory Purchase Act 2004 (as amended) defines a strategic matter as follows:

(a) sustainable development or use of land that has or would have a significant impact on at least two planning areas, including (in particular) sustainable development or use of land for or in connection with infrastructure that is strategic and has or would have a significant impact on at least two planning areas, and

(b) sustainable development or use of land in a two-tier area if the development or use—

(i) is a county matter, or

(ii) has or would have a significant impact on a county matter.

1.9.2 For these purposes, only (a) is relevant as Reading is not in a two-tier area.

1.9.3 The Duty to Co-operate Statement [EV001] sets out the strategic matters that relate to local planning in Reading that would have a significant impact on at least two planning areas and these are summarised in Appendix 1 of that statement. However, some of those are particularly significant for the LPPU due to the nature of the updates, as set out below.

1.9.4 **Need and provision for economic development and town centres:** In terms of economic development, this matter is dealt with in answer to question 1.7, but the strategic matter also covers town centre development. Reading town centre is the main regional centre serving an area that extends significantly beyond its boundaries. This issue was raised in the meetings with South Oxfordshire District Council (SODC) and Vale of White Horse District Council (VOWH), West Berkshire District Council (WBDC), Bracknell Forest Council (BFC) and Wokingham Borough Council (WBC) in October and November 2023 (see Appendices 1-4) at which point the Commercial Needs Assessment (CNA) [EV006] had not yet been commissioned, but given the situation with retailing nationwide, needs were expected to decrease from the adopted plan, which would reduce any impact that the Local Plan would be expected to have on nearby authorities.

1.9.5 As set out in paragraph 1.7.5, a draft of the CNA was circulated for comment to a number of relevant duty to co-operate partners on 12 November 2024, prior to the Regulation 19 consultation, with no comments received.

1.9.6 This matter is reflected in relevant Statements of Common Ground as follows:

- Paragraphs 4.16 and 4.17 of the SoCG with SODC/VOWH (Appendix 5 to the Duty to Co-operate Statement) state that neither authority has unmet needs for retail that will need to be accommodated in the other authority.

- Paragraphs 4.25-4.27 of the SoCG with WBC (Appendix 6 to the Duty to Co-operate Statement) identify no unmet needs and agree that the level of development planned for does not give rise to particular cross-boundary impacts.
- Paragraphs 4.21-4.23 of the SoCG with WBDC (Appendix 7 to the Duty to Co-operate Statement) note the need for a review of WBDC's retail needs in the first five years of the plan, but agree that the level of development planned for in the LPPU does not give rise to particular cross-boundary impacts.
- Paragraphs 4.21-4.2 of the SoCG with BFC (Appendix 8 to the Duty to Co-operate Statement) identify no unmet needs and agree that the level of development planned for does not give rise to particular cross-boundary impacts.

1.9.7 Strategic transport infrastructure needs and provision: Delivering some of the transport infrastructure identified in the Infrastructure Delivery Plan and policy TR2 requires cross-boundary co-operation, in particular because some of it requires land outside Reading. This is particularly the case for park and ride mobility hubs and cross-Thames travel. Park and ride was a matter that was discussed with WBC, WBDC and SODC/VOWH in the respective meetings that were held in October and November 2023 (Appendices 1, 2 and 4), and cross-Thames travel was discussed in the SODC/VOWH meeting. These are longstanding ambitions on which the parties have generally co-operated for some time, and the positions are well understood. These matters are dealt with in relevant Statements of Common Ground as follows:

- Paragraphs 4.18 and 4.19 of the SoCG with SODC and VOWH (Appendix 5 to the Duty to Co-operate Statement) deal with the parties' respective positions on cross-Thames travel and park and ride mobility hubs, and identify that the Joint South Oxfordshire and Vale of White Horse Local Plan does not safeguard land for this provision. Further work is therefore needed to reach agreement.
- Paragraphs 4.32 to 4.34 of the SoCG with WBC (Appendix 6 to the Duty to Co-operate Statement) deals with these infrastructure proposals and set out WBC's support for them in principle albeit with caveats that would need to be addressed as part of the proposals, and paragraph 6.3 notes that further co-operation will be necessary.
- Paragraph 4.26 of the SoCG with WBDC (Appendix 7 to the Duty to Co-operate Statement) identifies that the parties will continue to co-operate on the nature of multi-modal enhancements to transport corridors that extend into West Berkshire and agrees to continue to work together to identify opportunities for park and ride mobility hubs.

1.9.8 Strategic healthcare infrastructure needs and provision: The main issue requiring cross-boundary co-operation in the context of the LPPU is around the Royal Berkshire Hospital and plans for its replacement with a new hospital, potentially on a site within Wokingham Borough. Section 2.7 of the Duty to Co-operate Statement summarises the engagement on this topic with the Royal Berkshire Hospital Foundation Trust and WBC, which consisted of eight meetings between RBC and the Trust, one of which also included WBDC, with the issue also being discussed in duty to co-operate meetings with BFC (Appendix 3) and WBDC (Appendix 4). In terms of specific outcomes, there is a commitment to continue to work together on this matter in paragraph 4.38 of the SoCG with WBC (Appendix 6 to the Duty to Co-operate

Statement). The Council also sent a draft of policy ER3 to the Trust for their comment on 30 August 2024, and as no response was received the Council believes that the Trust is satisfied by the draft policy. However, more concrete outcomes are not possible with no decision yet having been made on whether the hospital is to remain on site or to move off site.

- 1.9.9 More generally, there is agreement in the respective SoCGs⁶ that the level of development in the LPPU will not generate additional needs for healthcare provision within another authority.
- 1.9.10 **Strategic biodiversity considerations:** The main cross-boundary issue in relation to biodiversity is in terms of the Kennet Meadows and West Reading Woodlands, which represent Biodiversity Opportunity Areas that cross the boundary with West Berkshire. The Kennet Meadows in particular were discussed at the meeting with WBDC on 18th October 2023, where proposals for engineering works to control water levels for biodiversity purposes were discussed, which could also deliver off-site biodiversity net gain, which is reflected in updates to policy SR5. Paragraph 4.31 of the SoCG with WBDC (Appendix 7 to the Duty to Co-operate Statement) identifies that cross-boundary implications are not expected.
- 1.9.11 **Strategic flooding considerations:** The main engagement on strategic flood risk matters has been with the Environment Agency on the draft Strategic Flood Risk Assessment [EV027]. A draft of this document was provided to the Environment Agency on 11 October 2024, and comments from the EA received on 19 November were incorporated into the final version of the SFRA. In terms of neighbouring authorities, the SoCGs with WBC (paragraph 4.41) and WBDC (paragraph 4.32) (Appendices 6 and 7 to the Duty to Co-operate Statement) agrees that the parties do not expect the growth identified in the LPPU to have cross-boundary implications in terms of flood risk, although the matter is not covered in the SoCG with SODC/VOWH.
- 1.9.12 **University of Reading:** This is a strategic matter as the University's main Whiteknights campus straddles the boundary between Wokingham and Reading Boroughs. Policy ER2 in the existing Local Plan deals with the campus, and policy SS9 of Wokingham's Local Plan is drafted to be consistent and utilises much of the same wording. The University was one of the matters discussed at the 1 November 2023 meeting with WBC (see Appendix 4), and at the time the Council was awaiting an Estates Strategy which was still not published at the time of submission. In the event, the changes to policy ER2 were very minor. Paragraphs 4.46 and 4.47 of the SoCG with WBC (Appendix 6 to the Duty to Co-operate Statement) deals with this matter, and 4.47 identifies that the policies in the two authorities are consistent and that WBC supports RBC's general approach.
- 1.9.13 **Planning within the Detailed Emergency Planning Zone for AWE Burghfield:** The DEPZ for AWE Burghfield covers parts of three authorities in addition to

⁶ Paragraph 4.20 of the SoCG with SODC/VOWH (Appendix 5 to the Duty to Co-operate Statement); paragraph 4.37 of the SoCG with WBC (Appendix 6 to the DTC Statement); paragraph 4.29 of the SoCG with WBDC (Appendix 7 to the DTC Statement); paragraph 4.26 of the SoCG with BFC (Appendix 8 to the DTC Statement).

Reading: West Berkshire (within which the facility is located and the authority that has responsibility for the Off-Site Emergency Plan (OSEP)), Wokingham and Basingstoke and Deane, and as such development within that zone is a strategic matter. This was discussed in the meetings with WBDC on 18 October 2024 in relation to existing allocations in particular (Appendix 2), with WBC on 1 November 2024 (Appendix 4) and with Basingstoke and Deane Borough Council on 30 November 2024. Following on from this, an early draft of the proposed amendments to policy OU2 was provided to WBDC (both Planning and Emergency Planning sections) as the main authority responsible for AWE on 17 April 2024 for comment, although no comments were received.

1.9.14 The SoCG with WBDC (Appendix 7 to the Duty to Co-operate Statement) deals with issues around AWE Burghfield in more depth. Regarding policy OU2, it outlines WBDC's support for the general principles but also its concern around some of the wording detail. As set out in paragraph 4.42 of the SoCG, RBC remains open to a discussion around wording changes that would constitute main modifications, and intends to progress a further SoCG with WBDC to agree those modifications in time for the Stage 2 hearings. Regarding the location of development within the DEPZ, WBDC continues to have some concerns with the retained employment allocations, and no agreement has been reached other than to continue to work together on understanding the impacts in terms of the OSEP.

1.9.15 Paragraph 4.52 of the SoCG with WBC (Appendix 6 to the Duty to Co-operate Statement) notes that WBC supports the approach towards AWE Burghfield in the LPPU, subject to the addition of reference to other consultation zones identified by the Office for Nuclear Regulation (ONR).

1.9.16 In terms of the other strategic matters identified in the Duty to Co-operate Statement, positions on these matters are generally agreed within the relevant SoCGs with WBC, WBDC and, where relevant, BFC, although the SoCG with SODC/VOWH is more limited to the key strategic matters.

1.10 Has the Council engaged with all relevant local planning authorities, county councils and other prescribed bodies in the preparation of the LPPU?

1.10.1 Yes, the Council considers that it has engaged with all relevant bodies in the preparation of the LPPU. The Duty to Co-operate Statement [EX001] provides the detail up to submission stage.

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?

1.11.1 Yes, the Council considers that it has complied with the Duty to Co-operate on an ongoing basis, actively and constructively. This is set out in full in the Duty to Co-operate Statement [EV001], and the Council does not propose to add significantly to the evidence set out in that document. However, it is worth bearing in mind that, as this is a Partial Update rather than a full plan, the Council has prioritised co-operation on those matters most significant to the update, such as housing needs.

- 1.11.2 There are no outstanding Duty to Co-operate objections from Duty to Co-operate partners. The only such objection was from Wokingham Borough Council, and this was withdrawn on 1 May 2025 confirmation of which is included in paragraph 4.29 of the Statement of Common Ground in Appendix 6 of the Duty to Co-operate Statement [EV001].
- 1.11.3 There were three representations at Regulation 19 stage from other organisations that raised concerns about compliance with the Duty to Co-operate – the Home Builders Federation (HBF), Gladman and USS Investment Management Ltd.
- 1.11.4 HBF argues that the premise of the co-operation that had taken place under the Duty was flawed, because it was based on there being exceptional circumstances to justify the use of an alternative calculation and there therefore being no unmet needs from Reading. The Council disagrees with this conclusion because its engagement under the Duty with neighbouring authorities has been open that, whilst the LPPU proposed to rely on the identified exceptional circumstances, the Council would also need to explore the situation were the standard method to be applied. For example, in the meetings that were held with Wokingham Borough Council, South Oxfordshire District Council, West Berkshire District Council, Bracknell Forest Council and Basingstoke and Deane Borough Council during October and November 2023 it was explained that the Council considered there were exceptional circumstances for an alternative approach, but that a formal Duty to Co-operate request was nonetheless expected to be sent to each of those (and other) authorities to understand the situation with regard to the standard method. This request was made in August 2024.
- 1.11.5 Gladman make the argument that, although RBC has promoted co-operation and dialogue with neighbouring authorities, this has not been reciprocated and therefore the engagement was not effective. There are no details in the Regulation 19 response about what the specific failure is considered to be, but Gladman's comments at Regulation 18 stage (summarised in the Statement of Consultation [LP010]) indicate concern that the South Oxfordshire and Vale of White Horse Duty to Co-operate Statement in January 2024 made no mention of Reading's plan-making process and housing needs. RBC rejects any suggestion that it has failed the Duty to Co-operate in this regard. It has engaged with South Oxfordshire and Vale of White Horse District Councils throughout, including on identifying housing needs, setting levels of provision, considering the consequences of use of the standard method and through signature of a Statement of Common Ground (Appendix 5 to the Duty to Co-operate Statement [EV001]). All authorities are agreed that there are no unmet needs, and RBC does not consider that there has been a lack of engagement from South and Vale authorities.
- 1.11.6 USS Investment Management Ltd argues that the Housing Provision Background Paper [EV012] misrepresents the outcome of the duty to co-operate request made in relation to the standard method, in stating that *"in summary there was no scope identified to meet any unmet housing needs from Reading should they arise"*, and that the absence of an assessment of the capacity of South Oxfordshire and Vale of White Horse to accommodate unmet needs from Reading, referred to in SODC and VOWH response to the duty to co-operate request, represents a failure of the duty to co-operate. The Council considers that the Housing Provision Background Paper is

correct, because no scope to accommodate unmet needs was actively identified in any response including that from SODC and VOWH, but that in any case there was no need for any further exploration of this issue as there are no unmet needs under policy H1.

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?

1.12.1 Yes, the LPPU has been prepared, publicised and consulted on according to the statutory requirements within the Planning and Compulsory Purchase Act 2004. A detailed self-assessment of the steps taken by the Council based on a template provided by the Planning Advisory Service is available in the examination library [EV003].

1.12.2 A summary of each of the main requirements within the Planning and Compulsory Purchase Act 2004 and a description of the actions taken by the Council is listed below:

- Section 13 of the Planning and Compulsory Purchase Act 2004 requires that local planning authorities “*must keep under review the matters which may be expected to affect the development of the area*” and provides a detailed list of specific considerations, such as the size of the population, transport systems, and the principal physical, economic, social and environmental characteristics of the area. This has been largely achieved through the production of the Local Plan evidence base and through annual monitoring. Annual monitoring reports are available on the Council’s website [here](#) and are published each December.
- A Local Development Scheme is required under section 15 of the Planning and Compulsory Purchase Act 2004 (as amended). This must be made publicly available and kept up-to-date and clearly detail which documents will comprise the development plan for the area. The RBC Local Development Scheme is available in the examination library [PP001] and was last updated in June 2024.
- Section 18 of the Act states that authorities must prepare and regularly review a Statement of Community Involvement. The Statement of Community Involvement (SCI) was adopted following a review on 9th June 2025 and has been added to the examination library [EX015]. Compliance with the SCI is explored in answer to question 1.14.
- Section 19(1B) - (1E) of the Planning and Compulsory Purchase Act 2004 states that each local planning authority must identify strategic priorities and formulate policies to address these priorities, including both strategic policies (which address priorities for the entire area) and non-strategic policies (which deal with detailed matters). The LPPU clearly identifies a range of strategic priorities within Sections 2 and 3 of the LPPU [LP003b] and each policy that follows within Sections 4 – 9 is clearly identified where it is strategic.

- The Duty to Cooperate is set out in Section 33A of the Act. Compliance with the Duty is explored in previous answers within this statement.
- Section 35 of the Act requires that local planning authorities must prepare regular reports pertaining to the implementation of the local development scheme and the extent to which the policies set out in the local development documents are being achieved. Section 11 of the LPPU [LP003b] states that the Council's primary tool for achieving this requirement is through the production of Annual Monitoring Reports. The Schedule in Figure 11.1 [LP003b] sets out how each policy within the LPPU will be monitored. This will therefore demonstrate over time whether specific policies are in need of further review. The most recent Annual Monitoring Report is included in the examination library [PP008], and section 2 of that document monitors progress against the LDS whilst Appendix IV contains information for each Local Plan indicator, including any cumulative figure. This has been the case for every year since the Local Plan was adopted, and will continue to be the case.
- Section 39 of the Act states a clear requirement for local plans to contribute to sustainable development. The Council has produced a Sustainability Appraisal Scoping Report [PP004] and Sustainability Appraisals of the LPPU at various stages (LP005 at Regulation 19 and LP009 at Regulation 18). The appraisal incorporates the requirements of the Strategic Environmental Assessment (SEA) and tests each of the LPPU policies and site allocations against reasonable alternatives.

1.12.3 The Town and Country Planning (Local Planning) (England) Regulations 2012 outline specific requirements for consultation during local plan production. The Self-Assessment Toolkit [EV003] illustrates that the Council has clearly met the minimum requirements under the regulations, the Planning and Compulsory Purchase Act and the NPPF. At each stage listed below, documents made available for comment were publicised extensively through press releases, social media promotion, drop-in events and the publication of physical copies made available at all libraries and the Civic Offices, with other tools also being used such as an online workshop at Regulation 18 stage. A summary of these requirements and a description of the actions taken by the Council follows below:

- Under Regulation 18, the Council consulted on a document outlining the scope and content of the Local Plan Partial Update [LP008]. This document described the approach that would be taken to update each of the 45 policies identified in March 2023 for review but did not contain a draft update. It also identified all sites that had been put forward. This consultation took place from 27 November 2023 to 31 January 2024, a period of just over 9 weeks. A summary of the measures taken is described in detail in the Statement of Consultation on the Local Plan Partial Update on Scope and Content [LP010]. The consultation notified over 1,500 contacts including statutory consultees, adjoining local authorities, Parish Councils, community and voluntary groups, commercial organisations, businesses and individuals. Detailed measures taken are listed in paragraph 2.6 of the Regulation 18 Statement of Consultation [LP010].

- From 6 November 2024 to 18 December 2024, the Council held a further consultation under Regulation 19. This document [LP003b] was a full draft which took account of representations received during Regulation 18 and a detailed summary of the consultation is described in the Statement of Consultation on the Pre-Submission Draft of the Local Plan Partial Update [LP006]. Stakeholders were asked to focus on whether or not the Pre-Submission Draft was legally compliant, fulfilled the duty to co-operate and met the tests of soundness set out in Paragraph 35 of the NPPF. The specific actions taken by the Council to publicise the consultation are outline in Section 2 of the Statement of Consultation [LP006].

1.13 To what extent has the LPPU's production been consistent with the Reading Borough Council Local Development Scheme (June 2024) [PP001]?

1.13.1 The LPPU was produced closely in accordance with the Local Development Scheme (LDS) [PP001]. The most recent LDS was published in June 2024 following a minor adjustment to the programme for the Local Plan Partial Update to allow for the completion of key pieces of the evidence base and to take account of recent changes to national policy.

