

# Memo

**To:** Jonathan Markwell

**From:** Cathy Holwill (RBC Ecology Consultations)

**CC:**

**Date:** 19 February 2026

**Re:** Application ref: PL/25/1706

Address: Forbury Retail Park, Kenavon Drive, Reading, RG1 3HS

Description: Outline application with all matters reserved with the exception of access, for site redevelopment involving the demolition of all existing structures & a residential-led mixed use proposal for up to 700 residential units (Class C3) & up to 3,000 sqm (GEA) of commercial uses (Class E), together with various associated works including replacement pedestrian and vehicle access routes, open spaces, hard & soft landscaping & sewer works, partial basement excavation, up to 130 basement level car parking spaces, up to 53 separate car parking spaces for Class E uses, up to 600 cycle parking spaces & servicing facilities. This application is accompanied by an Environmental Statement

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The application for the replacement of an existing retail park with a residential led mixed use development scheme comprising commercial units and 700 flats across 12 blocks.

The Ecology report (Stantec, September 2025) has been undertaken to the appropriate standard and states that the site is of generally low ecological value comprising predominantly hardstanding and buildings, small areas of grassland and shrubs as well as trees alongside the railway line and scattered trees at the front of the site. Habitats on site are considered unsuitable for bats, reptiles, great crested newt, badgers or other protected species.

There are also a number of stands of semi-invasive non-native cotoneaster which would need to be removed in a manner that ensures that they are not spread into the wild. Measures to protect nesting birds during construction works and other retained habitats are outlined within the report

A condition should therefore be set to ensure that a Construction Environmental Management Plan for Biodiversity (CEMP: Biodiversity) – wording is provided below

## **Biodiversity Net Gain (BNG)**

The application is subject to mandatory net gain requirements as outlined in Schedule 7A of the Town and Country Planning Act 1990.

A Biodiversity Net Gain assessment and report (Stantec, November 2025) has been submitted using the Statutory Biodiversity Metric, and is based on the indicative illustrative masterplan provided. The existing site comprises a large area of hardstanding/buildings of little wildlife value with numerous trees shown to the rear of the site (along the railway line) and along the front of the site.

The assessment results indicate that a 2.5824 net gain in area habitat units (equivalent to 176 %) and a large net gain in hedgerows units (4.03 area habitat units) can be achieved. The masterplan shows new planting including green roofs (sedum and wildflower) on each of the 12 blocks, communal planting areas, 94 new trees, a small pond, ground cover planting ie shrubs and new native hedges.

Based on the information provided, the linear baseline habitats appear to have been accurately accounted for in the Metric.

#### Red line Boundary (RLB) and plans showing the baseline and post development habitats

It is unclear from the submitted details precisely where the RLB is located. The existing fencing along the northern boundary would reasonably be expected to define the extent of the RLB. However it seems the habitat maps within the BNG assessment show the RLB both inside and crossing this fence line. This requires clarification and is of importance as there a number of trees along the northern boundary of the site. A brief site visit showed some of these trees are located within the fenceline – whereas the baseline habitat map provided shows a line of trees outside of the RLB. Furthermore, the ecology report (Photo 3) refers to “... *Scattered trees and scrub along the northern Site boundary – trees located both in and outside of the boundary fence. ...*”

Confirmation should be provided that all land and habitats within the red line boundary (RLB) have been fully assessed.

The baseline habitat map provided shows areas including trees that are outside the RLB – this is inconsistent with the post development habitats map. Both the baseline and post development maps should only show habitats within the RLB. Any retained trees should also be identified and shown as such on the post development plans.

The DAS also refers to the retention of trees along the northern boundary to maintain the railway wildlife corridor. However, if these trees fall outside of the RLB , they would not be within the applicants ownership and control This point would also need clarification.

