

**Reading Borough Council****Examination of the Reading Borough Local Plan Partial Update****Inspector:** Joanna Gilbert MA (Hons) MTP MRTPI**Programme Officer:** Jane Greenway**Telephone:** 0118 937 4029**Email:** [Programme.Officer@reading.gov.uk](mailto:Programme.Officer@reading.gov.uk)**Address:** Civic Offices, Bridge Street, Reading RG1 2LU.**Webpage:** <https://www.reading.gov.uk/planning-and-building-control/planning-policy/new-local-plan/local-plan-examination/>

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**Inspector's Matters, Issues and Questions – Stage 2 Hearings****Introduction**

This document sets out the Inspector's Matters, Issues and Questions (MIQ) for Stage 2 Hearings regarding the soundness of the Reading Borough Local Plan Partial Update (LPPU). Prior to hearing sessions, responses are invited from participants on the MIQ.

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

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

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

Please note that I issued an initial letter in June 2025 [EX001]. The Council responded to this letter in July 2025 [EX002 – EX009 and EX014]. Representors are advised to have regard to these documents when drafting any hearings statements.

Further information about the Examination is provided in the Guidance Note for Stage 2 hearings and the Provisional Hearings Programme for Stage 2 hearings, which should be read alongside the MIQ for Stage 2 Hearings.

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

### **Matter 3: Housing, including Five Year Supply of Housing Land**

*Issue 1: Will the Council be able to demonstrate a five year supply of housing land on adoption of the LPPU?*

- 3.1 Will the LPPU provide a 5-year supply of deliverable sites against the LPPU's target of 825 dwellings per annum on adoption?
- 3.2 Is the housing trajectory at Appendix 1 of the LPPU realistic and does it align with the Summary Infrastructure Delivery Schedule at Table 10.2 of the LPPU and the Draft Infrastructure Delivery Plan (May 2025) [EV005]?
- 3.3 Are the assumptions and analysis regarding site suitability, availability and achievability and development capacity in the Reading Housing and Economic Land Availability Assessment (HELAA) [EV015 and EV016] reasonable and realistic? In particular, are the identified capacities for sites justified?
- 3.4 Does the evidence give sufficient confidence that allocated sites will be deliverable and developable in accordance with the Framework?
- 3.5 Is there compelling evidence to show that windfall schemes coming forward on small sites will provide a reliable source of supply as anticipated in the LPPU?
- 3.6 What is the annual need for affordable housing and the total affordable housing need over the plan period? Has the need for affordable housing been accurately calculated and based on robust, up-to date data? Has this need been calculated in accordance with the PPG? What is the past record for affordable housing completions and forms of delivery? How does the Council consider this will change in the future?
- 3.7 What are the identified needs for specialist housing, for example housing for older and disabled people and student accommodation, within the overall housing need for Reading? How will these needs be met?

*Issue 2: Are the policies for housing positively prepared, justified, effective and consistent with national policy?*

- 3.8 What is the evidential basis for the density and mix of housing in Policy H2?
- 3.9 Is Policy H2 justified and effective?
- 3.10 Is Policy H3 justified, effective, and consistent with national policy?
- 3.11 Is Policy H3 consistent with the PPG with regard to viability review mechanisms? Where would viability review mechanisms be appropriate and what are the clear process and terms of engagement explaining how and when viability will be reassessed?
- 3.12 What is the rationale behind the tenure mix in Policy H3? Is this justified?
- 3.13 Is Policy H4 justified? What is the evidential basis behind the amendment to part 2 of Policy H4 in respect of a further three-year tenancy?
- 3.14 Is Policy H5 justified, effective, and consistent with national policy? Is it accompanied by a robust and up-to-date evidence base?
- 3.15 Is Policy H6 justified and supported by robust and up-to-date evidence?

- 3.16 Would Policy H8 be justified and effective? How would Policy H8 be implemented as drafted? Does the supporting text support Policy H8 effectively?
- 3.17 Is Policy H12 justified and based on robust and up-to-date evidence?
- 3.18 Is the approach taken to renewal and regeneration of residential areas in Policy H14 justified and effective?
- 3.19 With regard to purpose-built shared living accommodation, is Policy H15 justified, consistent with national policy, and supported by a robust, up-to-date evidence base?

