

READING BOROUGH COUNCIL

REPORT BY DIRECTOR OF ENVIRONMENT AND NEIGHBOURHOOD SERVICES

TO:	STRATEGIC ENVIRONMENT, PLANNING AND TRANSPORT COMMITTEE		
DATE:	24 NOVEMBER 2015	AGENDA ITEM:	11
TITLE:	LOCAL PLAN ISSUES AND OPTIONS		
LEAD COUNCILLOR:	COUNCILLOR PAGE	PORTFOLIO:	STRATEGIC ENVIRONMENT, PLANNING AND TRANSPORT
SERVICE:	PLANNING	WARDS:	ALL
LEAD OFFICER:	MARK WORRINGHAM	TEL:	0118 9373337
JOB TITLE:	PRINCIPAL PLANNER	E-MAIL:	<a href="mailto:mark.worringham@reading.gov.uk">mark.worringham@reading.gov.uk</a>

1. EXECUTIVE SUMMARY

- 1.1 The Council is beginning the task of replacing its existing development plans (the Core Strategy, Reading Central Area Action Plan and Sites and Detailed Policies Document) with a new single local plan to set out how Reading will develop up to 2036. This is mainly necessitated by changes to policy at national level, particularly the National Planning Policy Framework. The first stage of producing a plan is to consult on Issues and Options. This is not a draft plan, rather it is a wide-ranging discussion paper on which issues should be included in the plan, and options for how some of those issues should be addressed.
- 1.2 This report seeks Committee's approval to undertake community involvement on the Issues and Options for the Local Plan (Appendix 1) and associated documents. Community involvement will then feed into a draft local plan.
- 1.3 One of the main issues that the Issues and Options tackles is the number of new homes to be provided over the plan period. One of the key inputs to the plan is the Strategic Housing Market Assessment, which has been produced in conjunction with the other five Berkshire unitary authorities, and identifies a level of need for 699 dwellings per annum in Reading.

## 2. RECOMMENDED ACTION

- 2.1 That the Issues and Options for the Local Plan (Appendix 1) be approved.
- 2.2 That community involvement on the Issues and Options for the Local Plan and associated supporting documents be authorised.
- 2.3 That the Head of Planning, Development and Regulatory Services be authorised to make any minor amendments necessary to the Issues and Options for the Local Plan in consultation with the Lead Councillor for Strategic Environment, Planning and Transport, prior to community involvement.

## 3. POLICY CONTEXT

- 3.1 The Local Plan sets out the planning policies for an area and is the main consideration in deciding planning applications. The local plan for Reading, previously referred to as the Local Development Framework, currently consists of three documents - the Core Strategy (adopted 2008), Reading Central Area Action Plan (RCAAP, adopted 2009) and Sites and Detailed Policies Document (adopted 2012). The Core Strategy and Sites and Detailed Policies Document were subject to an amendment relating to affordable housing policies in January 2015.
- 3.2 Various changes have meant the need to review the Local Plan. In particular, the publication of the National Planning Policy Framework (NPPF) in 2012 has meant significant changes, in particular the need for local planning authorities to identify their 'objectively assessed development needs' and provide for them. The need to review the local plan as a single, comprehensive document was identified in a Local Development Scheme, which is the programme for producing planning policy documents, the latest version of which was agreed by this Committee on 25<sup>th</sup> November 2014 (Minute 17 refers).

## 4. THE PROPOSAL

### (a) Current Position

- 4.1 The first stage of preparing a new local plan is to consult broadly on what the plan should address and how it should address it. This stage is typically known as Issues and Options, and takes the form of a discussion paper with a number of consultation questions and alternative options on how to proceed. The Local Development Scheme (LDS, November 2014) identifies that this consultation will take place in November and December 2015.

- 4.2 Potentially the single biggest issue that the Local Plan will need to tackle will be how many homes should be provided in Reading over the plan period (likely to be to 2036). National policy in the NPPF states that this should be informed by an objective assessment of housing needs, which is carried out through a Strategic Housing Market Assessment (SHMA).
- 4.3 The Council has worked with the other Berkshire unitary authorities in producing a SHMA. The SHMA identifies an annual housing need for each local authority to 2036, based on a variety of considerations around demographics and likely economic growth. The final report is due to be published in November 2015, and information on it can be viewed on the Council's website<sup>1</sup>. It concludes that Reading Borough has a need for 699 new dwellings per annum to 2036, a total of 16,077 between 2013 and 2036. For comparison, the existing Core Strategy contains an annual requirement up to 572 dwellings per annum.
- 4.4 The identified need is the starting point for how many dwellings Reading should seek to provide, but it does not take account of physical and policy constraints. The expectation in the NPPF is that each authority should seek to accommodate its objectively assessed needs within its boundaries insofar as is compatible with other policies in the NPPF. The Local Plan will therefore need to explore to what extent this level of housing can be accommodated within Reading, and what the annual target for new housing should be.
- (b) Option Proposed
- 4.5 Committee is recommended to approve the Issues and Options document (Appendix 1) for community involvement.
- 4.6 The Issues and Options stage is the initial stage of local plan preparation. It is not a draft plan, rather it is a discussion paper, asking what the document should cover, and setting out options on how to address those issues. It does not state the Council's preferred approach at this stage. The responses received to the consultation will then be used in drawing up the draft plan. As such, many of the questions and options are quite wide ranging and open-ended.
- 4.7 The main body of the Issues and Options document is structured into four parts:
- What are we aiming to achieve, and by when?
  - How much development?
  - How and where should development take place?
  - Which other issues should be dealt with?

