



Planning Inspectorate

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 2 Hearings

1. Stage 2 hearing sessions were held on 3 – 6, 10 – 12 and 23 February 2026 to examine the Local Plan Partial Update's (LPPU) soundness. 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 as there remain several outstanding issues which I refer to. 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. This letter sets out areas where further work is expected and outlines whether main modifications are necessary in relation to certain policies and allocations.

Water Quality

4. The Council commissioned a Water Quality Assessment (EV025). The Environment Agency (EA) considers that this document is not sufficiently robust. The EA has raised concerns about water quality as a significant constraint to development and growth in Reading, with reference to the need to upgrade Reading Sewage Treatment Works (STW). Any additional flow to the STW may result in rising main or pumping station failures, which in turn can damage the environment. The STW discharges into Foudry Brook, which is at Poor ecological status and Poor for Phosphate.
5. With regard to infrastructure, the STW has a Maximum Daily Volume (MDV) permit and the EA is working with Thames Water to convert this into a Dry Weather Flow (DWF) permit. MDV and DWF permits are not measured in the

same way, with DWF allowing for more robust control over the impacts of sewage discharge on the receiving waterbody, regular reviews of the permit limits, and consideration of storm water capacity. The EA therefore considers that the STW has potential capacity concerns and a robust assessment of capacity is required, including consideration of scenarios based on a reasonable future DWF permit limit.

6. In terms of environmental capacity, the EA considers that the Water Quality Assessment has not assessed potential impacts of growth on Foudry Brook's water quality. This is necessary to be consistent with statutory water quality objectives under the Water Framework Directive and the Environment Act 2021. It has been highlighted by the EA that such assessment is normally undertaken via catchment modelling. As this has not been undertaken, the EA considers it is not possible to understand whether growth can progress in Reading without deteriorating water quality.
7. I have asked the Council to work with its consultants and the EA to seek to resolve this issue. I understand that the Council is awaiting the EA's response. I would be grateful for an update on this matter as soon as possible.

Policy CC2: Sustainable Design and Construction and Policy H5: Standards for New Housing

8. During the hearing sessions for Matters 3 and 4, the Council acknowledged the Inspector's and representors' concerns about the application of Policies CC2 and H5 for different forms of development. The Council and its consultants are working through modifications to the two policies. I would be grateful if the Council could keep me updated via the Programme Officer on the timetable for the provision of the modified policies.

Policy CC7: Design and the public realm

9. The Council had proposed a main modification to the sixth characteristic outlined in Policy CC7 on security in public spaces. On reflection, the sixth characteristic does not require any modification for soundness. The Council should remove modification 4-Q from the draft schedule of main modifications.

Policy EN19: Urban Greening Factor

10. In monitoring Policy EN19, the Council has suggested a monitoring indicator on the proportion of planning permissions for major and minor developments which exceed Policy EN19's requirements with a target of 80%. I would be grateful if the Council could set out such an indicator and target as a main modification.

Policy OU1: New and Existing Community Facilities

11. During the hearings, the Council agreed to liaise with the Integrated Care Board (ICB) on modifications to the supporting text to Policy OU1. I understand that

some progress has been made in this regard. In the event that agreement is not reached between the Council and the ICB, please set out the differences in a Statement of Common Ground.

Policy OU2: Hazardous installations

12. With regard to Policy OU2 and in addition to the main modification to Policy OU2 proposed in the Statement of Common Ground between West Berkshire District Council, Reading Borough Council and the Office for Nuclear Regulation (EX045), the following text should be added to the end of criterion b of Policy OU2 in order to be effective and justified:

Development in the DEPZ is likely to be refused planning permission where the ONR, as the regulator for nuclear licensed sites, advises against the proposed development.

13. In addition, the Council should add the Detailed Emergency Planning Zone (DEPZ) for Atomic Weapons Establishment (AWE) Burghfield and the consultation zones for AWE Aldermaston and Burghfield to the Proposals Map. Furthermore, the supporting text to Policy OU2 should be modified to confirm that the DEPZ and the consultation zones are not maintained by the Council and may be subject to updating from time to time.

Policy TR5: Car and Cycle Parking and Electric Vehicle Charging

14. Policy TR5 seeks to exceed Buildings Regulations by seeking 20% of spaces to be provided with active electric vehicle charging within communal car parks for non-residential developments of at least 10 off-road parking spaces. This is not justified as it has not been subject to viability testing and there is no detailed evidence available as to how the 20% requirement was reached. As such, Policy TR5 should be modified to remove the second paragraph in respect of 20% of spaces having active vehicle charging points.

Site Allocations

15. Some site allocations should be removed from the LPPU or modified for soundness. In some instances, this will require changes to the Council's housing trajectory, and other parts of the LPPU such as Policy H1 on provision of housing and the area strategies. These will need to be provided as main modifications or consequential changes to the Proposals Map. An updated Excel housing trajectory should also be provided. The required main modifications to site allocations are set out in LPPU order below and overleaf:
 - a) Site allocation CR14x part of Tesco Car Park, Napier Road should be modified to add to the end of the fourth bullet point on flood risk 'and ensure that floodplain storage is not compromised';

- b) Site allocation CR14z Sapphire Plaza, Watlington Street should be modified to include the adjacent Royal Court site within the site allocation. This will necessitate altering the site allocation's name, increasing the site's size and capacity to include Royal Court as per the Council's Housing and Economic Land Availability Assessment 2024 (EV015 and EV016) and will require a bullet point on phasing of development to ensure that accommodation for existing Royal Court residents is satisfactorily maintained;
 - c) Policy SR1 deals with Island Road Major Opportunity Area and is supported by Figure 6.2 which illustrates key principles. However, Figure 6.2 should be modified to remove reference to site B or SR2b from the figure and the key to the figure as the site allocation no longer exists;
 - d) Site allocation WR3b 2 Ross Road & Part of Meadow Road should be deleted;
 - e) Site allocation WR3i Land at Portman Way should be modified to add to the end of the second bullet point on flood risk 'and to ensure that floodplain storage is not compromised';
 - f) Site WR3u 132 – 134 Bath Road is already proposed for modification, but modification 10 – AJ should be amended to read 'address surface water flood risk issues, including the provision of a site-specific flood risk assessment';
 - g) Site allocation CA1a Reading University Boat Club, Thames Promenade should be deleted.
16. The Council has confirmed that the Local Wildlife Site at Kentwood Hill/Armour Hill was accepted by Thames Valley Environmental Records Centre (TVERC) at their panel meeting on 20 February 2026. As previously requested, I would be grateful if the Council could confirm what effect the Council considers this should have on the two residential site allocations WR3s Land at Kentwood Hill and WR3t Land at Armour Hill in respect of soundness. Given the new Local Wildlife Site designation, it would also be helpful to understand the Council's view on whether the sites should also be designated as Local Green Space under Policy EN7.
17. I also require mapping showing the extent of the new Local Wildlife Site and its relationship to the two site allocations, as well as any documentation that TVERC used to reach their decision, including minutes of the TVERC meeting if these are available.

Next Steps

18. In addition to receiving timetable updates and information requested above, the Council should notify me via the Programme Officer as to when they plan to submit the draft schedule of main modifications and consequential changes to the Proposals Map. This can be done in a phased manner if the majority of main modifications are ready prior to the ongoing work on water quality and Policies CC2, H5 and OU1. In addition, the action list for the Stage 2 hearings

can be updated to reflect the content of this letter and uploaded onto the examination website.

19. This letter should be uploaded 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