

Reading Borough Council

Examination of the Reading Borough Local Plan Partial Update

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Dear Mr Worringham

Examination of the Reading Borough Local Plan Partial Update - Inspector's Letter following Stage 1 Hearings

1. Hearing sessions were held on 11 and 12 November 2025 to examine the Local Plan Partial Update's (LPPU) compliance with statutory processes and legal compliance, including the Duty to Co-operate and the housing need and requirement. I am grateful to the Council and other participants for their involvement in the hearings thus far.
2. The interim views expressed in this letter do not represent my full or final conclusions on these matters. The Stage 2 hearings will provide an opportunity for further investigation, and my report will take account of any additional work and representations made during consultation on main modifications. My report will also cover other issues that are not dealt with in this letter.
3. In summary, therefore, I consider that the LPPU examination should progress to Stage 2 hearings. Further detail on areas where further evidence is required or main modifications should be made is set out below.

Duty to Co-operate

4. Section 20(5)(c) of the Planning and Compulsory Purchase Act 2004 requires that I consider whether the Council has complied with any duty imposed on it by section 33A of the same Act in respect of the LPPU's preparation. Section 33A states that local planning authorities, county councils in England that are not local planning authorities, and a body, or other person, that is prescribed or of a prescribed description, must co-operate with every other aforementioned organisation or person. The Duty to Co-operate requires these organisations to have cooperated in maximising the effectiveness of the LPPU's preparation and to have engaged constructively, actively and on an ongoing basis. The Duty to Co-operate relates to the period up to the LPPU's submission for examination and therefore cannot be rectified during the examination itself.

5. The Council's Duty to Co-operate Statement May 2025 [EV001] provides information about engagement with local planning authorities and prescribed bodies on strategic matters during the preparation of the LPPU in relation to section 33A of the 2004 Act. Statements of Common Ground¹ are within Appendices 5 – 8 of the Council's Duty to Co-operate Statement. Additionally, the Council has provided responses on Duty to Co-operate matters within the Reading Borough Council response to initial questions (part 1) [EX002] in respect of my initial letter [EX001] and in their hearing statement [EX016].
6. Thank you for the list of dates for Berkshire Heads of Planning and Development Plans Group meetings from March 2023 to May 2025, which the Council provided following the Matter 1 hearing. It would also be helpful if the Council could provide any letters sent to neighbouring authorities to outline the Council's position on strategic matters during the same time period. These should also be published on the examination webpage.
7. I will set out my views in greater detail in my report, but can confirm that I consider the Duty to Co-operate to have been met. Any remaining concerns with regard to housing need and requirement, provision for gypsies, travellers and travelling showpeople, and strategic transport infrastructure are matters of soundness which may necessitate main modifications in due course.

Housing need and requirement

8. Having reflected on the evidence and discussions at the hearing regarding housing need, the LPPU examination should proceed on the basis that the minimum housing need for Reading is 822 dwellings per annum based on the standard method for local housing need applicable at the time of the LPPU's submission. The exceptional circumstances set out by the Council in respect of the demographic basis for household forecasts and the cities and urban centres uplift are not sufficiently compelling to convince me that it would be sound for the LPPU to continue to use the Council's own non-standard method figure of 735 dwellings per annum, based on the Reading Housing Needs Assessment (July 2024) [EV011]. Greater detail on my concerns regarding the Council's exceptional circumstances will be set out in my report.
9. Accordingly, it will be necessary for the Council to produce main modifications to the supporting text of Policy H1 and any other relevant areas in the LPPU to reflect the use of the standard method figure of 822 dwellings per annum.
10. In terms of housing requirement, the Council has set a figure of 825 dwellings per annum within Policy H1. This is a capacity-based figure resulting from the

¹ Statement of Common Ground with South Oxfordshire and Vale of White Horse District Councils, dated December 2024; Statement of Common Ground with Wokingham Borough Council, dated May 2025; Statement of Common Ground with West Berkshire District Council, dated May 2025; Statement of Common Ground with Bracknell Forest Council, dated May 2025.

Council's assessment of sites within the borough. I am not yet able to come to any firm conclusions on the soundness of the housing requirement. Further discussion will be necessary, including more detailed consideration of anticipated delivery of housing during the LPPU's plan period and specific site allocations. I shall address this through forthcoming Matters, Issues and Questions for Stage 2 hearings. Any suggested main modifications put forward shall also need to be considered in due course.