1.13.2 Appendix 1 of the LDS [PP001] lists key information with regard to updating Local Plan policies. Table A1.1 of that document has been reproduced below and contains an additional column evaluating the consistency of LPPU production with the LDS:

Table 1: LPPU Production compared to the Schedule within the 2024 LDS

Element	Information Stated in the June 2024 LDS	Deviation during LPPU Production
Title	Reading Borough Local Plan Partial Update	-
Role and subject	Update of selected policies within the Reading Borough Local Plan (adopted 2019) based on the outcome of the review of the Local Plan, to ensure that policies are up-to-date. The following policies are identified as being in need of an update: • Cross-cutting policies – CC2, CC3, CC4, CC7, CC9 • Environment policies – EN4, EN7, EN12, EN13, EN14 • Employment policies – EM1, EM2 • Housing policies – H1, H2, H3, H4, H5, H6, H7, H8, H14 • Transport policies – TR1, TR2, TR4, TR5 • Retail and leisure policies – RL2, RL3, RL4	The policies identified in the June 2024 LDS were all carried forward and updated during LPPU production. In addition to these, the following policies and sites were updated based on representations received during consultation, changes to national policy or changes taking place within the Borough that were not anticipated during the 2023 Review: • Environment policies – EN18 • Site allocation and area-specific policies – CR10, SR2, Wholly new policies were included as follows: • Cross-cutting policies – CC10 • Environment policies – EN19 • Housing policies – H15

Element	Information Stated in the June 2024 LDS	Deviation during LPPU Production
	- Other use policies – OU2, OU3 - Site allocation and area-specific policies – CR2, CR5, CR6, CR7, CR11, CR12, CR13, CR14, CR15, SR1, SR4, SR5, WR3, CA1, ER1, ER2, ER3 The update will also include the overall Spatial Strategy and the Infrastructure Delivery Plan. Other policies not mentioned above will not be part of the scope of the policies update unless it is determined at a later date that this is necessary.	
Geographic coverage	Whole of Reading Borough	-
Status	Development Plan	-
Joint preparation	No joint preparation expected	-
Policy lineage	National policy	-
Documents that would be replaced	Selected policies of the Reading Borough Local Plan	-
Call for site nominations	April 2023	-
Regulation 18 consultation	November/December 2023 – January 2024	-
Regulation 19 consultation	November/December 2024 – January 2025	Consultation took place entirely in November and December and did not extend to January 2025
Submission	End February 2025	Early May 2025 due to absence within the team and slight delays in finalising pieces of evidence, although the key findings of evidence were known in advance of publication to inform production
Examination	May/June 2025	November 2025 as a result in delay to submission and continued absence issues within the team.
Adoption	September/October 2025	Forthcoming (dependent on Examination)

- 1.13.3 A detailed summary of the publication of final evidence is contained under the Council's response to IQ10 in the RBC Response to Initial Questions [EX002]. This helps in part to explain the delay in submission noted in the table above.
- 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?*
- 1.14.1 Yes, the Local Plan Partial Update has been prepared in accordance with the Council's Statement of Community Involvement (SCI) adopted in 2014 [PP002].
- 1.14.2 Section 6 of the SCI [PP002] outlines how the Council will consult on the Local Plan. At Regulation 18 stage, the Council sought to elicit representations on possible changes to policies identified for review together with a range of alternative options. This stage included press releases, leaflet distribution, an online video to explain proposals, social media promotion, an interactive online webinar, in-person drop-in events, presentations to community groups and directly contacting over 1,500 consultees. A detailed summary of the actions taken by the Council under Regulation 18 can be found in Section 2 of the Statement of Consultation Draft Local Plan Partial Update [LP010].
- 1.14.3 At Regulation 19, the Council published a full draft document for comment and asked representors to consider whether the approach taken was correct and how it might be improved. This focussed on directly contacting consultees, including those involved at Regulation 18 stage, direct conversations with key stakeholders, in-person drop-in events, promotion on social media and press release. A detailed summary of the actions taken during the stage of consultation can be found in Section 2 of the Statement of Consultation on the Pre-Submission Draft Local Plan Partial Update [LP006].
- 1.14.4 At the time of Submission in May 2025, the Local Plan Partial Update Submission Draft (May 2025) [LP001] was made available in hard copy format at libraries across the Borough and at the Civic Offices and an email was sent to notify those on the consultation database list.
- 1.14.5 In terms of whether the 2014 SCI remains up-to-date, a review of the SCI was undertaken and was reported to a meeting of full Council on 15 October 2024. Appendix 7 contains the review as it was reported to Council. It identified that the SCI was out-of-date only in terms of neighbourhood planning, and that other elements of the SCI were up-to-date. The following was resolved by Council:
- "That Council agree that the Statement of Community Involvement (adopted 2014) remains an up-to-date basis for carrying out consultation on the Local Plan Partial Update as informed by the Review of the SCI in Appendix 4 to the report;"*
- Full minutes of this item can be viewed on the Council's website⁷.

⁷ [Agenda item - Pre-Submission Draft Local Plan Partial Update - Reading Borough Council](#)

- 1.14.6 The Council subsequently progressed a new version of the SCI [EX015], which was subject to consultation in January and February 2025, and adopted in June 2025, and is referred to in more detail in answer to question 1.15.
- 1.14.7 The documents making up the evidence bases were made available for public comment during various stages of consultation as they emerged. As noted above in answer to question 1.13 there were some delays in evidence production which resulted in a phased publication.
- 1.14.8 At Regulation 18 stage, the Scope and Content Consultation Document [LP008] was accompanied by a draft Sustainability Appraisal and Infrastructure Delivery Plan.
- 1.14.9 At the start of the Regulation 19 consultation period on 6th November 2025, the following documents were published alongside the LPPU:
- Duty to Cooperate Statement (November 2024) (earlier version of EV001)
 - Statement of Consultation following Regulation 18 (November 2024) (LP010)
 - Housing and Economic Land Availability Assessment, November 2024 (HELAA) (EV015 and EV016)
 - Housing Needs Assessment (EV011)
 - Housing Provision Background Paper (EV012)
 - Draft Infrastructure Delivery Plan (November 2024) (earlier version of EV005)
- 1.14.10 The following documents were published during the Regulation 19 consultation period:
- Reading Commercial Needs Assessment Volume A (Interim Draft, November 2024) on 11 November 2024
 - Local Plan Self-Assessment Toolkits on 12 November 2024
 - Strategic Flood Risk Assessment and Appendices 1-8 on 4 December 2024
 - Sustainable Connectivity and Vehicle Trip Distribution Study on 11 December 2024
 - Local Plan Viability Testing Report Draft (December 2024) on 13 December 2024
- 1.14.11 It is accepted that some documents were made available towards the end of the consultation period. In some cases, preliminary drafts were shared with significant consultees before publication. For example, a draft Strategic Flood Risk Assessment was shared with the Environment Agency on 11 October 2024 and their comments contributed to the final draft. The Local Plan Viability Testing Report was shared with the Home Builders Federation on 5 December 2024. In the case of the Local Plan Transport Modelling, a draft was produced after the end of the Regulation 19 consultation period and therefore the Council engaged directly with neighbouring authorities and National Highways. This is detailed in the Duty to Co-operate Statement [EV001].

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).

1.15.1 The newly adopted Statement of Community Involvement (June 2025) has been added to the Examination Library as EX015.

1.15.2 A full list of all of the changes between the SCI adopted in March 2014 and June 2025 is included as Appendix 8.

1.15.3 In summary, the following are the main changes of substance to the SCI and their implications for the LPPU consultation:

- Updated situation regarding duty to co-operate in paragraph 3.4: This is a contextual description of the situation at the time, and has no implications for the LPPU approach because, as outlined in paragraph 3.3, it is not the role of the SCI to outline how the duty is to be undertaken.
- Reference in paragraph 4.4 to an additional two week consultation period when consultation is over Christmas and New Year: This was a statement of existing practice. The Regulation 18 consultation took place over the Christmas and New Year period and was therefore extended from six weeks to over nine weeks, lasting between 27 November 2023 and 31 January 2024.
- Reference in paragraph 4.5 to publishing documents as accessible documents for screen readers: The Council has tested each version of the local plan for consultation to ensure accessibility using the built-in accessibility tools in Adobe Acrobat, as well as its supporting documents to ensure their accessibility. This is required by law in any case.
- References in paragraph 5.3 and 6.5 to use of webinars and videos: This was added after the Council's experience of using a video and hosting a webinar as part of the Regulation 18 consultation.
- Updates to how main modifications are handled in paragraph 6.10: This was updated after greater experience of this process, and there are no implications for the LPPU as this stage has not yet been reached.
- Substantial new text on the approach to neighbourhood plans and orders in paragraphs 2.6 and 6.21 to 6.25: These are not relevant to the LPPU.

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?

1.16.1 The Sustainability Appraisal and Local Plan Partial Update process have effectively run parallel to each other, with each iteration of the Partial Update subject to Sustainability Appraisal from 2023 to 2024. Conclusions drawn during evaluation of each policy and site during the SA resulted in changes to the Partial Update, for example adding language to require mitigation measures within site allocations or

increasing or reducing the number of units indicated. The Sustainability Appraisal of the Local Plan Pre-Submission Draft Partial Update under Regulation 19 [LP005] in Section 2 summarises the process in depth. Each version of the SA was also subject to consultation at both Regulation 18 and Regulation 19 stages and comments received during these periods resulted in changes that were reflected in subsequent versions.

- 1.16.2 Mitigation measures included within the site allocations are closely aligned with the sustainability appraisal objectives, as well as the suitability considerations within the Housing and Economic Land Availability Assessment [EV015]. In general, negative impacts can be mitigated through cross-cutting policies within the document.
- 1.16.3 The reasonable alternatives tested in the Sustainability Appraisal are often based on the changes on the ground or changes to national policy identified during the March 2023 Local Plan Review [LP011] and according to the steps within paragraphs 5.37 – 5.40 in the Sustainability Appraisal of the Local Plan Partial Update Pre-Submission Draft [LP005]. This explains that a ‘no policy’ and ‘business as usual’ option offer a good basis for appraising effects, but a ‘no policy’ option was not tested for the vast majority of policies and allocations since they were currently within the adopted local plan. Rather, a ‘business as usual’ option was tested to assess the effects of the existing Local Plan as well as a ‘proposed approach’ alongside any reasonable alternatives. For instance, where a policy sets a threshold, an alternative threshold level was tested. It was important to ensure that all ‘reasonable alternatives’ were in conformity with national policy (or could potentially be justified in those terms) and achievable in practice. Section 4 of the Local Plan Partial Update Background Paper May 2025 [EV002] contains a detailed discussion of each of the alternatives tested for each policy.

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?

- 1.17.1 The SA assesses each of the likely effects of policies and site allocations within the LPPU against the 20 sustainability objectives set out in Table 1 of the Sustainability Appraisal of the Local Plan Partial Update Pre-Submission Draft [LP005]. Appendix 3 [LP005] takes each policy and site allocation in turn. A summary of the significant effects drawn from the analysis in Appendix 3 is summarised in Appendix 1 [LP005]. The options tested were derived as described above in Question 16.
- 1.17.2 In terms of testing housing growth within the SA, in pp. 75 of the Sustainability Appraisal of the Local Plan Partial Update Pre-Submission Draft [LP005] the following options were tested:
- H1(i) Housing provision figure reflective of available capacity (825 homes per year)
 - H1(ii) Retain existing approach, do not update the housing provision figures

- H1(iii) Housing provision of 878 homes per year (reflecting the national standard methodology with urban uplift at the time)
- H1(iv) Housing provision of 735 homes per year (based on latest locally-based need figure)

Option (iii) is reflective of housing growth consistent with the national standard methodology and urban uplift at the time. The Sustainability Appraisal concluded that this option while bringing significant positive effects with regard to housing delivery would bring the potential for other negative effects, such as climate change, school places, GP surgeries and the protection of undeveloped land.

1.17.3 The Local Plan Partial Update Background Paper May 2025 [EV002] provides a narrative for each of the options considered and the reasons for pursuing the proposed approach for each policy and site allocation. If an alternative was rejected, the Background Paper [EV002] as well as the SA [LP005] clearly explains why the alternative option is inappropriate and highlights which specific SA objectives would see negative effects.

1.17.4 Testing of the policies and alternatives was undertaken to be consistent as far as is possible. Provision of a specific score in the tables in the Sustainability Appraisal can sometimes give rise to inconsistency, as different people may score things differently, which is why the identification of issues and potential mitigation requirements is generally more helpful.

1.18 Has the SA's methodology been appropriate? What concerns have been raised and how would the Council respond to these concerns?

1.18.1 The methodology used for the SA is detailed in the Sustainability Appraisal Scoping Report [PP004]. This document outlines the national guidance that sets out each stage of the appraisal and encompasses the first of five stages (Stage A, Section 2) [PP004]. This stage includes identifying relevant plans, programmes and other sustainability objectives, collecting baseline information, identifying issues and problems, developing the SA framework and consulting on the scope of this initial report. The SA methodology includes the coping stage of the Habitat Regulations Assessment and an Equality Impact Assessment. The SA methodology was derived based on consideration of an extensive body of best practice and national guidance and the objectives developed cover a wide range of environmental, social and economic objectives.

1.18.2 Stage B which involves developing and refining alternatives and assessing effects occurred during 2023 and 2024 alongside development of the LPPU. This development of alternatives and the assessment of effects is contained within both the Regulation 18 and Regulation 19 Sustainability Appraisal Documents [LP009 and LP005].

1.18.3 Table 2 summarises the concerns raised regarding the Sustainability Appraisal at Regulation 18 stage and provides a response from the Council.

Table 2: Summary of Regulation 18 Representations regarding Sustainability Appraisal

Representor	Summary of representation	Response from the Council
Sadler, Debbie	Suggestion to include reference to the climate emergency in Objective 1	Change agreed
Reading Climate Action Network	Objective 1 should be made more specific and measurable and should refer to policies that underpin the objective, for example “[...] by ensuring that development adheres to the specific policies set out in the Local Plan.” Objective 13 fails to refer to net zero standards for housing. Objective 18 should refer to a transition to a low carbon economy and investment in necessary skills and services.	Partially agree. It is not the role of the objectives to underpin compliance with LPPU policies, but a change was agreed to include reference to development and refer to the climate emergency in Objective 1. Change agreed to refer to ‘sustainable’ housing in Objective 13. Partially agree. Change agreed to refer to the transition to a low carbon economy in Objective 18, but it is not considered necessary to specifically refer to low carbon skills and services.
Historic England	Objective 10 should refer to the contributions that heritage can make to the economy.	Change agreed.
Marcouse, Tricia	Object 8 seems restrictive. Why does it only include internationally important wildlife sites when these are not relevant to Reading? This should be extended to include all areas of biodiversity interest identified in the Local Plan.	No change agreed. Objective 8 seeks to address the screening stage of the Habitat Regulations Assessment which is a specific statutory requirement. This is explained in detail within the SA itself. Objective 7 effectively assesses effects on local sites.
ICB	Objectives 11 and 15 are related to primary healthcare. While the ICB has no comments to make related to objective 11, the ICB considers that the wording of objective 15 should be revised. The original wording of objective 15 is to “Ensure good physical access for all to essential services and facilities, including healthcare.” While the ICB fully supports a good physical access for all to healthcare facilities is needed, it is important to ensure that there are also adequate services and facilities to be provided. The ICB has the following recommendation on the wording of Objective 15: Ensure all essential services and facilities, including healthcare to be physically accessible and adequate for all.	Change agreed.
Stantec on behalf of St Edwards Homes	The Sustainability Appraisal (SA) should reflect that housing provision in accordance with the standard method will have a greater positive effect on SA Objective 13 compared	The Sustainability Appraisal came to the correct conclusion based on understanding of the capacity of Reading at the time. This has now been refined through the Housing

Representor	Summary of representation	Response from the Council
	to the proposed lower figure as housing needs will be met in full. In this regard, whilst we support the scoring in the SA of Option H1(v) (735dpa) being lower than Options H1(iv) (877dpa) and H1(i) (800dpa) we do not agree that the current scoring of Option H1(i) is appropriate. Currently, the scoring and comments within the SA on Options H1(i) and H1(iv) are identical and in doing so fail to reflect the benefit that would result from meeting needs in full. Moreover, the conclusion drawn within the SA in respect of Policy H1 states that Option H(i) (800dpa) would be: <i>the preferred approach as this would deliver beyond the local identified need for housing and would be in line with the borough's capacity, avoiding unnecessary over development whilst enabling an ample supply of housing for current and future generations.</i>	and Economic Land Availability Assessment, and the dwelling number increased to 825. It is important to note that whilst the scoring in the SA is a useful indication, it is not always possible to give a different score for every level of housing provision. What is important is that the effects are identified and mitigation provided, if necessary.
Lichfields on behalf of Packaged Living	These representations highlight the potential of the site (CR14v) to make a valuable contribution towards meeting housing need. This contribution could be in excess of the highest delivering development option assessed for the site during the LPPU Sustainability Appraisal (SA) of 240 units, and considerably beyond the SA's preferred delivery options for the (i) conversion to residential (for estimated 70-80 units) and (ii) development for 110-185 dwellings.	No change agreed. The SA clearly identifies negative sustainability effects for option (i) due to the very high number of homes proposed. A proposal for dwellings exceeding this would increase the likelihood and severity of negative effects identified in the appraisal.
Keep Kentwood Green	Also to be considered is the impact that any development would have on the Major Landscape feature contained within WR3s, "the West Reading Wooded Ridgeline" recognised for its value and characterised by its amenity value, largely as a result of its collective tree cover. It is hard to imagine how building 80 houses could be done without impacting this Major Landscape Feature even with the most diligent developer and bulldozer operatives. Changing the designation of sites WR3s and WR3t and thus protecting the land in its current state would also help RBC meet some of its objectives within its Sustainability Framework. Objective 4 seeks to minimise consumption of, and reduce damage to, undeveloped land. Sites WR3s and WR3t alongside all other parts of land owned by TPLC have always been green field/ undeveloped as can be evidenced from studying Ordinance	Noted. These particular sensitivities are recognised within the SA. The criteria within the policy are intended to mitigate these possible effects.

Representor	Summary of representation	Response from the Council
	Survey maps back to 1870. The only exception to this would be unauthorised development within the Builders Yard but this is in varying states of disrepair and provides evidenced homes for foxes and bats as well as foraging ground for deer and badgers. Objective 7 details valuing, protecting, and enhancing the amount and diversity of wildlife and 8 seeks to avoid adverse effects on designated wildlife sites. 22 of the protected species/ species of special concern listed in RBC's Biodiversity Action Plan have been officially recorded with TVERC in 2023 from observations purely from the edges of the land. Well over 100 different species have been recorded since we began collecting evidence in 2022. Objectives 1, 2 and 9 could also be helped by turning the sites into LGS. Objective 1 - any house building will reduce the mass of flora absorbing CO2 and other greenhouse gases from Kentwood and Armour Hill. Objective 2 - there are a number of underground streams that run through WR3t, and this area has historically been used to grow watercress. Building here would only increase the flooding seen at the bottom of Armour Hill every time it rains as well as potential landslides from the hill as the gradient on this section is very steep. You only have to compare the aerial footage of the area during the summer to witness the marked difference in colour between the verdant green of WR3s and WR3t compared to the brown grass of Victoria Rec and Arthur Newbery Park to see the value the area provides local wildlife during droughts. Objective 9 relates to clean environments – protection would allow the continued “green lung” to act for local residents as well as being a key future objective for KKG if we're allowed access to the land to clear it of accumulated litter and fly tipping.	
Hicks, Steve	The Council should change the designation of sites WR3s and WR3t meet some of the Councils Sustainability Framework objectives. Objective 4 seeks to minimise consumption of, and reduce damage to, undeveloped land. Sites WR3s and WR3t are green field. Objective 7 details valuing, protecting, and enhancing the amount and diversity of wildlife and 8 seeks to avoid adverse effects	Noted. These particular sensitivities are recognised within the SA. The criteria within the policy are intended to mitigate these possible effects.

Representor	Summary of representation	Response from the Council
	on designated wildlife sites. Well over 100 different species have been recorded Objectives 1, 2 and 9 are also relevant. Objective 1 - any house building will reduce the mass of flora absorbing CO2 and other greenhouse gases from Kentwood and Armour Hill. Objective 2 - there are a number of underground streams that run through WR3t, and this area has historically been used to grow watercress. Objective 9 relates to clean environments and site are not accessible to human activity.	