#### **Matter 4: Cross-Cutting Policies**

*Issue 1: Are the cross-cutting policies justified, effective and consistent with national policy?*

- 4.1 Is Policy CC1 necessary given that the presumption in favour of sustainable development is set out in national policy?
- 4.2 Is the LPPU positively prepared in respect of climate change? Having regard to Policies CC2, CC3, CC4 and other policies within the LPPU, would the LPPU be consistent with national policy and legal requirements in relation to climate change?
- 4.3 Is Policy CC2's approach justified and effective and is the approach, which seeks to set local energy efficiency standards, consistent with national policy and evidenced by a robust, up-to-date and locally relevant evidence base?
- 4.4 Is Policy CC2 clearly written and unambiguous? Is it clear to both the decision-maker and the applicant what will be required of them in meeting Policy CC2 for different types of development? When read in tandem with Policy H5 on energy efficiency for residential development, is it clear how both policies will work together?
- 4.5 What is the evidential basis for applying Policy CC2 to the redevelopment and refurbishment of existing building stock?
- 4.6 Would Policy CC2's requirements apply to reserved matters applications where the outline or hybrid application was approved prior to the LPPU being adopted?
- 4.7 Is Policy CC3 justified and effective, having regard to national policy?
- 4.8 Is Policy CC4 justified and effective? Is Combined Heat and Power (CHP) considered to represent a suitable decentralised energy system in terms of carbon emissions?
- 4.9 Is Policy CC7, justified, effective and consistent with national policy? Is Policy CC7 clear, unambiguous, internally consistent and avoids undue repetition?
- 4.10 How would a scheme be measured as having made "a positive contribution within the following characteristics" as per the opening paragraph of Policy CC7? Would every scheme be expected to meet all Policy CC7's parameters?
- 4.11 Is Policy CC9 justified and effective?
- 4.12 Does the Council's Draft Infrastructure Delivery Plan (May 2025) [EV005] clearly set out the infrastructure required to support growth and the delivery of development proposed in the LPPU?

- 4.13 Having regard to the list of priority infrastructure in Policy CC9, where does affordable housing fall within the prioritisation of infrastructure? What is the evidential basis for the prioritisation of particular forms of infrastructure?
- 4.14 Is the approach in Policy CC10 to health impact assessment justified, effective, and consistent with national policy?

## **Matter 5: Built and Natural Environment**

*Issue 1: Are the policies for the built and natural environment justified, effective and consistent with national policy?*

- 5.1 Are Policies EN1 - EN6 consistent with national policy and do they set out a positive strategy for the conservation and enjoyment of the historic environment?
- 5.2 Is Policy EN7 justified and effective, having regard to national policy?
- 5.3 How robust and up-to-date is the evidence base for Policy EN7 on both Local Green Space and Public Open Space?
- 5.4 Are the changes to sites EN7Ed, EN7Nn, EN7Wp and EN7Wu in the list of sites in Policy EN7 justified?
- 5.5 Is the addition of site EN7Ww in the list of sites justified?
- 5.6 With regard to the table under the supporting text to Policy EN9 at paragraph 4.2.44, is it necessary to cross-refer to other policies in the LPPU?
- 5.7 Is the approach to biodiversity, including Biodiversity Net Gain, in Policy EN12 justified and consistent with national policy?
- 5.8 Regarding LPPU paragraph 4.2.75, have there been any updates on changes to the boundary of the Chilterns National Landscape since drafting the LPPU?
- 5.9 Are the requirements of Policy EN14 justified? Will Policy EN14 be effective and consistent with national policy?
- 5.10 Would the increased dwelling capacities of site allocations give rise to any need to alter the content of Policy EN17 for soundness?
- 5.11 Is Policy EN18 justified and effective, having regard to national policy?
- 5.12 Is the approach to urban greening within Policy EN19 justified, effective, and consistent with national policy?
- 5.13 Is there a robust, up-to-date and locally relevant evidence base for bringing forward Policy EN19 and Appendix 3?
- 5.14 How does the Urban Greening Factor within Policy EN19 and Appendix 3 work with Biodiversity Net Gain requirements set out in Policy EN12?
- 5.15 How and when would the Urban Greening Factor be assessed and what would happen if the Urban Greening Factor was not met on site?

## **Matter 6: Employment**

*Issue 1: Are the policies for employment positively prepared, justified, effective and consistent with national policy?*

- 6.1 Are the new floorspace figures for offices and industrial, warehouse and/or research and development set out in Policy EM1 justified?
- 6.2 Has sufficient allowance been made in Policy EM1 for any sites which do not come forward or for future losses of employment floorspace?

- 6.3 Is it appropriate for industrial, warehouse and/or research and development uses to be grouped together under one floorspace figure in Policy EM1?
- 6.4 Would the LPPU's employment policies be satisfactorily underpinned by modelling of impacts on the transport network?