It is therefore not clear whether all trees within the application boundary have been included within the BNG baseline assessment. The BNG metric calculation itself includes a comment the line regarding ‘Urban Trees’ stating “*34 small moderate trees at baseline/ 16 small- moderate condition trees to be removed*” and these 34 trees appear to be those along the southern area of the site (although the baseline habitat map shows 35 trees, which will also need to be clarified)

Nonetheless, subject to clarification of the above points, it seems reasonable to assume that the proposals will result in a net gain for biodiversity for both linear and area based habitats..

Consequently, if planning permission is granted, it will be contingent on meeting the pre-commencement general biodiversity net gain condition. This condition requires the submission and approval of a Biodiversity Gain Plan, demonstrating how a 10% increase in biodiversity value will be achieved for the development – please see informative wording below.

### **Biodiversity Enhancements**

Paragraph 193 of the NPPF (2024) states that “*opportunities to improve biodiversity in and around developments should be integrated as part of their design*”.

The submitted ecology report includes reference to the inclusion of integrated bird and bat boxes on the buildings and larger trees. These features should be installed in accordance with British Standard BS 42021:2022, with details of their specification, location, and installation methods provided. A variety of bird boxes should be included, with particular emphasis on swifts—a species in decline in Reading. Monitoring arrangements should also be set out in accordance with BS 42021:2022. These enhancements should be secured by condition, example wording provided below.

Full specifications are also required for biodiversity roofs which appear to be a mix of both sedums and wildflower planting. These should be accompanied by cross-sectional drawings of roof planting areas showing substrate depth, along with confirmation from a qualified architect or structural engineer that the buildings are capable of supporting the proposed green roofs (the council needs to be confident that the proposed landscaping on the roofs are structurally feasible and can be effectively implemented.)

## **Lighting:**

The site lies adjacent to a tree lined railway line which is of significant value for wildlife and likely to be used by foraging and commuting bats.

Paragraph 198 of the NPPF states that planning decisions should limit the impact of light pollution from artificial light on nature conservation. Lighting can have an adverse impact on wildlife and is one of the reasons for a significant reduction in invertebrate numbers. Excessive lighting can also adversely affect other species groups such as bats and birds.

Section 6.5.18 (External Lighting Strategy) of the DAS states that *“An external lighting strategy will be developed to complement the architectural lighting strategy and to bring theatre and energy to the key public spaces.”*. However, it is unclear from this statement whether this strategy has or hasn't been done – in any case it doesn't appear to have been submitted.

Any lighting strategy should ensure that it adheres to the Institute of Lighting Professionals (ILP) Guidance Note (GNo8/23) *‘Bats and Artificial Lighting At Night (2023)’* to ensure a wildlife friendly lighting scheme. This is particularly important along the adjacent wildlife corridor associated with the railway line which should remain dark and unlit.

The use of uplighters are referenced in the DAS – however uplighting and other sources of light spill are likely to prevent birds from using the trees for roosting and will reduce their value to other wildlife. As such, uplighters should be removed from the lighting proposals. We would also need confirmation that the bird and bat boxes installed as enhancements are not subject to excessive lighting. The lighting strategy across the site needs to be developed in consultation with the project ecologist to ensure that external lighting does not adversely impact any proposed bat and bird roosting features and that any currently dark areas such as the railway line wildlife corridor remain sufficiently dark at night. It is therefore recommended that the full details of the lighting are submitted in conjunction with plans for the location of bird and bat boxes.

As such a condition should be set to ensure that a wildlife friendly lighting scheme is provided. Suggested wording is provided below.

## **Summary**

The ecological impact of the proposals during and after construction will be minimised if a Construction Environmental Management Plan for Biodiversity is implemented.

The proposals are likely to result in a net gain for biodiversity as required.

Subject to the conditions below, there would be no objections to this application on ecology grounds.

