

Examination of the Reading Borough Local Plan Partial Update

Reading Borough Council Hearing Statement for Matter 5: Built and Natural Environment

January 2026

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Note: In all Council Hearing Statements, references to the Local Plan Partial Update (LPPU) are to the Pre-Submission Draft Local Plan Partial Update showing tracked changes [LP003b] unless otherwise specified.

Issue 1: Are the policies for the built and natural environment justified, effective and consistent with national policy?

5.1 Are Policies EN1 - EN6 consistent with national policy and do they set out a positive strategy for the conservation and enjoyment of the historic environment?

5.1.1 Policies EN1, EN2, EN3, EN5 and EN6 are not within the scope of the Partial Update as confirmed in table A1.1 of the Council's response to initial questions part 1 [EX002]. Policy EN4 is within scope.

5.1.2 These policies have previously been examined, and paragraph 46 of the Inspector's report for the now-adopted Local Plan stated that, subject to identified main modifications, *"the policies for the Built Environment in the LP are justified, effective and consistent with national policy"*. The Local Plan Review 2023 [LP011] did not identify any changes to national policy, or any other changes in circumstances, that would affect this conclusion and no further changes in circumstances since 2023 are known.

5.1.3 In terms of policy EN4, this policy was identified within paragraphs 3.122 – 3.133 of the Local Plan Review 2023 [LP011] for updating. It identifies that the following updates are required:

- The need to address issues raised in appeal decisions as follows:
 - Lack of clarification as to whether or not the policy applies to buildings of townscape merit; and
 - Whether the policy's requirement for the significance of the building in the event of loss or harm to be significantly outweighed by benefits is consistent with the approach within the NPPF.
- The need to clarify that the policy is relevant to all decision makers, not solely the Local Planning Authority.

5.1.4 The updated policy addresses these in the following manner:

- In the second paragraph of the policy, the wording is changed to align with paragraph 207 of the NPPF to state *"that substantial harm or total loss is necessary to achieve substantial public benefits that outweigh harm or loss"* rather than *"that the benefits of the development significantly outweigh the asset's significance."*
- *"the Council"* is replaced by *"the decision-maker"* to account for instances where, for instance, a planning inspector may be the decision-maker; and
- Changes to the supporting text to clarify that the policy is not intended to be applied to heritage assets with a national designation (such as listed buildings) or buildings of townscape merit within a conservation area which are covered elsewhere.

5.1.5 The only option assessed was to not update the policy given the existing policy is already in place. This was rejected due to the issues identified within paragraph 5.1.3 above which would lead to continued uncertainty about how to apply the policy and cause further issues at appeal.

5.1.6 In terms of being compliant with national policy, this is dealt with in the first bullet point of paragraph 5.1.4 above.

5.1.7 The following representations were received on this policy at Regulation 19 stage:

- The Berkshire Gardens Trust stated that EN4 is biased towards the built environment and does not sufficiently cover non-designated parks and gardens. They also stated that there is a lack of evidence regarding the historic significance of open spaces within the Borough, such as St Mary's and St Laurence's churchyard. The Council does not agree. The language within EN4 is broad enough to sufficiently cover all assets, not simply buildings. For example, Kings Road Garden is currently on the Local List. With regard to assessing the historic significance of open spaces within the Borough, this is not relevant or proportional to the Partial Update, and St Mary's is in any case in a conservation area which has a related appraisal. Locally significant spaces are afforded protection under EN4 or, where so designated, EN7 whether or not they are locally listed.
- The University of Reading stated that there is an inconsistency with paragraph 209 of the NPPF as the proposed policy wording refers to "substantial harm" and "substantial public benefits," elevating the test for non-designated heritage assets. The Council does not agree that the approach conflicts with the NPPF as paragraph 209 outlines the need for a balanced judgement. It is considered that requiring substantial public benefits that outweigh the harm or loss provides this balance.
- Historic England stated that the paragraph 4.2.21 limits the scope of the policy and requests that a change be made to the supporting text within the paragraph to omit "other types of non-designated heritage assets." This change has been agreed within the SOCG with Historic England [EX014] following submission and is included within Appendix 1.

5.2 Is Policy EN7 justified and effective, having regard to national policy?

5.2.1 Policy EN7 is justified in that it is an appropriate strategy, taking into account the reasonable alternatives, and based on robust and proportionate evidence. It is effective in that it is deliverable over the plan period. It also complies with national policy.

5.2.2 The policy is mostly unchanged from the existing adopted Local Plan, where it was examined and found to be consistent with national policy, subject to a main modification which was incorporated into the adopted version. The Local Plan Review 2023 [LP011] at paragraphs 3.150-3.161 (pp 30-32) assesses the need for update in the context of changes since adoption, and identifies the need for updates solely in relation to:

- The need to consider additions to take account of the Playing Pitches Strategy; and
 - Changes to boundaries of existing spaces due to development.
- 5.2.3 Justification of the specific changes made is set out in answer to questions 5.4 and 5.5 below. The evidence base for the original policy is dealt with in answer to question 5.3.
- 5.2.4 The following options were considered:
- EN7(i) Alteration of boundaries for previously designated Local Green Spaces following changes on the ground, and inclusion of EN7Ww (Ibis Club and Scours Lane) (proposed option).
 - EN7(ii) Retain existing Local Green Space Boundaries
 - EN7(iii) Identify two allocated sites (WR3s and WR3t) as Local Green Space
- 5.2.5 In terms of being effective, the protection of these spaces is deliverable over the plan period. There are clearly developments that have occurred since the plan was adopted on protected land, but these have only been for developments that have brought significant public benefits (leisure centres and schools) and the protection of the land has been an important part of the weighting of material considerations in those cases.
- 5.2.6 Protection of important areas of open space is fully in line with the NPPF [OP001], where the importance of access to a network of high quality open spaces and opportunities for sport and physical activity is identified at paragraph 102. Paragraph 103 is clear that existing open space should not be built on other than in defined circumstances.
- 5.2.7 Those areas that are identified as Local Green Space have been selected based on the criteria set out in paragraph 106 of the NPPF. They were all identified when the plan was initially prepared or as part of this update, and are all considered capable of enduring beyond the end of the plan period as required by paragraph 105.
- 5.2.8 Representations at Regulation 19 stage have mainly focused on sites that have been excluded from the policy. In this case, the Council has sought to avoid layering protections over one another wherever possible. In the case of Fobney Marsh/Kennet Meadows, the area is an extensive tract of land and is also almost entirely located in the functional floodplain, as well as being a Biodiversity Opportunity Area and a Major Landscape Feature, so there is very little prospect of development. In the case of Reading Old Cemetery the site is a registered park.
- 5.3 How robust and up-to-date is the evidence base for Policy EN7 on both Local Green Space and Public Open Space?*
- 5.3.1 At Local Plan stage a Local Green Space and Public Open Space Background Paper (2018) was prepared that assessed each potential site in turn, including against all of the NPPF paragraph 106 criteria (which are unchanged since that point) and came to a recommendation on whether the site should be protected as Local Green Space, Public Open Space or not specifically protected. The Inspector's Report for the Local Plan states at paragraph 39 that:

“The assessment of sites for Local Green Space and Public Open Space in Policy EN7 (Local Green Space and Public Open Space) is up to date, and the methodology used to assess sites is robust.”

5.3.2 The evidence has not been re-run at this LPPU stage because the focus has been on providing a proportionate evidence base for the updates that are required rather than reassessing all existing sites. Other than those sites where updates are proposed, there have been no changes in circumstances identified that would alter the conclusions of the 2018 Background Paper. That Background Paper can be added to the examination library if required.

5.4 Are the changes to sites EN7Ed, EN7Nn, EN7Wp and EN7Wu in the list of sites in Policy EN7 justified?

5.4.1 The changes to these sites are justified. The justification for changes to sites EN7Ed, EN7Nn and EN7Wp is set out in full in paragraph 6.7 (p27) of the Local Plan Partial Update Consultation on Scope and Content [LP008], and the boundary changes are shown in Appendix 1 (pp109-110) of that document.

