

**Representation to Planning Inspector re Reading Borough Council's Local Plan  
Partial Update, Stage 2 Hearing – Matter 10: Site Specific Policies – response to  
question 10.40**

1. We submit this **representation**, as members of the Keep Kentwood Green (KKG) local action group, on behalf of local Tilehurst residents who oppose the development of WR3S and WR3T on the grounds of their importance as areas of local green space and wildlife habitat.
2. In order to avoid repetition and overlap in evidence, this submission should be read in conjunction with our response to the preceding question (10.39).
3. We do not believe the current site allocations for WR3s and WR3t as suitable for residential development to be justified or effective on the basis that they easily satisfy the eligibility criteria for designation as a Local Wildlife Site and hence as Local Green Space. We request that both sites be designated as unsuitable for residential development. We request instead that WR3s and WR3t be incorporated into EN7Wu and that the entire site be rightly granted the status of Local Green Space and so granted the maximum permitted planning protection.
4. The KKG submission to the Regulation 18 consultation, outlining in full why the criteria for LGS have been met, is included with all the other comments in planning document LP010. Given its relevance to answering this question, it is also attached below (Appendix 1) for ease of reference.

Appendix 1 – Regulation 18 Submission



## **KKG Response to Partial Plan Update**

Keep Kentwood Green (KKG) is a group that was set up in response to the announcement by the landowner (TPLC Tilehurst Poor's Land Charity) that they were putting up for sale the sites WR3s and WR3t (plus the protected Area of Biodiversity Interest "the Withies") in December 2021.

KKG is a means of providing a collective voice for local residents and allotment plot-holders who deeply value this land and the wildlife that lives in and on it. As the organisers of KKG we have undertaken, on the permission of all of our members, to make the following submission:

**Q15: Do you consider that Land at Kentwood Hill (WR3s) and Land at Armour Hill (WR3t) would qualify as Local Green Space (LGS)?**

Yes, we unequivocally do and will break down below how the sites WR3s and WR3t meet the criteria, as being:

- a) in reasonably close proximity to the community it serves
- b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value, tranquillity or richness of its wildlife; and
- c) local in character and is not an extensive tract of land.

The community served by these two sites (as well as the adjoining, already categorised LGS, sites of the Victoria Recreation Ground and the allotments) are comprised of many groups of people. These are local residents, allotment plot holders, dog walkers, schoolchildren and people who regularly walk past the sites on way to work, school, local shops and Arthur Newbery Park (also an LGS).

The site is surrounded by mature housing (some dating back to 1835) and both Armour Hill and Kentwood Hill have a significant number of passers-by, all of whom enjoy the amenity value of the significant wooded areas. This was recognised by Sarah Hanson (Reading Borough Council (RBC) Natural Environment Officer) as stated in her report to Planning Applications Committee on 22 June 2022 in response to the objection to the Area Tree Preservation Order (TPO) served in March 2022.

*"When viewed by the passing public on Armour Hill and Kentwood Hill, the land has an overall green, treed appearance providing amenity value to the street scene". Also, that "the site will be viewable and provide amenity value to those residents living adjacent to the land".*

You will be aware of how many members of the community consider the sites special as it will have been demonstrated by the number of individual direct responses you've had to this public consultation from all of the sectors of the local community. KKG has over

650 members on its Facebook group and our on-line petition - launched to ask TPLC to reconsider the sale and instead allow the land to remain as a wildlife haven - has received nearly 1000 signatures, most within a few weeks of launch (in combined hard copy and online forms). Local meetings held to discuss the sale of the land have also seen large volumes of local people turn up in support of protecting this land from development. Two meetings held by the Tilehurst Globe group in January 2020 and again this month saw attendance numbers swell as the land sale/ Local Plan implications were used in their advertising of the events. A meeting organised by two of our local Councillors Mark Keeping and Glenn Dennis in October 2022 saw approximately 150 people attend on a Friday evening at short notice, including the other local councillors Raj Singh, James Moore, Ann Morgan and the mayor, Rachel Eden, all in support of KKG.