## **Conditions**

### **Construction Environmental Management Plan: Biodiversity (CEMP: Biodiversity**

Condition: No development shall take place (including demolition, ground works, vegetation clearance) until a Construction Environmental Management Plan: Biodiversity (CEMP: Biodiversity) has been submitted to and approved in writing by the Local Planning Authority. The CEMP: Biodiversity shall include the following:

- a) Risk assessment of potentially damaging construction activities.

- b) Identification of “biodiversity protection zones”.
- c) Practical measures (both physical measures and sensitive working practices) to avoid or reduce impacts during construction (may be provided as a set of method statements).
- d) The location and timing of sensitive works to avoid harm to biodiversity features.
- e) The times during construction when specialist ecologists need to be present on site to oversee works.
- f) Responsible persons and lines of communication.
- g) The role and responsibilities on site of an Ecological Clerk of Works (ECoW) or similarly competent person.
- h) Use of protective fences, exclusion barriers and warning signs.

The approved CEMP: Biodiversity shall be adhered to and implemented throughout the construction period strictly in accordance with the approved details unless otherwise agreed in writing by the local planning authority.

Reason: To minimise impacts on biodiversity in accordance with Paragraphs 187 and 192 of the NPPF.

#### **Green and Biodiverse Roofs –**

Condition: Prior to commencement of above-ground works (excluding demolition and site preparation), details of all green/biodiverse roofs shall be submitted to and approved in writing by the Local Planning Authority. These shall include:

- Cross-sectional drawings showing build-up and planting depths;
- A planting specification, including species and maintenance;
- Written confirmation from a qualified architect or structural engineer that the structures can support the proposed landscaping.

The development shall be implemented in accordance with the approved details and retained as such thereafter.

Reason: To ensure the proposed roof landscaping is structurally feasible and deliverable, and provides enhancement of biodiversity across the site.

#### **Landscaping – use standard L2 conditions to match the BNG Plan**

##### **Lighting**

Condition: Prior to commencement of the development (excluding demolition and site preparation), a report detailing the internal (from windows facing the railway line) and external lighting scheme and how this will not adversely impact upon wildlife shall be submitted to and approved in writing by the LPA. The report shall include the following figures and appendices:

- A layout plan with beam orientation
- A schedule of equipment
- Measures to avoid glare
- An isolux contour map showing light spillage to 1 lux both vertically and horizontally and areas identified as being of importance for commuting and foraging bats.

The external lighting shall thereafter be implemented in accordance with the approved details prior to the first occupation of any residential unit

Reason: To limit the impact of artificial lighting on biodiversity and to protect the ecological value of the adjacent railway corridor, in accordance with paragraphs 192 and 198 of the NPPF and Local Plan policies EN11 and EN12.

**Biodiversity Enhancements:**

Condition: Prior to commencement of the development (excluding demolition and site preparation), details of biodiversity enhancements, to include bird and bat boxes, bricks or tiles built into the walls of the new buildings and proposals for native and wildlife friendly landscaping, shall be submitted and approved in writing by the council. All bird and bat boxes should be installed in accordance with British Standard BS 42021:2022, and the submitted details shall include specification, location, installation details and monitoring and maintenance arrangements in line with BS: 42021:2022.

Prior to first occupation, a brief letter report shall be submitted and approved in writing by the Council, confirming that the approved biodiversity measures have been installed. The report will include photographs of the features in situ and a simple plan showing their location

Reason: To incorporate biodiversity improvements in and around developments in accordance with paragraph 193 of the NPPF

**Biodiversity Net Gain -**

Informative: Please note that this permission is has been granted subject to the statutory condition ("the biodiversity gain condition") that development may not begin unless:

- (a) a Biodiversity Gain Plan has been submitted to the planning authority, and
- (b) the planning authority has approved the plan.

Failure to submit a Biodiversity Gain Plan prior to the commencement of development is a breach of planning consent and may lead to formal enforcement action being taken that will require all development on site to cease.

You should ensure that works do not commence until Biodiversity Gain Plan has been submitted to and approved in writing by the council and "the biodiversity gain condition" has been discharged.