

Examination of the Reading Borough Local Plan Partial Update

Our ref 15037/01/DL/NK
Date 9 January 2026

Subject Matter 10: Site-specific policies - West Reading and Tilehurst

This Hearing Statement has been submitted by Tilehurst People's Local Charity (also known as Tilehurst Poor's Land Charity) (hereafter "*TPLC*"), promoting Land at Kentwood Hill (Policy WR3s) and Land at Armour Hill (Policy WR3t) in the emerging Reading Borough Local Plan Partial Update (hereafter "*LPPU*").

The LPPU is being examined against the version of the National Planning Policy Framework (NPPF) published in December 2023, in line with the transitional arrangements set out in Annex 1 of the December 2024 version of the NPPF. It is therefore also being examined against the version of Planning Practice Guidance (PPG) that underpinned the 2023 NPPF. References within this statement to 'NPPF' and 'PPG' should be taken as those associated with the December 2023 Framework, unless otherwise stated.

This Matter Statement should be read alongside the submissions made by Lichfields on behalf of TPLC at Regulation 19 Stage, which can be found at LPP07 (5 of 6).

Our comments below on **Matter 10, Issue 3**, relate to questions **Q10.30, Q10.39 and Q10.40** only.

1.0 Issue 3: Are the policies for West Reading and Tilehurst justified, deliverable and consistent with national policy?

Q10.30) Is the strategy for West Reading and Tilehurst justified?

- 1.1 Notwithstanding our comments below about specific allocations WR3s and WR3t, TPLC consider the overall Strategy for West Reading and Tilehurst to be justified. The strategy, among other things, seeks to accommodate around 1,900 dwellings (around 13% of the total planned) between 2023 and 2041. This is broadly consistent with the strategy of the adopted RBLP (2019) which sought to accommodate 2,400 homes between 2013 and 2036 (around 15% of the total planned for).
- 1.2 This strategy reflects the important role that the 'Tilehurst and West Reading' area can play in accommodating growth, at a scale that is proportionate to its accessibility, but subordinate to that of Central Reading (8,700 homes planned to 2041, around 59% of the total planned for). The Strategy for 'Tilehurst and West Reading' would make a significant contribution towards meeting the Council's objectively assessed needs, which is especially important given the Inspector's letter of 24th November 2025 which confirms a minimum

housing requirement 822 dwellings per annum (an increase from 800 homes per year proposed in the Regulation 18 LPPU November 2023).

Site-specific questions

Q10.39) What is the current situation with regard to Local Wildlife Site status for sites WR3s and WR3t? Please provide mapping of each site to indicate how the Local Green Space designation would overlap with any area being assessed for Local Wildlife Site status.

- 1.3 We note the Inspector has requested further mapping of each site from RBC, showing relevant designations, which we consider is consistent with the approach required by NPPF para 185(a).
- 1.4 Currently the Proposals Map 2024 accompanying the LPPU does not indicate any part of site WR3s or WR3t that would be an 'Area of identified biodiversity interest' subject to policy EN12. Neither site is currently designated as a LWS and the LWS site selection process is standalone, operating outside, and separate from the Local Plan preparation process.

Q10.40) Are the site allocations WR3s and WR3t justified and effective?

- 1.5 The allocation of the sites' for residential development is justified, and consistent with the principle of the sites' suitability for residential development, established by the adopted Reading Borough Local Plan¹ (2019). Their continued allocation for residential development in the LPPU would make an important contribution towards meeting Reading's Objectively Assessed for housing, including family housing.
- 1.6 However as drafted, the LPPU draft policy allocation(s) WR3s and WR3t are not justified, nor effective for the reasons set out below, which could prejudice the delivery of residential development at the site(s):
 - 1 Site allocations WR3s and WR3t are entirely predicated on neither respectively being identified as a Local Wildlife Site (LWS), which is not justified by the NPPF.
 - 2 The policies contain onerous requirements to 'avoid detrimental impacts on important areas of biodiversity' with inadequate reference to management or mitigation of impacts, consistent with the emphasis of the NPPF.
- 1.7 These concerns are expanded upon below.