As well as raising public awareness of the sale of the land, KKG has been proactively surveying the sites to officially record the wildlife living there. Wildlife cameras have been set up on the edge of sites WR3s and WR3t, as requests to TPLC for access to undertake surveys have been repeatedly denied. We have also undertaken bat, bird and moth watching activities. All recordings have been logged with TVERC with their associated video, photographic or sound evidence and geolocation data. Well over 100 different species have been seen or heard in or above WR3s and WR3t and the Builders Yard. This data was used in the successful bid to get the whole area listed as a Local Wildlife Site <sup>1</sup>. Given TPLC have refused both KKG and TVERC access to the land for independent surveys, it would be safe to assume that this recorded species listing is only a small subset of the actual biodiversity that exists there (in particular of flora, as the focus has been predominantly on vertebrates).

22 of the protected species/ species of special concern listed in RBC's Biodiversity Action Plan have been officially recorded with TVERC as existing on the land, including badgers, hedgehogs, slow worms, stag beetles, 6 species of bats, owls, and kites. A verified, large and mature, main badger sett is situated here, with satellite setts and foraging pathways found throughout all the land surrounding the allotments and Victoria Rec. Throughout WR3s, WR3t, the Withies and even within the Builders Yard, bats roost, birds nest and other animals live and forage. Without WR3s and WR3t left as wild, green space, the biodiversity enjoyed by so many would disappear. The allotments are used for foraging, not setts or nesting. While of undoubted recreational value, Victoria Rec is a biodiversity desert other than the trees, which connect with those on WR3s and WR3t. The recognised protected Areas of Biodiversity Interest of the Withies, McIlroy Park, land at the end of Armour Hill and Arthur Newbery Park – which comprise an interconnected wildlife corridor - would be hugely impacted by allowing houses to be built on WR3s and WR3t, even with the noted planning restrictions of leaving some minimal form of wildlife corridors. The unique characteristic of these 2 sites is that they are not publicly accessible so the wildlife can live and breed in areas undisturbed by people and their

dogs and move to and from their homes to surrounding green space for foraging and hunting at night. If these sites are not also given the same level of protection, then the biodiversity in the area will disappear. Habitats are arguably more important for wildlife than corridors.

KKG has the support of Binfield Badgers (affiliated to the Badgers Trust), CPRE Berkshire and BBOWT and they have all said they would formally respond to this Partial Update of RBC's Local Plan supporting our bid to recognise WR3s and WR3t as Local Green Space. The richness of the wildlife throughout WR3s and WR3t has been evidenced and many individual locals (including all KKG members) will attest to this being the main reason for its significance.

<sup>1</sup> Site will show in TVERC LWS listing in May 2024. List only updated annually, and decision was too late for the 2023 updates. Will stay as proposed LWS as TPLC have refused access to TVERC.

Another recognised characteristic of Local Green Space that is true of WR3s and WR3t is their vital contribution to the tranquillity of the area. The trees act as a buffer against noise, heat, and light pollution that anyone using the allotments (either as a plot holder or other members of the local community walking through) can enjoy. The land, its numerous trees, flora, and fauna afford a real appreciation of nature and a sense of countryside in the town – rare and precious features in an otherwise highly built-up area. Local residents and allotment plot holders value its multiple benefits for well-being and health - contact with wildlife in town, a pleasant view, dark skies at night to view the stars, fresh air, in addition to the afore-mentioned buffer - on a daily basis.

Sites WR3s and WR3t have always been green space and have never been developed. Even the Builders Yard is mostly open-air storage of scaffolding with a few non-permanent buildings (no planning permission sought or granted) and some hard-standing. The Builders Yard is still inhabited by the wildlife - used by bats for roosting and the derelict remains of outbuildings used as shelters by foxes, deer, and birds so the process of rewilding is happening here too.

The two sites, even when counted together, are not extensive – WR3s is 1.43 ha with WR3t being smaller at 0.45 ha. This is significantly less than the RBC upper limit placed at 50 ha when deciding on Local Green Space being “not extensive”.

The first exercise to classify LGS within Reading borough was carried out in 2018 and the approach and results are detailed in the 2018 document “Local Green Space and Public Open Space Background Paper”. RBC gave LGS status to the Victoria Road Recreation Ground and Kentwood Hill Allotments (Local Plan ref EN7Wu) as it “is one of the most valued green spaces in the west of Reading and provides sports pitches and allotments, as well as habitat for wildlife”. WR3s and WR3t were not mentioned in this document although without WR3s and WR3t there would be no habitat for wildlife since the species identified do not live on the allotments or the Victoria Rec. Reading the paper, WR3s and WR3t must have been excluded as they were provisionally “already allocated for housing” as part of the Call for Sites exercises in 2014 and 2017. The only other criterion that is true of these sites compared to the ones that did get included is that they are not accessible by the public. Public access is obviously a valid criterion for the tandem Public Open Space policy, but it is not a criterion for including or excluding land as LGS.