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<sup>1</sup> [http://www.reading.gov.uk/media/4104/SHMA-Presentation-Stakeholder-Event/pdf/SHMA\\_Presentation\\_Stakeholder\\_Event\\_201015.pdf](http://www.reading.gov.uk/media/4104/SHMA-Presentation-Stakeholder-Event/pdf/SHMA_Presentation_Stakeholder_Event_201015.pdf)

- 4.8 *What are we aiming to achieve, and by when?* deals with the vision, objectives and end date of the plan. It is proposed that the plan runs to 2036.
- 4.9 *How much development?* deals with the key issue of what the development needs are that Reading should seek to accommodate. The main issue that the Local Plan will need to tackle will be how many dwellings should be provided, which is informed by the SHMA as described in paragraphs 4.2 to 4.4 above. As the figure from the SHMA does not take account of physical and policy constraints, there is a need for a range of options based around the SHMA figure and what different levels of provision would mean in terms of the types and density of site.
- 4.10 The paper also discusses the important issue of how to balance the competing demands of economic growth and housing. The existing Core Strategy seeks continued employment development without setting a specific quantum. However, pursuing a similar strategy in the new Local Plan will inevitably lead to a significantly higher need for additional housing. This matter is a critical one for the Local Plan to explore, and the Issues and Options therefore sets some options for how to deal with it.
- 4.11 The next section asks *How and where should development take place?* It initially talks about overall strategy, and proposes continuing the focus on central and south Reading from the Core Strategy. It also talks about different types of site, for instance town centre sites, greenfield sites, suburban renewal and employment areas, and asks to what extent if any they can help to meet our development needs, particularly for housing.
- 4.12 The section then goes on to talk about specific development sites. The paper includes an Appendix setting out potential development sites. This includes all existing allocated sites (unless development is already complete or underway), all sites nominated by landowners, developers or others as a result of two 'calls for sites' by the Council early in 2014 and more recently in September 2015, and any other sites with development potential from other sources, excluding those which already have permission. This is the only opportunity to consult on these sites prior to producing a full draft document. Many of these sites may not be considered suitable for inclusion when a full draft is produced, and the Issues and Options paper includes substantial caveats, but it is vital that they are subject to community involvement.
- 4.13 Under *Which other issues should be dealt with?* the paper also sets out which policies are expected to be retained in the same, or a modified, form, and which policies are expected to be revised or replaced. In general, it is expected that most of the detailed development management policies will be able to remain in place. However, there are areas where change is potentially required, and these areas are discussed in turn. This section includes such matters as protection of

sites from development, sustainable design and construction, provision for gypsies and travellers and the historic environment.

- 4.14 The Issues and Options is supported by a Sustainability Appraisal, which is a requirement of all stages of plan production, and assesses each option against a range of environmental, social and economic objectives to identify any significant sustainability issues. This document also needs to be open to consultation, and is available on the Council's website<sup>2</sup>.
- 4.15 Community involvement is intended to start early in 2016 to avoid the Christmas period, and will last for a period of at least six weeks. Responses from the community involvement exercise will feed into a full draft Local Plan. The LDS currently timetables this for August 2016, but it seems likely that it may need to be somewhat later than envisaged, partially due to the reliance on producing key pieces of evidence including the SHMA. This will potentially involve a report to this Committee in November 2016 followed by consultation early in 2017.

(c) Other Options Considered

- 4.16 There are two alternative options that could be considered whilst still keeping to the approach agreed within the Local Development Scheme approved by SEPT Committee in November 2014;
- Produce an outline plan rather than a merely a discussion paper; or
  - Avoid any consultation on sites at this stage.
- 4.17 Producing an outline or skeleton plan as part of the consultation could help to bridge the gap between a discussion paper and a full draft plan, and the 'Preferred Options' stage, along these lines, was used in preparing the Core Strategy and the RCAAP. However, this was a second consultation stage after Issues and Options, and it is considered that including such an outline at this stage would pre-judge the outcome of consultation on the identified issues, and could discourage the public from getting involved in the consultation if the impression is given that there is already a preferred strategy.
- 4.18 To some extent, including specific sites within the consultation is something of an awkward fit with a very high level discussion paper, and there is an argument for avoiding that level of detail at this stage. However, it is vital that the public has a chance to have their say on the range of potential sites identified before they are included in (or excluded from) a draft plan. If sites were not dealt with at this stage, there would therefore have to be a separate consultation to cover this prior to the draft plan stage, which would almost certainly mean needing to lengthen the local plan production timescales.

