

Background to proposed additional change to policy EN12

Background

Existing policy EN12 in the Reading Borough Local Plan contains the statement that

“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.” (emphasis added)

In the LPPU, this wording was proposed to be deleted and replaced with new point b) on Biodiversity Net Gain. This change was proposed due to the introduction of new statutory biodiversity net gain which would have meant that it was unnecessary to require no net loss of biodiversity.

However, a Written Ministerial Statement on 16 December 2025 by Matthew Pennycook, the Minister of State for Housing and Planning, stated that the government intends to exempt smaller developments up to 0.2 hectares from biodiversity net gain as part of the package to support small and medium-sized housebuilders. This would apply to a significant number of sites in Reading. For instance, of 93 sites which had outstanding planning permission for new build housing on 1 April 2025, 66 (71%) were under 0.2 hectares.

This means that a situation the LPPU did not anticipate is now very likely to arise, i.e. a very large number of development sites now having no policy requirement to, at the very least, not result in a net loss of biodiversity on site. This would not be an acceptable situation.

Point c) of policy EN12 as proposed to be amended does state that, unless there are clearly justifiable reasons for not doing so, development must protect and enhance features of biodiversity interest on and adjacent to the application site. However, this is not considered to be sufficient because there would be an incentive for developers to pre-emptively clear small sites to reduce their ecological value pre-submission of a planning application. Furthermore, many small features (particularly on small sites), such as a garden pond, individual trees, short hedgerows etc., would not necessarily be considered ‘features of biodiversity interest’ in their own right, and their loss in isolation would not be considered significant but cumulatively would result in a significant loss of biodiversity across the borough.

This is particularly important in a built-up borough like Reading where green biodiversity is relatively scarce. The habitats and species that do exist are therefore proportionately more valuable and their cumulative loss can significantly and adversely affect the borough’s biodiversity.

Proposed modification

It is proposed that a main modification be made as set out in Appendix 1 to reinstate the requirement that there be no net loss of biodiversity

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
TBC	67	EN12	<p>Amend point b) of policy as follows:</p> <p><u>b) Biodiversity Net Gain</u></p> <p><u>Except for householder applications there will be no net loss of biodiversity on development sites. 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.</u></p>	As set out in this statement	N/A
TBC	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 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. The Statutory Metric should also be used to demonstrate no net loss of biodiversity even where Biodiversity Net Gain does not apply.</u></p>	As set out in this statement	N/A