1.18.4 Table 3 summarises the concerns raised at Regulation 19 Stage and provides a response from the Council.

Table 3: Summary of Regulation 19 Representations regarding Sustainability Appraisal

Representor	Summary of representation	Response from the Council
Wokingham Borough Council	Policy TR2 supports the expansion of the Bus Rapid Transit (BRT) network. The policy references proposals for the southern (A33) and eastern (A4) corridors, identified on the Proposals Map. Limited evidence has been provided to inform proposals which is an essential part of the Sustainability Assessment / Strategic Environmental Assessment process to remove, reduce or mitigate adverse effects. The adopted RBC Local Plan was supported by proposals to expand the network of Park & Ride sites in Wokingham Borough, serving destinations in Reading (generally retained in Figure 4.6). The Inspector's Examination Report (paragraph 77) considered these as necessary. The Plan suggests these might be replaced with mobility hubs, but these proposals are not supported by evidence to explain what form these hubs might take, how many might be necessary, where they might be located or any supporting infrastructure to enable longer range trips to shift mode to more sustainable alternatives. Whilst WBC are considering mobility hubs these are unlikely to be delivered until much later in the Plan period therefore RBC might need to support accelerated delivery close to the borough boundary.	Noted. No change proposed. The exact form of park and ride mobility hubs are not specified in the Local Plan or the Transport Strategy, but the Transport Strategy suggests that over time park and rides might evolve to become green mobility hubs that could include a range of services. It is not considered necessary to know the exact details of mobility hubs to effectively assess Policy TR2 within the Sustainability Appraisal.
USS Investment Management Limited	The conclusion in the SA that there are less positive sustainability effects for the Option 14t(i) (i.e. Tall Building Option) than Option 14t (iii) (i.e. Non-Tall Building Option) is undermined by RBC not considering the	Do not agree. Identification of a possible negative effect is not intended to be read as impossible to overcome by policy requirements or detailed

Representor	Summary of representation	Response from the Council
	potential for the redevelopment proposals of Aquis House (Policy CR14t) to address the purported tendency for negative effects with regard to landscape/townscape (if any).	proposals, rather it simply highlights an area where mitigation may be required.
USS Investment Management Limited	The conclusion in the SA that there is less positive sustainability effects for the Option CR14u (i) (i.e. Tall Building Option) than Option CR14u (iv) (i.e. Conversion Option) is unsubstantiated.	Do not agree. No change proposed. The reasons for this conclusion are clearly outlined on pp. 179-181 [LP005].
Bracknell Forest Council	Potential impacts on designated sites appear to have been identified for several policies but the assessment is taken no further. It should show what policies (and sites) have been screened in for Appropriate Assessment (AA) and an AA should be undertaken for these policies and sites.	The screening was carried out for all sites and policies and no significant effects were identified for the options that were taken forward into the plan. However, the Regulation 19 Sustainability Appraisal did not contain the full matrix of policies and sites that was in the Regulation 18 version to inform this assessment. This is now included as a separate document (Full Habitat Regulations Screening Tables Regulation 19) [LP012].
Gladman	The SA is flawed as it does not consider the potential for accommodating unmet housing need from nearby local authorities, in particular South Oxfordshire. The options considered in relation to housing provision are limited to: • Option H1(i) Housing provision figure to be amended to reflect available capacity to 2041 (825 homes per year). • Option H1(ii) Retain existing approach, do not update the housing provision figures. • Option H1 (iv) Housing provision of 878 homes per year (need based on national standard methodology). • Option (v) Housing provision of 735 homes per year (based on latest locally based need figure). RBC has limited its options assessment to meeting only its own needs. There has been no assessment of meeting the needs of adjoining authorities in the wider housing market area. Whilst the chosen housing number of 825 is based on 'capacity' rather than the standard method figure, tested options have been limited. As a general observation, we would also note that Options H1(i) and (iv) perform the same in the scoring matrix provided on page 75 of the Pre-Submission SA report, meaning that is unclear why the former has been chosen in preference to the latter in SA terms. Whilst the supporting commentary to the assessment reasons that H1(i) is the	There is no identified unmet need from South Oxfordshire, or any authorities within the housing market area, and therefore no need to test an option of accommodating that need. The scores identified in the sustainability appraisal do not always allow for a noticeable difference between options, which is why it is important to cross reference to the supporting commentary, which in this case clearly states why the option was chosen.

Representor	Summary of representation	Response from the Council
	preferred choice, as this would be in line with the borough's capacity, avoids unnecessary over-development and provides housing for current and future generations, the results of the SA do not appear to support its selection in preference to all the stated alternatives.	
Wokingham Borough Council	As noted under 'Spatial strategy and transport' above, given the limitations of the transport evidence, it is not possible to understand whether the impacts of the spatial strategy have been suitably assessed. Indeed, paragraph 3.4 of the sustainability appraisal acknowledges this issue. Even with additional evidence provided by Stantec (Dec'24) it will be necessary to align other parts of the plan before the Plan is submitted for examination.	The Transport Modelling report did not identify significant cross-boundary impacts, and the draft report has now been provided to Wokingham Borough Council and other relevant duty to co-operate partners. As a result, WBC withdrew the duty to cooperate objection on 1st May 2025.

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?

1.19.1 Section 19 of the Planning and Compulsory Purchase Act 2004 requires a local planning authority to carry out a full sustainability appraisal of all proposed policies and sites alongside the preparation of a local plan. In practice, sustainability appraisal also incorporates the detailed requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 (commonly known as the Strategic Environmental Assessment (SEA)). These regulations outline the requirement to identify and evaluate the likely significant effects on the environment. The Planning and Compulsory Purchase Act 2004 requires consideration of environmental, social and economic effects.

1.19.2 Paragraph 33 of the NPPF states:

“Local plans and spatial development strategies should be informed throughout their preparation by a sustainability appraisal that meets the relevant legal requirements. This should demonstrate how the plan has addressed relevant economic, social and environmental objectives (including opportunities for net gains). Significant adverse impacts on these objectives should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where significant adverse impacts are unavoidable, suitable mitigation measures should be proposed (or, where this is not possible, compensatory measures should be considered).”

Further government guidance, including a checklist for SEA requirements, is included within Planning Practice Guidance document [Strategic environmental assessment and sustainability appraisal](#).

1.19.3 Given the guidance outlined above, a brief assessment of the Council's Sustainability Appraisal compliance is described below.

Table 4: Compliance with PPG Guidance for Sustainability Appraisal

Requirements within the PPG flowchart	Evidence of compliance
STAGE A: Setting the context and objectives, establishing the baseline and deciding on the scope A1- Identify other relevant policies, plans and programmes and sustainability objectives A2- Collect baseline information A3- Identify sustainability issues and problems A4- Develop sustainability appraisal framework A5- Consult the consultation bodies on the scope of the sustainability appraisal report	Sustainability Appraisal Scoping Report Sept 2014 [PP004]
STAGE B: Developing and refining alternatives and assessing effects B1- Test the Local Plan objectives against the sustainability appraisal framework B2- Develop the Local Plan options including reasonable alternatives B3- Evaluate the likely effects of the Local Plan and alternatives B4- Consider ways of mitigating adverse effects and maximising beneficial effects B5- Propose measures to monitor the significant effects of implementing the Local Plan	Local Plan Update Sustainability Appraisal Reg 18, Nov 2023 [LP009] Sustainability Appraisal of the Local Plan Partial Update Pre-Submission Draft, Nov 2024 [LP005]
STAGE C: Prepare the Sustainability Appraisal Report	(as above)
STAGE D: Seek representations on the sustainability appraisal report from consultation bodies and the public	Both [LP009] and [LP005] were published alongside the Reg 18 and Reg 19 iterations of the LPPU and comments received. These comments are summarised within the respective Statements of Consultation [LP010] and [LP006]. A list of those consulted is also included in each document.
STAGE E: Post adoption reporting and monitoring E1- Prepare and publish post-adoption statement E2- Monitor significant effects of implementing the Local Plan E3- Respond to adverse effects	Forthcoming post-adoption

1.20 Were consultation requirements complied with in respect of sustainability appraisal?

1.20.1 The PPG states:

“The plan making body must consult the consultation bodies and other parties who, in its opinion, are affected or likely to be affected by, or have an interest in, the decisions involved in the assessment and adoption or making of the plan. Further details on consultation procedures are set out in regulation 13 of the Environmental Assessment of Plans and Programmes Regulations 2004.

The plan-making body may also want to consult those they are inviting representations from, as part of the development of the plan itself. The sustainability appraisal report, including the non-technical summary, needs to be published alongside the draft plan for a minimum of 6 weeks. (Paragraph: 020 Reference ID: 11-020-20140306)”

1.20.2 It also states in Paragraph 21 that:

“The sustainability appraisal report will not necessarily have to be amended if the plan is modified following responses to consultations. Modifications to the sustainability appraisal should be considered only where appropriate and proportionate to the level of change being made to the plan. A change is likely to be significant if it substantially alters the plan and/or is likely to give rise to significant effects.

Further assessment may be required if the changes have not previously been assessed and are likely to give rise to significant effects. A further round of consultation on the sustainability appraisal may also be required in such circumstances but this should only be undertaken where necessary. Changes to the plan that are not significant will not require further sustainability appraisal work. Paragraph: 021 Reference ID: 11-021-20140306”

1.20.3 The LPPU Sustainability Appraisal was completed in two phases alongside each iteration of the LPPU draft (Reg 18 and Reg 19) and made available for public consultation for a period of at least six weeks at both stages. Following comments received during Regulation 18, a small number of changes were made to the Sustainability Appraisal and these were made available for comment during the Regulation 19 consultation period.

1.20.4 A full list of those consulted at Regulation 18 stage is available in The Statement of Consultation on the Local Plan Partial Update Scope and Content [LP010] on pp. 12. This document also contains a full description of the actions taken to advertise the consultation and a summary of all representations received in within Appendix 12.

1.20.5 The Statement of Consultation on the Pre-Submission Draft Local Plan Partial Update [LP006] contains a full list of those consulted at Regulation 19 on pp. 10, a description of the actions taken in Section 2 and a summary of all representations received in Appendix 8.

Habitat 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?*

1.21.1 The Habitat Regulations Assessment was carried out as part of the Sustainability Appraisal process, in line with the approach that was set out in the Sustainability Appraisal Scoping Report in 2014 [EX008] and was used for the adopted Local Plan. This is a proportionate approach in Reading, which is, at its closest point, more than 5km from any relevant site, meaning that significant effects are not frequently identified, and reduces the need for additional reports.

1.21.2 The Scoping Report identifies the relevant sites, i.e. those within 20km of Reading's boundaries, an approach which is considered to comply with the guidance that a precautionary approach be taken at every stage, because it is very unlikely that sites 10-20 km from Reading's boundaries will see any significant effect. The Scoping Report also identifies a number of potential effects which are to be considered. The sites and impacts are discussed in more detail in relation to question 1.22.

1.21.3 The screening assessment considers whether the policy, site or alternative option will have likely significant effects in terms of each potential impact on each site, and therefore comes to a conclusion as to whether there would be an impact on sustainability objective 8, which is to:

“Avoid contributing towards a likely significant effect, either alone or in combination with other plans and projects, that could lead to an adverse effect on the integrity of internationally-designated wildlife sites.”

1.21.4 A likely significant effect identified for one or more potential impact on one or more site would lead to an automatic significant negative effect on the objective. Should this be identified for any part of the LPPU, then the need for full Appropriate Assessment would be triggered. However, no likely significant effects for any of the proposed policy options were identified.

1.21.5 The process meets the requirements of the Conservation of Habitats and Species Regulations 2017 (as amended). Regulation 105(1) states that:

“Where a land use plan—

(a) is likely to have a significant effect on a European site or a European offshore marine site (either alone or in combination with other plans or projects), and

(b) is not directly connected with or necessary to the management of the site,

the plan-making authority for that plan must, before the plan is given effect, make an appropriate assessment of the implications for the site in view of that site's conservation objectives.”

1.21.6 The approach used in assessing the LPPU complies with this as it assesses whether there are any likely significant effects on relevant sites either on its own or in combination with other plans or projects. No part of the plan is directly connected with or necessary to the management of any European site, so 105(1)(b) does not apply.

1.21.7 Regulation 105(2) states that:

“The plan-making authority must for the purposes of the assessment consult the appropriate nature conservation body and have regard to any representations made by that body within such reasonable time as the authority specifies.”

1.21.8 In this case, the appropriate nature conservation body is Natural England. The requirement in the Regulations applies for the purposes of the assessment, i.e. the appropriate assessment, a stage not reached because no likely significant effects of the LPPU were identified. Nevertheless, Natural England was consulted on the Sustainability Appraisal, which contained the Habitat Regulations Assessment screening at both Regulation 18 and 19 stages. No representations on the screening assessment were received from Natural England at either stage.

1.21.9 Regulation 105(3) states that:

“The plan-making authority must also, if it considers it appropriate, take the opinion of the general public, and if it does so, it must take such steps for that purpose as it considers appropriate.”

1.21.10 The Habitat Regulations Assessment screening, as part of the Sustainability Appraisal, was open to public consultation at both Regulation 18 and 19 stages. Only one representation was received at each stage, and these are discussed in relation to question 1.23.

1.21.11 Regulation 105(4) states that:

“In the light of the conclusions of the assessment, and subject to regulation 107, the plan-making authority must give effect to the land use plan only after having ascertained that it will not adversely affect the integrity of the European site or the European offshore marine site (as the case may be).”

1.21.12 As no likely significant effects were identified, this has been complied with.

1.21.13 No further parts of the Regulations have particular implications for the LPPU.

1.21.14 ‘Nutrient neutrality’ is also an issue that has been relevant to the Habitat Regulations Assessment process since Natural England wrote to local planning authorities in March 2022 regarding certain river catchments protected under the Habitat Regulations which are in an unfavourable condition due to nutrient levels. Reading was not one of the areas contacted. The River Lambourn SAC is the closest of the identified catchments and falls within 20 km of Reading. This SAC is one of those for which effects are screened for the LPPU. However, development would not be expected to result in additional nutrients being discharged into the catchment, as discharge from Reading would take place through sewage treatment works that are over 20km downriver of the catchment. No relevant catchments are downriver of Reading. As such, nutrient neutrality has no implications for the assessment of the LPPU.

1.21.15 In terms of case law, the Council believes that the approach is compliant.

1.21.16 The main potentially relevant case is the ‘Sweetman’ European Court of Justice ruling⁸. This established that, at screening stage, the planning authority cannot take account of specific mitigation measures. Paragraph 40 of the ruling states that

“it is not appropriate, at the screening stage, to take account of the measures intended to avoid or reduce the harmful effects of the plan or project on that site.”

1.21.17 This approach is now embedded in national guidance on undertaking Habitat Regulations Assessment, which states that:

“At this stage, you should not consider any mitigation measures included by the proposer for the purpose of avoiding or minimising risk to a European site. These mitigation measures need to be considered at the appropriate assessment stage.”

1.21.18 The approach to assessing the LPPU has complied with this ruling. There are no measures built into the plan to specifically avoid effects on any European site. Where policies are assessed as having no likely significant effects, this is because there would be none with or without mitigation, due to the subject of the policy or the distance from the sites, or both.

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?

1.22.1 The following designated sites were considered during the Habitat Regulations screening assessment:

- Aston Rowant SAC;
- Chilterns Beechwoods SAC;
- Hartslock Wood SAC;
- Kennet & Lambourn Floodplain SAC;
- Little Wittenham SAC;
- River Lambourn SAC;
- Thames Basin Heaths SPA; and
- Windsor Forest and Great Park SAC⁹.

1.22.2 These represent all designated sites within 20 km of Reading’s boundaries. The closest of these sites, Hartslock Wood SAC, is 5.5 km from the Reading boundary, with Thames Basin Heaths SPA being only slightly further. No sites are within or partially within Reading Borough. Figure 4 on p18 of the Sustainability Appraisal Scoping Report [PP004] contains a map showing the location of these sites in relation to Reading.

1.22.3 The potential impacts considered were as follows:

- Noise, disturbance and vibration;
- Air pollution and quality;

⁸ People Over Wind and Sweetman v Coillte Teoranta (Case C-323/17)

⁹ SAC – Special Area of Conservation; SPA – Special Protection Area

- Water pollution and quality;
- Water flows;
- Climate change;
- Habitat loss and degradation;
- Landscape effects; and
- Lighting.

1.22.4 Given the distance from Reading and the nature of most of the policy changes, very few of the policy options were identified as having any significant effects. However, at Regulation 18 stage, the proposed policy options for policies EM1 and RL2 were identified as having potential negative effects in terms of noise, disturbance and vibration and air pollution and quality for Chilterns Beechwoods, Hartslock Wood and Thames Basin Heaths. This would be due to the impacts of any increased traffic on these habitats, as these sites sit close to major roads leading to Reading. The effects were listed as uncertain but with potential for negative effects at Regulation 18 stage because the levels of need for employment development (EM1) and retail and leisure development (RL1) had not yet been established and set in policy, and significant increases in employment or retail could lead to increased vehicle movements close to the European sites.

1.22.5 At Regulation 19 stage, once these levels of need had been ascertained and the respective policies fully drafted, these effects were no longer present. This is mainly because the provision identified in EM1 for industrial and warehouse development represented a 13% increase over the adopted Local Plan whilst the office provision represented a reduction. Meanwhile, RL1 did not plan for any increase in retail and leisure. For this reason, no likely significant effects were identified for these policies and no Appropriate Assessment was therefore necessary.

1.22.6 At Regulation 19 stage, the only likely significant effects identified were for an alternative option that did not form part of the proposed plan, which was to not update policy TR2 on major transport projects. No Appropriate Assessment was carried out as it did not form part of the plan.

1.23 Have any concerns been raised regarding the Habitats Regulations Assessment and what are they? How would the Council respond to these concerns?

1.23.1 Only one concern was raised relating to the Habitat Regulations Assessment at Regulation 18 stage, by Tricia Marcouse, which was as follows:

“Objective 8 seems a bit restrictive. Why only for internationally important wildlife sites when these are not really relevant to Reading. This should be extended, preferably to all areas of biodiversity interest identified in the current local plan, but definitely to whs, Local nature reserves AND any corridors identified as important in the upcoming nature recovery strategy for Berkshire.”

1.23.2 The Council's response is that Objective 8 serves the specific purpose of carrying out the Habitat Regulations Assessment screening stage, and impacts of important areas of biodiversity interest more generally is covered by Objective 7.

- 1.23.3 The only concern that was expressed at Regulation 19 stage regarding the Habitat Regulations Assessment was from Bracknell Forest Council. The concern was as follows:

“Potential impacts on designated sites appear to have been identified for several policies but the assessment is taken no further. It should show what policies (and sites) have been screened in for Appropriate Assessment (AA) and an AA should be undertaken for these policies and sites.”

- 1.23.4 The first element of the Council’s response is that, at Regulation 19 stage, no significant effects were identified for any of the options that were taken into the plan. However, some significant effects were identified for an alternative option for policy TR2 that was not carried forward into the LPPU. As no potential significant effects of the LPPU proposals were identified, no full Habitat Regulations Assessment is required.

- 1.23.5 However, the Council accepts that the summary description of the results of the Habitat Regulations screening for each option in the Pre-Submission Draft LPPU Sustainability Appraisal [LP005] would have been more helpfully accompanied by the full tables showing the effects of each option for each designated site and each likely impact. The full Habitat Regulations Screening Tables were subsequently published at submission stage [LP012].

1.24 How and when has Natural England been involved in the Habitats Regulations Assessment process?

- 1.24.1 Natural England’s main involvement in the process was prior to the LPPU. The general approach was agreed with Natural England in relation to development plans that preceded and were superseded by the Local Plan, including identifying potential impacts, but the sites considered were those within 15km of the boundary, i.e. Chilterns Beechwoods, Hartslock Wood and Thames Basin Heaths. We no longer have full records of discussions with Natural England at this stage.
- 1.24.2 The approach was proposed to be integrated into the sustainability appraisal process by means of a new sustainability objective when the Council undertook a consultation on a revised Sustainability Appraisal Scoping Report in November 2013. The process set out at that stage was similar to that used for the LPPU but retained the 15km buffer rather than 20km. Natural England did not comment on that aspect of the Scoping Report. The Council did take the decision to extend the buffer to 20km on a precautionary basis in any case as at that stage the scale of development in the forthcoming Local Plan was not yet known. This was incorporated into the Sustainability Appraisal Scoping Report 2014 [EX008].
- 1.24.3 Involvement from Natural England in the process as part of the LPPU itself has been limited to their statutory consultee role as part of the Sustainability Appraisal. Natural England were consulted on the Sustainability Appraisal incorporating the Habitat Regulations Assessment screening at both Regulation 18 and 19 stages in November 2023 and November 2024 respectively. Natural England did not comment on Habitat Regulations Assessment screening at either stage.

Other matters

1.25 *Is the LPPU sufficiently clear on which policies would be superseded and which would remain extant on adoption?*

1.25.1 Yes. No policies would be entirely superseded; all policies would remain extant either in their existing form or an amended form. The LPPU is published in tracked changes format so that it can be seen exactly which policies would be amended and what those amendments would be.

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?*

1.26.1 Yes.

1.26.2 The following are the Council's priorities as set out in the Council Plan 2025-2028 and referred to in paragraph 2.1.7 of the LPPU.

- Promote more equal communities in Reading;
- Secure Reading's economic and cultural success;
- Deliver a sustainable and healthy environment and reduce Reading's carbon footprint;
- Safeguard and support the health and wellbeing of Reading's adults and children; and
- Ensure Reading Borough Council is fit for the future.

1.26.3 Table 5 sets out which policies in the Local Plan as amended by the LPPU help to deliver these priorities or alternatively how this has been approached.

