Emma Gee
Acting Executive Director of Economic Growth and Neighbourhood Services

Civic Offices, Bridge Street,
Reading, RG1 2LU
0118 937 3787

Our Ref:
Your Ref:

Direct: ☎ 0118 9373337
e-mail: Mark.Worringham@reading.gov.uk

31st March 2026

Ms Joanna Gilbert, Planning Inspector
Via Programme Officer

Your contact is: Mark Worringham, Planning Section

Dear Ms Gilbert

Re. Land at Kentwood Hill and Armour Hill

I write with regard to the Post-Stage 2 Hearings Letter of 18 March 2026, specifically in relation to your requests in paragraphs 16 and 17 regarding allocations WR3s (Land at Kentwood Hill) and WR3t (Land at Armour Hill).

As you are aware, on 20th February, the decision was made by Thames Valley Environmental Records Centre to identify an area of land at Kentwood Hill and Armour Hill as a Local Wildlife Site (LWS). Below is a map showing the newly designated area and the allocated sites as in the Pre-Submission Local Plan Partial Update (LP003b on the examination list), with the LWS in green and the allocation boundaries in blue.

We have also added a number of documents to the examination list as requested:

- EX104 Land at Kentwood and Armour Hills Full Survey Report
- EX105 Land at Kentwood and Armour Hills Site Selection Report to the Council
- EX106 Land at Kentwood and Armour Hills Letter to Landowner

We are also waiting for a Summary of TVERC panel discussion to be provided, which will be EX107 and we will send to you when we have it.

You asked for our views on the effect we consider the designation should have on the two site allocations in respect of soundness. We remain of the view, as expressed in relevant hearing statements and at the hearings themselves, that the sites should now be removed as allocations. The reasoning for this is set out in paragraph 10.40.12 of the Council's Hearing Statement on Matter 10 (EX053), which states:

> *"The Local Plan policy position is quite clear on this, both in existing and proposed amended policy EN12, that the green network, including LWSs, should be maintained, protected, consolidated, extended and enhanced. Development would not be permitted for development that negatively affects these sites. The LPPU does not include any other development proposals that would result in the loss of a LWS, and doing so would be inconsistent with the Council's policy position."*

We would also add that this approach would be consistent with the National Planning Policy Framework, which states in paragraph 180 that

> *"Planning policies and decisions should contribute to and enhance the natural and local environment by:*
> *a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);"*

It also states 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; …"*

The identification of land as a Local Wildlife Site, in addition to the removal of the allocations and consequential changes to the housing trajectory, would need to be shown as part of the 'Area of identified biodiversity interest' on the Proposals Map.

Finally, you asked for the Council to confirm its stance on whether the sites should be identified as Local Green Space under policy EN7. Whilst the designation of the land as LWS does clearly lend some weight to the argument that the land meets paragraph 106 b) of the NPPF in terms of its wildlife value, the Council is still of the view as expressed in the hearings that the land (other than the land which is already proposed to be added to the LGS designation in LP003b) falls short of these criteria because the areas of greatest value to wildlife and which have contributed most to the LWS designation are already proposed to be covered by LGS. In addition, the Council does not feel it is necessary to layer protections on top of one another.

Please feel free to contact me if there are any queries.

Yours sincerely

Mark Worringham
Planning Policy Manager