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<sup>2</sup> [www.reading.gov.uk/localplan](http://www.reading.gov.uk/localplan)

## **5. CONTRIBUTION TO STRATEGIC AIMS**

5.1 The Local Plan, through setting out the way Reading will develop to 2036, will contribute to the following priorities in the Corporate Plan 2015-18:

- Safeguarding and protecting those that are most vulnerable;
- Providing the best life through education, early help and healthy living;
- Providing homes for those in most need;
- Keeping the town clean, safe, green and active;
- Providing infrastructure to support the economy;
- Remaining financially sustainable to deliver these service priorities.

## **6. COMMUNITY ENGAGEMENT AND INFORMATION**

6.1 It is vital that the widest community engagement in the local plan takes place at the very earliest stage, as this is an opportunity for the public and other consultees to have most influence on how the plan develops and what areas it deals with. Therefore, a significant community involvement exercise on Issues and Options is required. It is proposed that this begins early in January 2016, which is somewhat later than specified in the Local Development Scheme, but avoids consulting over the Christmas period.

6.2 Consultation will take place in accordance with the Council's adopted Statement of Community Involvement, which was adopted in March 2014. This lists the following measures as being potentially appropriate for this stage of plan preparation.

- Appropriate involvement tools at this stage might include:
- Interactive workshops;
- Questionnaires;
- Leaflet drops across a defined area;
- Exhibitions, particularly in locations and at times which would maximise the number of people not previously involved in planning matters attending, e.g. shopping centres;
- Online resources, including interactive webpages or questionnaires;
- Forum discussions, which could include specific groups such as developer/landowner forums.

## **7. EQUALITY ASSESSMENT**

7.1 The Sustainability Appraisal of the Issues and Options incorporates the requirement to carry out a screening stage of an Equality Impact Assessment. This is included for each set of options and each site within Appendix 4 of the Sustainability Appraisal document. Because there are a range of options, there is clearly also a wide range of impacts, some of which may have some adverse impacts on some of the defined groups.

At this stage, there is no proposal to pursue any of those options, but if these options were to be incorporated within the draft plan, a full Equality Impact Assessment would be required. This would be reported at a future meeting.

## **8. LEGAL IMPLICATIONS**

- 7.1 Local Development Framework documents are produced under the Planning and Compulsory Purchase Act 2004. The process for producing local plans is set out in the Town and Country Planning (Local Planning) (England) Regulations 2012. Regulation 18 states that a local planning authority should consult on what a local plan should contain. The Issues and Options consultation fulfils this Regulation 18 requirement.

## **9 FINANCIAL IMPLICATIONS**

- 9.1 Production of the local plan will generally be carried out within existing budgets, and this will largely be the case with the documents listed in the LDS. However, there are some elements of producing the plan that can have significant resource implications, depending on how they are carried out.
- 9.3 Consultation exercises can be resource intensive, particularly at early stages where the focus is on engaging as many people as possible, and on asking wide-ranging and open-ended questions. However, the Council's consultation process is based mainly on electronic communication, which helps to minimise resource costs.
- 9.4 Another main area where there can be significant financial implications is in producing the evidence base, particularly where the use of external consultants is required. Some external consultants will be needed when considering matters such as retail and economic need and flood risk. Consultants will only be used where they genuinely represent the best option in terms of value for money.

### Value for Money (VFM)

- 9.6 The preparation of a local plan will ensure that developments are appropriate to their area, that significant effects are mitigated, that contributions are made to local infrastructure, and that there are no significant environmental, social and economic effects. Robust policies will also reduce the likelihood of planning by appeal, which can result in the Council losing control over the form of some development, as well as significant financial implications. Production of the local plan, in line with legislation, national policy and best practice, therefore represents good value for money.

### Risk Assessment

- 9.7 There are no direct financial risks associated with the report.

## BACKGROUND PAPERS

- Planning and Compulsory Purchase Act 2004 (Section 15)
- Localism Act 2011 (Section 111)
- The Town and Country Planning (Local Planning) (England) Regulations 2012
- National Planning Policy Framework
- Sustainability Appraisal of the Local Plan Issues and Options, November 2015
- Local Development Scheme 2014
- Berkshire Strategic Housing Market Assessment, October 2015