In 2018, the Local Plan had not been formally adopted so the land was only *proposed* as suitable for residential development, rather than *proven* to be suitable. There have not been any planning permissions sought on the land since 2002 (The process was started by Wimpy homes but was withdrawn shortly before the Planning Applications Committee meeting) nor has the land yet been sold to a developer.

The evidence submitted to state that WR3s and WR3t were suitable for residential development and were of no significance from a wildlife or biodiversity perspective was based purely on a desk-based survey undertaken in 2017 by a company employed by TPLC who wanted (and still want) to sell the land to any bidder. This is manifestly in contrast to the reality of our evidence gathered and reported to TVERC as above. They also failed to acknowledge the many veteran trees included within WR3s and downplayed the role of scrubland, hedgerow and a huge mix of trees from both a species and age perspective from being a valuable recognised habitat to being of no value. In any case, this survey is now many years out of date: in the interim, both flora and fauna populations have grown significantly.

Also of note is that, prior to the Call for Sites in 2014 and 2017 at a time when the Housing Crisis was the main driving force behind planning, all of TPLC's land was protected as "Public and Strategic Open Space", summarised as "*Important areas as shown on the proposals map will be protected from development. Proposals that would result in the loss of any of these areas of open space or jeopardise their use or enjoyment by the public will not be permitted.*" The enjoyment by the public has not diminished; RBC have since recognised the Climate Crisis; the wildlife and flora have flourished; and housing targets have been met.

If LGS protection is given and TPLC allow us, KKG would seek funding via schemes such as the Community Ownership Fund, the Community Infrastructure Levy and the biodiversity net gain funding (as obtained and being utilised by BioCap Limited at the nearby Sulham Estate) to enhance all areas in terms of their biodiversity and beauty and hope to work with the tenants of the Builders Yard to help achieve this. All or parts of the Builders Yard could be repurposed to host educational and other community activity and/ or proactively rewilded once the current tenancy period has expired if TPLC seek to utilise the land in a more profitable and environmentally friendly manner. We would work to move the LWS to the standards defined as being in "positive conservation management" by DEFRA.

### **Q75: What is your view on the suggested changes to sites WR3s and WR3t?**

We wholeheartedly support the suggested change of status of these sites from 'suitable for residential development' to protected 'Local Green Space.'

Keeping the land green as opposed to developing it helps RBC towards meeting its Climate Emergency objectives that are the common theme behind the wording changes deemed necessary to central parts of this Local Plan Partial Update.

Changing designation is clearly in line with RBC policy EN12 – Biodiversity and the green network. Existing protected Areas of Biodiversity Interest are connected to WR3s and WR3t directly. Whilst the current wording with regards to WR3s and WR3t mentions that wildlife corridors must be provided we believe that WR3s and WR3t as they exist today are crucial for the biodiversity in the area and that they are the land areas where the wildlife actually lives – using the adjacent sites of Arthur Newbery park and the bottom of Armour Hill/ Kentwood Hill solely as foraging and hunting ground, given the extensive use of these sites by people and their dogs during the day. WR3s and WR3t are vital to the life of the West Reading Woodlands, one of only two of RBC's Local Nature Recovery Strategies & Biodiversity Opportunity Areas.

Including WR3s and WR3t as LGS is clearly also in line with policy EN14 – Trees, hedges, and woodland. As stated earlier we sought the help of Sarah Hanson when TPLC told us the land was for sale. A TPO had been in place since September 2000 (so over 21 years at the time of review) on 12 specific individual trees, 2 groups of trees and 5 areas of trees. Of these, WR3s has Area 1 within it, parts of Area 2 and 3 and 4 of the individual trees. WR3t has one group and one individual within it. The majority of the roadside perimeters of the sites are made up of dense trees and mature hedgerows. Many of the trees within WR3s would be considered veteran; there are sufficient old fruit trees (allowed to grow since allotment plot holders were evicted from WR3s some 40 years ago) that the habitat in WR3s can be counted as mature orchard (including juglans sp. malus spp., prunus spp.), there are also many examples of mature ash trees with no die back. An area TPO was served in March 2022 to protect all of the trees from opportune land clearance pre any planning application process. This was objected to by TPLC but was unanimously confirmed by the Planning Applications Committee on 22<sup>nd</sup> June 2022.

