

APPENDIX 11
Detailed Biodiversity Net Gain Report

BIODIVERSITY NET GAIN ASSESSMENT
AND TREE CANOPY REPORT
BOARDMASTERS, PERMANENT PLANNING
Issue 3 – January 2024



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Document information

BIODIVERSITY NET GAIN ASSESSMENT AND TREE CANOPY REPORT BOARDMASTERS, PERMANENT PLANNING

Document information

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01-11-2023	Amy Horn-Norris	Adrian Spalding	Issue 2 – metric v4.0	BNG_Boardmasters Permanent Planning_Iss2_V1 (Appendix to main Ecology report)
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Disclaimer

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1. INTRODUCTION

1.1. Background

Spalding Associates (Environmental) Ltd has been commissioned to undertake Biodiversity Metric calculations for permanent planning for the festival (replacing its rolling temporary consents) and also to extend the size of the festival from 184.5 Hectares to 229.2 Hectares, an increase of 44.7 Hectares, refer to Figure BNG1.

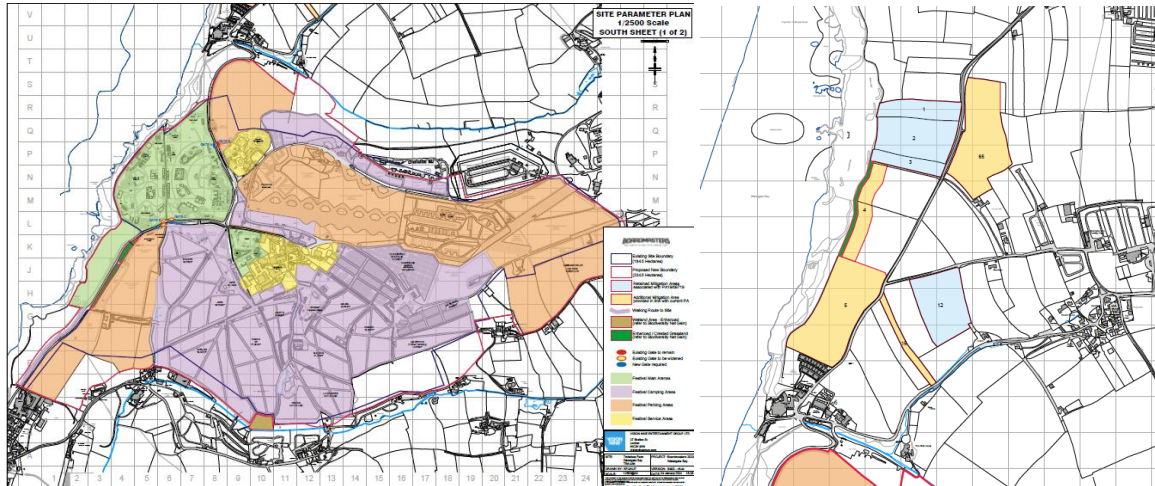


Figure BNG1. Indicative Site Parameter Plan (V6.44), Vision Nine Entertainment Group Ltd, October 2023. Main Proposal Site left and northern mitigation areas right.

The National Planning Policy Framework 2019 and the Cornwall Local Plan Strategic Policies 2010-2030 require development to show Biodiversity Net Gain.

The Cornwall Council Draft Chief Planning Officer’s Advice Note: Biodiversity Net Gain in Cornwall provides the following guidance: ‘From 1st March 2020 all major developments must demonstrate at least a 10% Net Gain in Biodiversity.’

It is important to note that this is a temporary event: public attend event for 5 days. Along with the set up and deconstruction (known as “build and break”) the total length of time for the event is 36 days in total (one twelfth of the year) after which all habitats are returned to their initial state (within 10 days). No permanent infrastructure is currently planned for the event. There is currently no function to account for temporary events within the DEFRA metric, therefore a target of providing at least 1% biodiversity was followed for the event in terms of both linear and area habitats.

In addition to Biodiversity Net Gain Cornwall Council have recently adopted the Supplementary planning document Climate Emergency DPD guidance (March 2023) of which Policy G3 relates to Tree Canopy (phased introduction from 15 June 2023)¹. Tree canopy has also been considered within this report.

¹ <https://www.cornwall.gov.uk/media/nlckvq1c/policy-guidance-climate-emergency-dpd-v11-18-october-2023.pdf>

2. OVERVIEW OF THE DEFRA BIODIVERSITY NET GAIN METRIC CALCULATOR AND TREE CANOPY CALCULATOR

Cornwall Council, in the Chief Planning Officer's Advice Note: Biodiversity Net Gain in Cornwall, indicates that the council requires that biodiversity is measured, both before and after development, according to the most up to date calculation tool.