5.4.2 The changes to these sites are simply to reflect development that has now taken place, as follows:

- EN7Ed: Palmer Park – A new leisure centre has been constructed as an extension to Palmer Park Stadium and is now open. Although the building itself does not sit on the LGS, some of the car parking provision does, and this would require removal from the designation. However the development provides a more formal public space on former car parking in front of the building which forms part of the park and should be added to the LGS.
- EN7Nn: Mapledurham Playing Fields – A new primary school has been constructed and is operating on the part of the site to be removed from the LGS designation.
- EN7Wp: Rivermead and Thameside Promenade – A new leisure centre has been constructed and is open on land identified as LGS and the adjoining existing leisure centre has been demolished. This requires removal of the land occupied by the new centre from the designation, and inclusion of the land where the old centre was demolished in the designation as the planning permission (20/1734) makes clear that this is to be open space provision. In addition a new secondary school has been constructed on a former golf driving range on another part of the site that was completed in 2024-25 and is now open.

5.4.3 For these sites therefore the amendments to the LGS boundaries and associated extents are a straightforward reflection of what has occurred on the ground and are therefore justified.

5.4.4 The only representation on the above changes is from the Warren and District Residents' Association challenging the measurements for EN7Nn, but no alternative measurement is provided and the Council is confident that this is correct.

5.4.5 The situation is more complex regarding site EN7Wu as this site is part of the wider considerations around allocation WR3s (Land at Kentwood Hill). It is proposed to be

removed from the allocation and added to the wider LGS designation that already exists on surrounding land due to important new information that has come to light regarding presence of a protected species, highlighted by the prospective developers' ecological consultants.

- 5.4.6 The criteria in the NPPF [OP001] for inclusion as a Local Wildlife Site are as follows (paragraph 106):

“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 (including as a playing field), tranquillity or richness of its wildlife; and

c) local in character and is not an extensive tract of land.”

- 5.4.7 In terms of criterion a), the extended part of EN7Wu is close to the centre of Tilehurst, a historic village in its own right that has been amalgamated into Reading, and is less than 300m from the Tilehurst Triangle district centre boundary.
- 5.4.8 Regarding point b), whilst the extent of representations on site WR3s make clear the importance of this site to the local community, the main consideration is that the ecological value of the extended part of the LGS is so significant that it clearly meets the test regarding the richness of its wildlife, and, without a decision yet on Local Wildlife Status and without the area having been identified as priority habitat, a LGS designation is the only way to reflect the need for its protection in policy.
- 5.4.9 In terms of c) the extended area is 0.56 ha, which is a small area that is local in character and not an extensive tract of land.
- 5.4.10 Representations on this matter are generally made under policy WR3s and include calls for the whole of sites WR3s and WR3t to be identified as Local Green Space. These are dealt with in the relevant answer in the Hearing Statement on Matter 10.

5.5 *Is the addition of site EN7Ww in the list of sites justified?*

- 5.5.1 The addition of site EN7Ww (Ibis Club and Scours Lane) is justified. The justification for this is set out in full in paragraph 6.13-6.15 (p29) of the Local Plan Partial Update Consultation on Scope and Content [LP008], and the boundary change is shown in Appendix 1 (p110) of that document.
- 5.5.2 Regarding NPPF criterion a) (see paragraph 5.4.6 above), the site is in reasonably close proximity to the location it serves as it is located less than 250m from the large residential community of West Reading/Tilehurst.
- 5.5.3 In terms of criterion b), the site is considered to meet the test of being demonstrably special to a local community through its recreational value. This is evidenced through the Playing Pitches Strategy [OP007], which states it was adopted in November 2021. The Strategy in Appendix 1 highlights the use of the Ibis Club pitches for football (mini, junior, youth and adult) and cricket (turf and non-turf) and the Scours Lane pitch for adult football. The area contains the Rivermoor Stadium which is the home of Reading City FC as well as hosting Tilehurst Panthers FC and Woodley

United FC. Among the Strategy's recommendations in Appendix 2 is the following for both of the adjoining Scours Lane and Ibis Club pitches:

"This site should be protected as a playing field site in the Local Plan unless better or equivalent facilities are provided."

5.5.4 In relation to criterion c) the area to be protected is 8.26 ha. In the context of the value of the land for recreation, this is considered to be local in character and not a significant tract of land.

5.5.5 At Regulation 18 stage when this was subject to specific consultation, alongside the main proposed option of alteration of boundaries for previously designated Local Green Spaces following changes on the ground, and inclusion of additional sites, alternative options for this matter were considered and subject to sustainability appraisal as follows:

- Do not update the policy to add the Ibis Club and Scours Lane site
- Identify all additional sports pitches within the Playing Pitches Strategy as Local Green Space

5.5.6 At Regulation 19 stage there were no specific representations on this site.

5.6 With regard to the table under the supporting text to Policy EN9 at paragraph 4.2.44, is it necessary to cross-refer to other policies in the LPPU?

5.6.1 Policy EN9 is not within the scope of the Partial Update as confirmed in table A1.1 of the Council's response to initial questions part 1 [EX002].

5.6.2 The purpose of the table is to avoid confusion arising around the various requirements regarding open space, amenity space, landscaping etc. There is the potential for additional confusion with the addition of the urban greening factor. The table makes clear that there are a number of policies in place that relate to this issue and avoid the impression that complying with policy EN9 avoids the need to address other policy areas broadly related to 'greening'. The table has been in the Local Plan since its 2019 adoption and has caused no issues, and the Council considers that it is still necessary.

5.7 Is the approach to biodiversity, including Biodiversity Net Gain, in Policy EN12 justified and consistent with national policy?

5.7.1 EN12 is justified in that it is an appropriate strategy, taking into account the reasonable alternatives, and based on robust and proportionate evidence. It is also consistent with national policy.

5.7.2 The overall approach to EN12 in both the adopted plan and the LPPU is based around the identification of a Green Network comprising both areas of existing biodiversity value and opportunities for enhancement of biodiversity, linked together by green links which are either already in place or would need to be established. The reason for this is that Reading does contain some important areas for biodiversity, but, as for many urban areas, they are small and fragmented, and do not adequately allow for the movement of wildlife in and out of these areas, which is likely to become more important as climate change impacts are more widely felt. Creation of a network

was therefore considered essential, and this was initially identified mostly by work undertaken by Thames Valley Environmental Records Centre (TVERC) who mapped the areas and links to support the Sites and Detailed Policies Document (adopted 2012). This approach was then reflected in the existing policy EN12, albeit there have been some changes to the areas identified over time.

5.7.3 Policy EN12 was examined as part of the Local Plan, and subject to a slight main modification to bring the wording into line with national policy, which was incorporated into the adopted version and is not proposed to be further amended here, was considered to be justified, effective and consistent with national policy. The Local Plan Review [LP011] in paragraphs 3.196 to 3.214 (pp 35-38) considers whether updates are required on the basis of matters that have changed since the Local Plan was prepared, and comes to the conclusion that updates are necessary for the following reasons:

- The introduction of mandatory Biodiversity Net Gain (BNG) and other aspects of the Environment Act;
- The need to incorporate actions from the Climate Emergency Strategy and Biodiversity Action Plan; and
- To rectify a misunderstanding that has arisen in an appeal decision.

5.7.4 The vast majority of proposed changes to the policy at LPPU stage are to amend the policy to operate alongside the new BNG system or to factor in matters that have arisen in the Biodiversity Action Plan (BAP) adopted in 2021 [OP008].

5.7.5 The policy is lengthy and, with new additions around BNG, it was considered necessary to restructure it to make it more readable and understandable and reduce duplication wherever identified. New point a) is mainly also a restructure rather than a change of policy direction, albeit with the addition of trees, hedges and woodlands, recognising their biodiversity value as set out in the Tree Strategy [OP003] e.g. in paragraphs 3.93-3.98 (p47). The policy also now refers to the Berkshire Local Nature Recovery Strategy (BLNRS), for more information on which please see paragraphs 5.7.16 to 5.7.23

5.7.6 Point b) is where the policy is amended to refer to BNG. Although the 10% BNG requirement is mandatory and does not necessarily require repetition in the plan, there are other authorities that have set alternative, higher requirements and there have also been representations that have sought a higher figure in Reading. In this sense it is considered necessary for effectiveness that the policy clearly state the level that applies. Regarding the level that should apply, the Council does not consider that there is a strong justification for seeking a higher figure. This is a new requirement that Reading is starting to get to grips with and fully understand how it operates, and there is limited experience of the level that is capable of delivery on mainly brownfield sites in a restricted urban area such as Reading. The Council believes that if a higher level is to be sought, it should be after greater experience of applying the requirement as it is that can feed into a more robust justification. We could not confidently state that a 20% requirement, for example, would not detrimentally affect our ability to meet development needs. In addition, any increase in the requirement would also have viability implications, and given that viability

margins are tight, would be likely to restrict our ability to secure affordable housing or other critical infrastructure.