¹ Subsequently reviewed in 2023. Both iterations allocated a larger extent of land (with a higher quantum of development) than is currently subject to draft allocation by LPPU policies WR3s and WR3t. As set out in our Reg. 19 representations, TPLC does not object to the reduced site area proposed in the LPPU.

Background

- 1.8 The sites' were initially identified (as part of a wider area owned by TPLC), within the Reading Borough Local Plan (RBLP) Issues and Options Consultation Document (January 2016) as a 'Suggested for Site Development' and our clients responded to this, supporting the inclusion of elements of the wider landholding for residential development.
- 1.9 The landholding was subsequently assessed within the Reading Borough Council (RBC) Housing and Economic Land Availability Assessment (HELAA) (November 2017) as site KE008. A number of options were considered in relation to the allocation of the land (which had then been identified as 'Land at Kentwood Hill' and 'Land at Armour Hill'). This process led to land at Kentwood Hill and Land at Armour Hill being allocated for residential development under policies WR3s and WR3t in the adopted Reading Borough Local Plan (2019)².
- 1.10 At the time of allocation in 2019 the Local Plan Inspector concluded³ that *"development of the rest of the two sites would be subject to a significant number of criteria....it would also require assessment and mitigation... avoiding adverse impacts on the West Reading Wooded Ridgeline major landscape feature and on biodiversity. With the requirements as set out, these would be effective in mitigating any adverse impacts, and the allocation of the two sites is therefore justified."* (IR, Para 110)
- 1.11 Subsequently, RBC undertook a *"Review of The Reading Local Plan 2019"* (March 2023). This review did not identify any change to the circumstances of the sites' allocated by policies WR3s and WR3t, since their allocation in the adopted Reading Local Plan in 2019.
- 1.12 Site allocations(s) WR3s and WR3t were scrutinised during the examination process of the now adopted Reading Local Plan 2019, and during the subsequent review process. Throughout this process, their physical attributes have been noted, and they have consistently been identified as being appropriate for residential development subject to detailed mitigation measures.
- 1.13 More recently, TPLC and its development partner has been able to refine the proposals based on the sites' attributes, and our client is content that the reduced site area now proposed for WR3s and WR3t is consistent with their emerging proposals. There have been no material differences in the sites' use, or physical condition since allocation in 2019. The land contained within the broad extent of that subject to LPPU draft allocation WR3s remains in active and ongoing use as a builders yard whilst WR3t provides parking and access to the nearby allotments.
- 1.14 Despite the above, the LPPU seeks to fundamentally alter the allocations in such a way that could prejudice their future development, which is neither justified nor effective for the reasons set out below.

² Comprising a larger extent of land (with a higher quantum of development) than is currently subject to draft allocation by LPPU policies WR3s and WR3t.

³ Report on the Examination of the Reading Local Plan 29th September 2019

Predicating the site allocations WR3s and WR3t on the basis they are not identified as Local Wildlife Sites (LWS)

Potential Status of sites as LWS

- 1.15 We note the Council have been asked to report on the current situation with regard to LWS status of the site allocation(s) within the Inspector's MIQs and this clarity is welcomed.
- 1.16 It remains our client's position, that based on their ecological survey data and advice, that whilst parts of the site have a degree of ecological value (as do many allocated development sites), they do not reflect the characteristics of a LWS and thus do not warrant such designation.
- 1.17 Notwithstanding this, the key fact is that neither site is currently designated as a LWS. The PPG contains a Standard Criteria for assessing LWS, and no assessment by RBC, Thames Valley Environmental Records (TVERC) or other qualifying body has concluded the sites' warrant LWS designation. The sites' remain part of that allocated for residential development in the adopted local plan, and neither their use or physical attributes have materially altered since.
- 1.18 Our client considers that the LPPU19's proposed approach to predicate the site allocation(s) on them not being designated as an LWS would pose a significant risk to the delivery of development at the site and is inconsistent with national policies.
- 1.19 NPPF (December 2023) para. 11(b) states that "*strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:*

