

Policy Committee

16 September 2026



Reading
Borough Council
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Title	Local Plan Partial Update Additional Main Modification
Purpose of the report	To make a decision
Report status	Public report
Report author	Mark Worringham, Planning Policy Manager
Lead Councillor	Councillor Micky Leng, Lead Councillor for Planning and Assets
Corporate priority	Healthy Environment
Recommendations	1. That the Local Plan Partial Update Additional Main Modification (Appendix 1) be approved for consultation.

1. Executive Summary

- 1.1. The Reading Borough Local Plan was adopted in 2019. There is a statutory requirement to undertake a review of a local plan within five years of adoption. A Review to comply with this requirement identified that there was a need to undertake a Partial Update of the Local Plan, and this was agreed by Strategic Environment, Planning and Transport committee on 23rd March 2023 (Minute 36 refers). Consultation on Scope and Content was undertaken between November 2023 and January 2024, and consultation on a Pre-Submission Draft Local Plan Partial Update (LPPU) took place in November and December 2024.
- 1.2. The LPPU was submitted to the Secretary of State on 9th May 2025. This resulted in a public examination led by an independent Planning Inspector, including hearings held in November 2025 (stage 1) and February 2026 (stage 2).
- 1.3. The Inspector identified a number of main modifications that are needed to make sure that the LPPU is sound and legally compliant. These main modifications need to be subject to consultation, and this consultation was agreed by Strategic Environment, Planning and Transport Committee on 23rd June 2026 (Minute 7 refers). However, the Inspector has since identified an additional main modification regarding committing to an early review of the updated Local Plan, and this will also need to be subject to consultation. This report recommends undertaking consultation on this additional main modification.

2. Policy Context

- 2.1. The Reading Borough Local Plan was adopted by Council on 4th November 2019 (Minute 28 refers). Since that point, the Local Plan has been the main consideration in determining planning applications within Reading.
- 2.2. There is a statutory duty for local planning authorities to review their local plans within five years of the adoption date. Such a review should determine whether there is a need to update the Local Plan in full or in part. A review of the Reading Borough Local Plan as reported to SEPT Committee on 23rd March 2023 (Minute 36 refers) identified a need to carry out a Partial Update of the Local Plan.
- 2.3. Changes to national policy and guidance, in particular in relation to the level of housing need for the authority, represent particular reasons why plans or individual policies may

require updating. There have been a variety of changes to national policy, including new versions of the National Planning Policy Framework (NPPF) in July 2021, September 2023 and December 2023 (and subsequently also in December 2024). These make significant changes to how local plans are expected to identify housing need. This was the main reason that a need to update the Local Plan was identified, but there are a number of individual reasons for the particular policies.