- 5.7.7 Point b) also generally reflects the hierarchy in the BNG requirement, but it is considered worth emphasising the importance of on-site delivery where possible within our local context. This is because there are currently no registered sites that can provide BNG credits within Reading, and the opportunities for such sites to come forward in the future are very limited. The major opportunity is the Kennet Meadows and the Council is investigating the possibility of providing credits on its portion of the land, but this is still some way away. Linking off-site provision to the Local Nature Recovery Strategy is in line with one of the main purposes of progressing such strategies. However, it is considered necessary to propose a main modification to this for effectiveness given that the BLNRS is now published and that the Biodiversity and Natural Environment SPD has not progressed and is now unlikely to given the announcement about a 30th June 2026 deadline for adopting SPDs. The key headlines from what would have been in the SPD are now within the LPPU. This is set out in Appendix 1.
- 5.7.8 We would like to highlight an error in marking the deletions in existing point b of the policy in the tracked changes version of the LPPU [LP003b]. The full text of the adopted policy point b is as follows, and only those shown in blue were marked deleted or retained in the LPPU:

“b) On all sites, development should not result in a net loss of biodiversity and geodiversity, and should provide a net gain for biodiversity wherever possible. Development should:

- Protect and wherever possible enhance features of biodiversity interest on and adjacent to the application site, incorporating and integrating them into development proposals wherever practicable; and***
- Provide new tree planting, wildlife friendly landscaping and ecological enhancements (such as wildlife ponds, bird and bat boxes) wherever practicable.***

In exceptional circumstances where the need for development clearly outweighs the need to protect the value of the site, and it is demonstrated that the impacts cannot be: 1) avoided; 2) mitigated or; 3) compensated for on-site; then new development will provide off-site compensation to ensure that there is “no net loss” of biodiversity. Provision of off-site compensation shall be calculated in accordance with nationally or locally recognised guidance and metrics. It should not replace existing alternative habitats, and should be provided prior to development.”

The remainder was intended to be deleted as it is essentially replaced by BNG but was not shown as such. The Council would appreciate some guidance on how this could be rectified, and whether it would be sufficient to show these as new deletions in a main modifications consultation on which consultation responses are sought.

- 5.7.9 Changes to criterion c) are in part structural to ensure that it reads better, but also incorporates matters identified in the Biodiversity Action Plan [OP008]. In particular,

objective F2 of the BAP (see p35) is *“To reduce light pollution on and adjacent to the rivers, minimising the effects it has on wildlife”*. The section headed ‘Lighting’ on p36 of the BAP emphasises why this is so important for invertebrates in particular. In addition, the Tree Strategy [OP003] also identifies the need to *“Carefully consider species selection, planting predominantly native or wildlife friendly species”* (see paragraph 3.98, p47). Both the Tree Strategy and BAP help to put the overall aims in the Climate Emergency Strategy [OP004] into place, and it is therefore important that where there are matters that are relevant to development, they are appropriately referred to in policy.

- 5.7.10 It is considered necessary to make some amendments in response to a representation by Swifts Local Network: Swifts and Planning Group to ensure that the references are correct and it reads well, which is set out in Appendix 1.
- 5.7.11 Likewise, the new criteria d) and e) are both in response to the BAP. The importance of waterbodies and watercourses are heavily emphasised in the document, and the new points included in criteria d) relate to objectives and actions in that document. The issue with artificial light has already been highlighted. Objective F8 (*“To ensure that new development maximises the opportunities to conserve and enhance the biodiversity of rivers”*) on p35 includes as actions *“To ensure that any new landscaping adjacent to watercourses is predominantly native and wildlife friendly”* and *“To require the re-naturalisation of the river bank when new development is adjacent to it”*. Another action is *“To seek opportunities to de-culvert watercourses”*, and this will also mean ensuring that additional covering of watercourses is not proposed.
- 5.7.12 In terms of criterion e), the protection of Reading’s soils is currently a policy gap. Objective C4 of the BAP is *“To protect Reading’s soils”* and the action is to ensure that planning applications are assessed in terms of their impacts on soils. Further information is included on p32 of the BAP.
- 5.7.13 Changes to the supporting text are to support the changes outlined above and ensure that the text follows better. A main modification is proposed to paragraph 4.2.66 to reflect statutory requirements regarding the BNG metric, for which see Appendix 1.
- 5.7.14 The following alternative options were established and subject to sustainability appraisal:
- 10% Biodiversity Net Gain (BNG) requirement with off-site compensation mechanism. Specific consideration for important soils, light spillage, native planting, and wildlife friendly design.
 - Do not update the policy to include the above.
 - Increase the on-site BNG requirements to 20%
 - Do not include any spatial requirements for off-site BNG

The reasons for the approach selected have already been set out above.

5.7.15 In terms of compliance with national policy, the main requirements are in paragraph 185 of the NPPF [OP001]. This 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; and

b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.

Policy EN12 is considered to be wholly in compliance with these statements, as it maps habitats – only habitats of local importance are present in Reading, and these have been defined with local partners – and seeks both their conservation and enhancement, as well as promoting a network of connected habitats, as well as securing an appropriate level of biodiversity net gain.

Berkshire Local Nature Recovery Strategy

5.7.16 Under Section 102 of the Environment Act 2021, which amends Section 40 of the Natural Environment and Rural Communities Act 2006, a public authority in discharging its general biodiversity duty must have regard to any relevant local nature recovery strategy. Current Planning Practice Guidance states that:

“Local planning authorities should consider the priorities set out in the relevant Local Nature Recovery Strategy when determining how their local plan should contribute to and enhance the local and natural environment.” (Paragraph: 046 Reference ID: 8-046-20250219)

Under paragraph 185a of the 2023 NPPF [OP001], plans should identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks including areas identified by national and local partnerships for habitat management, enhancement, restoration or creation. This would include areas identified in a relevant Local Nature Recovery Strategy.

5.7.17 A Berkshire Local Nature Recovery Strategy (BLNRS) has now been prepared. The Royal Borough of Windsor and Maidenhead was the Responsible Authority, with the other five Berkshire unitary authorities including Reading plus Natural England as the Supporting Authorities. The BLNRS was published on 7th October 2025, following consultation on a draft in February 2025. For clarity, although the Council has been involved in its development, there was no BLNRS draft available at the time of the Pre-Submission LPPU (Regulation 19) that could have informed the drafting of the LPPU, and therefore neither the published nor draft versions have been taken into account. However, the amendments to policy EN12 have been drafted to refer to this emerging document wherever possible.

5.7.18 The Council will take Inspector's advice on whether the BLNRS should be added to the examination library and the degree to which changes may be needed to the LPPU. The document is available to view as follows:

1. [The Local Habitat Map link](#)
2. [The Description of Berkshire](#)
3. [The List of Priorities and Measures](#)
4. [The Species Priorities List](#)

5.7.19 In terms of the list of priorities and measures, those identified are considered to be broadly consistent with the LPPU. Table 1 lists the priorities and some initial high-level comments on how they relate to the LPPU. Ultimately, a revision of the Biodiversity Action Plan will need to be undertaken to consider how Reading can best meet these priorities across all of its service areas in detail, and the contents of a revised BAP would need to be further considered in a future update of the Local Plan.