Also to be considered is the impact that any development would have on the Major Landscape feature contained within WR3s, "the West Reading Wooded Ridgeline" recognised for its value and characterised by its amenity value, largely as a result of its collective tree cover. It is hard to imagine how building 80 houses could be done without impacting this Major Landscape Feature even with the most diligent developer and bulldozer operatives.

Changing the designation of sites WR3s and WR3t and thus protecting the land in its current state would also help RBC meet some of its objectives within its Sustainability Framework. Objective 4 seeks to minimise consumption of, and reduce damage to, undeveloped land. Sites WR3s and WR3t alongside all other parts of land owned by TPLC have always been green field/ undeveloped as can be evidenced from studying Ordnance Survey maps back to 1870. The only exception to this would be unauthorised development within the Builders Yard but this is in varying states of disrepair and provides evidenced homes for foxes and bats as well as foraging ground for deer and badgers. Objective 7 details valuing, protecting, and enhancing the amount and diversity of wildlife and 8 seeks to avoid adverse effects on designated wildlife sites. 22 of the protected species/ species of special concern listed in RBC's Biodiversity Action Plan have been officially recorded with TVERC in 2023 from observations purely from the edges of the land. Well over 100 different species have been recorded since we began collecting evidence in 2022.

Objectives 1, 2 and 9 could also be helped by turning the sites into LGS. Objective 1 - any house building will reduce the mass of flora absorbing CO2 and other greenhouse gases from Kentwood and Armour Hill. Objective 2 - there are a number of underground streams that run through WR3t, and this area has historically been used to grow watercress. Building here would only increase the flooding seen at the bottom of Armour Hill every time it rains as well as potential landslides from the hill as the gradient on this section is very steep. You only have to compare the aerial footage of the area during the summer to witness the marked difference in colour between the verdant green of WR3s and WR3t compared to the brown grass of Victoria Rec and Arthur Newbery Park to see the value the area provides local wildlife during droughts. Objective 9 relates to clean environments – protection would allow the continued “green lung” to act for local residents as well as being a key future objective for KKG if we're allowed access to the land to clear it of accumulated litter and fly tipping.

We appreciate there is a recognised housing need in Reading. There's an increase from 689 to 877 homes per year quoted on page 8 of the Partial Update paragraph 2.7 up to 2041. This is an increase of 3,196 homes (based on increase of 188 per year for 17 years from 2024 to 2041).

By analysing the volumes included in the Partial Update however this increased need can be met with the additional sites proposed from the latest Call for Sites exercise as well as the included increased volumes in previously nominated sites across all sections of the Reading area. (This volume of 877 is also at the maximum end of the estimates included within the document. There's a local need value of 735 per annum and it was stated in the webinar held on 13<sup>th</sup> December 2023 that RBC are aiming for their calculated capacity value of 800 per annum).

There are also current developments not included in the Local Plan or this Partial Update that will increase dwelling numbers across Reading. Examples in the local news include the proposed use of the Tesco car park on Portman Road (80 dwellings), redevelopment of the Curzon Club (30 dwellings) and the completion of Chesters Place on Downing Road (5 dwellings).

The table below only includes locations where dwelling numbers were specified (using an average where a range was specified) but there are potentially large-scale developments mentioned in the update that would also meet need (Apex - CR11d; Aquis - Cen1; Central Library - Cen2, Crowne Plaza - Cen4; Hexham Road - Sou5).