The metric tool automatically scores different habitat types by predetermined relative biodiversity values referred to as units. The predevelopment site is surveyed, and the habitats identified and mapped by a suitably qualified ecologist. The metric tool provides the baseline unit score which is then used in designing the development. The biodiversity net gain is therefore given a score when the number of baseline biodiversity units are subtracted from the number of units that the design is predicted by the ecologist to provide.

Net results are tabulated as 'headline results' within the calculator tool; these have (necessarily) been replicated from the metric tool screen by taking screen shots.

Net gain for hedges is treated separately to other habitat units; net gain is expected for each and not in combination.

3. METHOD

3.1. Baseline site condition

The Preliminary Ecological Assessment (PEA) included an Extended Phase 1 Habitat Survey (JNCC, 2016)² and the UK Habitat Classification System³ assessment. These surveys and report were carried out by Spalding Associates in June 2023. The baseline conditions for the biodiversity net gain assessment were based on this report. The work and report have been undertaken by Amy Horn-Norris BSc (Hons) MSc and John Blackburn BSc (Hons) MSc who are suitably qualified ecologists and Full members of the Chartered Institute of Ecology and Environmental Management (CIEEM). Smaller areas were surveyed by Aidan Hulatt BSc (Hons) MSc an Associate member of the Chartered Institute of Ecology and Environmental Management (CIEEM) and freshwater and stream BNG specialist. The work has been completed in accordance with the standards expected of members of CIEEM.

3.2. Biodiversity Metric tool version

The updated calculations have been undertaken using the most recent available Defra Biodiversity Metric 4.0 calculation tool⁴ which was released on 20th April 2023.

² <http://data.jncc.gov.uk/data/9578d07b-e018-4c66-9c1b-47110f14df2a/Handbook-Phase1-HabitatSurvey-Revised-2016.pdf>

³ <https://ukhab.org/>

⁴ <http://publications.naturalengland.org.uk/publication/6049804846366720>

3.3. Tree Canopy Calculator tool version and Cornwall Policy

Tree canopy has also been considered within this report via use of the most recent available version of Cornwall’s tree canopy calculator v3.1, note this is still in “test” form with the final version not yet released.

The most recent relevant Supplementary Planning Document (SPD) regarding tree canopy “Climate Emergency Development Plan Document”⁵ calls for 15% delivery of tree canopy for major developments (extracted from version February 2023, box 1 below). However, there is no information noting what should be included for a temporary event such as this. In line with the strategy thus far a one twelfth delivery would be 1.25%.

Box 1. Policy G3 extracted from most recent Supplementary Planning Document (SPD) Climate Emergency Development Plan Document⁵

Policy G3 – Canopy

All major development should provide, through the retention of existing and or / the establishment of new, canopy coverage equal to at least 15% of the site area (excluding areas of the site that are priority habitat types) in accordance with a Cornwall Council approved calculator or metric.

- 1) Any proposal to remove canopy on the site should be justified in accordance with the canopy mitigation hierarchy.
- 2) Where a pre-development site already contains canopy that exceeds the 15% requirement, the development proposal should ensure the retention of as much canopy as possible on site in line with the mitigation hierarchy and should justify the losses proposed. An alternative canopy cover percentage, as evidenced by a council approved canopy metric, should be agreed with the Local Authority.
- 3) Where there are significant ecological, historical, landscape or operational reasons to justify a canopy requirement of less than 15% on site and this can be fully evidenced, an alternative percentage of canopy provision shall be agreed with the Council.
- 4) Minor development sites (with the exception of householder development and Change of Use (not creating new dwellings or additional floorspace) are not required to demonstrate the 15% canopy target but should explore all options in relation to canopy provision, and take appropriate measures to both avoid or reduce harm to existing onsite trees. Proposals shall include where appropriate and practicable provision of new canopy.
- 5) New canopy should provide a mix of species that are resilient to pests, diseases and climate change and should be delivered in sustainable locations, in a manner that supports the growth and spatial requirements of canopy. New canopy should positively contribute to the climate resilience of the site in a manner which protects and enhances existing canopy.

3.4. Habitat Areas and Hedge Lengths

The habitats have been assessed for the purposes of this report in accordance with the technical guidance for the Biodiversity Metric 4.0 Calculation Tool User Guide⁶. The approximate area (m²) of habitats on site were calculated by using MapInfo© GIS to form polygons for pre- and post-development. Area measures have been converted to hectares as these are the working units of the calculator. Plans for post-construction provisions have been designed in liaison with the clients and are detailed on the Ecological Constraints and Opportunities Plans (ECOP) for the site (Figure 1, main report).