Table 1: Initial comments on implications of BLNRS priorities for the LPPU

Priority from BLNRS	Comment
PRIORITY 1: Improve the quality of habitats in agricultural land and the wider countryside	Of limited relevance to Reading.
PRIORITY 2: Improve the quality of woodland	This priority is largely around management which is not a matter for the LPPU, but protection of existing woodlands is covered by EN14 which also expects planting to align with priorities in the BLNRS.
PRIORITY 3: Improve the quality and connectivity of wood pasture and parkland	The measures under this priority are around management and would not be relevant to the LPPU.
PRIORITY 4: Restore, buffer and connect ancient woodland in Berkshire to protect from external pressures and fragmentation	Policy EN14 deals with protection and securing the future of ancient woodland. There are two small areas of ancient woodland in Reading, shown on the Proposals Map. Buffering and connecting these will be difficult to achieve in an existing urban environment particularly since they are distant from one another, but wider connectivity is achieved through the Green Network in EN12.
PRIORITY 5: Increase the extent and connectivity of wet woodland to increase patch size and connectivity	Tree planting generally is promoted through EN12 and EN14 particularly in waterside environments, but there are not specific references to wet woodland. Policy EN14 5 a) refers to planting aligning with priorities in the LNRS.
PRIORITY 6: Improve the quality of chalk habitats	Of limited relevance to Reading.
PRIORITY 7: Improve the quality of urban habitats	Improving urban habitats wherever possible is dealt with in EN12 insofar as it applies to

Priority from BLNRS	Comment
	Planning. Much of this will need to be through management which will relate to other functions of the Council.
PRIORITY 8: Increase canopy cover and habitat connectivity in urban areas	Habitat connectivity in urban areas is central to the approach of EN12. Increasing canopy cover was a key aim of the Tree Strategy and is covered by updates to EN14.
PRIORITY 9: Increase the extent and improve the quality of wetlands and floodplain	This is very difficult to achieve in an existing urban area with geographically small development sites. Relevant allocations seek to keep areas in Flood Zone 3 free from development but ultimately meeting housing and other development needs, as well as the presence of existing urban development, restricts our ability to extend floodplain and wetlands. However an opportunity has been identified in the Kennet Meadows, and this forms part of the update to policy SR5.
PRIORITY 10: Improve ecological quality of rivers to support biodiversity	The main way in which this is relevant to the LPPU is through conserving and restoring river banks and renaturalising the watercourses, which in the case of Reading would mainly be through deculverting. The LPPU in policy EN11 already seeks an ecological buffer to watercourses appropriate to an urban environment of 10m. A larger buffer is difficult to achieve in Reading in most cases due to there already being existing rights of way and public realm in those locations as well as existing development, and would have a detrimental impact on meeting development needs. Opportunities for deculverting are identified in relevant allocations where they exist. The Water Quality Assessment [EV025] assesses the implications of the LPPU for water quality.
PRIORITY 11: Obtain good chalk stream management	Of limited relevance to Reading.
PRIORITY 12: Improve the quality of heathland habitats	Of limited relevance to Reading.
PRIORITY 13: Increase the overall land areas dedicated to nature and wildlife	This is sought in general terms through EN12, but it must always be balanced against other demands on scarce land including both for development and for leisure and recreation.
PRIORITY 14: Improve general biodiversity across Berkshire	This is to be achieved through the Biodiversity Action Plan, which in turn has led to some amendments to the LPPU. A new BAP will be necessary in the future to address the content

Priority from BLNRS	Comment
	of the BLNRS and this will inform future reviews of the Local Plan.

5.7.20 The Species Priority List is too specific to have any identified implications for the LPPU at this stage. It would need to be considered in more detail though a revision of the BAP.

5.7.21 The impacts of the baseline biodiversity and opportunities identified on the Local Habitat Map on proposed allocations are minimal, and are restricted to the following:

- CR14n: Reading Central Library, Abbey Square – falls within an opportunity area for the creation of ponds along the Holy Brook, but given the small size of the site and its almost complete coverage by existing development, this is considered highly unlikely to be achievable.
- SR1a: Former Landfill Island Road – some small areas along the eastern fringe of the site adjoining the brook are identified for opportunities to buffer watercourses and create ponds. These areas are very small and would have no impact on the wider capacity of the site, and would be covered by criterion v of policy SR1 which talks about protection and enhancement of biodiversity particularly in close proximity to watercourses, as well as the general application of EN11 which applies a 10m buffer to the top of the bank of such a watercourse.
- SR1c: Island Road A33 Frontage – areas in the middle of the site are identified for restoration of grassland and creation of ponds, and along the southern and eastern boundary opportunities are identified for creation of ponds and wet woodland. This does not take into account the existing permission on the site or the existing allocation. The opportunities for habitat creation in the middle of the site are unlikely to be capable of being fulfilled, but there may be opportunities to provide grassland and ponds within the site in an alternative location as part of any development. Creation of wet woodland may be achievable along the eastern boundary and policy SR1c already refers to tree planting in this location.
- WR2: Downing Road Playing Field – part of the site is identified for the creation of wildflower grassland and part for veteranizing trees, with the remainder not covered by any opportunities. This policy is not part of the scope of the LPPU. Creation of grassland in its current state as a playing field which covers the vast majority of the site would be limited to the edges of the pitches.
- CA1a: Reading University Boat Club, Thames Promenade – various opportunities for enhancement are identified at the southern end of the site, specifically creation of wildflower grassland, restoration of grassland and creation of wet woodland, as well as a baseline biodiversity feature in the form of a tree. All of these are within the area that falls within Flood Zone 3 and which the policy would keep free from development, so these opportunities should not be affected.
- ER1c: Land rear of 8-26 Redlands Road – two existing trees are identified as baseline biodiversity features. The policy already requires the retention of mature trees on site, and this is taken into account in the site capacity, so this is not considered to have any impact on the allocation.

- Various sites adjoining watercourses particularly in the town centre – a strip along existing watercourses is shown as an opportunity to buffer watercourses. Policy EN11 already requires a 10m buffer, and this is generally also referred to in the relevant allocation policies. This is considered appropriate on already developed land particularly in the town centre. The BLNRS refers to 25m, but this will be unlikely to be achievable on the allocations identified in the LPPU, and the Council does not consider that it would be appropriate,

5.7.22 The areas identified as both baseline biodiversity and opportunities for enhancement on the Local Habitat Map generally map very faithfully to the areas identified as part of the green network on the Proposals Map, unsurprisingly given that they often come from the same sources. However, there are some limited areas shown on the Local Habitat Map that do fall outside the mapped extent of the green network. The Council has not had sufficient time to overlay mapping extents and identify every area where this is the case, and if it was considered necessary to update the Proposals Map to show these locations we would need additional time to undertake this exercise.

5.7.23 In summary therefore, the BLNRS as now published would have only marginal implications for the LPPU, but if it were considered necessary that it be fully reflected in any main modifications we would need an additional opportunity to fully lay out what those modifications should be, particularly regarding changes to the Proposals Map.

5.8 Regarding LPPU paragraph 4.2.75, have there been any updates on changes to the boundary of the Chilterns National Landscape since drafting the LPPU?

5.8.1 Yes. The proposal for extension of the Chilterns National Landscape boundary was cancelled by Natural England on 9th May 2025, following a cut in DEFRA funding for the programme. As this was also the submission date for the LPPU, this meant that this information was not able to be captured in the plan. The Chilterns National Landscape boundary will therefore remain as it is for the foreseeable future. A main modification to paragraph 4.2.76 is proposed to reflect this. No changes to the policy itself are necessary.

5.9 Are the requirements of Policy EN14 justified? Will Policy EN14 be effective and consistent with national policy?

5.9.1 EN14 is justified in that it is an appropriate strategy, taking into account the reasonable alternatives, and based on robust and proportionate evidence. It is effective in that it is deliverable over the plan period and is consistent with national policy.