Table 5: Council Plan priorities and how they are addressed through strategic policies

Council Plan priority	How it is met in the LPPU
Promote more equal communities in Reading	H3: Affordable Housing CC10: Health Impact Assessment
Secure Reading's economic and cultural success	CC9: Securing Infrastructure EM1: Provision of Employment Development EM2: Location of New Employment Development EM3: Loss of Employment Land H1: Provision of Housing H3: Affordable Housing RL2: Scale and Location of Retail, Leisure and Culture Development

Council Plan priority	How it is met in the LPPU
Deliver a sustainable and healthy environment and reduce Reading's carbon footprint	CC2: Sustainable Design and Construction CC3: Adaptation to Climate Change CC4: Decentralised Energy EN12: Biodiversity EN13: Major Landscape Features and National Landscapes EN14: Trees, Hedges and Woodlands H5: Standards for New Housing TR1: Achieving the Transport Strategy TR2: Major Transport Projects TR4: Cycle Routes and Facilities
Safeguard and support the health and wellbeing of Reading's adults and children	CC10: Health Impact Assessment H6: Accommodation for Vulnerable People
Ensure Reading Borough Council is fit for the future	This priority relates to the operation of the Council as an organisation and is not a matter that requires reflection in the LPPU.

- 1.26.4 It should be noted that the Council Plan refers specifically to the Local Plan within the priority to 'Secure Reading's economic and cultural success' when setting the following objective:

"Enable the delivery of an average of 825 high-quality new homes a year in Reading, including affordable homes, along with the infrastructure to support new development."

It states that, as one of two projects to deliver this objective, the Council will:

"Progress an updated Local Plan towards adoption to provide a framework to guide decision making on the planning applications for homes and infrastructure."

- 1.26.5 The requirements of paragraphs 20 to 22 of the NPPF are set out in Table 6, together with a brief explanation of how the Local Plan, as amended by the LPPU, meets these requirements.

Table 6: NPPF requirements for strategic policies and how they are addressed

NPPF requirement	How it is met in the LPPU
Set out an overall strategy for pattern and scale of places (20)	CC6: Accessibility and the Intensity of Development EM1: Provision of Employment Development EM2: Location of New Employment Development H1: Provision of Housing H2: Density and Mix RL1: Network and Hierarchy of Centres CR10: Tall Buildings
Set out an overall strategy for design quality (20)	CC7: Design and the Public Realm CR10: Tall Buildings

NPPF requirement	How it is met in the LPPU
Make sufficient provision for housing (including affordable housing) (20)	H1: Provision of Housing H2: Density and Mix H3: Affordable Housing H6: Accommodation for Vulnerable People H12: Student Accommodation CR11: Station/River Major Opportunity Area CR12: West Side Major Opportunity Area CR13: East Side Major Opportunity Area SR2: Land North of Manor Farm Road Major Opportunity Area SR3: South of Elgar Road Major Opportunity Area
Make sufficient provision for employment, retail, leisure and other commercial development (20a))	EM1: Provision of Employment Development EM2: Location of New Employment Development EM3: Loss of Employment Land RL2: Scale and Location of Retail, Leisure and Culture Development CR11: Station/River Major Opportunity Area CR12: West Side Major Opportunity Area SR1: Island Road Major Opportunity Area
Make sufficient provision for infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management (20b))	CC9: Securing Infrastructure TR1: Achieving the Transport Strategy TR2: Major Transport Projects TR4: Cycle Routes and Facilities
Make sufficient provision for minerals (20b))	Not in LPPU. See Central and Eastern Berkshire Joint Minerals and Waste Plan
Make sufficient provision for energy (20b))	CC4: Decentralised Energy CC9: Securing Infrastructure
Make sufficient provision for community facilities (such as health, education and cultural infrastructure) (20c))	CC10: Health Impact Assessment OU1: New and Existing Community Facilities ER3: Royal Berkshire Hospital
Make sufficient provision for conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure (20d))	EN1: Protection and Enhancement of the Historic Environment EN7: Local Green Space and Public Open Space EN8: Undesignated Open Space EN12: Biodiversity EN13: Major Landscape Features and National Landscapes EN14: Trees, Hedges and Woodlands

NPPF requirement	How it is met in the LPPU
Make sufficient provision for planning measures to address climate change mitigation and adaptation (20d))	CC2: Sustainable Design and Construction CC3: Adaptation to Climate Change CC4: Decentralised Energy EN14: Trees, Hedges and Woodlands H5: Standards for New Housing
Make explicit which policies are strategic policies (21)	Included in the title of relevant policies and referred to in paragraph 1.3.5
Be limited to those necessary to address the strategic priorities of the area (and any relevant cross-boundary issues), to provide a clear starting point for any non- strategic policies that are needed (21).	The policies identified in the table above are those needed to meet those strategic priorities, with the addition of the following which have particular cross-boundary implications: OU2: Hazardous Installations ER2: Whiteknights Campus, University of Reading
Not extend to detailed matters that are more appropriately dealt with through neighbourhood plans or other non-strategic policies (21).	The policies identified as strategic are those necessary to cover the matters above and do not extend to more detailed matters.
Look ahead over a minimum 15 year period from adoption (22).	The strategic policies cover this period, subject to 2026 adoption. See answer to question 1.27.
Where larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, be set within a vision that looks at least 30 years ahead (22),	Developments of this scale are not identified in the LPPU.

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?

- 1.27.1 As the LPPU has an end date of 2041, which is also the end date for the assessment of housing and commercial needs as well as other evidence, the strategic policies would have a minimum time period of 15 years subject to adoption being reached in 2026. The Council considers that adoption in 2026 is still achievable.
- 1.27.2 However, should the length of the examination mean that 2026 adoption is not possible, the plan period would need to be extended until at least 2042. This would require further evidence of the levels of need for the additional year(s) as well as other resultant changes to other evidence on, for instance, housing supply and transport impacts.

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?

- 1.28.1 There are no existing or emerging Neighbourhood Plans in Reading. There are no parish or town councils or any other existing or proposed designated neighbourhood areas, nor is there any existing or proposed neighbourhood forum for such an area that would constitute a 'qualifying body' that could initiate a process for the purpose

of requiring the Council to make a neighbourhood development plan under the terms of Section 38A of the Planning and Compulsory Purchase Act 2004. Therefore the LPPU has no relationship to any existing or emerging neighbourhood plans.

1.28.2 The LPPU does however clearly identify strategic policies within the respective policy titles as expected by the NPPF, and any neighbourhood plan that may emerge during the plan period would need to be in general conformity with those policies. Additionally, paragraph 1.3.5 of the LPPU outlines the role of strategic policies.

1.28.3 It is difficult to be more specific in the LPPU about how it will relate to any neighbourhood plans that could emerge at some point in the plan period, because we do not know what the extent of any neighbourhood areas would be. It is not possible, for example, to identify housing numbers for such areas without it being possible to predict what the area boundaries would be.

1.29 *How does the LPPU meet paragraph 11 a) of the Framework?*

1.29.1 Paragraph 11 a) states that:

“all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects;”

1.29.2 How the LPPU meets the individual elements of this paragraph is set out in table 7;

Table 7: Requirement of paragraph 11a and how the LPPU meets the requirement

Requirement	How the LPPU meets the requirement
Promote a sustainable pattern of development	The spatial strategy focuses a considerable proportion of development in Central Reading, where the level of accessibility by walking, cycling and public transport is extremely high. This would involve 59% of new dwellings and virtually all new office development. Development in this location would often be at high density to maximise the efficient use of land, subject to other important considerations. A secondary focus of development is South Reading, in particular for industrial and warehouse development. This location has seen substantial upgrades in public transport accessibility recently with the new Green Park station and the phased delivery of Bus Rapid Transit along the A33. The approach of concentrating development on where it is most accessible is also set out in the general policies such as CC6 and the minimum densities in H2.

Requirement	How the LPPU meets the requirement
Meet the development needs of their area	Policy H1 meets the need for housing set out in the Housing Needs Assessment in full, and were the LPPU to rely on the standard method in the 2023 NPPF would also meet that need in full. Policy EM1 meets the need for employment development in full. No significant need for retail and leisure development has been identified, but the Council's approach is set out in policy RL2. There is an outstanding need for permanent provision for gypsies and travellers which cannot be met in Reading. This is an existing unmet need from the adopted plan. This matter is dealt with in depth in relation to Matter 2.
Align growth and infrastructure	The LPPU seeks to align growth and infrastructure primarily through policy CC9 and the Infrastructure Delivery Plan. It also ensures that land is safeguarded for infrastructure delivery where required, in particular the major transport projects in TR2, and new provision on a development site is made where required, such as primary healthcare on town centre sites in CR11, CR12 and CR13. The LPPU relies upon development taking place on mostly smaller sites at high density within an existing urban area that already benefits from significant infrastructure provision. In this context, the relationship between a specific development and a specific item of infrastructure is not always clear cut, and instead infrastructure improvements are more often related to the overall level of growth.
Improve the environment	Whilst there are many policies in the LPPU where the aim is to conserve the natural or built environment, there are others which contain a more positive approach seeking improvements. For the natural environment this includes in terms of biodiversity gain (EN12), tree planting (EN14) and provision of new open space (EN9). For the built environment, this includes taking cues from the historic environment to inform new development (EN6) and overall policies seeking a high design quality (CC7, CR2) and improved town centre public realm (CR3). Within individual site allocations, opportunities are also identified for, for instance, tree planting and improving the waterside.

Requirement	How the LPPU meets the requirement
Mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects	The Council is seeking net zero development as part of its changes to CC2 and H5. It also continues to promote sustainable modes of travel including through the major transport projects identified in updated policy TR2 and new cycle routes associated with policy TR4. The overall pattern of development which delivers a majority of residential development in the town centre and which is expressed in overall terms in policy CC6 helps to reduce reliance on the car and make effective use of land in urban areas, and this is further achieved through the minimum residential densities inserted into policy H2 and the site allocations themselves. Adaptation to the effects of climate change in new developments is achieved through updated policy CC2, but also through policies such as EN18 regarding sustainable drainage systems and EN14 on ensuring tree planting for reasons including shading, including a new emphasis on large canopy trees. The effects of climate change on flood risk have also been considered when assessing the flood risk of development sites.

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?

1.30.1 Section 19(1A) of the Planning Compulsory Purchase Act 2004 states that:

“Development plan documents must (taken as a whole) include policies designed to secure that the development and use of land in the local planning authority’s area contribute to the mitigation of, and adaptation to, climate change.”

1.30.2 *“Delivering a sustainable and healthy environment and reducing Reading’s carbon footprint”* is at the heart of the LPPU’s vision. The first objective of the LPPU stated on pp. 15 is to *“respond to the climate emergency by contributing to achieving a net zero carbon Reading by 2030.”* Moreover, each policy and site has been robustly tested within the Sustainability Appraisal against multiple climate related objectives:

- Objective 1: To limit the impact of climate change through minimising CO2 emissions and other greenhouse gases.
- Objective 2: Adapt to inevitable climate change in terms of preparedness for extreme weather events, including avoiding and managing the risk of flooding, heat waves, drought and storm damage.
- Objective 3: Ensure appropriate, efficient, reliable and careful use and supply of energy, water, minerals, food and other natural resources.
- Objective 4: Minimise the consumption of, and reduce damage to, undeveloped land.
- Objective 5: Minimise the generation of waste and promote more sustainable approaches to waste management

- Objective 6: Minimise air, water, soil/ground and noise pollution, and improve existing areas of contaminated land and poor air and water quality.
- Objective 7: Value, protect and enhance the amount and diversity of wildlife, habitat and geology, and other contributors to natural diversity, including establishing/enhancing ecological networks, including watercourses and surrounding corridors
- Objective 14: Reduce the need for travel and transport particularly by car or lorry and facilitate sustainable travel choices.

This ensures that possible effects on the climate are identified at an early stage and mitigation measures included in the LPPU policies and site allocations.

1.30.3 The LPPU addresses climate change through a number of policies and site allocations to ensure that all development carefully considers and mitigates its effects on the local environment and emissions. The primary tool for addressing climate change is the spatial strategy itself which prioritises housing and employment development in highly sustainable locations, reducing the need for travel. Concentrating development in the centre at appropriate densities brings many climate related co-benefits by enabling the development of low- or zero- carbon heat networks and prioritising brownfield land for development.

1.30.4 The following policies seek to address climate change mitigation and adaptation directly:

- CC2 and H5 require high energy efficiency in new buildings and energy from renewable sources. This policy is the main driver for reducing emissions across the Borough and utilises powers delegated under the Planning and Energy Act 2008 allowing local planning authorities to set energy efficiency standards exceeding the current Building Regulations.
- CC3 requires that development proposals demonstrate how they have been designed to adapt to climate change and mitigate against the most significant local effects anticipated within the Borough namely, overheating, flooding and extreme storms.
- CC4 requires consideration of establishment of or connection to an existing or future heat network from non-fossil fuel sources.
- CC6 requires that the scale and density of development will be related to accessibility by walking, cycling and public transport.
- EN12, EN14 and EN19 aim to maintain and protect an extensive green network including tree canopy and to increase urban greening and biodiversity on development sites.
- EN18 requires the full consideration of the effects of flooding from all sources over the lifetime of a development. Development cannot increase flood risk, must provide safety and safe access for occupants in times of flooding and must illustrate mitigation measures that will be taken. Requirements for Sustainable Drainage Systems (SuDS) ensure that applicants minimise run-off and reduce the area of impermeable surfaces.

- H2 prescribes higher minimum densities to town centre sites which are well connected to public transport, services and facilities, reducing the need for travel and associated emissions.
- TR1, TR2, TR4 and TR5 require sustainable transport schemes such as bus rapid transit corridors, mobility hubs, pedestrian and cycle routes and electric vehicle charging.

Policies seek to be pragmatic and consider the effects on viability and deliverability and this is discussed in more detail within the Council's Whole Plan Assessment of Viability [EV004].

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?

1.31.1 Section 149 of the Equality Act 2010 states that:

- (1) A public authority must, in the exercise of its functions, have due regard to the need to—*
- (a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;*
 - (b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;*
 - (c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.*

1.32.2 The relevant protected characteristics are:

- age;
- disability;
- gender reassignment;
- pregnancy and maternity;
- race;
- religion or belief;
- sex;
- sexual orientation.

1.32.3 The requirement for Equality Impact Assessment has been incorporated into the Sustainability Appraisal process, through the sustainability objective 16 which is to “Avoid significant negative effects on groups or individuals with regard to race, age, disability, gender reassignment, pregnancy and maternity, religion or belief, sex or sexual orientation”. Carrying out the assessment highlights where policies would have a positive or negative effect against these characteristics.

1.32.4 The Sustainability Appraisal of the Pre-Submission Draft LPPU [LP005] identifies significant positive effects in terms of objective 16 for the following policies:

- **H3: Affordable Housing;** Updating the tenure split to introduce the First Homes discount at 30%, positive impacts would be had on those of a younger age who are less likely to already own a home could benefit from the First Homes discount.
- **H5: Standards for New Housing;** Points e and f of the policy require provision of all new build homes as accessible and adaptable under M4(2) of the Building Regulations and 10% of developments over 20 homes as wheelchair user dwellings in line with M4(3), with positive implications for disability and age.
- **H6: Accommodation for Vulnerable People;** The policy ensures that the appropriate amount of specialist housing is provided for vulnerable people, in particular through age or disability, whilst ensuring that younger people are not excluded through stating that that ages of eligibility for what would otherwise be standard C3 dwellinghouses will need to be robustly justified.

1.31.5 Clear but not significant positive effects are also associated with the following matters:

- A positive impact of the new policy CC10: Health Impact Assessment has been identified, in that the policy requires applicants to identify groups that could be affected by the development in terms of health, which could well fall into the protected characteristics in particular age and disability, and mitigate effects on those groups.
- Positive impacts in terms of those policies that seek to increase family-sized accommodation, i.e. H2, H7, CR6 and SR4g (Reading Link Retail Park) due to seeking to meet the identified needs for those that are likely to fall into certain age categories.

1.31.6 No clear negative impacts have been identified for any of the proposed policies. In the case of H8: Residential Conversions, both a positive and a negative impact are identified in particular due to age, as the policy promotes the needs of family housing (which may benefit those of a certain age) over those living in HMOs (who would be disproportionately young, single adults) in some areas. This highlights the need for a careful balance, but the policy still ensures that there is scope for HMOs to be provided where it would not lead to overconcentration.

1.32 *Is the geographical illustration of all relevant policies shown on the Policies Map?*

1.32.1 The geographical illustration of all relevant policies is shown on the Policies Map [LP004]. The policies in Table 8 define geographical areas that are required to be shown

Table 8: Geographical areas defined by policies in the LPPU

Policy	Designation
EN2: Areas of Archaeological Significance	Areas of archaeological potential
EN7: Local Green Space and Public Open Space	Local Green Spaces Public Open Spaces
EN12: Biodiversity	Existing or Proposed Green Link

Policy	Designation
EN13: Major Landscape Features and National Landscapes	Major Landscape Features
EM2: Location of New Employment Development	Core Employment Areas
TR2: Major Transport Projects	Major Transport Projects
RL1: Network and Hierarchy of Centres	Boundaries of identified centres
RL3: Vitality and Viability of Smaller Centres	Key frontage in district and local centres
CR1: Definition of Central Reading	Primary Shopping Area Central Core Office Core
CR7: Primary Frontages in Central Reading	Designated primary frontage in Central Reading (existing) Designated primary frontage in Central Reading (proposed)
CR9: Terraced Housing in Central Reading	Terraced housing in Central Reading
CR10: Tall Buildings	Tall buildings clusters Areas of less potential for tall buildings
CR11: Station/River Major Opportunity Area	Major Opportunity Area boundaries Sites for development or change
CR12: West Side Major Opportunity Area	Major Opportunity Area boundaries Sites for development or change
CR13: East Side Major Opportunity Area	Major Opportunity Area boundaries Sites for development or change
CR14: Other Sites for Development in Central Reading	Sites for development or change
CR15: The Reading Abbey Quarter	Abbey Quarter
CR16: Areas to the North of Friar Street and East of Station Road	North of Friar Street and East of Station Road
SR1: Island Road Major Opportunity Area	Major Opportunity Area boundaries Sites for development or change
SR2: Land North of Manor Farm Road Major Opportunity Area	Major Opportunity Area boundaries Sites for development or change
SR3: South of Elgar Road Major Opportunity Area	Major Opportunity Area boundaries Sites for development or change
SR4: Other Sites for Development in South Reading	Sites for development or change
SR5: Kennet Meadows	Leisure and recreation use of the Kennetside areas
WR1: Dee Park	Sites for development or change
WR2: Park Lane Primary School, The Laurels and Downing Road	Sites for development or change

Policy	Designation
WR3: Other Sites for Development in West Reading and Tilehurst	Sites for development or change
CA1: Sites for Development in Caversham and Emmer Green	Sites for development or change
CA2: Caversham Park	Caversham Park
ER1: Sites for Development in East Reading	Sites for development or change
ER2: Whiteknights Campus, University of Reading	Whiteknights Campus
ER3: Royal Berkshire Hospital	Royal Berkshire Hospital

1.32.2 There are also a number of designations which are defined outside the LPPU, by other plans or processes, but which are required to be shown to understand how policies are to be applied. These are shown in Table 9.

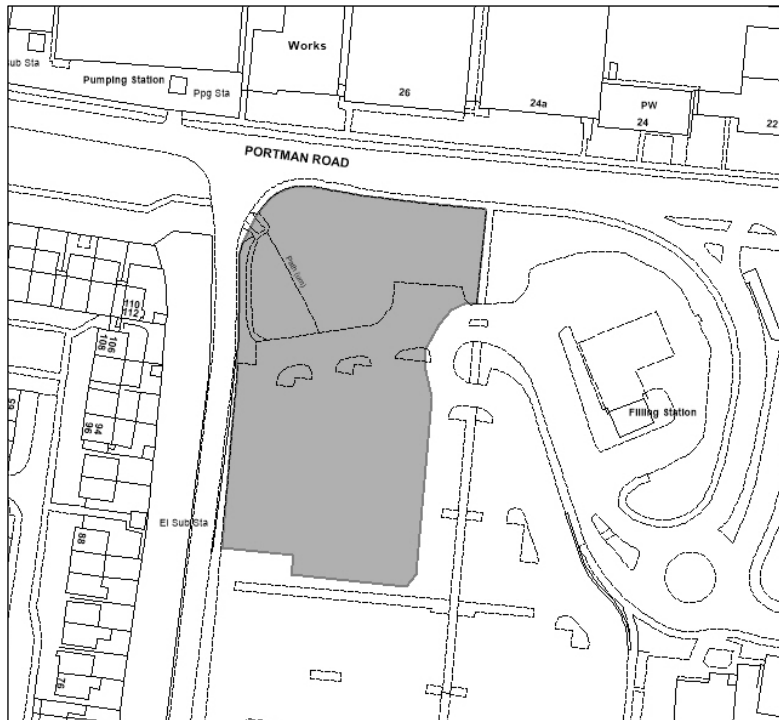
Table 9: Geographical areas defined elsewhere but related to policies in the LPPU

Policy	Designation
EN1: Protection and enhancement of the historic environment EN3: Enhancement of conservation areas	Conservation areas
EN2: Areas of Archaeological Significance	Scheduled ancient monuments
EN12: Biodiversity	Areas of identified biodiversity interest (Local Wildlife Sites, Local Nature Reserves, priority habitats)
EN13: Major Landscape Features and National Landscapes	Boundary of National Landscape
EN14: Trees, Hedges and Woodland	Ancient woodland
EN15: Air Quality	Air Quality Management Area
TR2: Major Transport Projects	Area safeguarded for Crossrail
TR3: Access, Traffic and Highway Related Matters	Classified Highway Network
OU2: Hazardous Installations	Detailed Emergency Planning Zone for AWE Burghfield Major hazard sites

1.32.3 The Council does not consider that any other designations are required to be shown.

1.32.4 In terms of any need for change, the response by Ridgepoint Homes to the Pre-Submission Draft LPPU [LP007] notes that there is an error in that site WR3w (Part of Tesco Car Park, Portman Road), which overlaps the local centre boundary, is shown on the main Proposals Map but not on the Oxford Road West inset. The Council agrees that this should be rectified, and suggests that this should be a main modification. The site boundary as should be shown on the map is shown in Figure 4.