## **Matter 7: Transport**

*Issue 1: Are the policies for transport justified, effective and consistent with national policy?*

- 7.1 Is Policy TR1 based on robust and up-to-date evidence including transport modelling? Will Policy TR1 be effective and will it deal appropriately with any cross-boundary transport issues?
- 7.2 How has the Council:
  - a) Identified the transport demands arising from the LPPU policies, allocations and growth aspirations;
  - b) Assessed the impacts of policies, allocations and growth aspirations on the transport network's performance;
  - c) Identified and assessed the adequacy of any outcomes or mitigation; and
  - d) Identified any phasing and/or funding requirements necessary to ensure that the identified infrastructure measures are viable and deliverable?
- 7.3 Are the major transport projects in Policy TR2 justified and deliverable?
- 7.4 Is it clear from Policy TR2 what pedestrian and cycle routes would be delivered? Is it clear what land would need to be safeguarded?
- 7.5 Is the approach to cycle routes and facilities in Policy TR4 justified?
- 7.6 Is Policy TR5 justified and consistent with national policy and Building Regulations? What is the evidential basis for non-residential development going beyond Building Regulations?

## **Matter 8: Retail, Leisure and Culture**

*Issue 1: Are the policies for retail, leisure and culture justified, effective and consistent with national policy?*

- 8.1 Is Policy RL2 justified and effective?
- 8.2 Is Policy RL3 justified and consistent with national policy? Is it clear that Key Frontages are defined on the Policies Map?
- 8.3 Is Policy RL4 justified and supported by robust, up-to-date evidence? What is the rationale for the 150 square metres threshold?

## **Matter 9: Other Uses**

*Issue 1: Are the policies for other uses justified, effective and consistent with national policy?*

- 9.1 Is Policy OU1 justified and effective?
- 9.2 Is Policy OU2 justified, supported by robust evidence, and consistent with national policy? Is the Council's approach to the Detailed Emergency Planning Zone and other consultation zones for Atomic Weapons Establishment Burghfield consistent with that of its neighbours, West Berkshire District Council and Wokingham Borough Council?

9.3 Is Policy OU3 justified and consistent with national policy?

## **Matter 10: Site-specific policies**

### **Central Reading**

*Issue 1: Are the policies for Central Reading justified, deliverable and consistent with national policy?*

- 10.1 Is the strategy for Central Reading justified?
- 10.2 Is Policy CR2 justified and effective?
- 10.3 Is Policy CR2 c) necessary given the content of Policy CC3 in terms of climate change adaptation and Policy EN12 on biodiversity?
- 10.4 What is the rationale for the mix of units in Policy CR6 i)? Is this justified and supported by a robust evidence base?
- 10.5 Is Policy CR7 justified and effective?
- 10.6 Is Policy CR10 justified, effective, consistent with national policy, and based on robust and up-to-date evidence? What is the justification for three clusters of tall buildings and areas of less suitability for tall buildings? How do areas of less suitability for tall buildings differ from the rest of the borough outside the clusters?
- 10.7 Does Policy CR10 unnecessarily repeat other LPPU policies?
- 10.8 Is Policy CR11 justified and effective?
- 10.9 Is Policy CR12 justified and effective?
- 10.10 Is Policy CR13 justified and effective?
- 10.11 What rationale is there for deleting site allocations CR11h, CR14b, CR14c, CR14e, CR14f, and CR14k?
- 10.12 Is Policy CR15 justified and effective?

*Taking each of the following proposed site allocations CR11a – CR11g, CR11i, CR12a – CR12e, CR13a – CR13d, CR14a, CR14d, CR14g – CR14j, CR14l – CR14ab individually, respond to the following questions for each site as relevant:*

- 10.13 What is the background to the site allocation? How was it identified and which options were considered?
- 10.14 What is the basis for the scale, type, and use proposed? Is it justified?
- 10.15 What is the site's status in terms of permissions or completions?
- 10.16 What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?
- 10.17 Is the site available, realistically viable and deliverable? What is the expected timescale and rate of development and is this realistic?
- 10.18 Are there any main modifications required to the allocation for soundness?

### **South Reading**

*Issue 2: Are the policies for South Reading justified, deliverable and consistent with national policy?*

- 10.19 Is the strategy for South Reading justified?
- 10.20 Is Policy SR1 justified and effective?
- 10.21 Is Policy SR2 justified and effective?

- 10.22 What rationale is there for deleting site allocations SR1b and SR4f?
- 10.23 Is Policy SR5 justified and effective?

*Taking each of the following proposed site allocations SR1a, SR1c, SR2, SR3, SR4a – SR4e and SR4g – SR4l individually, respond to the following questions for each site as relevant:*

- 10.24 What is the background to the site allocation? How was it identified and which options were considered?
- 10.25 What is the basis for the scale, type, and use proposed? Is it justified?
- 10.26 What is the site's status in terms of permissions or completions?
- 10.27 What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?
- 10.28 Is the site available, realistically viable and deliverable? What is the expected timescale and rate of development and is this realistic?
- 10.29 Are there any main modifications required to the allocation for soundness?