3. The Proposal

Current position

- 3.1 The first consultation stage in undertaking the Partial Update was a Consultation on Scope and Content under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012. Strategic Environment, Planning and Transport Committee on 15th November 2023 approved this document for consultation (Minute 20 refers), and consultation was undertaken between 27th November 2023 and 31st January 2024.
- 3.2 The second consultation stage was a Pre-Submission Draft under Regulation 19. This was approved for consultation at Council on 15th October 2024 (Minute 22 refers). Consultation was subsequently carried out between 6th November and 18th December 2024.
- 3.3 Following consultation, the Local Plan Partial Update (LPPU) along with its evidence base was submitted to the Secretary of State on 9th May 2025. Submission of the document commences a period of public examination held by an independent Planning Inspector. The purpose of the examination was to establish whether the plan was sound, legally compliant and fulfilled the statutory duty to co-operate. The Inspector appointed was Joanna Gilbert MA (Hons) MTP MRTPI.
- 3.4 The examination was conducted in two stages. Stage 1 covered legal and procedural matters and housing need and included virtual hearings held on 11th and 12th November 2025. The Inspector provided a letter with her findings from Stage 1 on 24th November, which among other findings confirmed that the Council had complied with the duty to co-operate, and this enabled the examination to proceed to Stage 2.
- 3.5 Stage 2 covered all other matters, in particular the details of policies and sites. In-person hearings were held between 3rd and 12th February 2026, with an additional virtual hearing on 23rd February to allow a participant to speak who had been unavailable for the main hearings.
- 3.6 The Inspector identified that 'main modifications' would be required to ensure that the plan is sound and legally compliant. Main modifications are those that would be significant enough to require consultation and to be subject to sustainability appraisal. It would be unusual for a plan to escape the need for main modifications, and such modifications have been identified with each of the most recent development plan documents in Reading. Through the examination process, the Inspector identified where these modifications were required and liaised with the Council and, in some instances, other participants, to set out the drafting. Strategic Environment, Planning and Transport Committee agreed these main modifications for consultation on 23rd June 2026 (Minute 7 refers).
- 3.7 However, before consultation could begin, the Inspector identified an additional main modification which commits the Council to undertaking a full review of the Local Plan earlier than would normally be required. This modification would also require consultation, and it is set out in Appendix 1.
- 3.8 The reason for the modification is that it was identified during the examination process that the evidence was insufficient in relation to two matters – the accommodation needs of gypsies and travellers and the impact of the proposed level of development on water quality. The Inspector made clear in her post Stage 1 hearings letter of 24th November 2025 that an early review in respect of gypsy and traveller accommodation was required.

A potential early review in respect of water quality issues was discussed during Stage 2 hearings in February 2026 but had not yet been formally required.

- 3.9 The understanding until recently had been that an early review could be undertaken in a partial manner, i.e. that once the additional evidence work had been completed, a partial update of the relevant elements of the plan would be undertaken. This would have likely been very limited in scope as it would have likely covered policy H13 on gypsies and travellers, policy EN16 on pollution and water resources and the infrastructure delivery schedule showing anticipated upgrades to the Reading Sewage Treatment Works (which are already planned by Thames Water) only.
- 3.10 However, the Town and Country Planning (Local Planning) (England) Regulations 2026 were laid before parliament on 3rd March and came into force on 25th March 2026. These Regulations made major changes to the process for preparing local plans. Due to transitional arrangements, they would not be relevant to the current Local Plan Partial Update, but would be relevant to any plan review, including the early review identified by the Inspector. One change that had not been anticipated by the Council or the Inspector is that there is no longer any ability to undertake a partial review of the plan as the Regulations require a plan to be prepared in full.
- 3.11 Therefore, on 26th June the Inspector wrote to the Council identifying that an early review would require a full review of the entire plan, and that a modification would be required committing the Council to commencing such a review upon adoption. The Inspector made clear that the alternative would be to withdraw the plan from examination. The modification required is set out as Appendix 1.
- 3.12 For clarity, the full timeline of how this situation has been reached is set out below:
- 9th May 2025 – Submission of Local Plan Partial Update to Secretary of State;
 - 12th November 2025 – Discussion of accommodation for gypsies and travellers during Stage 1 hearings, at which prospect of an early review was initially discussed;
 - 24th November 2025 – Inspector's Post Stage 1 Hearings Letter that identified that the assessment of need for gypsy and traveller accommodation would require an early review;
 - 9th January 2026 – Hearing Statement from the Environment Agency received which raises concerns around the lack of water quality modelling of the level of development proposed, relating specifically to the capacity of Reading Sewage Treatment Works and the resulting potential for impacts on the Foudry Brook;
 - February 2026 – Stage 2 hearings undertaken which includes discussion of the water quality issue, and at which the prospect of an early review to allow water quality modelling to be undertaken is discussed;
 - 4th March 2026 – Local Planning Regulations laid before Parliament;
 - 18th March 2026 – Inspector's Post Stage 2 Hearings Letter requires the Council to work with the Environment Agency to set out a way forward in respect of water quality modelling;
 - 25th March 2026 – Local Planning Regulations come into force;
 - 17th April 2026 – Updated Water Quality Assessment prepared by Stantec on behalf of the Council;
 - April – May 2026 – Discussion with the Environment Agency on the results of the assessment and a proposed modification;
 - 21st May 2026 – Suggested main modification as agreed with the Environment Agency committing the Council to an early review involving undertaking water quality modelling provided to the Inspector;

- 26th June 2026 – Letter from the Inspector highlighting that an early review would be required that would encompass the whole plan.