Figure 4: Site WR3w: Part of Tesco Car Park, Portman Road



Appendix 1: Notes of Duty to Co-operate meeting with South Oxfordshire and Vale of White Horse District Councils, 6 October 2023

Duty to Co-operate Meeting between South Oxfordshire and Vale of White Horse District Councils and Reading Borough Council

6th October 2023, MS Teams

NOTES OF MEETING

Present: Emma Baker (SO&VOWHDC), Louise Dell (SO&VOWHDC), Tom Rice (SO&VOWHDC), Chris Maddocks (RBC), Mark Worringham (RBC)

1. Introductions

2. Updates on Local Plan process

Reading

- Local Plan adopted November 2019, so five year review date is up November 2024
- Local Plan Review undertaken March 2023, identified need for Partial Update based in particular on housing need, but also other matters
- Local Development Scheme approved March 2023, expects Regulation 18 consultation November 2023 and Regulation 19 consultation July 2024 followed by submission by November 2024
- Currently working on Regulation 18 consultation, which will set out a direction of travel for each policy rather than a draft.
- Submission before 2025 will mean duty to co-operate still applies.

South Oxfordshire

- Joint Local Plan across South Oxfordshire and Vale of White Horse, consulted on Regulation 18 stage last summer.
- Next Regulation 18 stage to go through committee cycle in November, but not expected to be published until the new year. It will contain all draft policies.
- Aiming for submission before April 2025
- Oxford City Council due to publish Regulation 19 consultation in November with an unmet need figure that causes a duty to co-operate issue with the South and Vale plan.

3. Housing needs and supply issues

Reading

- Existing Local Plan based on Strategic Housing Market Assessment need figure of 699
- Standard methodology currently produces a figure of 877 per year, due mainly to the 35% urban uplift.
- Commissioned ORS to generate a figure for local need, and this work is still ongoing but likely to be higher than existing policy but lower than standard methodology.
- Hope had been that ORS would lead stakeholder engagement on draft figure prior to consultation, but this is now unlikely to be the case.
- Capacity is likely to be around 800 per year. So likely situation will be that an unmet need only arises if the standard methodology is used. Not therefore clear

whether there will be an unmet need, but RBC is likely to make a DtC request regarding unmet need under standard methodology at some point.

- It is likely that the figure RBC ultimately plans for will be the capacity figure.
- Agreements within the existing plan with Western Berkshire authorities re unmet need are only valid for the unmet need from the 2016 SHMA. None of those other authorities' plans (none of which are yet adopted) explicitly contain an allowance for Reading's unmet need, but they do express a range which goes above their minimum need, so there is some flexibility across the wider area.

South Oxfordshire

- A workshop on housing need was already undertaken earlier this year which RBC attended
- Emerging plan based on standard methodology figure, which are lower than the existing plan figures that were linked to the Oxfordshire Growth Deal
- ORS commissioned to look at the detailed elements of housing need e.g. accommodation for elderly people
- Revised spatial strategy will need to be considered taking into account the changing levels of housing need. Focusing on Science Vale and Tier 1 settlements.
- Not expecting to need any additional allocations
- Currently approximately 4.2 years' housing land supply in South

4. Sites on boundary of South Oxfordshire/Reading

- Reading Golf Club: Reading part of Golf Club land now permitted for 223 dwellings including reserved matters, due to start imminently. Not clear yet if allocation will be amended in line with consent or removed entirely.
- Caversham Park: Outstanding planning application for conversion of house to residential care and additional development within grounds. Site is a registered park/garden, and still lots of issues to resolve.
- Sites at Play Hatch and north of Emmer Green (in South Oxfordshire) submitted to plan process in both authorities by Gladman. RBC met with Gladman to discuss. Offer includes a park and ride on A4155, but RBC would need to consider whether this had a positive effect overall on transport in Reading.
- Other sites put forward to South and Vale plan on the boundary are mainly those in previous process, e.g. remainder of Reading Golf Club, Palmers Riding Stables. Exception is proposal for employment at Caversham Lakes.

5. Transport infrastructure

Transport Strategy progress

- Process of new Transport Strategy began before Covid and was then paused, in particular to allow post-Covid movement patterns to settle and to wait for some delayed DfT guidance.
- Recently started consultation on draft Transport Strategy (LTP4).
- Consultation likely to last until December or new year.
- Earliest possible date for adoption is Spring 2024.
- Includes Cross Thames travel and mobility hubs
- Adopted LCWIP to make improvements to walking and cycling, jointly with West Berks and Wokingham to cover the Reading urban area parts of those authorities.
- Rights of Way Improvement Plan in progress

Action: CM to send consultation details to LD

Cross Thames travel

- Formerly considered as Crossing of the Thames in Reading's documentation, now called Cross Thames Travel to look at the issue in the round.
- This is contained within the Draft Reading Transport Strategy, albeit that it would not be within Reading.
- Any further work on this will go through the Cross Thames Travel Group on which both parties are represented.
- SO&VoWHDC likely to only support public transport and active travel solutions
- Within Transport for the South East (TfSE) strategy, albeit not wholly within their area.

Park and ride/mobility hubs

- Three proposed corridors for mobility hubs in draft Reading Transport Strategy that cross the South Oxfordshire/Reading boundary, as has been the case in the past.
- No specific sites identified, but there is no space in Reading so would need to be in South Oxfordshire
- Would be more than just park and ride, with mobility hubs indicating a wider range of modes.
- Referenced within Transport for the South East strategy

Local Plan transport matters

- Reading Local Plan updates will mainly be to accommodate and reflect Transport Strategy
- No transport modelling commissioned yet for Reading, this will require more information on development levels and location
- In South Oxfordshire, matters are complicated by the fact that the Oxfordshire mobility model is not available yet, so exploring other options.

6. Employment and commercial needs

Reading

- No work yet commissioned on employment and commercial needs.
- Situation in existing plan is that needs for industrial and warehouse, office and retail need can all be met within authority.
- Not expecting significant increases in need, so this situation is unlikely to change and not therefore expecting there to be unmet needs to be exported.

South Oxfordshire

- Work from AECOM is reporting.
- High employment need in the past against which delivery has been good, so not expecting a particularly significant need this time.
- Some convenience retail need identified around Science Vale, some of which can generally be accommodated within the large allocations.
- Not expecting this issue to have particular cross-boundary implications.
- Both authorities have responded to West Berkshire duty to co-operate request regarding employment needs to state no scope to meet these needs in the respective areas.

7. Gypsies and travellers

Reading

- Not intending to update the relevant policy or carry out another assessment.

- Situation remains that there are unmet needs for 10-19 permanent pitches, and RBC will continue to seek opportunities for these to be met in neighbouring areas.
- Transit needs will be met through a new permission.

South Oxfordshire

- Work underway at an Oxfordshire level on updating gypsy and traveller need.
- Existing strategy is to deliver pitches within larger allocations, but these are still outstanding.

8. Statement of Common Ground

- Existing Statement of Common Ground dates from period of South Oxfordshire examination, May 2019.
- Neither authority intending to need an updated version ready before their respective consultations, but consider an updated version would be useful.
- Suggested that draft text for SO&VOWHDC Duty to Co-operate Statement be the basis for a revised SoCG. **Action: EB to send draft text to MW.**

9. Any other business

- Agreed not to set a date for a next meeting at this stage, but likely to need something in the new year.

Appendix 2: Notes of Duty to Co-operate meeting with West Berkshire District Council, 18 October 2023

Duty to Co-operate Meeting between West Berkshire District Council and Reading Borough Council

18th October 2023, MS Teams

NOTES OF MEETING

Present: Paula Amorelli (WBDC), Sarah Conlon (WBDC), Laila Bassett (WBDC), Cheryl Willett (WBDC), Mark Worringham (RBC), Sarah Burr (RBC), Katie Jefferis (RBC)

Apologies: Bryan Lyttle (WBDC)

1. Introductions

2. Updates on Local Plan process

Reading

- RBC is undertaking a partial update of the Local Plan (adopted Nov 2019). Five year review would be due in Nov 2024, but RBC is working ahead of this deadline in order to ensure that policies can have weight applied in advance of the deadline.
- Initial review undertaken in March 2023 concluded that half of policies need to be updated. Update is largely driven by changes to housing numbers.
- Regulation 18 consultation will occur from Nov 2023 – Jan 2024. Regulation 19 consultation will take place next summer (July 2024). RBC is planning to submit in Nov 2024 and adopt in 2025.
- The Regulation 18 consultation document indicates a ‘direction of travel’ and will go before Committee in mid-November.
- RBC has commissioned a Housing Needs Assessment (HNA) to inform the update. Consultants have been unable to undertake stakeholder engagement to this point. Therefore, RBC is arranging DtC meetings with its neighbours in the meantime.

West Berkshire District Council

- Local Plan review has been submitted (March 2023) and is at examination stage. Inspector has requested supplementary questions and WBDC is working on a response. Most queries concern the allocation at Northeast Thatcham, which has seen dwelling numbers decrease significantly.
- At this time, WBDC is proceeding with the examination process and hearings will likely take place in Spring 2024.

3. Housing needs and supply issues

Reading Borough Council

- RBC’s standard methodology figure is 877 dwellings per year. This is high because Reading is subject to the 35% urban uplift applied to the largest urban areas.
- RBC cannot deliver this figure, but could likely deliver 800-825 dwellings based on preliminary capacity assessments.

- RBC has commissioned Opinion Research Services (ORS) to develop an alternative figure based on local need. This work is ongoing and has yielded a preliminary figure of 735 dwellings.
- RBC will likely plan for 800-825 dwellings. This will allow RBC to argue that the Local Plan will overdeliver based on local need. In recent years, RBC has seen development delivered at higher densities than expected (included high levels of conversions to residential) and expects this to continue.
- There is a risk that an Inspector would request adherence to the standard methodology figure. RBC plans to retain a back-up position adhering to the standard methodology which may require a DtC request to neighbouring authorities. This would likely take place early next year (2024) before the Regulation 19 consultation. RBC to liaise further with WBDC on the wording of any request. A new SoCG could include authorities outside the housing market area (HMA). Bracknell and Wokingham, for instance, have included a buffer within their plans which may address some of this unmet need. Further work is needed to look at the figures and will be further refined through the HELAA.
- RBC is also concerned that housing delivery may be constrained by electricity grid capacity (although this applies to many local authorities).

West Berkshire District Council

- West Berkshire's current position is as stated in the Local Plan. However, since the Plan was submitted, a planning permission that was thought to have lapsed has been confirmed as being extant. A Main Modification will be proposed to include this site in the supply which adds a further 160 dwellings.
- One of the Inspector's Preliminary Questions highlighted the need to consider full financial years post adoption. Taking account of this, in addition to the potential for adoption now being in 2025/26, means that the Council is proposing to extend the Plan by a further two years to 2041. The implication of this is that there will be a shortfall of around 600 dwellings.
- The strategic allocation at North East Thatcham was reduced at Reg 19 on the recommendation of the old administration, and an increase back to the original proposed number would resolve the shortfall. However, the new administration does not support this allocation and have proposed several alternatives which could decrease the housing supply further.

4. Spatial Strategy

Reading Borough Council

- RBC will amend its Local Plan to remove references to Grazeley and spatial strategies that included speculative development on Kennet Meadows.
- Sites nominated are mostly in the town centre. The spatial strategy will reflect an increasing emphasis on the town centre and at higher densities.
- Because of this, RBC is unlikely to be able to deliver the number of family homes needed.

5. Transport infrastructure

Transport Strategy progress

- The RBC draft Transport Strategy is now undergoing consultation until December 2023. It will be adopted in Spring 2024.

Park and Ride (Mobility Hubs)

- RBC retains an ambition to establish two mobility hubs on the A4 and A329 corridors on sites outside of the Borough.
- WBDC is unlikely to be able to identify any suitable sites on A4 corridor in the vicinity of Theale.

Other matters

- The RBC Local Walking and Cycling Infrastructure Plan (LWCIP) was developed with WBDC and Wokingham Borough Council to cover the entire urban area.
- RBC has yet to commission transport modelling. This will be commissioned in the coming months.
- WBDC is working with National Highways to resolve some issues around transport modelling and this should be resolved in mid-December.
- RBC town centre sites are delivered with low or no parking and have very little impact on road travel. Most every allocation outside the town centre is already included in the Local Plan and has been subject to modelling.

6. Employment and commercial needs

Reading

- RBC has allocated one large site for industrial and warehouse use at Island Road. This site is within the DEPZ, but RBC plans to carry forward the allocation. Other employment needs will be met through intensification.
- Employment forecasts obtained through the HNA suggests that no further employment space over and above the planned level in the Local Plan is needed, but this is still to be looked at in detail.
- RBC holds more permissions for office space than are likely to be needed. This could possibly help to meet WBDC's unmet office need, but further employment work will be commissioned (particularly to take account of changing working patterns in recent years).
- Retail need is expected to decrease given the national state of retailing.
- Shortly after Regulation 18 consultation is launched in Nov, RBC will take steps toward commissioning work on employment and commercial needs, flood risk, transport modelling and viability.

West Berkshire District Council

- WBDC has 50,000 sqm of unmet office space need and 30,000 sqm of unmet industrial/warehousing space need and would appreciate assistance from RBC. (RBC does not anticipate that monitoring data will be ready in time, but the issue will continue to be discussed).

7. Gypsies and travellers

Reading

- RBC is not seeking to update its GTAA or relevant policies.
- 10-17 permanent pitches needed cannot be delivered within the Borough and RBC will continue to seek solutions with neighbouring authorities for which RBC may be able to provide resources.
- RBC has recently permitted 7 transit pitches (14 caravan capacity) on its own land and will seek to manage the site.

West Berkshire District Council

- WBDC needs to deliver 3 sites in the short-term and a further 17 to meet need to 2038. The GTAA (2021) is considered up-to-date. WBDC is planning to publish a

separate DPD (submission by June 2025) to address Gypsy and traveller needs and will hold a call for sites.

8. Natural environment & Kennet Meadows

- RBC plans to carry forward most relevant policies.
- This area will form one of the main locations for Biodiversity Net Gain within the Borough. RBC has held discussions with landowners that are seeking to provide BNG credits. This area includes some land within WBDC. The Environment Team at WBDC has been involved in these discussions.
- There is a proposal to change how water levels are managed in the Kennet Meadows area to create a wetland that would help to manage flood risk. No effects are expected within WBDC, but this will be investigated in detail as proposals move forward.

9. West of Berkshire Statement of Common Ground

- RBC will redraft the SoCG to reflect progress within the area and send to the various affected Councils for agreement, for ultimate sign-off by Councillors. This would be helpful for WBDC's examination. RBC will begin work on this after the Regulation 18 consultation is launched.

10. Any other business

- DPG and Berkshire Heads of Planning groups are still ongoing, but it is unclear whether leaders and chief executives are in contact.
- The next DtC meeting will take place as part of stakeholder engagement for RBC's housing figures through ORS.

Appendix 3: Notes of Duty to Co-operate meeting with Bracknell Forest Council, 31 October 2023

Duty to Co-operate Meeting between Bracknell Forest Council and Reading Borough Council

31st October 2023, MS Teams

NOTES OF MEETING

Present: Natalie Hird (BFC), Charlie Fulcher (BFC), Mark Worringham (RBC), Katie Jefferis (RBC), Sarah Burr (RBC)

1. Introductions

2. Updates on Local Plan process

Reading

- RBC is undertaking a partial update of the Local Plan (adopted Nov 2019). Five-year review would be due in Nov 2024, but RBC is working ahead of this deadline in order to ensure that policies can have weight applied in advance of the deadline.
- Initial review undertaken in March 2023 concluded that half of policies need to be updated. Update is largely driven by changes to housing numbers.
- Regulation 18 consultation will occur from Nov 2023 – Jan 2024. Regulation 19 consultation will take place next summer (July 2024). RBC is planning to submit in Nov 2024.
- The Regulation 18 consultation document indicates a 'direction of travel' and will go before Committee in mid-November.

Bracknell Forest Council

- Main modifications consultation started this week. This will end in December and BFC will await an Inspector's Report.

3. Housing needs and supply issues

Reading Borough Council

- RBC's adopted plan figure is based on the SHMA which pre-dates the standard methodology.
- RBC's standard methodology figure is 877 dwellings per year. This is because Reading is subject to the 35% urban uplift applied to the largest urban areas. RBC cannot deliver this figure and considers it unrelated to need.
- RBC could likely deliver 800 dwellings based on preliminary capacity assessments.
- RBC has commissioned Opinion Research Services (ORS) to develop an alternative figure based on local need. This work is ongoing and has yielded a preliminary figure of 735 dwellings.
- RBC will likely plan for around 800 dwellings. This will allow RBC to argue that the Local Plan will overdeliver based on local need. In recent years, RBC has seen development delivered at higher densities than expected (included high levels of conversions to residential) and expects this to continue. As currently drafted, the figure in the local plan review will not result in any unmet need. (The

adopted plan resulted in an unmet need of 230 dwellings. This has been resolved due to increased densities on new schemes and new housing evidence.)

- There is a risk that an Inspector would request adherence to the standard methodology figure. RBC plans to retain a back-up position adhering to the standard methodology which may require a DtC request to neighbouring authorities. This would likely take place early next year (2024) before the Regulation 19 consultation.
- RBC is also concerned that housing delivery may be constrained by electricity grid capacity (although this applies to many local authorities).
- Consultants have been unable to undertake stakeholder engagement to this point. Therefore, RBC is arranging DtC meetings with its neighbours in the meantime.
- RBC will rebase Local Plan period from 2023 to 2041.

Bracknell Forest Council

- BFC is able to accommodate its needs under the standard methodology.
- A modification to the plan (reference MM7) refers to existing unmet need of 230 dwellings to be met across the HMA (as stated in the Memorandum of Understanding). BFC raises this in consultation responses to other authorities' plans within the HMA.

4. Spatial Strategy

Reading Borough Council

- RBC will amend its Local Plan to remove references to Grazeley and spatial strategies that included speculative development on Kennet Meadows.
- Sites nominated are mostly in the town centre. The spatial strategy will reflect an increasing emphasis on the town centre and at higher densities.

5. Transport infrastructure

Transport Strategy progress

- The RBC draft Transport Strategy is now undergoing consultation until December 2023. It will be adopted in Spring 2024. The Local Plan review incorporates projects listed in the strategy. No direct impacts for BFC are anticipated.
- Transport modelling will occur in the coming months, but impacts are expected to be limited since most town centre sites will be delivered with low or no parking with little impact on road travel. RBC to keep BFC informed of progress.

6. Employment and commercial needs

Reading

- RBC has employment forecasts from housing needs work but will commission further work in the coming months.
- Employment forecasts obtained through the HNA suggest that no further employment space over and above the planned level in the Local Plan is needed, but this is still to be looked at in detail.
- Retail need is expected to decrease.
- RBC will only have surplus industrial space if needs reduce as a result of new analysis. Existing approach to intensify industrial uses on existing sites will be carried forward.

- RBC's Article 4 Direction has just been modified at the request of the Secretary of State and is significantly reduced in size. It aims to protect retail and office core, as well as main frontages in district and local centres.

