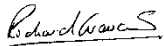
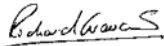




PROVIDING TRUSTED ECOLOGICAL ADVICE

**BIODIVERSITY NET GAIN REPORT FOR LAND SOUTH OF ASCOT HIGH STREET
V0.2 UPDATED**

Project	Prepared By	Approved by	Client	Status	Date
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INTRODUCTION

Instruction

Richard Graves Associates were instructed by London Square Developments Ltd to complete a Biodiversity Net Gain (BNG) calculation for the redevelopment proposals for a site currently used for race day car parking, at Land to the south of the High Street, Ascot.

Background

The Site covers approximately 2.77 hectares (ha) and is centred at Ordnance Survey (OS) grid reference: SU 92328 68700. It is located on the southern side of Ascot High Street and the eastern side of Station Hill.

The Site was visited for the Phase 1 Habitat Survey and Protected Species Walkover by Richard Graves BSc (Hons) MSc PGDip CEcol CEnv FCIEEM and Dr Suzy Cardy BSc (Hons) MSc CEcol MCIEEM on the 18th January 2022 (Cardy, 2022).

Project Ecologist

Richard Graves BSc (Hons) MSc PGDip CEcol CEnv FCIEEM has been appointed to undertake the BNG assessment for the site. Richard is the director of Richard Graves Associates with over 29 years' experience of ecological issues in relation to development projects. Richard is a chartered ecologist and environmentalist and fellow of the Chartered Ecology and Environmental Management (CIEEM) and holds survey licences for protected species.

Biodiversity Net Gain Requirements

A BNG calculation has been requested by the local Planning Authority (LPA) The Royal Borough of Windsor and Maidenhead (RBWM), as a planning requirement for the application, fulfilling the requirements of the National Planning Policy Framework (NPPF) (DCLG, 2021).

The NPPF – which applies only to England – was first published in 2012. It provides the framework for producing local plans for housing and other development, which in turn provide the background against which applications for planning permission are decided.

The NPPF must be taken into account in preparing the development plan and is a material consideration in planning decisions. Planning policies and decisions must also reflect relevant international obligations and statutory requirements.

When determining planning applications, local planning authorities should apply the following principles:

- If significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused
- Development on land within or outside a Site of Special Scientific Interest (SSSI), and which is likely to have an adverse effect on it (either individually or in combination with



other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of SSSIs

- 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
- Development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to incorporate biodiversity improvements in and around developments should be encouraged, especially where this can secure measurable net gains for biodiversity. While opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate.

Of particular significance in the 2021 amendments, the NPPF now requires opportunities to incorporate biodiversity improvements in and around development. This demonstrates further steps taken by the government towards achieving the 25 Year Environment Plan (2018) which sets out the aspiration to mainstream BNG in the planning system and move towards approaches that integrate natural capital benefits.

The site is not an SSSI and contains no irreplaceable habitats. The proposals do not result in significant harm to biodiversity and opportunities to deliver biodiversity improvements have been maximised as part of the landscaping and architectural design. This iteration of the BNG calculation has been produced following consultation with the Royal Borough of Windsor and Maidenhead and revisions to the landscape proposals.



BIODIVERSITY NET GAIN - APPROACH

Introduction

Biodiversity is essential to sustain our society and economy. Enhancing biodiversity is integral to sustainable development, and BNG is an approach to embed and demonstrate biodiversity enhancement within development. It involves first avoiding and then minimising biodiversity loss as far as possible and achieving measurable net gains that contribute towards local and strategic biodiversity priorities. BNG does not apply to statutorily designated sites or irreplaceable habitats.

BNG is defined as “*development that leaves biodiversity in a better state than before, and an approach where developers work with local governments, wildlife groups, landowners and other stakeholders in order to support their priorities for nature conservation.*” (Baker, 2019)

Achieving BNG relies on the different stakeholders recognising the aims, and sometimes constraints, of each stakeholder involved. Stakeholders are defined as “*individuals and organisations who are actively involved in the project, or whose interests may be positively or negatively affected as a result of project execution or successful project completion.*” At a strategic level, national policies set the context for LPAs and corporate strategies drive an organisation’s BNG agenda. At the project level, stakeholders influence decisions through consultations and how they communicate and collaborate.

BNG should be proportionate to the development and the potential impact on biodiversity. Such proportionate approaches are more likely to be achieved if strategically planned for and incorporated within local plans from the outset.

The Environment Act 2021 (HMG, 2021) received royal assent in November 2021.

Mandatory BNG as set out in the Environment Act 2021 (HMG, 2021) applies in England only by amending the Town & Country Planning Act (TCPA) and is likely to become law in 2023. The Act sets out the following key components to mandatory BNG:

- Minimum 10% gain required calculated using Biodiversity Metric & approval of net gain plan.
- Habitat secured for at least 30 years *via* obligations/conservation covenant.
- Habitat can be delivered on-site, off-site or *via* statutory biodiversity credits.
- There will be a national register for net gain delivery sites.
- The mitigation hierarchy still applies of avoidance, mitigation and compensation for biodiversity loss.
- Does not apply to Nationally Significant Infrastructure Projects (NSIPs) or marine development.
- Does not change existing legal environmental and wildlife protections.