- 3.8 An additional modification has therefore been drafted that would address the Inspector's points and this is included as Appendix 1. The modification makes clear that the timeline of commencing a new plan would initially involve an 18-month period following adoption to undertake evidence work on gypsies and travellers and water quality and to assess whether the results of this work constitute a significant change in circumstances that necessitate preparation of a new plan. In the event that a new plan is required, there would then be an additional 6 months before Gateway 1 (self-assessment of readiness for local plan preparation) under the new Regulations would need to be completed. Gateway 1 is the formal commencement of plan-making and the government's expectation is that plans are adopted within 30 months of Gateway 1.

Option proposed

- 3.10 Main modifications require consultation before they can be incorporated into the LPPU. The proposal is therefore to consult on the additional main modification set out in Appendix 1. Consultation on the additional main modification will be carried out alongside those agreed by SEPT Committee on 23 June and is expected to take place in September and October for a period of six weeks.
- 3.11 Consultation responses will be provided directly to the Inspector, and it will be for her to consider them in preparing her final report. Only when the final Inspector's Report which concludes that the plan is sound, legally compliant and fulfils the duty to co-operate has been received can the Council adopt the LPPU.

Other options considered

- 3.12 The Inspector has made clear that the only alternative option to the proposed modification is to withdraw the plan from examination. The Council has already rejected this option. Withdrawal would mean that the Council would need to restart plan-making from the beginning and would therefore likely need to produce a plan earlier than set out in the modification. It would also mean that the Council would not be able to adopt up-to-date planning policies which are considered essential for putting a robust basis in place for determining planning applications.
- 3.13 It was considered whether the Council could request a pause in the examination in order to undertake the evidence work and potential updates to the plan within the current examination. However, examinations can only be paused for a maximum of six months, and this is simply not enough time to commission and undertake the evidence work and then undertake changes to the plan itself, which would also require updated assessments of potential sites for gypsies and travellers and potentially liaison with neighbouring authorities about meeting any unmet needs elsewhere. This would then likely result in the plan being found unsound as a whole.

4. Contribution to Strategic Aims

- 4.1 The Local Plan Partial Update, through setting out the way Reading will develop to 2041, will contribute to the following priorities in the Council Plan 2025-28:
- Promote more equal communities in Reading: through ensuring that communities have access to the services and facilities to live a healthy life, including inclusion of a new policy requiring health impact assessments;
 - Secure Reading's economic and cultural success: through meeting the development needs of Reading including delivery of 825 homes per year, including affordable housing, and employment needs totalling up to 253,000 sq m;
 - Deliver a sustainable and healthy environment and reduce Reading's carbon footprint: through promoting a sustainable pattern of development with good accessibility by walking, cycling and public transport, with increases in green infrastructure and by seeking the highest standards of energy efficiency in new development; and

- Safeguard and support the health and wellbeing of Reading's adults and children; through measures including planning for the needs for residential care and other specialist accommodation, ensure accessible housing and identifying opportunities for new primary healthcare provision.

5. Environmental and Climate Implications

- 5.1 There is a requirement to undertake a sustainability appraisal of each stage of a Local Plan document. A sustainability appraisal assesses the impact of each policy, proposal and alternative option against a range of sustainability objectives covering environmental, economic and social matters. A Sustainability Appraisal of the main modifications including this additional modification has been prepared and will be published alongside the consultation as a background document. The environmental and climate implications of each policy and option are considered as part of that document.
- 5.2 There would be no specific environmental or climate implications of the modification itself as it is procedural in nature.