⁵ <https://www.cornwall.gov.uk/media/uxgik4jn/climate-emergency-dpd.pdf>

⁶ Biodiversity Metric 4.0 User Guide; section 1.5, page 8

3.5. Calculations of Tree Canopy

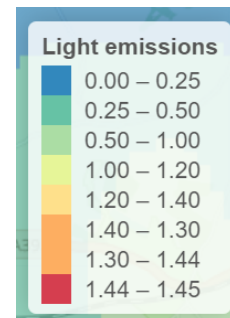
There is no arboriculture report for this site as it is a temporary event with no permanent infrastructure and the red line boundary for the event avoids woodland and the majority of larger trees and their canopies. The canopy of trees within the proposal boundary has however been considered for the purposes of this report (either in isolation or growing on hedgebanks) across the site where their diameter is larger than 10cm. Aerial imagery has been used to provide a best estimate of their actual canopy as it exists on site.

For the tree canopy calculations we have mapped the approximate spread for existing tree groups based on aerial imagery and the baseline ecology survey. In addition to this any hedgebanks assessed as Biodiversity Action Plan Priority Habitat (UK BAP, 2007) have been included with an average width taken to calculate canopy i.e. 3.5 metres. These values have been input to the calculator.

3.6. Connectivity to local nature network /opportunity areas

The site has also been assessed for its proximity to local nature network and opportunity areas as well as light emissions. This has been carried out using the LAGAS Natural Capital Information and Management Hub mapping tool, accessed July 2023. This tool displays links to the existing Nature Network and opportunities for habitat creation in the categories: Woodland, Wetland, Heathland and Other Corridor Opportunities. This Site has been assessed in relation to these existing areas and opportunities.

Light emissions have also been assessed for this site. This map displays the mean radiance (millicandela per m²) across the county with red being the highest and blue being the lowest (extract right).



4. EXISTING SITE CONDITIONS (Map 4)

4.1. Baseline site condition

Maps 3 and 4 within the main report display the existing on-site habitats as assessed from the baseline survey.

4.2. Baseline Tree Canopy

Much of the site is open and exposed reducing the potential for large trees with wide canopies to develop. Sheltered valleys to the north and south of the site have more established trees and woodland however these have been excluded from the current proposal area in line with recommendations from flood/drainage consultants. There are two main areas with more developed trees, towards the west of the site where a small number of Elm trees meet Willow Carr scrub and some Elms on a hedgebanks south of the Trebelsue farm. However, the proposal site is a working farm 11 months of the year, and the majority of hedges were regularly poached by cattle at the time of survey.

The approximate size of the tree canopy formed from groups of trees or standalone examples at this site is equal to 6886 m² (0.6886 Ha). The hedges and hedgebanks with at least 80% woody top contribute an additional 16975m² (1.6975 Ha), identified on Map 3a, main report.

4.2. Connectivity to local nature network /opportunity areas and light spill

The majority of the proposal site lies outside of any listed nature network or opportunity area. The coast path itself is a listed Nature Network area as are the stream valleys to the north and south. There is a small section within the site boundary listed as a network area although this does not obviously relate to any specific landscape feature. This could be an anomaly or perhaps relate to the patch of Elm and Willow adjacent to a footpath near the western side of the site. For further detail see main report.

In terms of Darkscape, the site is enclosed at the north, east and south-west by areas of moderate (Watergate Bay) or high (Cornwall Airport Newquay and towns of Newquay and Porth) light-spill areas resulting in the site itself falling within the moderate zone. These levels of lightspill could potentially dissuade some light-averse species; however, where the land falls into valleys with trees and dense vegetation along or through the site there could be pockets of darker habitat available. For further detail see main report.

5. POST-PLANNING (Figure 1, main report)

5.1. Conditions on-site post-planning

Spalding Associates have provided advice to the client and landowner through liaison with the RSPB. Habitat creation recommendations are based on the principles of the mitigation hierarchy i.e. habitats should be retained where possible, enhanced where appropriate and any losses mitigated for as a last resort.

The proposed festival is temporary following the schedule of:

- Build: 21 days
 - Live: 5 days
 - Strike: 10 days
- (36 days total)**

For the operational phase all habitats will be restored within 10 days of the festival therefore there is no permanent loss of habitat predicted as a result of the operational phase.

The metric considers habitats but does not consider the presence of species; in this case there are important species present which require bespoke habitat provision i.e. birds specifically Corn Bunting. Therefore, Cereal crops have been provided for Corn Bunting which do not deliver gain through the metric but are key for this species' success.