The current Biodiversity Metric 2.0 was launched in April 2023 by DEFRA. The Biodiversity Metric is designed to provide ecologists, developers, planners and other interested parties with a means of assessing changes in biodiversity value (losses or gains) brought about by development or changes in land management. The Metric is a habitat-based approach to determining a proxy biodiversity value.

BNG is now mandated in The Environment Act 2021, a minimum of 10% net gain will be required, once regulations are issued, by most developments, but currently this is an aspirational percentage.

There will be some exceptions to the BNG requirement, for example permitted development or minor householder applications, although this will be detailed in secondary legislation, which means that the regime is not expected to be implemented until 2023.



THE MITIGATION HIERARCHY

The mitigation hierarchy is the cornerstone of achieving BNG. The sequential order of mitigation actions is listed below:

1. Avoidance: This first stage is to avoid harm to biodiversity, for example, by locating to an alternative site.
2. Minimisation: If avoiding all adverse effects is not possible, action is taken to minimise these effects, which can include timing works to avoid sensitive periods.
3. Compensation: Addressing residual adverse effects is the final stage, only considered after all possibilities for avoiding and minimising the effects have been implemented. Compensation does not prevent the effects, rather it involves measures to make up for residual effects that cannot be prevented.

Offsetting is a form of compensation that trades losses of biodiversity in one location with measurable gains in another – biodiversity offsets have a formal requirement for measurable outcomes. Offsetting losses of biodiversity with gains elsewhere can be within or outside of the development footprint.

By following the mitigation hierarchy, developers should demonstrate that they have tried to maximise habitat retention and creation on site, before considering off-site locations. If they choose an off-site location, the Government expects a range of offset providers to offer their land, for example local authorities, wildlife trusts or bespoke offset providers.



STAKEHOLDER ENGAGEMENT

Good practice for BNG is to engage stakeholders early in the process; this can significantly improve the biodiversity outcomes. The scale of the stakeholder engagement should be proportionate to the size of the project.

The following stakeholders have been identified at this application stage:

- The Royal Borough of Windsor and Maidenhead (the local planning authority)
- The applicant
- Richard Graves Associates Ltd (Project Ecologist)
- Exterior Architecture (Landscape Architect)
- Aspect Arboriculture (Arboriculture Consultancy)



BASELINE CONDITIONS

The following baseline habitats in Table 1 were identified from a site assessment by the project ecologist with areas confirmed by clients and used in the BNG calculation using the Metric 4.0. The habitats were surveyed using Phase 1 Survey (JNCC, 2010) translated into the UK Habitat Classification method (Butcher, 2020). Interpreted to the level of detail that the metric supports.

The baseline areas before January 2020 as required for the metric assessed from Google Earth Pro aerial images suggests that the habitats present at that time were substantially the same as recorded in 2022. For the purpose of the calculation this has been interpreted as “*not in a local strategy*” in the strategic significance column.

Table 1: Baseline habitat types and sizes

Broad Habitat type (UK Habitat Classification) for use within the Metric	Habitat type (UK Habitat Classification) for use within the Metric	Size of habitat type (area ha / length km)
Urban	Artificial Unvegetated Unsealed Surfaces	0.1698 ha
Grassland	Modified Grassland	0.1698 ha
Urban	Vacant / derelict land / bare ground	0.1689 ha
Urban	Urban Tree	1.443 ha
Hedgerow	Native Hedgerow	0.0076 km
	Total Site Area (excluding Urban Trees):	2.77



ONSITE HABITAT CREATION

Habitat creation is the removal or loss of an existing habitat to create a new, different habitat. It can also involve creating habitat where none was previously present (including from bare earth and hardstanding). Habitat enhancement is increasing the biodiversity value of an existing habitat, for example by improving its biodiversity capacity or removing factors that degrade its value. When designing BNG, a mixture of habitat creation and enhancement can be appropriate.

Table 2 summarises the habitat creation in terms of the Metric 4.0 calculation. The habitats proposed are taken from landscape plans prepared by Exterior Architecture (Ascot Masterplan) (Exterior Architecture, 2023), translated into the best available UK Habitat Classification habitat that can be selected in the metric.



Table 2: Habitat types and sizes - Habitat creation and Enhancement (On-site)







New / Enhanced Habitat	Size (ha / km)
Artificial Unvegetated Unsealed Surfaces	1.3136 ha
Rain Garden	0.0516 ha
Modified Grassland	0.1424 ha
Lowland Meadow	0.5392 ha
Developed Land Sealed Surfaces	0.5213 ha
Other Neutral Grassland	0.2065 ha
Urban Tree	0.3866 ha
Native Hedge	0.0109 km
Total Site Area (Excluding Urban Trees) 2.77 ha	



BIODIVERSITY NET GAIN RESULTS

The Headline results from the Metric 4.0 are shown below in Table 3.