Bracknell Forest Council

- At the base date of the Local Plan, BFC had unmet industrial need (approx. 48,000 sq. m) but no unmet need for offices. However, due to the sustained loss of offices since 1st April 2020, the situation appears to be changing. Careful monitoring will be required.
- BFC has not pursued an Article 4 direction due to lack of evidence at this time, but this will remain under review.

7. Gypsies and travellers

Reading

- RBC is not seeking to update its GTAA or relevant policies.
- 10-17 permanent pitches needed cannot be delivered within the Borough and RBC will continue to seek solutions with neighbouring authorities for which RBC may be able to provide resources.
- RBC has recently permitted 7 transit pitches (14 caravan capacity) on its own land and will seek to manage the site.

Bracknell Forest Council

- BFC is looking to plan for cultural needs rather than PPTS needs due to recent ruling.
- BFC is unable to rely on transit site in Reading.
- BFC approach states support for sites coming forward.

8. West of Berkshire Statement of Common Ground

- RBC will redraft the SoCG to reflect progress within the area and send to the various affected Councils for agreement, for ultimate sign-off by Lead Members. RBC will begin work on this after the Regulation 18 consultation is launched.

9. Any other business

- Future of Royal Berkshire Hospital location is uncertain. RBH is looking closely at technical aspects of remaining onsite and exploring additional sites, including one within WBC. Investigations will not be complete until April at the earliest. There is a possibility that the future of the site will still be uncertain at time of plan submission.
- RBC Local Plan review will state preference for RBH remaining within the Borough. Should the hospital be relocated, RBC will seek some healthcare use on the existing site alongside residential.
- BFC asked about impacts of development on air quality. RBC is implementing an action plan as required by government but will not include anything new in the Local Plan with regard to air quality. Existing policy is considered to be effective and development aims to reduce car dependency overall. RBC is at least 7 km from protected sites and no impacts are anticipated for BFC. Transport modelling is expected to confirm this.

Appendix 4: Notes of Duty to Co-operate meeting with Wokingham Borough Council, 1 November 2023

Duty to Co-operate Meeting between Wokingham Borough Council and Reading Borough Council

1st November 2023, MS Teams

AGENDA

1. Introductions

Present: Ian Church (WBC), Ian Bellinger (WBC), Mark Worringham (RBC), Katie Jefferis (RBC)

2. Updates on Local Plan process

Reading Borough Council (RBC)

- Final housing need figure yet to be produced by ONS (consultants).
- Committee papers to be finalised at the end of this week and will go to committee on 15th November 2023. Reg 18 consultation will follow, finishing in January 2024.
- Reg 19 update to take place in July 2024, followed by submission by November 2024.
- Forthcoming Reg 18 consultation comprises scope and content. Sets out the direction of travel, including an outline of what has changed since the adoption of the local plan, bullet points of evolving policies, alternative options and series of questions.
- Approx. 47 policies out of 90 are being updated (roughly half). Housing is the key reason for the update in the first place.
- Intent is to adopt in 2025.

Wokingham Borough Council (WBC)

- Waiting for the new NPPF to come out before content is decided for the Reg 19 plan as it is hoped that this will resolve the issue of whether past over-delivery of housing can be taken into account. Intend to get this ready for the Council in late Jan / early Feb 2024, but subject to NPPF revisions on housing delivery.

3. Housing needs and supply issues

RBC

- The new standard methodology produces a figure of 877 dwellings to be delivered p.a., based on most recent calculations and as a result of the 35% urban uplift.
- Realistically, this figure will be difficult to deliver within the borough. In addition, the urban uplift does not reflect the actual local need.
- As a result, RBC have commissioned ORS to undertake research to produce a housing need figure based on actual local need. Indicative

findings show that the figure for local need is 735 dwellings per year. However, no draft reporting has been provided as yet.

- The current figure within the existing local plan is 699, so the revised figure would be an increase compared with the existing figure.
- The Reg 18 consultation document will set out that the need is 735 homes per year, but that RBC will deliver 800 to boost housing supply.
- A Duty to Cooperate request will be submitted following the consultation on the basis of the standard methodology figure to ensure that RBC have an insurance policy ahead of examination.
- Care will be taken to the wording of this and it is appreciated that Wokingham and West Berks are at a sensitive stage of the local plan process. The wording will refer to a 5 yearly review stage and there is no expectation to see this accommodated within current emerging plans. RBC will await results of HELAA assessment to ensure there is a firmer grasp on housing matters before a Duty to Cooperate letter is drafted.
- The standard method without the 35% uplift is around 650 homes per year.

WBC

- Currently undertaking a housing options and capacity for Wokingham. Generally, the borough has smaller sites and is reliant on strategic sites coming forward to address capacity issues.
- Previous DtC meeting covered the situation in Wokingham in more depth.

4. Spatial Strategy

RBC

- 75% of sites submitted within RBC's Call for Sites exercise are within the town centre. Some intensification of existing sites, but in general, a major reliance on the town centre to deliver new housing.
- A need to update in the plan what is going on outside of Reading e.g. Grazeley, Kennet Meadows.
- Englefield has put forward Grazeley for employment allocation. Not within the borough so RBC will not specifically comment. In addition, RBC do not require employment.
- RBC have an existing employment allocation within the DEPZ which is yet to be implemented. As it is an existing allocation, it appears as though this can still be delivered.

WBC

- WBC have a scheduled meeting with Savills/Crest Nicholson to discuss the possibility of employment development at Grazeley.
- Potential issues with major employment use within the DEPZ, WBC are not proposing to promote this idea.

5. Transport infrastructure

- RBC transport plan still out for consultation. Amendments include updates, for example, taking out existing completed projects and putting in new plans.
- Noted that Park and Ride Corridors are already established between RBC and WBC.
- No longer any specific reference to an east Reading link in a specific location but broadly shown as a corridor.
- Transport modelling work will commence once RBC is out to consultation. It is anticipated that the impact on the road network will be limited, given the majority of the sites are town centre sites with little or no parking envisaged.
- Generally, sites within the south of Reading are much smaller (e.g. 20-30 homes), so there is unlikely to be major implications on WBC.
- Further discussions to be had once additional transport modelling takes place.

6. Employment and commercial needs

RBC

- No work undertaken yet on employment needs, expect for employment forecasting in support of the housing needs assessment.
- Employment needs are not anticipated to increase, likely to be a continuation on the existing plan.
- Question surrounding Island Road site that is situated within the newly extended DEPZ. There is difficulty in meeting employment needs without this.
- Retail needs are unlikely to increase.

WBC

- WBC have an employment need, in particular for industrial/warehouse use. However, this could potentially be accommodated at a sub-regional level and does not specifically need to be in Wokingham. Neighbouring authorities have been in touch asking to meet their respective unmet needs.
- Generally, industrial/warehouse development in WBC comprises small extensions to existing countryside business parks but would not sufficiently meet the needs of the borough.
- Retail study showed that there was a need for new convenience floor space.

7. Gypsies and travellers

RBC

- RBC are not proposing to update the policy or undertake any updated GTAA work.
- General awareness of the unmet need which continues to be an issue.
- Permission granted for a transit site which would meet RBC's transit needs in full.

WBC

- Traveller need is high, WBC have the largest population in Berkshire. WCB are unable to meet the cultural need as land is not being prompted for such and there is difficulty in addressing this.

8. West of Berkshire Statement of Common Ground

- RBC intend to take the existing West of Berkshire SOCG and update/circulate for sign-off.
- There is hesitancy to re-convene with political groups as it is unlikely to be the most effective way to engage with members on this issue, however it was suggested that officers explain it to members so they are aware of the changes, in particular if there is something new or controversial being proposed.

9. Any other business

Royal Berkshire Hospital (RBH)

- RBH currently undertaking site investigations. Information is not likely to be available until April 2024.
- RBC's main position is that they would like RBH to remain on site and expand if necessary.
- RBH have requested meetings with WBC to discuss future options.

Reading University Update

- Policy to be updated with the knowledge that the University have produced an estates strategy, but is yet to be finalised.
- Further updates will be added when there is a little more info, e.g., policy will refer to specific sustainability updates when these are known.
- Student enrolment has increased at a postgraduate level and through remote learning, additional floorspace is not necessarily required.
- Would like to understand the University's position to avoid them showing up at examination with new information in due course.
- RBC has seen the draft estate strategy but this is not public yet.

AWE

- RBC are updating the policy around AWE to show new line around the DEPZ.
- WBC have a draft policy prepared on how to deal with a planning application within the DEPZ. WBC to provide draft to RBC.

Appendix 5: Full text of responses from neighbouring authorities on provision for housing and for Gypsies, Travellers and Travelling Showpeople

Housing

Bracknell Forest Council

The current plan covers the period 2013-2036. Policy H1 includes a requirement for 689dpa over the plan period. The updated Plan covers the plan period 2023-2041. Updated Policy H1 includes a housing requirement of 825dpa (14,850 total over the plan period), which relates to the capacity of sites in the 'Housing and Economic Land Availability Assessment' (2024).

The updated Policy H1 is less than the local housing need based on the national standard method of 878dpa (15,804 over the plan period, including a 35% urban uplift, based on the December 2020 guidance).

However, Reading Borough Council has undertaken its own housing needs assessment (ORS, July 2024) which identifies a need for 735dpa (13,230 total over the plan period). The NPPF (para. 61, December 2023 version) allows for exceptional circumstances for a local assessment of need. The local assessment uses alternative population and growth assumptions which are more applicable to local circumstances. BFC has no objection to the approach proposed for deriving the local housing need figure, as it is agreed that the 35% uplift for Reading results in a figure which does not fully relate to local need.

Furthermore, Policy H1 identifies a greater requirement than set out in the ORS local assessment of housing need (difference of +1,620 dwellings), with the aim of boosting housing delivery.

However, BFC has concerns about how the remaining need (once existing commitments have been deducted) will be addressed in the Plan. The table at para. 4.4.5 (page 100) identifies a remaining need of 6,428 homes. However, the same table (page 101) sets out that sites identified in the plan amount to a capacity of 5,110-7,470 homes. Whilst there is no objection to the principle of identifying a capacity range for each site, if only the minimum range for each allocated site is achieved, this would result in a shortfall of 1,318 homes against Policy H1. Some assurance is sought that the identified sites will meet the requirement in Policy H1 to avoid the issue of unmet need. BFC notes that there are supporting policies on increasing densities of development in locations which are highly accessible by public transport, as well as walking and cycling.

Whilst not raising any point of soundness on approach to how site specific policies are set out, it is felt that the policies themselves (such as SR3) could be clearer if the indicative capacity was referred to within the main policy wording rather than as a footnote, for example (changes shown underlined):

Development of the South of Elgar Road site will be allocated for 360-540 residential units, with potential for supporting community uses.

Oxfordshire County Council

The proposed housing requirement is 825 dwellings per annum (dpa). This number is in excess of the need that Reading Borough Council and its consultants, ORS, have assessed of 735 dpa. The 825 number is also within 200 dpa of the previously proposed revised Standard Method calculation of 1,023 dpa contained in the National Planning Policy Framework (NPPF) consultation this year and is more than 80% of the revised Standard Method calculation of 1,028 dpa contained in the finalised spreadsheet available online 12th December 2024 (80% is 822.4). The NPPF consultation earlier this year indicated that Local Plans which reach Regulation 19 stage within a month of a newly published NPPF would benefit from a transitional provision if within that 200 dpa limit, and the final NPPF on 12th December 2024 now indicates that Local Plans which reach Regulation 19 stage within three months and are proposing a requirement of more than 80% of the new Standard Method figure will benefit from transitional provisions.

The proposal is for a Reading housing requirement that is higher than the need assessed by ORS. However, there is another factor: the 825 dpa figure is less than the old Standard Method calculation of 878 dpa. We understand that Reading Borough Council has been making an argument that there are exceptional circumstances to support their 825 dpa figure.

We note that the old Standard Method included a 35% uplift added for some urban areas in England including Reading. Without that, the Standard Method calculation would have been lower than the proposed requirement of 825 dpa. Reading is the smallest of the authorities affected by the urban uplift outside of London. The new Standard Method calculations do not include 35% uplifts.

It is our understanding that the 825 dpa figure is based on capacity within the Reading boundary. If the requirement was higher than 825 dpa, we expect that Reading Borough Council might be unable to meet that, and there would be unmet housing need. There is no agreement with any adjoining local planning authority, including those within Oxfordshire, to provide for any unmet housing need from Reading. The duty to cooperate statement which accompanies this Regulation 19 consultation includes recent responses from eight local planning authorities close to Reading, including South Oxfordshire and the Vale of White Horse, on the potential to accommodate unmet housing need. The are summarised at para 2.3.3 of that statement and none of them offered to meet any unmet needs.

Reading Borough Council's Regulation 19 Local Plan position on housing numbers is different from that in the South and Vale Regulation 19 Joint Local Plan (JLP) and the Wokingham Regulation 19 Local Plan which propose a requirement equal to the old Standard Method calculation.

Oxford City Council's Regulation 19 Local Plan, submitted in March 2024, proposed a higher housing requirement than the old Standard Method calculation. Oxford City Council received a letter from the Planning Inspectorate in September 2024 recommending withdrawing their Regulation 19 Local Plan. The letter followed examination hearings, attended by Oxfordshire County Council and others, which discussed concerns about their assessment of housing need and the resulting housing requirement and level of additional unmet need for which there was no agreement with other local authorities to address.

This letter does not comment on whether Reading Borough Council's housing need assessment of 735 dpa and its proposed requirement of 825 dpa are soundly based, as it would require a level of interrogation into the evidence that we do not have the resource for. However, Oxfordshire County Council remains interested in the issue of housing numbers in accordance with the duty to cooperate. The fact this Regulation 19 Local Plan does not give rise to unmet need, means we do not need to consider proposals for addressing that unmet need and whether that results in additional infrastructure implications. We note that the proposed level of housing at 825 dpa contained within Reading does not give rise to new strategic infrastructure implications that we need to address.

Royal Borough of Windsor and Maidenhead

We note that you do not propose to meet your full housing need figure, which you will seek to justify at examination stage. However, if the outcome of the examination is to increase your housing target beyond that stated in the Local Plan Pre-Submission Draft Partial Update, the Royal Borough would not be in a position to assist with meeting any unmet need as per our previous correspondence on this matter.

South Oxfordshire District Council and Vale of White Horse District Council

The Government sets out in the NPPF/PPG that it expects all authorities to follow the standard method to determine the number of homes needed, unless exceptional circumstances justify an alternative approach, which also reflects current and future demographic trends and market signals (December 2023 National Planning Policy Framework paragraph 61).

We support Reading's proposed housing requirement and believe it to be sound. Reading Borough Council has a revised Housing Needs Assessment (July 2024) which has identified a local housing need of 735 homes per year to 2041, which is lower than the standard method. We support the exceptional circumstances that justify the alternative approach to the standard method proposed by the Council in the Housing Provision Background Paper (November 2024).

Reading has a Housing and Economic Land Availability Assessment confirming the ability to meet needs in full to 2041, delivering 825 homes per year. This means that there is no expectation of unmet housing need needing to be planned for by neighbouring local authorities.

West Berkshire District Council

WBDC acknowledges RBC's position with regards housing needs over the LPU period 2023 to 2041.

WBDC also notes that Reading Borough Council's position is that its Partial Update to the Local Plan will meet its housing needs in full as identified through an alternative approach to calculating housing need rather than the Local Housing Need (LHN) identified under the standard methodology. It welcomes the intention that under this approach the Regulation 19 version of the Partial Update plans for the provision of 825 dwellings per annum compared to the identified need of 735 dwellings per annum, and therefore it is not intended that there will be any unmet needs to be accommodated in neighbouring authorities.

However, WBDC acknowledges that the approach proposed to be taken will come under scrutiny and under the current standard methodology the identified housing need for the Borough over the plan period 2023 – 2041 would be higher. In the event that the current standard methodology was to be used to identify housing need within Reading Borough, WBDC acknowledges there would be a shortfall in provision.

As you are aware WBDC is currently at examination with its Local Plan Review (LPR). A Post Hearing Letter was published by the Inspector on 31 July 2024 (IN30) setting out some interim findings and further action points for WBDC. In his letter the Inspector identified that there could be a shortfall in housing provision over the plan period of around 850 dwellings. As such the Inspector requested WBDC consider how the LPR could be modified to boost the housing land supply in light of the possible shortfall identified.

WBDC has identified additional provision, and this forms part of the consultation on the proposed Main Modifications which is running from 6 December 2024 until 31 January 2025. Given the current circumstances WBDC is not currently in a position to assist Reading with any unmet need that might arise within Reading Borough over the plan period to 2041.

WBDC is committed to an early review of the Local Plan and can, if necessary, consider this request again as part of this work. We will continue to work closely with Reading Borough Council and other neighbouring authorities in considering strategic planning issues in the area.

Wokingham Borough Council

Subject to the outcome of the transport assessment, WBC supports in principle Policy H1 in setting a housing requirement which equates to an average of 825 dwellings per annum.

It is noted that this exceeds the scale of housing need identified within the Reading Housing Needs Assessment July 2024 (735 dwellings per annum). It is further noted that whilst lower than the scale of housing need calculated by the national standard method under the NPPF 2023 (878 dwellings per annum), the proposed requirement exceeds the outcome before the additional step of the urban uplift is applied (650 dwellings per annum). Reading Borough Council have not defined any unmet housing need.

Whilst RBC are promoting the Reading Housing Needs Assessment July 2024 as the appropriate assessment of housing need, it is likely that other parties will promote the use of the national standard method.

It is important to acknowledge the advice contained within the NPPF 2023 regarding the standard method. NPPF paragraph 62 states:

“The standard method incorporates an uplift which applies to certain cities and urban centres, as set out in national planning guidance. This uplift should be accommodated within those cities and urban centres themselves except where there are voluntary cross boundary redistribution agreements in place, or where it would conflict with the policies in this Framework.”

Footnote 27 expands stating:

“In doing so, strategic policies should promote an effective use of land and optimise site densities in accordance with chapter 11. This is to ensure that homes are built in the right

places, to prioritise brownfield and other under-utilised urban sites, to utilise existing infrastructure, and to allow people to live near the services they rely on, making travel patterns more sustainable.”

WBC’s reading of the above is that where a local authority is unable to meet housing need as calculated by the base formula, i.e. before the application of the urban uplift, cooperation between local authorities is expected to enable this need to be met. There is however no requirement or expectation on cooperation to meet the proportion of housing need required by the additional urban uplift stage.

For the avoidance of doubt, housing delivery in Wokingham Borough is highly dependent on developing greenfield land. Exporting any proportion of housing need required by the urban uplift to Wokingham Borough would require further significant greenfield land to be utilised. This would be in clear conflict with the intended purpose of the urban uplift and national planning policy, and our view be inappropriate.

Gypsies, Travellers and Travelling Showpeople

Bracknell Forest Council

There are no changes proposed to the wording of Policy H13 ‘Provision for Gypsies and Travellers’. Policy H13 is a criteria based development management policy, with the supporting text setting out the local need. Paragraph 108 states there is a need (based on a Gypsy and Traveller, Travelling Showpeople and Houseboat Dweller Accommodation Assessment 2017) for 10-17 permanent pitches, a transit site of 5 pitches and 2 travelling showpeople plots. It is made clear in paragraph 109 that these needs cannot be met in Reading Borough and is stated that the Council is exploring options for meeting permanent needs outside the Borough.

No update is provided on whether any progress has been made on meeting needs. However, a change to the target is proposed to the Monitoring Framework in Figure 11.1 from ‘TBC’ to ‘None’. It is not clear why the target does not match the identified need in paragraph 108, even though no sites are allocated.

West Berkshire District Council

WBDC notes that there are existing needs identified, and that no sites have been identified which could meet the permanent or transit need. We support the inclusion of policy H13 which supports proposals for Gypsies and Traveller accommodation subject to certain criteria.

WBDC needs to deliver 20 permanent Gypsy and Traveller pitches in the period to 2038. There is no requirement to identify a site for transit pitches, however WBDC’s 2021 Gypsy, Traveller and Travelling Showpersons Assessment recommends that tolerated stopping places or negotiated stopping places should be provided.

The allocations included within WBDC’s existing Local Plan are being rolled forward into the LPR and no additional sites are proposed. WBDC has commenced work on a Gypsy and Traveller Accommodation Development Plan Document (DPD) which will contain policies and allocations to meet the Gypsy and Traveller accommodation needs.

At this point in time, WBDC are unable to accommodate any of RBC's unmet needs. Nonetheless, as part of the Duty to Cooperate, WBDC will continue to liaise with RBC as work on the DPD progresses and will advise whether it will be possible to meet needs within West Berkshire district or not.

