

Memo

To: Jonathan Markwell

From: Cathy Holwill (RBC Ecology Consultations)

CC:

Date: 10 July 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

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.

Biodiversity Net Gain (BNG)

Following our previous queries regarding the Biodiversity Net Gain calculation, the applicant has submitted a document entitled:- *Forbury Retail Park Clarification Note_v2.pdf* (Stantec, June 2026) . Our queries related to the original baseline habitat assessment within the BNG calculation. The clarification note confirms that the original BNG baseline assessment did not include 18 trees located within/on the application red line because of issues with the topographical mapping used to inform the BNG assessment. As such trees along the northern boundary were excluded from the calculation.

Including these 18 trees in the calculation leads to an increase in the baseline habitat value from 1.46 to 3.81 area habitat units (AHU) . This works out at an increase of over 160% and it is therefore difficult to see how the document has regarded this as a 'slight' change to the baseline value.

The document states that "*whilst there is a slight change to the pre-development baseline as a result of the inclusion of these northern boundary trees, the Site is likely to still achieve (subject to final landscape design) over 10% BNG for habitats*". However, a revised statutory biodiversity metric and updated habitat plans has not been submitted to support this statement.

As the applicant has confirmed that the original baseline assessment was incomplete, the previously submitted BNG calculation and reported net gain cannot be relied upon. The document states that a "A detailed BNG assessment will be submitted as part of the Reserved Matters Application ". However the Local Planning Authority needs to be satisfied at this stage that the outline scheme is capable of delivering the mandatory 10% Biodiversity Net Gain through providing

on-site habitats , off-site biodiversity units or both. Currently this is not the case and the applicant should be asked to provide:

1. a revised statutory BNG metric calculation showing the corrected baseline;
2. an updated baseline habitat plan
3. confirmation that the outline plans are capable of providing 10% BNG plus details of how this will be achieved - this should include details of how any shortfall below 10% net gain will be provided if necessary.

Summary

As the original BNG baseline was incorrect, the previously submitted BNG calculation and reported net gain cannot be relied upon. A revised BNG metric will need to be provided to demonstrate how the scheme is capable of delivering mandatory 10% BNG.