6 Community Engagement

- 6.1 There have already been two consultation stages on the Local Plan Partial Update, as set out in paragraphs 3.1 and 3.2.
- 6.2 'Main modifications' are those that would require additional consultation. A further six-week period of consultation is therefore required, which will be carried out in line with the Statement of Community Involvement (adopted October 2024), as for previous LPPU consultations. The consultation would be focused on the main modifications only, not the remainder of the Local Plan. The consultation period is proposed to be undertaken during September and October. As this is an extremely focussed consultation, no consultation events are planned.

7 Equality Implications

- 7.1 As set out in relation to section 5, a Sustainability Appraisal of the Pre-Submission Draft has been prepared and will be published alongside the consultation. One of the sustainability objectives is to "Avoid significant negative effects on groups or individuals with regard to race, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex or sexual orientation", and appraisal of the main modifications against this objective therefore addresses the equality implications of the policies.
- 7.2 There are not expected to be any equality implications of the additional main modification as it is procedural in nature.

8 Health Implications

- 8.1 As set out in relation to section 5, a Sustainability Appraisal of the Pre-Submission Draft has been prepared and will be published alongside the consultation. One of the sustainability objectives is to "Protect, promote and improve human health, safety and well-being including through healthy lifestyles.", and appraisal of the main modifications against this objective therefore addresses the health implications of the policies.
- 8.2 There are not expected to be any health implications of the additional main modification as it is procedural in nature.

9 Other Relevant Considerations

- 9.1 There are none.

10 Legal Implications

- 10.1 The Local Plan Partial Update is produced under the Planning and Compulsory Purchase Act 2004. Under Section 20(7C) of the Act, an Inspector can recommend main modifications, but only if requested to do so by the local authority. The process for producing local plans is set out in the Town and Country Planning (Local Planning)

(England) Regulations 2012. Regulations 23, 24 and 25 concern the process for examination of a Local Plan and publication of an Inspector's Report.

- 10.2 A new system for preparing local plans was introduced as part of the Levelling-Up and Regeneration Act 2023, and The Town and Country Planning (Local Planning) (England) Regulations 2026, which came into force on 26 March 2026, set out the detailed process. It is the introduction of these Regulations which makes it necessary that an early review of the plan will need to be a full plan rather than a partial review around the issues of gypsies and travellers and water quality.

11 Financial Implications

- 11.1 Production of the LPPU prior to examination stage has been carried out within existing planning budgets. The holding of an examination is a significant cost to the Council and the full scale of the cost will only become known once the Inspector's Report has been issued and the Planning Inspectorate provides an invoice. Up to the end of February 2026 (which includes all of the hearing dates) the total cost of the examination including Inspector time, venue cost, consultant support and additional evidence was around £75k. The costs associated with the proposed consultation on main modifications will be very limited and will be met from existing budgets.
- 11.2 Production of a whole new local plan, as would be committed to in the modification, would be costly. It has been estimated that the cost would be in the region of £375k over and above existing budgets, likely incurred primarily during 2028/29 and 2029/30. The main costs would be assembling evidence and costs of holding an examination. However, these costs would also be incurred if the Council were to withdraw the LPPU from examination (the only alternative option) and would likely be required at an earlier stage.

12 Timetable for Implementation

- 12.1 The timetable for adoption of the LPPU will depend on when a final Inspector's Report is received which confirms that the plan is sound, legally compliant and complies with the duty to co-operate. It is anticipated that this will be by the end of the year. Once the Report is received, the LPPU will be brought to full Council for adoption and this is currently expected to be at the January 2027 meeting.

13 Background Papers

- 13.1 There are none.