### **West Reading and Tilehurst**

*Issue 3: Are the policies for West Reading and Tilehurst justified, deliverable and consistent with national policy?*

- 10.30 Is the strategy for West Reading and Tilehurst justified?
- 10.31 Is Policy WR2 justified and effective?
- 10.32 What rationale is there for deleting site allocations WR3a, WR3c - WR3e, WR3m and WR3q?

*Taking each of the following proposed site allocations WR3b, WR3f - WR3l, WR3n - WR3p, and WR3r - WR3y individually, respond to the following questions for each site as relevant:*

- 10.33 What is the background to the site allocation? How was it identified and which options were considered?
- 10.34 What is the basis for the scale, type, and use proposed? Is it justified?
- 10.35 What is the site's status in terms of permissions or completions?
- 10.36 What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?
- 10.37 Is the site available, realistically viable and deliverable? What is the expected timescale and rate of development and is this realistic?
- 10.38 Are there any main modifications required to the allocation for soundness?

### **Site-specific questions**

- 10.39 What is the current situation with regard to Local Wildlife Site status for sites WR3s and WR3t? Please provide mapping of each site to indicate how the Local Green Space designation would overlap with any area being assessed for Local Wildlife Site status.
- 10.40 Are the site allocations WR3s and WR3t justified and effective?

## **Caversham and Emmer Green**

*Issue 4: Are the policies for Caversham and Emmer Green justified, deliverable and consistent with national policy?*

- 10.41 Is the strategy for Caversham and Emmer Green justified?
- 10.42 Is Policy CA1 justified and effective?
- 10.43 What rationale is there for deleting site allocations CA1b and CA1g?
- 10.44 Is Policy CA2 justified and effective?

*Taking each of the following proposed site allocations CA1a, CA1c - CA1f, and CA1h individually, respond to the following questions for each site as relevant:*

- 10.45 What is the background to the site allocation? How was it identified and which options were considered?
- 10.46 What is the basis for the scale, type, and use proposed? Is it justified?
- 10.47 What is the site's status in terms of permissions or completions?
- 10.48 What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?
- 10.49 Is the site available, realistically viable and deliverable? What is the expected timescale and rate of development and is this realistic?
- 10.50 Are there any main modifications required to the allocation for soundness?

## **East Reading**

*Issue 5: Are the policies for East Reading justified, deliverable and consistent with national policy?*

- 10.51 Is the strategy for East Reading justified?
- 10.52 What rationale is there for deleting site allocations ER1a, ER1f - ER1h and ER1j?
- 10.53 Is Policy ER2 justified and effective?
- 10.54 Is Policy ER3 justified and effective?

*Taking each of the following proposed site allocations ER1b – ER1e, ER1i, ER1k - ER1n individually, respond to the following questions for each site as relevant:*

- 10.55 What is the background to the site allocation? How was it identified and which options were considered?
- 10.56 What is the basis for the scale, type, and use proposed? Is it justified?
- 10.57 What is the site's status in terms of permissions or completions?
- 10.58 What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?
- 10.59 Is the site available, realistically viable and deliverable? What is the expected timescale and rate of development and is this realistic?
- 10.60 Are there any main modifications required to the allocation for soundness?



## **Matter 11: Viability**

*Issue 1: Does the LPPU take a justified and effective approach to the viability and deliverability of sites and policies?*

- 11.1 Taking account of the Local Plan Viability Testing Report: Independent Viability Review [EV004] (Viability Review), would the cumulative requirements of the LPPU's policies put the viability of plan implementation at serious risk? Have all of the LPPU's policy requirements been factored in? Specific reference should be made to Policies CC2, CC3, CC4, CC7, EN19, H3, H4, H5, H6, H15 and TR5, but all relevant policies should be outlined.
- 11.2 Has the Viability Review been subject to consultation/stakeholder engagement with regard to its assumptions and approach?
- 11.3 Does the Viability Review adequately reflect the typologies, nature and circumstances of LPPU proposed allocations?
- 11.4 Have affordable housing requirements been appropriately considered in testing sites, both in terms of the percentage and tenure mix?
- 11.5 Has adequate consideration been given to a) retirement living and extra-care housing, b) student accommodation, c) Build to Rent and d) non-residential uses within the Viability Review?
- 11.6 Are the density and mix assumptions made in the Viability Review consistent with the density and mix requirements within Policy H2 and the density of proposed site allocations in the LPPU?
- 11.7 The Viability Review indicates that development is not viable on some sites. Overall, is there evidence to show that the LPPU is deliverable?

## **Matter 12: Monitoring**

*Issue 1: Does the LPPU have a clear and effective framework for monitoring the implementation of the policies?*

- 12.1 Does the LPPU contain an adequate framework for monitoring the implementation of its policies? Are the monitoring indicators and targets sufficiently precise to be effective? Is it clear what action will be taken if targets are not met?

*Joanna Gilbert*

Inspector

28 November 2025