



Reading Borough Council Local Plan Partial Update

Matter 1 Hearing Statement

October 2025



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01260 288888

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MATTER 1: LEGAL REQUIREMENTS AND PROCEDURAL MATTERS

Issue 1: Duty to Co-operate

1.1 - The Council's Duty to Co-operate Statement (May 2025) [EV001] states at paragraph 2.3.1 that although the LPPU bases its level of housing need on the findings of the Reading Local Housing Needs Assessment (July 2024) [EV011], which can be fully met within Reading's boundaries, it was nonetheless considered necessary to make a request to neighbouring authorities under the duty to co-operate to understand the position if the LPPU were to be based on the outcome of the standard methodology. What did this process entail? Can the Council point to evidence of constructive, active and ongoing joint working with neighbouring authorities on a) general housing need and b) provision for Gypsies, Travellers and Travelling Showpeople?

1.1.1 Within the Council's Duty to Co-operate Statement (EV001) the process undertaken by the Council is set out. Reading wrote to nine neighbouring authorities within 10 km of the Reading Borough Council boundary on 23rd August 2024 to understand whether there would be scope to meet any unmet needs that would arise should the Partial Update be based on the standard methodology. This was seemingly done to understand if the Council were required to increase the housing number above the proposed housing requirement would any of the neighbouring authorities help address the unmet need. The only process that seemed to take place was one letter. Eight out of nine responses were received and none of which identified any scope to meet any of Reading's potential unmet needs. No further discussions were had following the responses.

1.1.2 Reading Borough Council have engaged with South Oxfordshire and Vale of the White Horse District Councils in a Statement of Common Ground which was completed in December 2024. The parties agreed on three strategic matters:

- a. Housing need and Supply (including affordable housing and the provision of sites for gypsies and travellers);
- b. The Supply of retail and employment land;

- c. The provision of infrastructure including health, education, utilities, flood risk and strategic sustainable transport links.
- 1.1.3 The parties set out the relevant information for both the Reading LPPU and the South and Vale Joint Local Plan. It is important to note that the South and Vale plan has now been recommended to be withdrawn on the basis of Duty to Cooperate with Oxford City Council, while this does not have a bearing on the LPPU, the way that Reading and South and Vale engaged through the process was not continuous and ongoing in the same way it was not with Oxford City Council.
- 1.1.4 Reading identified a concern over their ability to meet the housing needs within the Borough, but cross-boundary dialogue on this matter appears to have stopped at the point of receiving initial responses from South and Vale and the other authorities, as detailed in EV001. Drawing on the recent experience of South and Vale, it would have been prudent for Reading BC to continue to engage with its neighbouring authorities on this topic, to ensure that any potential unmet need can be delivered. This is also noting the concerns that we make in our Matter 2 Statement on the ability of Reading to meet its proposed housing requirement in its own boundary, through the capacity identified, and how this requirement reflects Reading's housing needs.
- 1.1.5 This could be construed as a lack of constructive, active and on-going evidence that Reading BC have strategically planned for local housing need that cannot be met within neighbouring areas as stated per paragraph 62 of the NPPF.
- 1.2- What is the provision 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?**
- 1.1.6 Given that Reading BC are stating that they can meet the housing needs within its boundary the provision of neighbouring authorities hasn't been taken into account.
- 1.1.7 In this context, South Oxfordshire needs to consider un-met needs from Oxford City Council as well as Reading. Due to the Geography of South Oxfordshire, the northern part of the district looks towards Oxford and the Southern part looks towards

Reading. However, the latter has not been comprehensively acknowledged by either authority.

1.1.8 The authority boundaries of Reading and South Oxfordshire align with the Reading development boundary. Benefitting from a direct relationship with the existing built-up area of the town, we submit that the north-eastern edge of Reading, within South Oxfordshire's administrative area, would be an appropriate location for meeting any unmet needs of Reading, and this should be recognised. It is submitted that South Oxfordshire would have capacity to accommodate additional housing needs on the boundary of Reading, including unmet needs arising from Reading.

1.1.9 Furthermore, the provision of housing in the LPPU needs to be considered alongside infrastructure requirements. The LPPU points to the need for cross boundary provision for transport infrastructure, this includes potential park and ride facilities. The LPPU states at paragraph 4.5.8 that due to the constraints of the Borough the opportunities for park and ride mobility hubs will be located within Neighbouring Authorities. In addition, further infrastructure projects have been identified that would require land outside the boundaries. It would appear that very limited discussions have been had regarding infrastructure requirements.

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?

1.1.10 Infrastructure requirements, including strategic transport and highways infrastructure should be considered as a strategic matter as defined by 33A(4) of the Planning and Compulsory Purchase Act 2004.