Table 3: BNG Headline Results

Land South of Ascot High Street				
Headline Results		Return to results menu		
Scroll down for final results 				
On-site baseline	Habitat units	10.97		
	Hedgerow units	0.02		
	Watercourse units	0.00		
On-site post-intervention <small>(Including habitat retention, creation & enhancement)</small>	Habitat units	11.44		
	Hedgerow units	0.04		
	Watercourse units	0.00		
On-site net change <small>(units & percentage)</small>	Habitat units	0.47	4.26%	On-site net gain is less than target set 
	Hedgerow units	0.03	172.00%	
	Watercourse units	0.00	0.00%	
Off-site baseline	Habitat units	0.00		
	Hedgerow units	0.00		
	Watercourse units	0.00		
Off-site post-intervention <small>(Including habitat retention, creation & enhancement)</small>	Habitat units	0.00		
	Hedgerow units	0.00		
	Watercourse units	0.00		
Off-site net change <small>(units & percentage)</small>	Habitat units	0.00	0.00%	
	Hedgerow units	0.00	0.00%	
	Watercourse units	0.00	0.00%	
Combined net unit change <small>(Including all on-site & off-site habitat retention, creation & enhancement)</small>	Habitat units	0.47		
	Hedgerow units	0.03		
	Watercourse units	0.00		
Spatial risk multiplier (SRM) deductions	Habitat units	0.00		
	Hedgerow units	0.00		
	Watercourse units	0.00		
FINAL RESULTS				
Total net unit change <small>(Including all on-site & off-site habitat retention, creation & enhancement)</small>	Habitat units	0.47		
	Hedgerow units	0.03		
	Watercourse units	0.00		
Total net % change <small>(Including all on-site & off-site habitat retention, creation & enhancement)</small>	Habitat units	4.26%		Total net gain achieved is less than target set 
	Hedgerow units	172.00%		
	Watercourse units	0.00%		
Trading rules satisfied?	Yes 			
Unit Type	Target	Baseline Units	Units Required	Unit Deficit
Habitat units	10.00%	10.97	12.07	0.63
Hedgerow units	10.00%	0.02	0.02	0.00
Watercourse units	10.00%	0.00	0.00	0.00
				Unit requirement met or surpassed 
				Unit requirement met or surpassed 

The completed master Metric 4.0 has been included as a separate document (Excel spreadsheet).

Implementing the development will result in a gain of 0.47 habitat units (a 4.26% net gain) and a significant net gain of 0.03 hedgerow units (a 172% significant net gain) and trading rules are satisfied.

In order to achieve a net gain the most important commitment required is to improve the condition of retained mature trees within the site. The current condition of the trees is considered to be poor, resulting from soil compaction and over-management (from its use as temporary car parking). The removal of car parking and more sympathetic management of retained trees is expected to enhance the trees to a 'good' condition over 30+ years, which



delivers a gain of 4.97 units. The new habitats proposed for the site, including new tree planting will deliver 6.47 units, a total of 11.44 units from a baseline of 10.97 units.

The drawings of baseline and proposed habitats are shown as Appendix A.



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- Cardy, S. (2022). *Ascot High Street, Preliminary Ecological Appraisal*. London: Richard Graves Associates Ltd.
- DCLG. (2021). *National Planning Policy Framework*. London: GLG.
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- HMG. (2021). *The Environment Act*. London: HMSO.
- JNCC. (2010). *Handbook for Phase 1 Habitat Survey*. Peterborough: JNCC.



APPENDIX A
Figure 1 Baseline Habitats





- Legend**
- Indicative site boundary
 - A3.1 Broadleaved parkland/scattered trees
 - A3.2 Coniferous parkland/scattered trees
 - J1.2 Cultivated/disturbed land - amenity grassland
 - J1.4 Introduced shrub
 - J2.1.2 Intact hedge - species-poor
 - J3.6 Buildings
 - J5 Hard standing
 - Target note

0	11/03/2022	FIRST ISSUE	JMG	SC	RG
Rev	Revision Date	Purpose of revision	Drawn	Check'd	App'd



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Project
High Street, Ascot

Drawing title
Figure 3: Phase 1 Habitat Survey

Scale
1:1000 @ A3

Drawing number
22RG-05-01

Rev
0

This drawing is not to be used in whole or part other than for the intended purpose and project as defined on this drawing. Refer to the contract for full terms and conditions. Do not scale from this drawing.

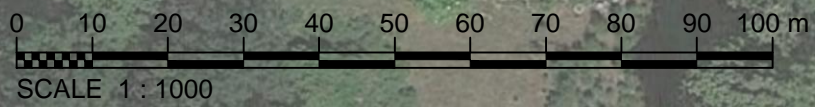


Figure 2 Habitats after Development

Please Refer to the Landscape Masterplan: 2157-EXA-00-00-DR-L-00100 Rev P03 (Exterior Architecture, 2023).