5.9.2 Much of policy EN14 continues from the existing Local Plan, which was examined and found to be sufficiently flexible, consistent with national policy and, subject to a main modification which was incorporated into the adopted version, effective. The Local Plan Review 2023 [LP011] at paragraphs 3.224-3.238 (pp 40-42) assesses the need for update in the context of changes since adoption, and identifies the need for updates solely in relation to:

- The need to incorporate some of the provisions of the Tree Strategy into the policy; and
 - The need to address the issue of large canopy trees that has arisen in an appeal decision.
- 5.9.3 Therefore, the main justification for the policy stems from the Tree Strategy 2021 [OP003], which includes consideration of large canopy trees. This contains ambitious aspirations for tree planting and canopy cover over a 10-year period, but it also includes a number of areas of detail that are of relevance to the policy update. The specific references in the Tree Strategy that have informed the update are set out below:
- References to ancient woodland and veteran trees – paragraph 3.99-3.105 (pp 48-49)
 - Quality of waterside vegetation – paragraph 3.25 (p33)
 - Canopy cover aspirations – objective 4 (p27), paragraph 1.66 (p25), paragraphs 3.64-3.74 (pp 41-44) and Appendix 2 (p61)
 - Focus areas for tree planting including treed corridors, low canopy cover wards, Air Quality Management Areas, areas of high treescape value – objective 4 (p27) and Appendix 3 (p62)
 - Impact on the historic environment – paragraph 3.38 (p35)
 - Diversity of tree stock – objective 2 (p27) and paragraphs 3.37-3.41 (pp35-36)
 - Prioritising large canopy species – objective 2 (p27) and paragraph 3.62 (p41).
- 5.9.4 Other elements such as ensuring sufficient soil volume simply reflect good practice in tree planting.
- 5.9.5 It should also be noted that the Tree Strategy is a document that is identified as being part of the response to the Climate Emergency, and this is reflected in the Climate Emergency Strategy [OP004].
- 5.9.6 The options considered for this policy to ensure it is justified were as follows:
- EN14(i) Update the policy to refer to Tree Strategy, changes to NPPF, BNG and consideration of impacts on the historic environment (proposed option)
 - EN14(ii) Do not update the policy
 - EN14(iii) Require a minimum canopy level.
- 5.9.7 In terms of being effective, the policy is capable of being delivered across the plan period. In this context it should be noted that monitoring has shown that tree planting has significantly increased on the Council's own land since the Tree Strategy was adopted, and now regularly exceeds a net gain of 300 trees on Council land per year. The canopy cover targets are very stretching, and tree planting now is unlikely to significantly contribute to increased canopy cover by 2030, but this is a target that the Council has already committed to.
- 5.9.8 Given the importance of the targets within the policy, it is suggested that a main modification to ensure effectiveness would be to monitor tree planting on Council

land and on development sites. This is something the Council already monitors and reports in the Annual Monitoring Report anyway. In addition, a canopy cover assessment in 2030 will be required to assess the effects of the Tree Strategy. This proposed main modification is set out in the Hearing Statement on Matter 12.

5.9.9 The proposals are entirely in accordance with the NPPF [OP001] which has been significantly strengthened in relation to tree planting since the Local Plan was adopted. Paragraph 136 recognises the importance of trees, seeks to ensure that new streets are tree-lined, that tree planting is incorporated into development and that there are long-term maintenance solutions. It is also required that the right trees are planted in the right place and that they do not conflict with highways standards and users. Policy EN14 complies with, and helps to achieve, all of this.

5.9.10 A Statement of Common Ground with Historic England was agreed in September 2025 [EX014] which identified a proposed main modification regarding point 5 criterion b relating to impact on the historic environment. This is set out in Appendix 1.

5.9.11 Representations at Regulation 19 stage on this policy were largely supportive.

5.10 Would the increased dwelling capacities of site allocations give rise to any need to alter the content of Policy EN17 for soundness?

5.10.1 No. Constraints imposed by existing policies such as EN17 were taken into account in the HELAA process as part of the suitability analysis which looked at noise and disturbance, and in some cases where there were considered likely to be noise effects areas of the site were excluded where there was not confidence that development on that part of the site would be able to be justified.

5.11 Is Policy EN18 justified and effective, having regard to national policy?

5.11.1 Policy EN18 is justified in that it is an appropriate strategy, taking into account reasonable alternatives, and based on robust and proportionate evidence. It is consistent with national policy.

5.11.2 The policy is based on the adopted policy which was examined and found to be justified, effective and consistent with national policy in 2019, subject to a main modification in the supporting text that was incorporated in the adopted version.

5.11.3 The Local Plan Review 2023 [LP011] did not identify any need for an update to this policy. However, following comments received from the Environment Agency at Regulation 18 stage, a decision was taken to include EN18 within the scope of the Partial Update.

5.11.4 Following comments from the Environment Agency at Regulation 18 stage, the following changes were made to Policy EN18 before Regulation 19 stage:

- A paragraph added to the beginning of the policy to clarify that proposals will only be granted where the effects of flooding from all sources (fluvial, surface water, reservoir, groundwater and sewer) have been considered over the lifetime of the development and accounting for climate change;

- Removal of language regarding the capacity of the floodplain, the flow of floodwater and the risk to life and property and replacement with a more concise list of these considerations that is clearly tied to site-specific SFRA in line with the Government's technical standards;
- Changes made to extend SuDS requirements to all development, rather than only major development, but with language added to account for impacts to viability or feasibility;
- Removal of "*wherever possible*" to strengthen the importance of SuDS maximising ecological benefits;
- Addition of the following: "*Surface water must not drain to a foul sewer as this is a major cause of sewer flooding;*" and
- Language requiring the submission of a SuDS maintenance plan with implementation secured by planning condition.

5.11.5 In addition to these changes to the policy itself, several amendments were made to the supporting text:

- Correction to refer to "*flood plain storage capacity*" rather than "*capacity*;"
- Addition of text to clarify that development should not obstruct flood flow routes;
- Replacement of a paragraph detailing when sites in Flood Zone 1 will require a Flood Risk Assessment;
- Removal of text that refers to specific SFRA allowances of 25%, 35% and 70%;
- Reference added to the most recent SFRA (2024); and
- Language added with clear bullet points outlining when redevelopment will be considered within the functional floodplain.

5.11.6 The only alternative option tested was to retain the policy as existing. The operation of national policy means that genuine alternative options are very limited. The existing approach was rejected as it fails to reflect changes to national planning policy guidance highlighted by the Environment Agency, does not refer to sewer flooding and does not refer growing emphasis on and importance of SuDS.

5.11.7 In terms of being compliant with national policy, this is largely dealt with in the supporting text which refers government guidance, particularly in paragraph 4.2.112 and the by reference to the Governments technical standards within the policy itself. In addition, it also complies with the following paragraphs of the NPPF:

- Paragraph 158 – "*Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk [...].*"
- Paragraphs 165 – 175 – These clearly outline requirements for directing development away from the areas of highest risk, the need for strategic flood risk assessment and the application of the sequential test.

5.11.8 The following representations were received at Regulation 19 stage:

- The Environment agency expressed that the policy was adequate, but noted the absence of the Level 2 SFRA at the time of consultation. The Level 1 SFRA was

shared with the Environment Agency directly for comment on 11th October 2024 and comments received from the EA on 19th November 2024 led to changes. Additionally, the EA suggested stronger wording for supporting text in paragraph 4.2.113. This change is included within Appendix 1.

- MP Matt Rodda expressed strong support for the policy.
- Thames Water stated support for the policy, particularly reference to the importance of considering sewer flooding.
- The Woodland Trust expressed support for the policy, particularly strong reference to SuDS.

5.12 Is the approach to urban greening within Policy EN19 justified, effective, and consistent with national policy?

5.12.1 Policy EN19 is justified in that it is an appropriate strategy, taking into account reasonable alternatives, and based on robust and proportionate evidence. It is also consistent with national policy.

5.12.2 The proposed approach is a wholly new policy which was drafted following comments from Natural England, local residents and community groups at Regulation 18 stage. These comments raised concerns that BNG may not be an effective tool for delivering green cover on some sites, particularly those in urban areas presenting with very low or no baseline biodiversity. Natural England stated:

“We also recommend RBC utilise the Urban Greening Factor (see the Natural England Green Infrastructure Framework for more details Green Infrastructure Home). This approach works alongside Biodiversity Net Gain to help set the quantity and functionality of Green Infrastructure that should be delivered on-site. The Urban Greening Factor (UGF) is one of the five headline Green Infrastructure Standards. It is a planning tool to improve the provision of Green Infrastructure and increase the level of greening in urban environments. Where the baseline biodiversity is low, the UGF can ensure development still promotes more nature-rich environments that increase the functionality, sustainability, and climate resilience, particularly in dense urban areas. It is applied to major developments and sets a target score for the proportion of Green Infrastructure within a development site for specific land uses. It can be introduced through planning policies and strategies to increase Green Infrastructure provision across an entire local planning area, or it can be applied to specific locations. It was introduced in the UK in 2015 and is now a prominent Green Infrastructure policy tool in the London Plan (2021) and is increasingly being used by Local Planning Authorities in the revision of their local plans.”