i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area [footnote 7]..."
- 1.20 Footnote 7 to this provision sets out the policies in the framework that would protect areas or assets of particular importance. LWSs are not listed in footnote 7 (or by its reference to sites listed in paragraph 187, or via the glossary). Therefore in the context of paragraph 11(b) of the framework, the presence of LWS's would not provide a reason for strategic policies to not 'as a minimum, provide for objectively assessed needs for housing' as para. 11(b) requires.
- 1.21 The Council acknowledge the sites would provide "*much needed housing, including likely family housing*" (Regulation 18 LPPU November 2023, para. 12.66) and their development would contribute towards meeting the Council's objectively assessed needs. The Council also recognise, specifically in respect of sites WR3s and WR3t, "*the Local Plan is not in a position where it can generally afford to lose existing allocated housing sites*" (LPPU, para 12.66). This emphasises the importance of retaining allocations WR3s and WR3t unfettered, especially given the LPPU's minimum housing requirement has increased since the point at which RBC noted they are not in a position to lose the site (increase from 800 homes per year proposed in the Regulation 18 LPPU November 2023 to 822 dwellings per annum - as per the Inspector's letter of 24th November 2025).

1.22 Predicating the site allocation(s) on them not being designated as LWS is therefore inconsistent with the principle outlined by NPPF (December 2023) para. 11b or the context within which the LPPU is being progressed.

1.23 The potential designation of the sites' as LWS's would not provide a justified reason to completely remove the site allocation(s) for residential development, which would make a valuable contribution to meeting RBC's objectively assessed needs.

The impact of LWS on residential development potential

1.24 TPLC recognise the importance of avoiding significant harm on biodiversity. There is no indication the emerging residential proposals would cause such harm (and no greater prospect of this than the historic allocation of the sites' covering a wider site area). As set out below, provisions exist within the NPPF and LPPU to safeguard against proposals that do not protect, and wherever possible, enhance features of biodiversity interest.

1.25 The proposed approach of policies WR3s and WR3t to predicate the entirety of both site allocations on neither respectively being identified as an LWS imposes an entirely unnecessary constraint on the delivery of much needed housing sites and fails to recognise that parts of the sites are likely to have differing ecological characteristics.

1.26 NPPF (December 2023) para. 185 notes that *"To protect and enhance biodiversity and geodiversity, plans should:*

a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation..."

1.27 LWS's represent *"locally designated sites of importance for biodiversity"* and therefore NPPF (December 2023) para. 185 requires plans to *"identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks"*. The need to map and safeguard components of LWS's highlights that LWS may comprise areas of varying ecological value.

1.28 The approach of the NPPF (December 2023) outlined above clearly highlights that a LWS designation should not represent a complete embargo on development of the entirety of the site(s), as the wording of both Policies WR3s and WR3t currently proposes.

1.29 In this instance, both sites' do have varying characteristics. It is notable that site ref. WR3s includes land that is expected to meet the definition of Previously Developed Land (PDL)/ Brownfield Land⁴ where the NPPF states planning policies should *"give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs"*⁵.

⁴ WR3s hosts buildings and hardstanding

⁵ TPLC note the provisions of NPPF footnote 49. They do not provide a reason for the LPPU to avoid *"accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land"*. This is because allocations WR3s and WR3t are not

- 1.30 There is no information in the LPPU or its evidence base about the specific extent of land under consideration as a LWS for either site allocation WR3s or WR3t, including whether this would cover all or parts of the sites'. Effectively removing the entirety of both site allocations for residential development (as policy WR3s and WR3t proposes) on the basis that they could, in the future, be designated as LWS's wholly or in part, speculates that all parts of the site allocation(s) have the same ecological value. This is inconsistent with the approach advised by NPPF para 185 and would neglect the planning policy support for redevelopment of PDL and indeed housing (including family housing) in this location.
- 1.31 If the potential for future identification as an LWS alone, is sufficient justification to remove a residential site allocation(s) entirely, our clients have not identified any assessment which has been undertaken of other residential site allocations in the LPPU that could, in the future, be subject to LWS designation. This undermines any contention that the policy approach to sites WR3s and WR3t can be considered justified.
- 1.32 In addition to their being no justification for predicating the site allocation on non designation as a LWS, there is also no need for such a caveat given other policy provisions. TPLC have previously highlighted that paragraph 186 of the NPPF (December 2023) sets out relevant provisions for considering avoidance, mitigation and compensation for significant harm⁶ to biodiversity.
- 1.33 Additionally, LPPU19 Policy EN12 contains provisions that would enable permission to be withheld for proposals that would negatively affect components of the Green Network, including LWSs. Therefore should parts, or potentially all of site WR3s or WR3t be designated as a LWS in the future, the LPPU contains clear policy provisions allowing sufficient assessment of the impacts of development on ecology which may potentially constrain but not prevent residential development.
- 1.34 On this basis, it is unnecessary and unjustified to fetter allocations of Policy WR3s and WR3t through the proposed wording 'subject to the site not being identified as a Local Wildlife Site'.