Appendices

1. Local Plan Partial Update Additional Main Modification

Appendix 1: Local Plan Partial Update Additional Main Modification

MM55	175	After paragraph 4.7.34	<i>Insert new section 4.8 containing a new policy and supporting text as follows:</i> <u>4.8 Next Local Plan</u> <u>LP1: Preparation of the Next Local Plan</u> <u>Within 18 months of adoption of the Local Plan Partial Update (LPPU), the Council will:</u> <u>a) Have produced a new assessment of the accommodation needs of gypsies, travellers and travelling showpeople; and</u> <u>b) Have undertaken catchment modelling in respect of water quality and engaged with the Environment Agency and Thames Water to understand the implications of the modelling results; and</u> <u>c) On completion of the actions set out in a) and b), assess whether either or both of these matters constitutes a significant change in local circumstances;</u> <u>d) In the event that either or both of these matters indicates that there has been a significant change in local circumstances, the Council will commence preparation of the next Local Plan.</u> <u>If needed, publication of a Gateway 1 self-assessment of readiness for local plan preparation will take place in accordance with Regulation 21 of the Town and Country Planning (Local Planning) (England) Regulations 2026 within six months of the completion of the above matters. This may be in advance of the expected five years from adoption of the LPPU.</u> <u>Any new Local Plan would be a full and comprehensive Local Plan in accordance with s15C of the Planning and Compulsory Purchase Act 2004 (as amended).</u> <u>4.8.1 Policy LP1 on Preparation of the Next Local Plan has been committed to by the Council, with particular regard to two outstanding issues relating to meeting the accommodation needs of gypsies, travellers, and travelling showpeople and water quality. Failure to progress these actions in accordance with the timeframe set out above is likely to mean that the presumption in favour of sustainable development would be engaged at the decision-making stage.</u> <u>4.8.2 The Government's Planning Policy for Traveller Sites confirms 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 no five year supply of deliverable sites or developable sites for years 6 – 10 and beyond for permanent accommodation for gypsies and travellers.</u> <u>4.8.3 The LPPU was submitted on the basis of evidence which was not up to date in respect of the needs of gypsies, travellers, and travelling showpeople. The Council will produce a new needs assessment on gypsies, travellers and travelling showpeople's accommodation in collaboration with stakeholders including the local gypsies, travellers and travelling showpeople communities where possible, neighbouring boroughs, the Council's housing team, and registered providers. Should this needs assessment identify significant additional needs for pitches and/or plots, the Council will consider reviewing the LPPU to support this, through the preparation of a new Local Plan. Prior to that needs assessment being undertaken and any further action</u>	To reflect the need for an early review in respect of needs for gypsy and traveller accommodation and assessment of water quality	Post Stage 1 hearings letter [EX030] paragraph 14 Post Stage 2 hearings further letter [EX114] paragraph 10
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			being taken through plan-making, any proposals for new or extended sites for gypsies, travellers or travelling showpeople will be assessed against the criteria set out in LPPU Policy H13. 4.8.4 The Environment Agency maintains 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. Any additional flow to the sewage treatment works may result in rising main or pumping station failures, which in turn can damage the environment. The sewage treatment works discharge into Foudry Brook, which is at Poor ecological status and Poor for Phosphate. 4.8.5 With regard to infrastructure, the sewage treatment works has a Maximum Daily Volume permit. The Environment Agency is working with Thames Water to convert this into a Dry Weather Flow permit. These permits are not measured in the same way, with Dry Weather Flow permits 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 Environment Agency therefore considers that the sewage treatment works has potential capacity issues and that a robust assessment of capacity is therefore required, including consideration of scenarios based on a reasonable future Dry Weather Flow permit limit. 4.8.6 In terms of environmental capacity, the Council's Water Quality Assessment has not assessed potential impacts of planned 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. Such assessment is normally undertaken via catchment modelling. The completion of catchment modelling would allow an understanding of whether growth can progress in Reading in the medium to long term without deteriorating water quality. In the intervening time between the adoption of the LPPU, the completion of catchment modelling, and any necessary progress towards delivery of a new Local Plan, development proposals will be considered against the requirements in LPPU Policy EN16 and the Council's monitoring framework. 4.8.7 The Council's assessment of whether the outcomes of the actions required by criteria a) and b) of Policy LP1, either individually or taken together, amount to significant change in local circumstances will be made publicly available.		
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