Appendix 6: Executive Summary of the Berkshire Functional Economic Market Area Study (2016)

Executive Summary

This report has been prepared by Nathaniel Lichfield & Partners ('NLP') on behalf of the Thames Valley Berkshire Local Enterprise Partnership ('TVBLEP') and the six Berkshire authorities of Bracknell Forest, Reading, Slough, West Berkshire, Windsor and Maidenhead and Wokingham. It establishes the various functional economic market areas that operate across Berkshire and the wider sub-region, in order to provide the six authorities and the TVBLEP with an understanding of the various economic relationships, linkages and flows which characterise the sub-regional economy.

The methodological approach adopted for this study has been informed by national Planning Practice Guidance for assessing economic development needs and investigating functional economic market areas within and across local authority boundaries, and been subject to consultation with a range of adjoining authorities and other relevant stakeholders.

A range of information and data has been drawn upon across a number of themes as summarised below:

Economic and Sector Characteristics

- Berkshire has recorded strong job growth in recent years, outperforming the regional and national average. Reading and West Berkshire represent the largest economies in employment terms, and Bracknell Forest the smallest. In relative terms, Berkshire's economy supports a strong concentration of jobs in high value telecoms, IT, professional services and utilities sectors when compared with the wider regional sector mix.
- Particular clusters of professional services activity are accommodated within Bracknell Forest and Reading, while West Berkshire shares similar characteristics to adjoining Basingstoke & Deane and Wiltshire with regards to a strong representation of manufacturing employment. Wholesale employment is strongly represented along the M25/M40 distribution corridor from Slough through South Bucks up to Wycombe. Slough also shares similar employment characteristics to adjoining Hillingdon in terms of transport, admin & support given its proximity to Heathrow.
- The Berkshire authorities perform unevenly across a range of labour market and business demography indicators. Slough shares a number of similar labour market and business characteristics with nearby Hillingdon, Runnymede and Wycombe, while similar characteristics can also be identified between Windsor and Maidenhead and Wokingham, particularly with regards to the size profile of firms and strong enterprise performance.

Labour Market Areas

- The functional labour market areas operating across Berkshire have been examined by assessing travel-to-work patterns in and out of the sub-region. An analysis of 2011 Census commuting flows data underlines the significant effect that Reading and West Berkshire have upon travel to work patterns in Berkshire. Slough also has a strong influence on labour market movements although these commuting relationships are just as strong with neighbouring Buckinghamshire and London as they are with Berkshire.
- Census data points to a growing east-west labour market divide in Berkshire, driven by the increasing influence and draw of Heathrow in commuting terms and declining influence of Reading upon travel to work flows with more eastern parts of Berkshire. TTWAs in the west of the LEP area have remained largely unchanged over the last 10 years.
- ONS analysis using 2011 Census data identified three broad TTWAs crossing the Berkshire LEP area, and these broad areas are substantiated by a more detailed local travel to work area analysis:
 - **A Reading TTWA** comprising the whole of Reading and Wokingham Boroughs as well as the majority of Bracknell Forest and parts of South Oxfordshire, West Berkshire, Windsor & Maidenhead and Hart.
 - **A Slough and Heathrow TTWA** including all of Slough Borough and parts of Windsor & Maidenhead. The majority of this TTWA falls to the east of the TVBLEP area, comprising a number of authorities including Runnymede, Spelthorne, South Bucks and the London Boroughs of Hillingdon and Kingston upon Thames.
 - **A Newbury TTWA** comprising the majority of West Berkshire District as well as parts of Wiltshire, Basingstoke and Deane and Test Valley.
- In most cases, these TTWAs align reasonably well with Berkshire local authority boundaries, although Windsor & Maidenhead stands out as featuring within two separate TTWAs; the western parts of the Borough within the Reading TTWA and eastern parts within the Slough and Heathrow TTWA. There are also significant labour market flows between West Berkshire and Reading, with eastern parts of West Berkshire District falling within the Reading TTWA.

Housing Market Areas

- From a housing market perspective, Berkshire is influenced by household migration and travel to work patterns from a range of surrounding authorities. Recent SHMA work undertaken on behalf of the six Berkshire authorities points to the existence of two HMAs operating across the TVBLEP area; a Western Berkshire HMA covering Bracknell Forest, Wokingham, Reading and West Berkshire; and an Eastern Berkshire HMA comprising Slough, Windsor and Maidenhead and South Bucks. This uses a “best fit” to local authority boundaries approach.

- Recent HMA analysis prepared on behalf of the four Buckinghamshire authorities identified that South Bucks falls across two separate HMAs; namely a Central Buckinghamshire HMA (comprising all of Wycombe and Chiltern Districts as well as parts of Aylesbury Vale and South Bucks) and a Reading & Slough HMA (comprising the local authorities of Bracknell Forest, Reading, Slough, West Berkshire, Windsor & Maidenhead and Wokingham, as well as South Bucks).
- Since that analysis was published, South Bucks have started to progress a Joint Local Plan with Chiltern District and have commissioned new evidence to determine housing and employment requirements over the period to 2033. The latest evidence emerging from this Housing and Economic Development Needs Assessment (HEDNA) study suggests that the Joint Local Plan Area for Chiltern and South Bucks would form part of a “best fit” with a Central Bucks HMA; together with the authorities of Aylesbury Vale and Wycombe. This is noted by the study as providing the most pragmatic arrangement for establishing local planning policy, although the previously defined HMA geography (which identifies strong housing market linkages between South Bucks and Berkshire) still remains valid.
- Housing market studies prepared for other authorities surrounding Berkshire defines those authorities as falling within separate HMAs, with no evidence of overlapping housing market relationships extending into Berkshire. On this basis, it is possible to conclude that two HMAs operate across the LEP area; an Eastern Berkshire HMA (which also incorporates South Bucks) and a Western Berkshire HMA.

Commercial Property Market Areas

- Within Berkshire, the largest concentration of employment space is found in Slough, followed by Reading and West Berkshire. These three authorities represent the largest industrial locations in floorspace terms, while Reading and Windsor & Maidenhead record the highest amount of office space.
- At a sub-regional level, commercial property markets areas are centred on the M3 and M4 strategic ‘Western corridors’, driven by strong functional economic linkages to Heathrow airport and the outer west London Boroughs. Within the Western Corridor, it is possible to identify specific sub market areas, each sharing a number of similar characteristics, trends and a high degree of interaction. This includes a Core Thames Valley or ‘Upper M4’ area focused on the key M4 markets of Reading, Maidenhead, Bracknell and Wokingham, with strong economic relationships between these towns in terms of value, accessibility and labour force.
- At the eastern end of the Thames Valley lies the Slough and West London sub area, reflecting the significant influence of Heathrow Airport upon property market interactions. This sub market area also takes in the South Bucks towns of Beaconsfield and Gerrards Cross.

- The western part of the sub-region accommodates the Newbury and Swindon sub-markets, which constitute the key nodes at the western end of the M4 corridor. This property market area is characterised by a lower value profile in both office and industrial terms than the M4 markets closer to London, a quasi-industrial character in regards to much of the demand, and linkages that exist with areas beyond the western boundary of Berkshire. There is some synergy in property market terms between Newbury and Reading, and Newbury and Oxfordshire, although these linkages and property market areas are not as strong.

Consumer Market Areas

- Working age population growth is expected to slow down in future across the majority of Berkshire authorities, with a number of nearby authorities across the wider sub-region anticipated to outperform the LEP area in working age population growth terms. These anticipated trends are likely to have an impact on the scale and proportion of travel-to-work and migration flows that occur to, from and within Berkshire as the balance of employment and working age population changes.
- Reflecting its size and position in retail ranking terms, Reading has the largest consumer market catchment in Berkshire, which extends along the M4, M3 and M40 corridors taking in all of Berkshire as well as large parts of Oxfordshire, Buckinghamshire, Surrey and Hampshire.
- Other Berkshire authorities tend to have more localised retail and consumer catchment areas, reflecting their lower order retail status and critical mass of occupiers. These generally form a broad radius around the main Berkshire centres and sit within the overarching Reading consumer catchment area, and also overlap into neighbouring counties.
- Due to the overlapping and complex nature of the various consumer market areas operating across Berkshire, this analysis is most helpful for defining sub-market areas rather than overarching functional economic market areas in themselves.

Transport and Connectivity

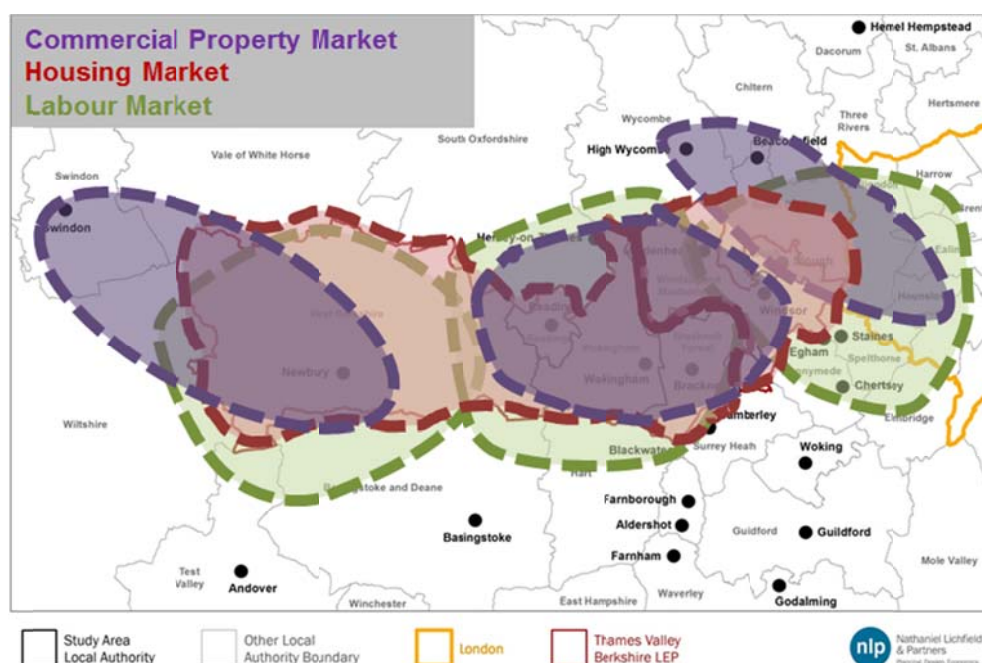
- Berkshire is located between three major east-west corridors of movement (M3, M4 and M40) and in close proximity to the M25; it therefore benefits from excellent access to motorway and trunk road networks. The LEP area is also well served by rail connections although north-south road routes are comparatively poor (with the exception of the A34 to the west of Berkshire).
- Transport accessibility is strongly linked with the geography of functional economic market areas, with the strategic transport network playing a key role in shaping commercial property, labour and housing market flows. Eastern Berkshire benefits from its proximity to a network of strategic routes which plays a key role in shaping the TTWA, housing market and commercial property market areas that operate across this part of Berkshire, and linking the key commercial centres of Slough, Heathrow Airport and High Wycombe.

- Similarly, the M4 and A4 corridors as well as the Great Western Mainline play an important role in linking Reading, Maidenhead, Wokingham and Bracknell in travel to work and commercial property market area terms. This pattern is likely to be reinforced through the operation of new Crossrail services from 2019. West Berkshire's location away from the 'core' Thames Valley cluster of Reading, Wokingham, Bracknell and Maidenhead means that commuting patterns and business movements tend to be more localised in character.
- These dynamics are echoed by peak drive time distances from Berkshire's largest centres, which identifies clear distinctions between eastern and western parts of Berkshire in terms of drive time accessibility and road connectivity.

Synthesis

- Based upon an assessment of the various functional economic markets that operate across Berkshire, it is possible to overlay each functional economic market to identify how well these align across Berkshire (Figure ES1). This represents a 'policy off' view of the geographical reach associated with different factors identified within the PPG including labour market flows, housing market areas and commercial property market areas that operate within and across Berkshire, regardless of administrative geographies. Invariably, however, these area boundaries are indicative and should not be interpreted as being either definitive or necessarily fixed over time.

Figure ES1 Functional Economic Markets – Summary Map



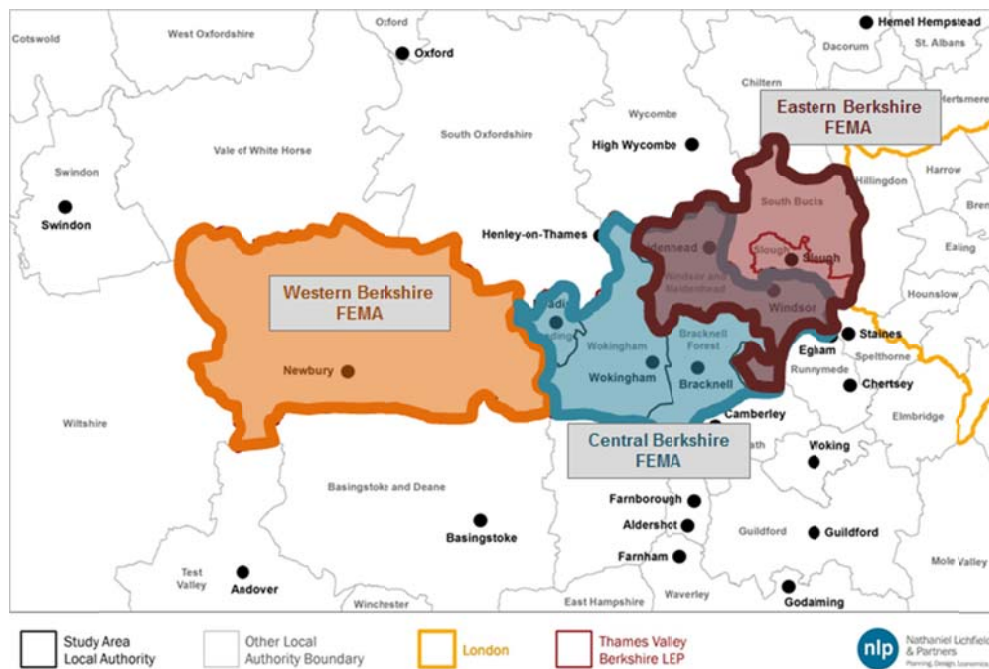
Source: NLP analysis, drawing upon a range of sources

- This shows that the spatial extent of these functional economic markets do not extend far beyond the TVBLEP administrative boundary. Parts of Surrey, Hampshire, Wiltshire, Oxfordshire, Buckinghamshire and Greater London feature within these broad geographical functional areas to a greater or lesser extent, although the only local authority area outside of Berkshire which consistently falls within these broad areas is South Bucks, which shares strong economic relationships with Berkshire (and in particular with eastern parts of Berkshire) in travel-to-work, housing and commercial property market terms.

Defining Core Functional Economic Market Areas

- In light of the inevitably nebulous nature of functional economic markets, it is helpful for Local Planning Authorities to identify a pragmatic and logical “best fit” with these various functional economic markets within the context of establishing Local Plan evidence and for the purposes of developing policy. On this basis, Figure ES2 below identifies three core Functional Economic Market Areas (FEMAs) that represent a “best fit” with local authority boundaries. These core FEMAs encompass those local authority areas that the evidence indicates consistently have strong inter-relationships.

Figure ES2 Core Functional Economic Market Areas (Best Fit to Local Authority Boundaries)



Source: NLP analysis, drawing upon a range of sources

- The '**Central Berkshire FEMA**' includes the authority areas of Reading, Wokingham, Bracknell Forest and Windsor & Maidenhead. This aligns with the ONS defined Reading TTWA and also the Upper M4 commercial property market area which is focused around the key M4 markets of Reading, Maidenhead, Bracknell and Wokingham, with strong economic relationships between these towns in terms of value, accessibility and labour force.
- The '**Western Berkshire FEMA**' comprises West Berkshire District and the key centre of Newbury. This area is characterised by having a relatively self-contained TTWA and tends to operate within a westward facing commercial property market constituting a key node at the western end of the M4 corridor. Whilst there is some synergy in travel to work and property market terms between Newbury and Reading, these linkages are not considered sufficiently strong to include West Berkshire within the Central Berkshire FEMA.
- The '**Eastern Berkshire FEMA**' comprises the two Berkshire authorities of Slough and Windsor & Maidenhead, alongside South Bucks. This area is consistent with the Slough and Heathrow TTWA as defined by the ONS (which comprises a number of other authority areas outside of Berkshire) as well as the Eastern Berkshire HMA. Within this FEMA, economic relationships with adjoining Buckinghamshire and West London are just as strong as they are with the rest of Berkshire and this is reflected in commercial property terms through the identification of a Slough & West London property market area. Of all three FEMAs, the Eastern Berkshire FEMA has the greatest degree of relationship and influence with areas beyond Berkshire, with South Bucks consistently standing out as sharing strong economic linkages with eastern parts of Berkshire.
- Windsor & Maidenhead sits across two FEMAs (Central and Eastern Berkshire) due to the varied characteristics and economic role associated with different parts of the Borough. The Borough's position within two FEMAs reflects the equally strong relationships that Windsor & Maidenhead exhibits with both more central parts of Berkshire as well as areas within South Bucks. In labour market terms, eastern parts of the Borough share a TTWA with Slough and Heathrow¹, while northern and western parts of the Borough have stronger functional economic relationships with western M4 corridor locations such as Reading and Wokingham. The Borough also falls within an HMA with Slough and South Bucks according to the Berkshire SHMA, underlining the particular strength of housing market relationships within this eastern part of Berkshire.

¹ Defined by ONS as the 'Slough and Heathrow' travel to work area (2011 Census based)

- Analysis undertaken as part of this study identifies evidence of interactions between the various Core FEMAs and with adjoining authorities outside of Berkshire. Whilst “best fit” areas have been defined above for the purposes of informing future plan making, it should be recognised that the boundaries of these areas are porous given the different layers of inter-relationship that exist between each area as well as across the TVBLEP area overall. It is important to continue to recognise these relationships in Duty to Cooperate terms.

Appendix 7: Review of the Statement of Community Involvement adopted 2014 (as reported to Council 15 October 2024)

The table below outlines the results of a review of the contents of the Statement of Community Involvement (SCI, adopted 2014). The content is reviewed against the following potential changes:

- Legislation
- National policy
- Local policy
- Monitoring results
- Technological changes
- Other changes

The review concludes that the SCI is only out-of-date as it pertains to neighbourhood planning. An updated version of the SCI should be progressed, but its content can be relied upon for consultations on the Local Plan Partial Update.

Element of SCI	Result of Review
Statutory requirements (Section 2)	Legislation: The 2004 Planning and Compulsory Purchase Act and the 2012 Regulations are still the main legislation governing consultation on development plans. National policy: N/A Local policy: N/A Monitoring: N/A Technological changes: N/A Other changes: N/A Conclusion: This part of the SCI remains up-to-date
Duty to co-operate (Section 3)	Legislation: Duty to co-operate remains in effect under Localism Act. It would be withdrawn by the Levelling-Up and Regeneration Act, but these elements are not yet in effect. National policy: There have been changes in the NPPF relating to the duty to co-operate, although these are not fundamental. Local policy: N/A Monitoring: Duty to co-operate measures are monitored in the Annual Monitoring Report, and this has not identified any issues requiring update. Technological changes: N/A Other changes: The publication of a Duty to Co-operate Scoping Strategy since the SCI was adopted does mean that updates to reflect the Strategy would be helpful, and these updates were proposed as a result of the 2019 review. However, this is a contextual element of the SCI and as such the potential for an update does not mean that the approach of the SCI is out of date. Conclusion: This part of the SCI does not deal specifically with the duty to co-operate, as it recognises that this is to be dealt with through a Duty to Co-operate Statement, which is separate. This information is therefore contextual and remains up-to-date
Eight principles for community consultation (paragraph 4.1)	Legislation: No legislation has come into force that conflicts with these principles

	National policy: National policy has not changed in a way which renders these principles redundant. Local policy: Although the document from which these principles was derived is now some years old (2012), there has been no successor document published and the principles therefore remain valid. Monitoring: Nothing has emerged from monitoring that suggests an update is needed. Technological changes: Although use of technology in consultation has increased over time, these general principles still remain essential. Other changes: None identified Conclusion: This part of the SCI remains up-to-date.
Accessibility and choice (paragraph 4.3)	Legislation: Legislation now requires that Councils publish accessible documents. However, the principles already state that materials will be designed to maximise accessibility, and it is not considered that a change is required. National policy: National policy has not changed in a way which affects this principle. Local policy: Local policy has not changed in a way which affects this principle. Monitoring: Nothing has emerged from monitoring that suggests an update is needed. Technological changes: As set out above, published documents need to be accessible, but this does not lead to a need for a change. Other changes: None identified Conclusion: This part of the SCI remains up-to-date.
Timeliness (paragraph 4.4)	Legislation: No changes that affect this part of the document. National policy: National policy has not changed in a way which affects this principle. Local policy: Local policy has not changed in a way which affects this principle. Monitoring: In practice, due to the timing of Committees, the Council has relatively frequently needed to consult over holiday periods. Where this is the case, as specified in the SCI, the time has been extended to at least 8 weeks. Not considered that an update is needed. Technological changes: No changes that affect this part of the document. Other changes: None identified Conclusion: This part of the SCI remains up-to-date.
Inclusiveness and equity (paragraph 4.5)	Legislation: No changes that affect this part of the document. National policy: National policy has not changed in a way which affects this principle. Local policy: Local policy has not changed in a way which affects this principle. Monitoring: Although not specifically monitored, it remains a challenge to engage the groups identified in this section, i.e. younger people, BME communities and people living in less affluent parts of the Borough. The Council continues to seek to address this, e.g. through targeted social media campaigns, but in general this principle remains valid.