Insertion of wording “*Retain and avoid detrimental impacts on important areas of biodiversity*” into draft allocations WR3s and WR3t

- 1.35 The LPPU proposals maps does not clearly indicate any area of site WR3s or WR3t would be an 'Area of identified biodiversity interest'. The inclusion of the above policy wording does not provide sufficient flexibility for impacts of residential development to be managed and mitigated in accordance with the approach outlined by NPPF para 186.
- 1.36 It is evident from NPPF (December 2023) para. 186(a) that when determining planning applications that would have significant harm to biodiversity (which our client does not accept would be the case in relation to the site), local planning authorities should consider avoidance, mitigation of, and compensation for ecological impacts.

strategic policies, are not considered to conflict with the NPPF given the approach of NPPF para 11(b), and it is expected proposals would be brought forward that avoid harm

⁶ TPLC do not consider the proposals would in any event, cause 'significant harm'.

- 1.37 The current wording of Policy WR3s and WR3t does not reflect this approach, setting a much higher, and potentially prohibitive stance to the delivery of development at the site.
- 1.38 As drafted, the policies seek to retain and avoid any “*detrimental impacts on important areas of biodiversity*”, without qualifying any limits to the ‘important areas’, where retention and avoidance will be sought. As drafted, the policy could be interpreted to seek complete retention of any area considered important for biodiversity, regardless of its degree of importance.
- 1.39 Imposing this blanket approach fails to recognise that no part either site is currently identified as an ‘Area of identified biodiversity interest’, nor any potential difference in the degree of the sites’ ecological importance (noting site WR3s comprises land in existing use and expected to meet the definition of Previously Developed Land). The policy should be amended to:
- 1 Clarify any specific areas of biodiversity importance where retention and avoidance is sought, reflecting the reality that not all areas of importance for biodiversity will have equal importance, as the NPPF (December 2023) recognises.
 - 2 Not simply seek the retention of areas of biodiversity importance, and complete avoidance of detrimental impacts - explicit reference should be made to the important role that mitigation will play in avoiding and minimising detrimental impacts, as required by NPPF para 180(d) and 186.

Summary

- 1.40 The continued allocation of sites WR3s and WR3t for residential development, which was found sound through the RBLP 2019 process, is justified. The wording of these draft policies however, which could prejudice development of the sites is not justified.
- 1.41 This would undermine the LPPU19’s ability to meet its aims “*to continue to address the housing crisis and to reflect national policy*” (para. 4.4.4). This is also inconsistent with the NPPF (December 2023) requirement to “*meet as much of an area’s identified housing need as possible*” (para. 60) and to ensure that “*a sufficient number and range of homes can be provided to meet the needs of present and future generations*” (para. 11b). The proposed strategy relating to our client’s site is not justified or effective - which are tests of Soundness.
- 1.42 The LPPU’s proposed approach to predicate site allocation(s) WR3s and WR3t on none of the allocated sites being identified as part of a LWS, and the failure to introduce flexibility to the policy text of WR3s and WR3t to allow for the implementation of mitigation measures is not effective or justified, and is inconsistent with NPPF (December 2023) para. 11b, 123, 185 and 186.
- 1.43 LPPU policies WR3s and WR3t should be amended to remove the unnecessary and unjustified caveat on non-identification as LWSs, and accommodate wording reflecting the NPPF’s approach to mitigation.