1.1.11 Through the adopted Reading Transport Strategy 2024-2041 and identified in policy TR2: major transport projects – which has been identified as a strategic policy – a number of cross boundary projects have been identified, including park and ride mobility hubs and cross Thames travel. While it is noted that the current proposals for a third Thames crossing lie outside Reading's boundary, this is a strategic matter that Reading have identified as a project to help with congestion over the current crossing points.

- 1.1.12 In addition, the Park and Ride mobility hubs while smaller in scale offer a benefit through sustainable travel and reducing traffic within Reading. These mobility hubs would be located outside of Reading's boundary and be used by residents from neighbouring authorities.
- 1.1.13 Whilst it is noted that the agreed SoCG between Reading BC and South and Vale¹ touches on the Third Thames Crossing and delivery of Mobility Hubs (under the heading of '*The provision of infrastructure, including...and strategic sustainable transport links*' being a strategic issue), other than stating the overarching positions of the three authorities on these matters, overall it is not clear whether there has been on-going engagement with neighbouring authorities about key strategies within the Reading Transport Strategy, or these strategic topics.

1.10 - 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?

- 1.1.14 No, on the basis of the presented information, we do not consider Reading BC have met the Duty-to-Cooperate. It is not clear that there has been ongoing, continuous dialog on strategic matters such as un-met housing needs and highways.
- 1.1.15 Notwithstanding that Reading BC did not believe it necessary to address any unmet housing need in neighbouring authorities, Reading BC did acknowledge that this may be a concern going forward, and with outstanding objections in relation to the housing requirement and Reading BC's ability to meet this requirement and its needs within its boundaries, we believe that further discussions and options should have been explored.
- 1.1.16 Furthermore, Reading BC identify a number of strategic highways projects that do not have neighbouring authorities by-in. There does not seem to have been on going engagement on these, even with projects being listed within the Council's Local Transport Plan.

¹ Appendix 5 of EV001 Duty to Cooperate Statement May 2025

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

1.17 - 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?

1.1.17 Questions 1.16 and 1.17 will be taken together. Reading BC have undertaken a Sustainability Appraisal (LP005) to accompany each stage of the plan making process.

1.1.18 However, it is not clear on how the SA influenced the LPPU, on the matter of housing provision, due to all the alternatives achieving similar scores. The SA housing provision options were 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).

1.1.19 The options within the SA are considered to generally have similar effects on local sustainability objectives considering that the proposed policy changes are increasingly sensitive to mitigating the effects of and addressing climate change and

BNG requirements. The SA does not give a justified explanation for choosing this approach.

1.1.20 For example, options H1(i) housing provision to reflect capacity and H1(iv) provision in accordance with standard method achieve the same score within the SA matrix. Both with negative and positive scores to the same extent, as well as the summary being identical. The Council has not provided a clear justification as why the standard method in the scenario is departed from.

1.1.21 The only justification given for the departure from the standard method within the SA is to be in line with the borough's capacity; however, this overlooks the alternative of meeting the standard method, potentially drawing on land outside the Borough's boundaries, noting that this would secure a level of housing provision that performs equally well from an SA perspective.

1.1.22 It is considered that the SA is flawed given it does not adequately and transparently assess all reasonable alternatives in relation to housing growth, and there is no clear justification given for choosing the option H1(i).

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?

1.1.23 The LPPU does not meet the legal requirements as set out within section 19(5) of the Planning and Compulsory Purchase Act 2004, or accord with the PPG. The PPG sets out that the sustainability appraisal needs to consider and compare all reasonable alternatives as the plan evolves².

1.1.24 The PPG states that options need to be reasonably distinct so meaningful comparisons can be made. In terms of the housing options, all outcomes have similar conclusions with H1(i) and (iv) having the same conclusion and no distinction could be made between the two options.

² PPG Paragraph: 018 Reference ID: 11-018-20140306

- 1.1.25 With this in mind, consideration of the likely significant effect of meeting unmet need outside the Borough's boundaries should have also been considered within the SA.

Other Matters

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

- 1.1.26 The LPPU lacks sufficient clarity regarding which policies will be superseded, and which will remain extant upon adoption. There is no clear list within the Submission Version of the LPPU (LP001) of which policies will be superseded. We would have expected to find such a list within the appendices of the plan.

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?

- 1.1.27 Paragraph 22 of the NPPF states the requirement for strategic policies to look ahead over a minimum 15-year period from adoption. Reading BC have proposed a plan period from 2023-2041. This plan period was based upon a potential adoption in September/ October 2025 which is outlined within the latest version of the Local Development Scheme (PP001) which would of provided a 16-year plan period.
- 1.1.28 However, given that the adoption of the plan has not happened in that timescale and the examination is taking place within two parts, we submit that it would be appropriate to extend the plan period to ensure that a plan period of 15 years is met and reflect this in the development strategy and requirements for the Borough accordingly.