5.12.3 The Council agrees that there needs to be a separate approach to identifying opportunities for urban greening, as BNG is unlikely to be effective in achieving this across Reading's development sites. Many of our sites are likely to have zero existing habitats, and application of 10% BNG will therefore also result in a requirement of zero. There are policies on tree planting and provision of open space, but improvements under wider urban greening do not necessarily take that form and could include provision that does not affect wider development capacity such as green walls and roofs. A bespoke approach for Reading was developed and tested

using existing or previous planning applications (please see answer to question 5.13).

5.12.4 The only other option assessed was a no policy option which reflects the existing approach. This was rejected as it would fail to deliver biodiversity and greening improvements on sites presenting with no existing biodiversity baseline. Given the urbanised nature of the Borough and the importance of urban greening for climate resilience, this was not considered to be acceptable.

5.12.5 In terms of being compliant with national policy, EN19 complies with the following NPPF statements,

- Paragraph 20 – *“Strategic policies should set out an overall strategy for the pattern, scale and design quality of places (to ensure outcomes support beauty and placemaking), and make sufficient provision for: [...] d) conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation.”*
- Paragraph 180 – *“Planning policies and decisions should contribute to and enhance the natural and local environment by: [...] d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures [...].*
- Paragraph 235 – *“To protect and enhance biodiversity and geodiversity, plans should [...] identify and pursue opportunities for securing measurable net gains for biodiversity.*

5.12.6 The following representations were made at Regulation 19 stage:

- Churchill Living stated that language be added to the policy to clarify that applications meeting statutory BNG requirements, as well as EN12 and incorporating SuDS through EN18 will not be subject to EN19. The Council would like to reiterate that EN19 is intended to be a separate requirement to the above policies and is intended to prevent applications coming forward with little to no biodiversity or greening improvements.
- DP9 Ltd on behalf of SH Reading Master LLP expressed their support for the policy but requested that the policy should state that it will only be applied to new full planning applications only. The Council does not believe this to be necessary as reserved matters applications will be determined against the principles in the outline consent as is usual practice.
- The following representors objected to the proposed approach citing “significant burden” on development and stated that the policy had not been viability tested and should be removed:
 - Stantec on behalf of SEGRO plc;
 - Stantec on behalf of St Edwards Homes Limited;
 - Turley on behalf of The Oracle Limited Partnership Group;
 - Stantec on behalf of Aviva Life & Pensions UK Ltd; and
 - Turley on behalf of CBRE Investment Management.

The Council does not agree. This policy and all the sustainability policies within the draft were subject testing within the Whole Plan Assessment of Viability [EV004]. Ecologists commissioned by the Council have further analysed the possible impacts on a number of sites and determined that the requirements of EN19 are able to be met for the vast majority of sites without impacts on viability (Appendix 2). More detail can be found in the Council's Answers to Initial Questions Part 2 July 2025 [EX009] and in the answer to questions 5.13 – 5.15 below.

- University of Reading argued that the evidential basis for requiring green infrastructure beyond BNG was unclear, particularly the scores required for each type of development. They state that the policy should only apply to major development and should recognise that requirements may be unachievable on some sites. The Council does not agree. The evidential basis for this policy is outlined within the Council's Answers to Initial Questions Part 2 July 2025 [EX009] and in the answer to questions 5.13 – 5.15 below. When testing a representative group of sites within the Borough, ecologists determined that the vast majority of sites were able to meet the requirements. In cases where the application did not meet the requirements, ecologists determined that these could have been easily achieved by low- or no-cost interventions, such as changing the type of tree selected to a larger canopy species.
- Woodland Trust expressed strong support for the approach, stating that applying a local metric for areas more dominated by urban and brownfield sites is an effective compliment to BNG and has been successfully implemented by other local planning authorities.
- Berkshire Gardens Trust also expressed strong support for the approach.

5.13 *Is there a robust, up-to-date and locally relevant evidence base for bringing forward Policy EN19 and Appendix 3?*

5.13.1 Yes, the Council's proposed approach is based on advice from Natural England, adopted policies from other local planning authorities and evidence commissioned by the Council in which ecologists tested a series of sites against the requirements in the policy. Due to the urbanised nature of the Borough, in which the majority of development expected will occur on sites within the centre that are dominated by hardstanding or existing buildings, an approach that relies entirely on BNG will result in sites coming forward with no green cover present. Given the urgency of the climate crisis and localised overheating effects that will be exacerbated by hardstanding, this is not an acceptable approach. Moreover, BNG may be delivered off-site and miss important opportunities for urban greening in the central area in particular. BNG also focusses on ecological value only, not visual, cooling, flood mitigation, air quality improvements or other important benefits.

5.13.2 The Climate Emergency Strategy [OP004] on pp 46 emphasises two key priorities with regard to nature:

- *“Managing existing natural habitats to sequester and store more carbon: by increasing the amount of permanent cover (including but not restricted to tree cover) and managing greenspace differently in the town and, perhaps even more*

important, increasing the storage of carbon within the soil, the natural environment can make a significant contribution to reducing Reading's carbon footprint;" and

- *"Ensuring that new development delivers a 'net gain' for the environment: as Reading grows we need to ensure that national and local planning policies requiring a 'net gain' for biodiversity are observed, so that new and restored habitats can help us mitigate the causes and adapt to the impacts of climate change."*

5.13.3 The calculators provided by Natural England, London and Southampton were used in the initial exploration of a proposed BNG calculator for Reading. Some of these methods were considered too burdensome, given many were published before statutory BNG and therefore, a new calculator was developed for Reading. In order to avoid an unnecessary burden for applicants, definitions were aligned with the DEFRA Statutory Metric, where possible. The policy is intended to provide a simple framework that will allow applicants to demonstrate an appropriate and proportionate level of green cover is being delivered based on the scheme's size and type.

5.13.4 There are also sites, such as private gardens, which are being eroded by new housing developments with minimal green landscaping beyond hard surfaces. Where these do not deliver 10% BNG, government guidance states that it would generally be inappropriate to refuse an application. Therefore, the Council is seeking an additional policy tool to ensure development in garden land is acceptable in terms of biodiversity. For example, a large householder extension would likely result in loss of green cover. By requiring examples of "surface cover types" stated within the proposed policy, such losses could be avoided.

5.13.5 For sites where mandatory 10% BNG does apply, meeting BNG requirements will also assist in meeting the requirements of Policy EN19. Demonstrating compliance with the UGF will not impose a significant additional burden, as the existing and proposed areas of various surface cover types will already have been measured for BNG compliance. For sites where BNG does not apply, the UGF will ensure that a contribution to greening is still made.

5.13.6 The proposed Reading UGF calculator has been tested on a variety of application types based on submitted landscape plans and/or BNG calculations where available. Of these, the majority (71%) passed. For those applications that failed to meet requirements, ecologists noted that small changes to landscaping plans or the selection of different tree species could result in a pass at low- or no-cost. An updated analysis of sites selected is included in Appendix 2.

5.14 *How does the Urban Greening Factor within Policy EN19 and Appendix 3 work with Biodiversity Net Gain requirements set out in Policy EN12?*

5.14.1 Policy EN19 is a separate policy requirement requiring submission of information separately, albeit we have sought to make the information to be provided as consistent as possible to avoid an additional burden. However, on-site measures to meet EN12 can and in many cases will count towards EN19 compliance, and the Council anticipates that for many sites that provide BNG on site there will not be any

significant additional measures required. As stated above, the definitions used have been aligned with the DEFRA statutory metric, where possible.

- 5.14.2 The Government has recently announced increased thresholds for BNG exemption, which further emphasises the need for an Urban Greening Factor in Reading as this will increase the number of sites coming forward that are exempt. Paragraph 4.12.2 of the Local Plan Partial Update Background Paper [EV002] remains relevant:

“Although BNG will result in significant protection and enhancement of biodiversity in the Borough, many potential development sites have no existing green space or vegetation and as such there will be no mandatory requirement for BNG under national guidance. Therefore, a new policy is proposed to ensure that all sites make a contribution, where possible. Urban Greening Factor cannot be used in place of any other policy requirements, such as mandatory BNG or other requirements within EN12.”

5.15 How and when would the Urban Greening Factor be assessed and what would happen if the Urban Greening Factor was not met on site?

