

Reading Local Plan EIP

Matter 5: Built and Natural Environment

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

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

As set in our representations HBF do not consider it to be necessary to have such a policy given that legislation and guidance already provide sufficient detail with regard to the information required at planning stages and how BNG should be delivered. If it is considered necessary to include a policy, the council should not specify where offsite net gains should be delivered on the basis that the spatial multiplier within the metric already provides significant incentive to deliver offsite gains as close to the development site as possible. As such it can be assumed by decision makers that the developer has looked to implement net gains within the borough prior to delivering these elsewhere.

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

HBF recognise the importance of improving the amount of green space on development where possible. However, the UGF is a blunt tool to achieving this. There will be cases where the proposed UGF cannot be met without undermining the deliverability of the site or the amount of development that can be achieved on a site. In terms of justification HBF could not find any reference to UGF within the Local Plan Viability Testing Report. There also does not appear to be any consideration as to whether the proposed level of urban greening can be achieved on sites whilst ensuring development makes the most efficient use of land. Without a robust evidence base the policy cannot be considered to have been justified.

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

See above.

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?

For Council.

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?

This is principally for the Council to answer but there must be flexibility in the policy to ensure that where the required level of greening cannot be achieved then it does not lead to development being refused.

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