	Technological changes: No changes that affect this part of the document. Other changes: None identified Conclusion: This part of the SCI remains up-to-date.
Transparency and honesty (paragraph 4.6)	Legislation: No changes that affect this part of the document. National policy: National policy has not changed in a way which affects this principle. Local policy: Local policy has not changed in a way which affects this principle. Monitoring: No changes that affect this part of the document. Technological changes: No changes that affect this part of the document. Other changes: It has not always been possible to publish all background evidence at the time that a consultation is carried out. However, it remains important to do so where this is possible and this principle therefore remains valid. Conclusion: This part of the SCI remains up-to-date.
Respect and listening (paragraph 4.7)	Legislation: No changes that affect this part of the document. National policy: National policy has not changed in a way which affects this principle. Local policy: Local policy has not changed in a way which affects this principle. Monitoring: No changes that affect this part of the document. These principles have been complied with for planning documents. Technological changes: No changes that affect this part of the document. Other changes: No changes identified. Conclusion: This part of the SCI remains up-to-date.
Accountability (paragraph 4.8)	Legislation: No changes that affect this part of the document. National policy: National policy has not changed in a way which affects this principle. Local policy: Local policy has not changed in a way which affects this principle. Monitoring: No changes that affect this part of the document. These principles have been complied with for planning documents. A Statement of Consultation is always published responding to the points made. Technological changes: No changes that affect this part of the document. Other changes: No changes identified. Conclusion: This part of the SCI remains up-to-date.
Flexibility and evolution (paragraph 4.9)	Legislation: No changes that affect this part of the document. National policy: National policy has not changed in a way which affects this principle. Local policy: Local policy has not changed in a way which affects this principle. Monitoring: No changes that affect this part of the document. These principles have been complied with for planning documents. Feedback is sought and lessons learned included in Statements of Consultation.

	None of the specific lessons learned render any of the general principles in the SCI out of date. Technological changes: No changes that affect this part of the document. Other changes: No changes identified. Conclusion: This part of the SCI remains up-to-date.
Resources – moving to electronic communications (section 5)	Legislation: No changes that affect this part of the document. National policy: National policy has not changed in a way which affects this principle. Local policy: Local policy has not changed in a way which affects this principle. Monitoring: No specific monitoring of this element. Technological changes: Increased availability of technology has underlined the comments in this section and meant that applying the principles has not generated significant issues so far. Other changes: No changes identified. Conclusion: This part of the SCI remains up-to-date.
Resources – combining consultations where possible (section 5)	Legislation: No changes that affect this part of the document. National policy: National policy has not changed in a way which affects this principle. Local policy: Local policy has not changed in a way which affects this principle. Monitoring: No specific monitoring of this element. Technological changes: No changes identified. Other changes: Opportunities have rarely arisen for planning consultations to be combined with consultations relating to other matters. In general, where consultations have been combined, they have been planning documents. However, it remains an important principle if it can be achieved. Conclusion: This part of the SCI remains up-to-date.
Local plan – pre-preparation (paragraphs 6.3-6.5)	Legislation: No changes that affect this part of the document. National policy: National policy has not changed in a way which affects this principle. Local policy: Local policy has not changed in a way which affects this principle. Monitoring: No specific monitoring of this element. Technological changes: Technology has changed in a way that now allows easy access to online workshops and events. The Council made use of this at Reg 18 stage. However, the SCI does not specify which types will be used, and it remains the case that a mix of in-person and online events will be appropriate, depending on the document and circumstances. Other changes: No other changes. Conclusion: This part of the SCI remains up-to-date.
Local plan – pre-submission draft (paragraphs 6.6-6.8)	Legislation: No changes that affect this part of the document. National policy: National policy has not changed in a way which affects this principle.

	Local policy: Local policy has not changed in a way which affects this principle. Monitoring: No specific monitoring of this element. Technological changes: None of the principles in this section are impacted by any technological changes. Other changes: No other changes. Conclusion: This part of the SCI remains up-to-date.
Local plan – examination (paragraphs 6.9-6.10)	Legislation: No changes that affect this part of the document. National policy: National policy has changed the tests of soundness since the SCI was prepared, but none of those changes impact the contents of this section. Local policy: Local policy has not changed in a way which affects this principle. Monitoring: No specific monitoring of this element. Technological changes: None of the principles in this section are impacted by any technological changes. Other changes: No other changes. Conclusion: This part of the SCI remains up-to-date.
Local plan – adoption (paragraph 6.11)	Legislation: No changes that affect this part of the document. National policy: No changes that affect this part of the document. Local policy: Local policy has not changed in a way which affects this principle. Monitoring: No specific monitoring of this element. Technological changes: None of the principles in this section are impacted by any technological changes. Other changes: No other changes. Conclusion: This part of the SCI remains up-to-date.
Supplementary planning documents (paragraphs 6.12-6.20)	Legislation: The Levelling-Up and Regeneration Act 2023 replaces SPDs with Supplementary Plans, that will need to go through examination and would have development plan status. This part of the Act is yet to be brought into force. When it is, the SCI will need to be updated, but this will need to be informed by Regulations that do not yet exist. National policy: No changes that affect this part of the document. Local policy: Local policy has not changed in a way which affects this principle. Monitoring: No specific monitoring of this element. Technological changes: Technology has changed in a way that now allows easy access to online workshops and events. The Council made use of this for the Shopfronts SPD for example. However, the SCI does not specify which types will be used, and it remains the case that a mix of in-person and online events will be appropriate, depending on the document and circumstances. Other changes: No other changes. Conclusion: This part of the SCI remains up-to-date.
Neighbourhood plans (paragraphs 6.21-6.22)	Legislation: In the 2019 review of the SCI, it was noted that there is a statutory requirement introduced by the Neighbourhood Planning Act 2017 for SCIs to set out the local planning authority's policies for giving advice or assistance on neighbourhood development plans and orders.

	Even though there are currently no neighbourhood forums in Reading, this does mean that this section of the SCI is out of date. Proposed text to address this emerged from the 2019 review and was subject to consultation. National policy: There have been a number of changes relating to neighbourhood planning in national policy over the years. The current SCI is not specific on any of these matters, and the national policy changes do not render anything in the SCI out of date. Local policy: Local policy has not changed in a way which affects this principle. Monitoring: There has been no neighbourhood plan making in Reading, and no formation of any neighbourhood forums. Technological changes: None of the text in the current SCI is affected by any technological changes. Other changes: No other changes. Conclusion: The part of the SCI relating to neighbourhood planning is out-of-date, as identified in the 2019 review. The SCI should be updated, and should any proposals for neighbourhood plans emerge, reference should be made to the proposed amended text as was subject to consultation.
Development proposals – pre-application consultation on significant or sensitive proposals (paragraphs 7.1-7.6)	Legislation: No legislation affects this part of the document National policy: No changes that affect this part of the document, and the NPPF has not changed in terms of the context set in this section. Local policy: Local policy has not changed in a way which affects this principle. Monitoring: No changes that affect this part of the document. Technological changes: Technology has changed in a way that can be used for pre-application engagement, but the SCI is not currently specific on use of technology and it is not appropriate to be prescriptive as different communities will need to engage in different ways. Other changes: No other changes. Conclusion: This part of the SCI remains up-to-date.
Development proposals – consultation on planning applications (paragraph 7.7)	Legislation: This part of the document merely states that planning application consultations will be carried out in line with the relevant statutory requirements, and therefore any legislative changes would not render the SCI out of date. National policy: National policy has not changed in a way which affects this principle. Local policy: Local policy has not changed in a way which affects this principle. Monitoring: No changes that affect this part of the document. Technological changes: This section is not impacted by any technological changes. Other changes: No other changes. Conclusion: This part of the SCI remains up-to-date.

Appendix 8: Changes between the 2014 and 2025 adopted versions of the Statement of Community Involvement

This table shows, in tracked changes format, how the 2025 adopted version of the SCI differs from the 2014 adopted version. Deleted text is shown in blue and struck through ([example](#)) and new text is shown in blue and underlined ([example](#)).

Table A8.1: List of changes between 2014 and 2025 adopted versions of the SCI

Location in document	Change to text
Paragraph 1.4	The previous version of the SCI was adopted on 19 th March 2014 and forms the basis for carrying out consultations on planning policy documents and guiding developers in undertaking pre-application consultation. This version replaces the 2014 version.
Paragraph 2.1	For planning policy documents, these requirements are at the time of writing set out in the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended). For planning applications, the requirements are in set out in the Town and Country Planning (Development Management Procedure) (England) Order 2010 (as amended).
Paragraph 2.2	For local plans, a number of specific bodies must be consulted if they have an interest in the area (e.g. English HeritageHistoric England, Natural England, Highways AgencyEngland, utilities providers and adjoining authorities); and
Paragraph 2.4	What is demonstrated above is that the minimum statutory requirements for consultation are actually quite limited.
Paragraph 2.6	<i>New paragraph:</i> 2.6 There is a statutory requirement under Section 18 of the Planning and Compulsory Purchase Act 2004 (as amended by the Neighbourhood Planning Act 2017) for Statements of Community Involvement to set out the local planning authority's policies for giving advice or assistance on neighbourhood development plans and orders. This is set out in Section 6 of the SCI, and this includes summarising out the statutory role of the local planning authority in that process.
Paragraph 3.1	The 'duty to co-operate', as it is generally known, requires local planning authorities to engage constructively with one another and with other specified bodies such as the Environment Agency, English Heritage Historic England and the Homes and Communities Agency England on an ongoing basis in preparing local planning documents.
Paragraph 3.3	Because As the duty to co-operate is a separate task from community involvement, and will also be dependent on the timescales and processes of other bodies, this SCI does not set out proposals for how it will be undertaken.
Paragraph 3.4	The Council has a Duty to Co-operate Scoping Strategy which identifies the main strategic matters that will need co-operation, and the key duty to co-operate partners for each matter. The most recent version of this strategy is from December 2015⁴, but the strategic matters and partners have been updated as part of the Local Plan process and are set out in the Duty to Co-operate Statement prepared to support the Local Plan Partial Update⁵, which also sets out the relevant measures undertaken in relation to the Council's local plan. The Council is in the process of agreeing Memoranda of Understanding with the other five Berkshire Unitary Authorities in terms of strategic planning and minerals and waste planning to guide how the duty to

Location in document	Change to text
	co-operate will be undertaken with those bodies. also seeks to agree Statements of Common Ground during plan-making with neighbouring authorities and potentially other duty to co-operate partners that sets out the relevant strategic matters. ⁴https://images.reading.gov.uk/2019/12/RBC Duty to Cooperate Scoping Strategy 1215.pdf ⁵https://www.reading.gov.uk/planning-and-building-control/planning-policy/new-local-plan/local-plan-partial-update/
Paragraph 4.4	The Council will avoid consulting over Christmas and New Year insofar as is possible. Where consultations over these periods are inevitable, consultation periods will be extended to take account of this, <u>usually for an additional two week period</u>. Where consultation is necessary in other holiday periods, consideration will also be given to extending deadlines.
Paragraph 4.5	<u>Local development documents will be published as accessible documents for screen readers, as will all supporting documents wherever possible.</u>
Paragraph 4.9	Lessons learned from individual community involvement stages will be reported on in the <u>Report Statement</u> of Consultation, and will be taken into account in future exercises.
Paragraph 5.2	In <u>recent years the Council has moved to largely electronic communications rather than sending letters</u>, as it represents a much better use of resources. the past, the Council has kept a number of individuals and organisations on its planning consultation lists for years, where there is no e-mail address. This has meant that letters have been sent out every year, costing the Council a great deal in postage and staff time. The response rate has been very poor. This approach is not effective and no longer sustainable, and, as part of the process of producing the Sites and Detailed Policies Document, the Council specifically asked whether respondents without e-mail addresses wished to continue to receive letters. Very few responded positively. Therefore, notifications of consultation will generally be sent to those on the <u>Council's planning consultation</u> lists by e-mail, unless correspondence by letter has been specifically requested, e.g. due to having no access to e-mail or the internet.
Paragraph 5.3	The Council will need to continue to evolve the way that it uses such areas as social <u>networking media</u> and interactive online tools to better enable community involvement. <u>Recent local plan consultations have involved hosting a webinar with interactive polls throughout and creation of a video explaining the plan.</u>
Paragraph 5.4	An important way of significantly reducing resource burdens is by combining consultations, either with other planning consultations, or with other consultations being carried out by the Council. The recent Residential Conversions SPD, for example, was consulted upon as part of the wider 'Let's Talk Housing' consultation. The Council will continue to look for such opportunities to combine consultations where appropriate.
Figure 1 caption	Figure 1: Approach to <u>Development Plan Documents</u>the local plan
Paragraph 6.5	Online resources, including interactive webpages or questionnaires, <u>videos and webinars</u>;
Paragraph 6.10	If it appears during the Examination process that changes are needed that would not result in significant policy shifts, there is a process by which the Council can consult on some limited changes and request that the Inspector make these changes to the

Location in document	Change to text
	document modifications necessary to make a plan sound and legally compliant can be proposed and recommended by the Inspector, known as 'main modifications'. This happened twice, for instance, during the Examination of the Sites and Detailed Policies Document in spring and summer 2012 regularly happens at examination stage, in Reading as elsewhere. The consultation will need to be fairly limited focused, as there is not scope to make substantial changes at this point comment on matters outside the modifications at this stage. However, the Council will need to consult broadly the same groups and individuals consulted at Pre-Submission stage.
Paragraph 6.11	When the DPD local plan is adopted in its final form, the Council simply needs to inform, as there is no longer an opportunity to affect the document other than through the judicial review process.
Paragraph 6.12	Supplementary Planning Documents (SPDs) supplement policy in higher level dDevelopment pPlan Documents. They are not able to make entirely new policy themselves. Examples of SPDs include bBriefs for specific sites, particularly where they are identified in DPDs development plans, or detailed guidelines on matters such as sustainable design or parking standards.
Paragraphs 6.21 to 6.25	Neighbourhood <u>Development Plans and Orders</u> 6.21 <u>Local communities are able to plan for the development that they wish to see through making a neighbourhood development plan or order for their area. Only parish and town councils and designated neighbourhood forums (plus, in the case of a neighbourhood development order, certain community groups) can make use of such powers. There are no parish or town councils in Reading, and currently no designated neighbourhood forums, although there is potential for the latter to be established within the lifetime of the SCI.</u> 6.22 <u>Should proposals for neighbourhood development plans or orders be brought forward, it will be for the neighbourhood forum to take the lead on the document, albeit with support from the Council. The emphasis at every stage of such a document is therefore to empower.</u> 6.23 <u>There are a number of statutory roles that the Council must fulfil within the process of making a neighbourhood development plan or order:</u> • <u>Consult on and determine any application for neighbourhood forum and area status within set timescales;</u> • <u>Check whether a submitted plan or order complies with the relevant legislation;</u> • <u>Publicise the submitted plan and notify consultation bodies;</u> • <u>Appoint an independent examiner;</u> • <u>Publicise the report of the examiner, reach its own view on the plan or order and decide whether to send it to local referendum; and</u> • <u>Organise the local referendum, and make the plan or order if the results show that more than half of those voting are in favour.</u> 6.24 <u>As well as the statutory roles, the Council will also provide support and guidance throughout the process. This may include the following general areas:</u> • <u>Notifying consultation bodies of an application for neighbourhood plan areas;</u> • <u>Giving initial advice on the scope of the plan or order;</u> • <u>Providing comments on emerging drafts;</u>

Location in document	Change to text
	• Assisting with preparing, commissioning or assembling evidence, including Strategic Environmental Assessment; • Access to technical tools and expertise, for instance on mapping; • Giving support to consultation It should be noted that the support that the Council can give over and above its statutory role may be limited by the resources available at the time. 6.25 Neighbourhood plans are not required by law to comply with the SCI, so it is not for this document to dictate how community involvement is carried out. However, the principles set out in section 4 are a useful guide to how to undertake consultation and involvement on planning matters. The Planning Advisory Service also has a useful series of publications and toolkits, giving advice and guidance on neighbourhood planning⁶. At this point, the Council is not aware of any proposals to produce neighbourhood plans in Reading. However, such plans could emerge over the life of the SCI. Although the Council has an important role in providing support to those producing neighbourhood plans, it will be for the neighbourhood forum to take the lead on the document. The emphasis at every stage of such a document is therefore to empower. 6.22—The statutory requirements for consultation on neighbourhood plans are set out in sections 14 and 16 of the Neighbourhood Planning (General) Regulations 2012. Unlike for other planning documents, neighbourhood plans are not required by law to comply with the SCI, so it is not for this document to include any more detail. However, the principles set out in section 4 are a useful guide to how to undertake consultation and involvement on planning matters. The Planning Advisory Service also publishes a useful guide on the process for neighbourhood plans, including undertaking consultation⁶. 6https://www.local.gov.uk/pas/pas-topics/neighbourhood-plans 6http://www.pas.gov.uk/process-for-preparing-neighbourhood-plans-and-orders#2
Paragraph 7.1	Paragraph 189-40 of the National Planning Policy Framework states that a local planning authority: <i>“... should also, where they think this would be beneficial, encourage any applicants who are not already required to do so by law to engage with the local community and, where relevant, with statutory and non-statutory consultees, before submitting their applications.”</i>
Paragraph 7.5 (Footnote 8)	⁸English HeritageHistoric England; CABE; Ancient Monuments Society; Council for British Archaeology; Society for the Protection of Ancient Buildings; The Georgian Group; The Victorian Society; The Twentieth Century Society; Garden History Society; The National Trust; Local Civic/Amenity Society; Local Building Preservation Trust; Local Archaeological and Antiquarian Societies, and local history societies. Also refer to “Planning and Development in the Historic Environment – A Charter for English Heritage Advisory Services,” English Heritage, 2005the Historic England website for further advice (https://historicengland.org.uk/advice/Planning/).
Paragraph 7.5	Where officer attendance or assistance in pre-application involvement exercises is specifically requested by a developer/potential applicant, and this is agreed on a “without prejudice” basis by the Planning Development Manager, any cost to the local authority will be charged to the developer/potential applicant at the Council’s standard rates for officer time and any materials.

Location in document	Change to text
Paragraph 7.5	Developers should provide a website of relevant information or provide digital images and information (or a suitable document such as a document in .pdf format in an accessible format) that can be put on the planning page of the Reading Borough Council wWebsite.
Glossary	<i>Deliberative polling:</i> A form of consultation that combines techniques of public opinion research and public deliberation. A sample of people are polled on a specific issue. This is followed up by some of the sample being invited to an event to discuss the issue. (See https://deliberation.stanford.edu/what-deliberative-polling/http://cdd.stanford.edu/polls/docs/summary/ for further information)
Glossary	<i>Enquiry by design:</i> An intensive, usually multi-day event (also known as a 'charrette', where a group of stakeholders seek to come up with a solution to a planning or design problem. (See https://participedia.net/method/4639http://www.princes-foundation.org/content/enquiry-design-neighbourhood-planning for further information)
Glossary	<i>Public meeting:</i> A meeting open to the public, usually with a number of speakers and a chance for questions and answers. This type of event may well be larger scale than the others listed. (See https://www.resourcecentre.org.uk/information/organising-a-public-meeting/http://www.unlockdemocracy.org.uk/guides/entry/how-to-hold-a-public-meeting for further information)