- 5.15.1 All relevant planning applications should include a completed UGF spreadsheet and associated plans at the point of submission. This requirement would be incorporated into the Local Validation List to ensure consistency. Where the submitted information clearly demonstrates that the proposed development achieves the minimum UGF score, no further details would be required. However, if the score falls below the required threshold, the scheme would need to be revised. In most cases, adjustments are expected to be minor and should not present significant challenges for applicants.
- 5.15.2 Where full landscaping details are not provided prior to determination or the application only marginally exceeds the minimum UGF score, a landscaping condition should be applied to secure compliance. Standard landscaping conditions would be amended as such.

Appendix 1: Proposed main modifications emerging from Hearing Statement

This Schedule sets out proposed 'main modifications' to the Local Plan Partial Update as a result of the contents of this hearing statement.

For the avoidance of doubt, the modifications and references in the following table show changes to the Local Plan Partial Update Pre-Submission Draft, November 2024 [LP003b].

The above document is already in tracked changes format and shows how the adopted Local Plan (November 2019) would be amended. Please therefore be aware that there are two types of amendments shown in this schedule.

Changes already proposed to be made in the LPPU Pre-Submission Draft [LP003b]:

- Additional text that would amend the adopted Local Plan (2019) is shown in green and underlined: Example
- Deleted text that would amend the adopted Local Plan (2019) is shown in green and struck through: ~~Example~~

Changes proposed as a main modification through the examination process:

- Additional text that would amend the Pre-Submission Draft LPPU (November 2024) is shown in blue and underlined: Example
- Deleted text that would amend the Pre-Submission Draft LPPU (November 2024) is shown in blue and struck through: ~~Example~~

Amendments in blue supersede those in green, so for instance where a change proposed to the adopted Local Plan in green is proposed to be further amended or deleted, this is shown in blue only.

Table A1.1: Schedule of proposed main modifications

Modification Number	Page number [LP003b]	Policy/Paragraph [LP003b]	Main Modification	Reason for Main Modification (linked to soundness requirements)	Reference in this statement
Matter 5 - A	53	4.2.21	<p>Amend paragraph as follows:</p> <p><u>For clarification purposes, this policy is not intended to be applied to heritage assets with national designation, such as listed buildings, nor other types of non-designated heritage assets, e.g. to identified buildings of townscape merit in conservation areas.</u></p>	To clarify what the policy refers to, so that it is effective.	Paragraph 5.1.7
Matter 5 - B	67	EN12	<p>Amend criterion b) of policy as follows:</p> <p><u>On all development sites, a 10% Biodiversity Net Gain (BNG) must be achieved, except that which is exempt as set out within The Biodiversity Gain Requirements (Exemptions) Regulations 2024 or as amended. The 10% BNG should be delivered on-site wherever possible. However, if on-site provision is not achievable, or Reading's Green Network can be more coherently enhanced through off site provision, off-site gain can be pursued, in accordance with the Biodiversity Gain Hierarchy. Where practicable off-site provision should be directed towards areas within the Borough and identified in the Council's Natural Environment SPD, BLNRS (or Biodiversity Opportunity Areas (BOAs) until such a time as the BLNRS and the SPD is in place).</u></p> <p><u>Notwithstanding the above development that results in the loss or deterioration of 'irreplaceable habitats' will not be permitted.</u></p>	To bring the policy up-to-date as the BLNRS is now published and the SPD is unlikely to be produced.	Paragraph 5.7.7
Matter 5 - C	67	EN12	<p>Amend fifth bullet point of criterion c) of policy as follows:</p> <p><u>• Provide wildlife friendly landscaping using wildlife-friendly species (preferably native) as appropriate; and ecological enhancements (such as wildlife ponds, and bird nesting and bat boxes/roosting opportunities integral within new buildings (such as universal swift bricks and integrated bat bricks/boxes or tiles) wherever practicable; and</u></p>	To respond to representation from Swifts Local Network: Swifts and Planning Group to ensure policy is effective	Paragraph 5.7.10
Matter 5 - D	71	4.2.66	<p>Amend paragraph as follows:</p> <p><u>The Statutory Metric is a spreadsheet tool for calculating habitat losses or gains from a project using habitats, measured using Habitat, Hedgerow and Watercourse Units as a proxy measure for biodiversity. It is accompanied by an excel spreadsheet calculator that assigns values to habitats before a change and assumed habitat values after the change. Development needs to result in a net gain in Habitat Units as measured with the Statutory Metric.</u></p>	To clarify statutory requirements	Paragraph 5.7.13
Matter 5 - E	72	4.2.72	<p>Amend paragraph as follows:</p> <p><u>At present, there are no established schemes to provide off-site BNG within the Borough of Reading. Details of The Council's approach to off-site habitat delivery will be provided within the Natural Environment SPD. Although these may emerge over time, it is acknowledged that given the urban nature of the borough, the availability of off-site gains within the borough boundary may at least in the first</u></p>	To bring the policy up-to-date as the BLNRS is now published and the SPD is unlikely to be produced.	Paragraph 5.7.7

Modification Number	Page number [LP003b]	Policy/Paragraph [LP003b]	Main Modification	Reason for Main Modification (linked to soundness requirements)	Reference in this statement
			<i>instance be limited. Therefore, off-site provision may need to be delivered outside of Reading Borough. Applicants are however advised that the provision of offsite habitat units close to the application site and within the borough may help demonstrate compliance with the he Biodiversity Gain Hierarchy and the Mitigation Hierarchy referred to above. The BLNRS identifies opportunities for enhancements for biodiversity within Reading and other Berkshire authorities, and this should help to identify appropriate opportunities for off-site delivery where they match up with established schemes as these arise. As well as those habitats already defined, there are many undesignated sites where there may be important biodiversity interest. The overall principle here is that there should be no net loss of biodiversity, and a net gain, as supported by the NPPF, wherever it can be achieved. Ecological information supplied should be in accordance with the British standard for biodiversity management, BS42020. A mitigation hierarchy approach, as set out in paragraph 118 of the NPPF, will be used to consider the loss of on-site biodiversity. In exceptional circumstances where the benefits of development outweigh the loss, and where the mitigation hierarchy has been followed, off-site compensation may be acceptable. There are established metrics for considering off-site mitigation at a national level, including those described in DEFRA's biodiversity offsetting guidance⁷⁴; and more specific local metrics may be produced during the plan period.</i>		
Matter 5 - F	73-74	4.2.76	<p>Amend paragraph as follows:</p> <p>Whilst no part of Reading Borough falls within an a <u>a National Landscape Area of Outstanding Natural Beauty (AONB)</u>, there are two AONBs <u>National Landscapes</u> in close proximity. The Chilterns <u>AONB National Landscape</u> runs along part of the boundary between Reading and South Oxfordshire, but does not cross it. It is vital that the rural-urban fringe at this point is managed to ensure that development does not jeopardise the characteristics of the <u>AONB National Landscape</u>. A review by Natural England of the Chilterns National Landscape boundary is underway, and this may change the degree to which the boundary interacts with Reading's boundary, but at the time of preparing this plan no amended boundary is available. The North Wessex Downs <u>AONB National Landscape</u> is, at its closest point, 200m west of the Borough boundary at Tilehurst. Therefore there are fewer visual linkages, but development in this area must nevertheless take into account any impact on this <u>AONB National Landscape</u>.</p>	To reflect the decision to cancel the Chilterns National Landscape extension, ensuring that the plan is justified.	Paragraph 5.8.1
Matter 5 - G	74	EN14	<p>Amend point 5 criterion b. as follows</p> <p><u>b. Planting should consider the historic environment as appropriate and avoid potential future harm to designated heritage assets informed by an understanding of the significance of any heritage assets that would be affected;</u></p>	To make clear that tree planting should consider heritage assets so that it is effective	Paragraph 5.9.9 and Statement of Common Ground with Historic England [EX014].
Matter 5 - H	86	4.2.113	<p>Amend final sentence of paragraph as follows</p> <p>Depending on the vulnerability of development proposed, and the flood risk classification, different allowances should be taken into account. the appropriate allowance must be taken into account within the Flood Risk Assessment. The</p>	To clarify FRA requirements to ensure that the plan is effective	Paragraph 5.11.8

Modification Number	Page number [LP003b]	Policy/Paragraph [LP003b]	Main Modification	Reason for Main Modification (linked to soundness requirements)	Reference in this statement
			<u>SFRA models and maps allowances of 25%, 35% and 70%, which correspond to the upper end allowances for the Thames basin.</u>		