Site Code	Site Name	Reason for Change	Change in Dwelling Numbers	Vol
CR12a	Cattle Market	volume change	330-490 to 800-1200	705
CR13c	Forbury Business Park	volume change	190-285 to 430-450	339
Cen3	John Lewis	new	200	200
Cen5	Norman Place	new	240	240
Cen6	Reading Bridge House	new	300-400	350
Cen7	Tesco Extra	new	150-200	175
Cen8	Kennet Place	new	70	70
Cen9	Sapphire Plaza	new	250-400	325
Cen10	Reading College	new	45	45
Sou1	Reading Link	new	200	200
Sou2	Tunbridge Jones	new	72-96	84
Sou3	Drake Way	new	23	23
Sou4	Green Park Village	new	50	50
Eas1	Upper Crown St	new	46	46
CA1b	Reading Golf Club	volume change	90-130 to 223	113
W	West Reading	Detailed separately		268
			Average Increase	3233

The sites above are brownfield or infills except for the Reading Golf Club and WR3s and WR3t. Councillor David McElroy said, in relation to another greenfield site where planning is proposed, that RBC have identified that 13,000 homes could instead be built on the huge amount of brownfield space available in Reading.

Looking specifically within the West Reading and Tilehurst area, we have the updates detailed below:

Site Code	Site Name	Reason for Change	Change in Dwelling Numbers	
WR3c	28-30 Richfield Avenue	change of use	loss of 50 - 80	-65
WR3e	Yemonary House	change of use	possible loss of 10 - 14	-12
WR3j	Moulsford Mews	volume change	max from 16 - 26, plus 10	10
WR3m	103 Dee Road	volume change	max from 50 - 54, plus 4	4
WR3o	The Meadoway Centre	change of use	+258 residential	258
WR3s	Land at Kentwood Hill	change of use	41 - 62	-52
WR3t	Land at Armour Hill	change of use	12 - 18	-15
Wes1	Milford Road	new	+70	70
Wes2	72 Berkeley Avenue	new	+20-30 (could be up to 35)	25
Wes3	132-134 Bath Road	new	approx 30 (could be up to 44)	30
Wes4	234 Southcote Library	new	+15	15
			Effect of all changes	268

There is an increase in volumes of dwellings in West Reading and Tilehurst (albeit on a much smaller scale than in other parts of Reading) even with the deselection of WR3c, WR3e, WR3s and WR3t. There are current planning permissions granted by West Berkshire council that will also impact Tilehurst and West Reading numbers.

Obviously actual dwelling numbers will vary and not all sites offered up will be suitable for development however there are large scale movements in both the retail and commercial property markets with the move to hybrid working methods and online retail reliance. This must mean that, within the lifetime of this Local Plan, there will be many more (brownfield) sites becoming vacant and offered up for residential use in future Call for Sites exercises that can deliver the longer-term housing stock.

There has been discussion with respect to precedence for moving land from suitable for residential development to an LGS. This has obviously not happened within RBC as the Local Green Space and Public Open Space Background Paper from March 2018 stated:

*“2.3.1 As LGS designation was introduced by Government in 2012, it is absent in existing Reading planning policy documents and is being proposed in this iteration of the Local Plan for the first time.”*

Logically therefore, as this is the first Partial Update where changes can be included for consideration, there will be no precedent within RBC to deallocate from residential development to LGS. There are however other removals from being suitable for residential development throughout the Partial Update (presumably due to landowner decision): for example, Yeomanry House.

Whilst LGS is a relatively new addition to the NPPF and changes can only be included when Local Plans are being updated, we have found examples of councils at a more progressed stage of their Local Plan updates that have designated LGS for sites that were previously earmarked for residential development. Sheffield County Council has approved the movement of a LWS to LGS away from suitable for residential development at a site called Owlthorpe Fields and this is currently with the Planning Inspectorate for imminent final decision. CPRE London cited a case where the local neighbourhood plan was not finalised, but its LGS designations still carried weight. In Caterham, Tandridge, in May 2021, the planning inspector refused a proposed development as it would cause the partial loss of an LGS designated in the emerging neighbourhood plan. He said that “while this emerging plan has not yet been adopted, the identified conflict [with this policy] can be given significant weight”. In a similar vein, the Neighbourhood Plan of Maids Moreton was contested by local residents when the Parish Council declined to give LGS to an LWS. This was contested with the use of a consultancy (Urban Vision Enterprise) and the Examiner ruled in favour of the local residents and granted LGS status overruling the Parish Council.

**KKG fundamentally believe that WR3s and WR3t form a unique wildlife haven that deserves to be protected from development by being given LGS status. Evidentially the land meets all the criteria laid out in the NPPF guidelines. Movements in residential land availability elsewhere offer the opportunity for RBC to proactively meet their environmental obligations without diminishing their ability to provide adequate housing stock as required by Government.**