11. During the Matter 2 hearing, the Council highlighted that it had up-to-date data on housing completions. I would be grateful if the Council could provide me with this data via the Programme Officer. This should also be published on the examination webpage.

Provision for Gypsies, Travellers and Travelling Showpeople

12. The Government's Planning policy for traveller sites confirms at paragraph 10 that local planning authorities should, in producing their Local Plan: identify and update annually, a supply of specific deliverable sites sufficient to provide 5 years' worth of sites against their locally set targets, and identify a supply of specific, developable sites, or broad locations for growth, for years 6 to 10 and, where possible, for years 11-15. The Council has confirmed that it has no five year supply of deliverable sites or developable sites for years 6 – 10 and beyond for permanent accommodation for gypsies and travellers.
13. The evidence supporting the adopted Local Plan identified a need for between 10 and 17 permanent pitches for gypsies and travellers, a transit site of 5 pitches, and 2 plots for travelling showpeople. I also understand that a permission has been granted for transit provision, but this is not expected to be delivered due to flood risk. Furthermore, there are no sites upon which the need for permanent pitches can be accommodated. As such, the Council is not proposing any update to the criteria-based Policy H13 on gypsy and traveller provision within the LPPU and has not produced an up-to-date gypsy and traveller needs assessment as part of the LPPU evidence base.
14. It is important to have an up-to-date Local Plan in place. I recognise the issues the Council has outlined with regard to delaying the examination of the LPPU to allow further evidence to be produced and with regard to scope for a separate plan document on gypsies and travellers. Pragmatically, I therefore consider that this omission would be best addressed through an early review of the LPPU. Over the examination, there may be other elements such as housing and strategic transport, which also form part of the rationale for early review.

Strategic transport

15. The Council confirmed during the Matter 1 hearing that it was working with National Highways to seek to resolve ongoing concerns about junction 11 of the M4. I would be grateful if the Council could provide me with a copy of Stantec's

recently produced Technical Note. Furthermore, I require an update from the Council as to when I can expect a completed Statement of Common Ground between the Council and National Highways. This will need to be provided prior to Stage 2 hearings as transport will form part of those hearings.

Climate change

16. Although climate change has not yet been subject to discussion at hearings, I wish to take this opportunity to set out my concerns again about the evidence base. In my initial letter to the Council dated 19 June 2025, I asked the Council to respond to my questions IQ46 – IQ50 on Policies CC2 and H5. These questions focussed on the robustness of the evidence base, viability, clarity, and the rationale for not using the approach set out in the Written Ministerial Statement on Planning - Local Energy Efficiency Standards Update dated 13 December 2023, the latest extant statement of national planning policy.
17. The Council provided their response to my questions IQ46 on evidence base and IQ47 on the WMS in July 2025 [EX009]. This document refers back to the LPPU Background Paper [EV002]. However, there remains a lack of a single clearly set out evidence base document supporting the development of Policies CC2 and H5. In broad terms, I would expect to see the following:
 - context setting, national policy and guidance background, coverage of best practice such as RIBA climate challenge targets and LETI targets for example, and explanation of any likely future measures such as Future Homes Standard;
 - explanation of the energy hierarchy;
 - reference to any exemplar adopted and emerging policies in other locations clearly set out with their pros and cons and differences from the Council's intended approach;
 - options considered for Reading with regard to energy efficiency policies and why they were discounted;
 - feasibility, including industry capacity;
 - effects on development viability and how this has been tested.
18. In the absence of clear and robust evidence, it may well be the case that I will ask the Council to make main modifications in due course to either continue with the adopted Local Plan 2019 policy approach or to amend the policies to refer to Target Emissions Rate requirements as set out in the WMS. I would be grateful if the Council could consider their position on this matter and provide me with confirmation of their proposed approach to addressing my concerns.

Next Steps

19. I have asked the Programme Officer to upload a copy of this letter to the examination website, but I am not seeking any comments from participants at this stage. In the meantime, should the Council have any queries about the

content of this letter, or anything discussed at the hearing sessions, then please do not hesitate to contact me through the Programme Officer.

Yours sincerely

Joanna Gilbert

Inspector