Appendix 2: Summary of sites tested against UGF Criteria

Table A2.1: Summary of sites tested against UGF Criteria

Application Reference	Status	Address	Description	UGF score	Development type	UGF threshold	Pass/Fail	Improvements needed to pass	Ecologist's comments
120293	Approved	Phase 2, Land at Chatham Place, Reading	Detailed planning application for phase 2 of the Chatham Place redevelopment comprising one nine storey and one nineteen storey building to accommodate a total of 184 residential units and ground floor retail uses (use classes A1, A2 or A3), together with basement car parking, public and private amenity space, public realm works and landscaping and alterations to existing vehicular access.	0.4175	Major developments that are predominately residential (more than 50% as-built internal floor area)	0.25	PASS	(n/a)	(n/a)
200683	Approved	Portman Road, Reading, Berkshire, RG30 1DR	Discharge of conditions 7 (Sustainable Drainage Scheme), 9 (Landscaping) and 25 (Bicycle Parking Facilities) relating to the planning permission 180319.	0.5365	Major developments that are predominately residential (more than 50% as-built internal floor area)	0.25	PASS	(n/a)	(n/a)
200888	Approved	Homebase Kenavon Drive, Reading	Non-material amendments to permission 170509 (granted on 10/10/2018) to alter landscaping, access design and associated alterations	0.3105	Major developments that are predominately residential (more than 50% as-built internal floor area)	0.25	PASS	(n/a)	(n/a)
221916	Undetermined	Former Debenhams Department Store West of Yield Hall Place The Oracle RG1 2AS	Original Proposal: Mixed use development comprising part demolition of former department store and erection of new buildings comprising up to 218 build to rent residential dwellings (Class C3) & 1,209sqm commercial uses within Uses Class E and/or bar (Sui Generis Use). Reconfiguration and change of use of up to 5,866sqm remaining department store floorspace (Class E) to uses with within Use Class E and/or bar (Sui Generis Use) and/or experiential leisure use (Sui Generis	0.2657	Major developments that are predominately residential	0.25	PASS	(n/a)	(n/a)

Application Reference	Status	Address	Description	UGF score	Development type	UGF threshold	Pass/Fail	Improvements needed to pass	Ecologist's comments
			<p>Use). Associated public realm, infrastructure works & external alterations to shopping centre, including creation of new shopping centre entrance (amended description) (accompanied by an Environmental Statement)</p> <p>Original Proposal: Mixed use development comprising part demolition of former department store and erection of new buildings comprising up to 218 build to rent residential dwellings (Class C3) & 1,209sqm commercial uses within Uses Class E and/or bar (Sui Generis Use). Reconfiguration and change of use of up to 5,866sqm remaining department store floorspace (Class E) to uses with within Use Class E and/or bar (Sui Generis Use) and/or experiential leisure use (Sui Generis Use). Associated public realm, infrastructure works & external alterations to shopping centre, including creation of new shopping centre entrance (amended description) (accompanied by an Environmental Statement)</p> <p>The amendments include:</p> <ul style="list-style-type: none"> - Changes to layout, massing and appearance - Reduction in height of proposed Blocks D and E - Proposed number of residential units increased from 202 to 218 for application ref. 221916 - Proposed number of residential units reduced from 247 to 218 for application ref. 221917 						

Application Reference	Status	Address	Description	UGF score	Development type	UGF threshold	Pass/Fail	Improvements needed to pass	Ecologist's comments
230613	Approved	Amethyst Lane Reading	Demolition and redevelopment of the Site at Amethyst Lane to deliver a new respite care facility alongside 21 new houses, soft and hard landscaping, parking and ancillary works	0.429	Major developments that are predominately residential (more than 50% as-built internal floor area)	0.25	PASS	(n/a)	(n/a)
231041	Undetermined	Portman Road Reading	Proposed residential development comprising 80 apartments including enabling works to the existing access and car park	0.21	Major developments that are predominately residential (more than 50% as-built internal floor area)	0.25	FAIL	Planting of 9 small (environmentally beneficial) canopy trees, 2 medium canopy, or 1 large canopy	This is an example of a site that would have benefitted from a UGF policy being in place as it would have secured significant green cover at low cost to the applicant.
240414	Withdrawn	47 Parkside Road, Reading, RG30 2BT	Two proposed 3-bed four-person detached properties with associated parking and gardens.	0.4804	All other applications where the proposals will result in more than 30% of the site as building(s) or hard-surfacing	0.25	PASS	(n/a)	(n/a)
240415	Approved	Land to South Of 104 Berkeley Avenue Reading RG1 6HY	Erection of a detached dwelling with parking and amenity space	0.5619	Self-build and custom-build housing	0.5	PASS	(n/a)	(n/a)
240605	Approved and landscaping condition discharged	15 Woods Road Reading RG4 6NA	Extensive alteration and extension of existing dwelling, including new porch, side, rear and first floor extension and external cladding and single garage to the rear, including new landscaping and parking	0.48	Householder applications where the proposals will result in more than 30% of the site as building(s) or hard-surfacing	0.6	FAIL	Replacement of one of the three new trees with a medium canopy species, such as a lime.	This is a replacement dwelling with lots of hard surface around the house. It would be significantly improved with better tree planting and would not make the scheme unviable (or increase costs).
240800	Approved	1 Arkwright Road Reading RG2 0LU	Proposed demolition and replacement of existing industrial unit with Associated parking and landscaping.	0.34	Major developments that are predominately commercial (more	0.25	PASS	(n/a)	(n/a)

Application Reference	Status	Address	Description	UGF score	Development type	UGF threshold	Pass/Fail	Improvements needed to pass	Ecologist's comments
					than 50% as-built internal floor area)				
240846	Undetermined	Napier Court, Napier Road Reading	Demolition of existing buildings and erection of new buildings of 11 and 12 storeys, with amenity space at roof level (part indoor and set back), to provide 576 build to rent residential dwellings (Class C3) with residential amenity space, parking, landscaping and associated engineering works.	0.21	Major developments that are predominately residential (more than 50% as-built internal floor area)	0.25	FAIL	Planting of 6 additional medium trees or change species so that larger canopy or more environmentally beneficial trees are used.	These improvements are low cost and would not make the scheme unviable.
PL/24/0998	Refused	5 Stoneham Close, Tilehurst, Reading, RG30 4HB	Construction of Two Storey - 3 Bedroom house and demolition of existing garage.	0.2373	All other applications where the proposals will result in more than 30% of the site as building(s) or hard-surfacing	0.25	FAIL	Not possible within context of the scheme	Disproportionately large dwelling on back garden land with no or very little garden. The scheme in any form is unlikely to have passed the UGF policy.
241035	Approved	292 Henley Road, Caversham, Reading, RG4 6LS	New 4-bedroom residential dwelling on the land to the rear	0.41	All other applications where the proposals will result in more than 30% of the site as building(s) or hard-surfacing	0.25	PASS	(n/a)	(n/a)

Table A2.2: Summary of results based on application type

Type	UGF target	Number of applications tested	Number of sites meeting criteria	Number of sites failing to meet criteria	% pass	% Fail
All other applications where the proposals will result in more than 30% of the site as building(s) or hard-surfacing	0.25	3.0	2.0	1.0	66%	33%
Development that results in a net loss of biodiversity using BNG	0.25	0.0	0.0	0.0	(n/a)	(n/a)
Development where more than 60% of land within the existing site boundary is hard surfacing	0.25	0.0	0.0	0.0	(n/a)	(n/a)

Type	UGF target	Number of applications tested	Number of sites meeting criteria	Number of sites failing to meet criteria	% pass	% Fail
Householder applications where the proposals will result in more than 30% of the site as building(s) or hard-surfacing	0.6	1.0	0.0	1.0	0	100%
Major developments that are predominately commercial (more than 50% as-built internal floor area)	0.25	1.0	1.0	0.0	100%	0
Major developments that are predominately residential (more than 50% as-built internal floor area)	0.25	8.0	6.0	2.0	75%	25%
Non-householder applications that are Biodiversity Net-Gain (BNG) exempt (as they are below the de-minimis threshold)	0.5	0.0	0.0	0.0	(n/a)	(n/a)
Self-build and custom-build housing	0.5	1.0	1.0	0.0	100%	0
% pass all applications	71.4%	N/A	N/A	N/A	N/A	N/A