



Matter 5: Built and Natural Environment

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

We have focused on question 5.7 in relation to policy EN12 and have provided the Inspector with an answer below.

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

Environment Agency answer

We do not consider the approach to biodiversity, including Biodiversity Net Gain in Policy EN12 to be consistent with national policy. We are of the opinion that the wording of Policy EN12 could further be strengthened to ensure the important wildlife habitats including woodlands, grasslands and wetlands in Reading Borough are protected and enhanced as required by NPPF Framework 15. We provide the following reasons and suggestions.

1. Within bullet point b) of policy EN12 it should be set out that there needs to be 10% BNG in all sections of the metric and they cannot be used interchangeably. It should also be set out that if there is a small site which would otherwise be eligible for the small site metric, but it has a watercourse in or next to the red line boundary, it still must use the statutory metric. We suggested this addition to the policy text

b) 'Biodiversity Net Gain 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. The 10% BNG should be delivered on-site wherever possible. However, if on-site provision is not achievable, or Readings 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).

Notwithstanding the above development that results in the loss or deterioration of 'irreplaceable habitats' will not be permitted. There needs to be 10% in all sections of the metric and they cannot be used interchangeably. Also, if there is a small site which would otherwise be eligible for the small site metric, but it has a watercourse in or next to the red line boundary, it still must use the statutory metric.'

The Environment Agency is not mandated to review and advice proposals with BNG. Therefore, we would like to highlight that the above is for the LPA to consider, and we are only providing advice and would not comment further on the matter of BNG.

2. Within bullet point c) of policy EN12 there should be reference made to providing new native tree planting. All references to wildlife friendly species should be changed to native as a priority rather than preferred.

We also note the policy lists site specific examples of ecological enhancements. This could be limiting as developers may only consider the listed options rather than look to provide enhancements beyond what is listed. We encourage the LPA to consider further enhancement. We suggest this addition to the policy text.

c) 'Wildlife friendly design

Unless there are clearly justifiable reasons for not doing so, development must (but not limited to the list below):

- Protect and enhance features of biodiversity interest on and adjacent to the application site;*
- Provide new native tree planting;*
- Provide wildlife friendly landscaping using wildlife-friendly species (native as a priority) as appropriate;*
- Provide permanent bird and bat boxes wherever practicable;*
- Provide wildlife friendly landscaping using wildlife-friendly species (native as a priority) as appropriate; and ecological enhancements opportunities integral within new buildings; and*
- Avoid increasing, and reduce, artificial light at night in particular over trees, hedgerows and waterbodies'.*

3. Within bullet point d), we support the provision of native and wildlife friendly landscaping corridors adjacent to waterbodies. It is important for all these corridors or buffer zones next to waterbodies to be at least 10m wide and left free from any development and formal landscaping and for commitments to be made to manage them for the benefit of wildlife in the river and the riparian zone (an ecological buffer). When considering the function of a buffer zone, it is also important that proposals which include any buildings next to the river is limited in height so they do not cause over shading of the river, as this can be detrimental to any vegetation which is planted within the riparian zone or the river channel, banks, etc.'

About re-naturalising the banks of waterbodies, the emphasis should be that this is done over the use of a hard bank, and if a hard bank has collapsed, a softer and more ecologically friendly alternative should be looked at to replace the hard bank.

Paragraph 4.2.66 should mention that there needs to be a net gain in Hedgerow and Watercourse Units, as well as Habitat Units, as they are separate.

We suggest these additions to the policy text and justification notes.

d) 'Waterbodies

Unless there are clearly justifiable reasons for not doing so, development must:

- Not increase artificial light at night over waterbodies, and reduce it wherever practicable*
- Provide native and wildlife friendly landscaping corridors adjacent to waterbodies. These buffer zones should be at least 10m wide and be left free from any development and formal landscaping and be managed for the benefit of wildlife in the river and the riparian zone.*
- Re-naturalise the banks of waterbodies when new development is adjacent to it wherever possible. – Re-naturalisation must be carried out over the use of hard bank and if a hard bank has collapsed, a softer, more ecologically friendly alternative should be looked at to replace the hard bank.*
- ~~Not cover over watercourses~~ Not culvert watercourses and de-culvert watercourses wherever possible.'*

4.2.66 'The Statutory Metric is a spreadsheet tool for calculating habitat losses or gains from a project using habitats, measured using Habitat 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. There must be a net gain in Hedgerow and Watercourse Units, as well as Habitat Units, where relevant, as they are all separate.



Matter 5: Built and Natural Environment

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

We have focused on question 5.11 and have provided the Inspector with an answer below.

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

Environment Agency answer

The wording of the Policy is robust and adequate, and we have no further comments to make regarding the wording of Policy EN18. However, the environmental evidence which supports this policy would have to be revised to make it adequate as required by national policy – NPPF Framework 14.

We asked at the Regulation 19 local plan consultation stage and in subsequent engagement with Reading Borough Council for evidence that supports the policy to be undertaken. Particularly we requested that a Sequential Test and a Level 2 SFRA be provided to support all the sites allocated within the local plan. Reading Borough Council have indeed produced a Sequential Test (EV026) and Level 1 and 2 SFRAs (located within EV027 and EV038x). The evidence demonstrates that some of the sites allocated for development in the local plan are at flood risk and will result in the risk of flooding to people and property in a flood event. In particular,

- The Sequential Test assessment has been undertaken; however, we do not agree with the conclusions made about four of the sites (**CA1a – Reading University Boat Club, CR14n – Reading Central Library, CR14x – part of Tesco Car Park, Napier Road and WR3i – land at Portman Way**) passing the sequential test out the 45 sites.
- The Level 2 SFRA has been undertaken as well. Following our review and assessment, we again do not consider some of the allocated sites to be deliverable regarding flood risk - (**CA1a – Reading University Boat Club, CR14n – Reading Central Library, CR14x – part of Tesco Car Park,**

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Napier Road and WR3i – land at Portman Way). We have provided further details about these in our answers to the questions in Matter 10.

- We consider the Level 1 SFRA to be adequate.

Based on the above, we do not consider the environmental evidence that supports Policy EN18 to be adequate and therefore the policy is not justified.