



Reading Borough Council Local Plan Partial Review Examination

Stage 2 Hearing Statement

Matter 5 – Built and Natural Environment

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Prepared for:
The University of Reading

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1 Matter 5: Built and Natural Environment

1.1 Issue 1 – Question 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?

- 1.1.1 Policy EN4 is focused on locally important heritage assets which are a form of non-designated heritage assets. The University raised concern with the wording of EN4 in its Regulation 19 consultation representations. The proposed policy wording of EN4, which refers to substantial harm and substantial public benefits, elevates the test for non-designated heritage assets to that applied to heritage assets. This is not consistent with the wording in paragraph 209 of the NPPF (December 2023). It is advised that the wording be amended as below to ensure the policy is sound:

“EN4: Locally Important Heritage Assets

~~Development proposals that affect locally important heritage assets will demonstrate that development conserves architectural, archaeological or historical significance which may include the appearance, character and setting of the asset.~~ **The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application.**

~~Planning permission may be granted in cases where a proposal could result in substantial harm to or loss of a locally important heritage asset only where it can be demonstrated that substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss.~~ **In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.** Where it is accepted by the decision-maker that retention is not important, recording of the heritage asset should be undertaken and submitted alongside development proposals. Replacement buildings should draw upon heritage elements of the previous design, incorporating historical qualities that made the previous building significant. This may include appearance, scale and architectural quality.”

- 1.1.2 Policy EN4 should be amended as set out above to ensure that it is consistent with paragraph 209 of the NPPF to ensure the policy is sound.

“The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset. Where it is accepted by the decision-maker that retention is not important, recording of the heritage asset should be undertaken and submitted alongside development proposals. Replacement buildings should draw upon heritage elements of the previous design, incorporating historical qualities that made the previous building significant. This may include appearance, scale and architectural quality.”



1.2 Issue 1 – Question 5.7

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

- 1.2.1 The University supports the policy which requires a 10% Biodiversity Net Gain (BNG) in accordance with the mandatory levels (10%) set out in the Environment Act 2021. It is considered that this level is appropriate for an urban authority such as Reading. The University acknowledges that clear guidance is required for the provision of off-site delivery of biodiversity net gain where on-site delivery is not possible. It is clear that not all sites within Reading will be able to deliver on-site BNG and so the Council must ensure it has a clear strategy and robust guidance for developers on this matter.
- 1.2.2 The University supports the updating of the policy to reflect current guidance and legislation. This policy should reflect the provisions of the Environment Act 2021 and the Biodiversity Gain Requirements (Exemptions) Regulations 2024 as well as the NPPF.
- 1.2.3 The last sentence of part (b) the policy states:
- “Notwithstanding the above development that results in the loss or deterioration of ‘irreplaceable habitats’ will not be permitted.”
- 1.2.4 This is not in accordance with paragraph 186 (c) of the NPPF wording relating to irreplaceable habitats which states: “development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists;”
- 1.2.5 As raised in the University’s representations at the Regulation 19 consultation, the final sentence of EN12 b) should be amended to read as follows in order to be fully consistent:

“Notwithstanding the above development that results in the loss or deterioration of ‘irreplaceable habitats’ will not be permitted, **unless there are wholly exceptional reasons and a suitable compensation strategy exists**”

1.3 Issue 1 – Question 5.12

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

- 1.3.1 The University supports the principle of improving the provision of green infrastructure within the Borough; however, it is important that policy EN19 does not unnecessarily constrain development. There are several other related policies in the plan which have similar and connected aims including policies on green space, open space, biodiversity, trees, hedges and woodland. To ensure EN19 is fully effective, it is important that the inclusion of this policy requirement is considered alongside the cumulative requirements of these policies.



- 1.3.2 The policy should recognise that the provision of a sizeable quantum of additional green infrastructure may be unachievable on certain sites, for example on small, urban, high-density developments or applications for changes of use. There is therefore a need for flexibility so that the land available for development can be used efficiently. Such flexibility is afforded in respect of BNG, for example by enabling off-site provision where necessary, and policy EN19 should incorporate reasonable flexibility to ensure that development is not constrained. It is considered that the Urban Greening Factor (UGF) should therefore only apply to major development.
- 1.3.3 The Natural England Report notes that the majority of existing UGF planning policies provide target scores for major development only. In order for the policy to be effective and not constrain delivery of development, it is considered that the policy should be amended as below to reflect this:

“Proposals **for major development** must demonstrate how an appropriate proportion of green cover will be delivered on site through an Urban Greening Factor (UGF) assessment. This may include both existing and newly established landscaping.

Type	Score required
Major developments that are predominately residential (more than 50% as-built internal floor area)	25%
Major developments that are predominately commercial (more than 50% as-built internal floor area)	25%
Non-householder applications that are Biodiversity Net Gain (BNG) exempt (as they are below the de-minimis threshold)	50%
Major Development where more than 60% of land within the existing site boundary is hard surfacing	25%
Major Development that results in a net loss of biodiversity using BNG	25%
Self-build and custom-build housing	50%
Householder applications where the proposals will result in more than 30% of the site as building(s) or hard surfacing	60%
All other applications Major Development where the proposals will result in more than 30% of the site as building(s) or hard-surfacing	25%

Table 1: Urban Greening Factor Scoring

- 1.3.4 It is considered that any amendments listed above are required to ensure that policy EN19 is justified and effective and therefore sound.

1.4 Issue 1 – Question 5.13

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

- 1.4.1 The Urban Greening Factor (UGF) score required for different development types needs to be appropriately evidenced and justified. Natural England published a report on developing a model urban greening factor for England. The report is titled 'NERR132 Edition 1 Urban



Greening Factor for England - Development and Technical Analysis'. EN19 is informed by this report which contains proposed UGF target scores and proposed surface cover weightings for England. This introduces the Urban Greening Factor (UGF) and provides an analysis of current applications of the UGF in the UK and abroad. It provides a concise set of UGF Target Scores and UGF Surface Cover Types for the Model UGF for England, and the rationale behind them. The recommended minimum UGF target scores for major developments in England are 0.3 for predominately commercial development and 0.4 for predominately residential development.

1.5 Issue 1 – Question 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?

- 1.5.1 The mandatory provision of a 10% biodiversity net gain (apart from sites that are exempt) will result in the provision of additional green infrastructure in order to achieve BNG. The evidential basis for imposing the provision of additional green infrastructure is therefore unclear. The supporting text at paragraph 4.2.125 that clarifies that “requirements of UGF are not to be used in place of other policy requirements, such as the requirements for mandatory BNG or any requirements through Policy EN12” is welcomed and this is an important distinction that should be absolutely clear in the supporting text.

1.6 Issue 1 – Question 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?

- 1.6.1 EN19 states proposals must demonstrate how an appropriate proportion of green cover will be delivered on site through an Urban Greening Factor (UGF). Appendix 3 sets out the process of engaging with the UGF Calculator and concludes that applicants input their site data and proposals into the UGF Calculator which determines if the development is above the required threshold.
- 1.6.2 Beyond this there is no mention within EN19 or Appendix 3 of what would happen in the event that a particular development does not achieve the UGF.