Map 2b and the ECoP (figure 1, main report) detail recommended enhancements for the site, summary below.

Area Habitats

The site is a working farm 11 months of the year therefore the scope for providing area habitats is relatively restricted within the proposal site. However, there is further potential to create and enhance habitats north of the proposal site.

The following will be provided associated with the development:

Location and type	Area in Hectares	Methods	
Main site area habitat provision			
Enhanced area of roadside verge (north-west of field 23)	0.5465	Aim to eliminate invasive Schedule 9 plants via weed control along the road in favour of native species.	
Enhanced wetter field at bottom of the site (field 64)	0.1 of 0.218 enhanced	Plug-planting of field with diversity of marginal inundation-associated species to enhance diversity of field and value to invertebrates and in turn bats and birds. Suitable species are listed in a table the end of this document.	
Off-site area habitat provision			
Retained value for Corn bunting	4	Grazing intensity maintained at reduced level (Graze mid-September to late-March only), increase complexity of structure diversity encouraging emergent vegetation for example Umbellifers.	Current Corn Bunting habitat re-secured
Retained and Enhanced value for Corn bunting	2.411	Long grass replaced with “trash Corn” i.e. 90% Barley 10% Mustard, encourage Umbellifers such as Hogweed.	Current Corn Bunting habitat re-secured and enhanced from long grass to Cereal crop – <i>bespoke enhancement for Corn Bunting</i>
Enhanced margin on west of field 4 adjacent to coast path	0.5565	Temporary Grass Ley/Commercial Arable Crop with a 10m margin of BFS 11 – Coastal Meadow Grassland Seed Mix (composition is listed in a table at the end of this document.)	General enhancement for site also with additional benefit for Corn Bunting, refer to table 10 main report for details.
Grassland enhanced from poor to good quality (field 5 and field 15)	4.0902 & 0.4969	Grazing intensity reduced (Graze mid-September to late-March only) Increase complexity of structure diversity encouraging emergent vegetation for example Umbellifers.	General enhancement for site also with additional benefit for Corn Bunting, refer to table 10 main report for details.
Bespoke enhancement for Corn bunting (Inland 40m of Field 4)	1.0205	Temporary Grass Ley to become Corn Bunting habitat = Long grass replaced with “trash Corn” i.e. 90% Barley 10% Mustard, encourage Umbellifers such as Hogweed.	Cereal crop – <i>bespoke enhancement for Corn Bunting</i>
Bespoke enhancement for Corn bunting (field 65)	3.4227	Commercial Spring Barley Crop to become Corn Bunting habitat = Long grass replaced with “trash Corn” i.e. 90% Barley 10% Mustard, encourage Umbellifers such as Hogweed.	Cereal crop – <i>bespoke enhancement for Corn Bunting</i>

Linear habitats

As a result of the new proposal three existing gates will be widened and there will be two gates created (these are for pedestrian access during the operational phase). Only one of these new gates will affect the linear hedgebanks on site, Gate D, Figure 1 (main report) where 12 metres of Cornish hedgebank will be lost.

It is proposed that a new length of traditional style Cornish Hedgebank be created at the site. The length to be created will be at least 400m total length (0.4km) and topped with locally characteristic native species. The location chosen for this feature has been used to design an appropriate species mix for the location and any species found to be present from ecology surveys at the site. The current proposed location for this feature is around the east and south of fields 19 and 20 which are currently open and exposed cliff-top fields; therefore topping vegetation should mirror other hedgebanks in the local i.e. include a variety of low-growing coastal-associated species. A seed mix such as BFS 11 – Coastal Meadow Grassland Seed Mix with additional plug plants of Heathers and Thrift would be appropriate and provide additional connectivity and habitat for reptiles nearby including Adder and Common Lizard. Occasional woody species including Hawthorn and Elder could also be considered however in this location these should be spaced apart to ensure that sufficient basking opportunities are retained for these reptiles.

If an alternative location were to be chosen for the site the species composition would likely be different for example with a higher percentage of locally characteristic woody species.

5.2. Baseline Tree Canopy

All trees and hedges at the site are proposed to be retained as part of these proposals. No specific tree-planting is proposed as part of the development plan for the site. However, through a current Countryside Stewardship agreement (CLS) additional fencing is to be installed over Autumn 2023 which will result in several of the higher quality BAP hedgebanks being better protected and as a result will develop a higher quality by the time the festival is operational. Fencing will surround fields 29, 30, 32, 36 and 37 including protection of BAP hedgebanks 7, 12, 14, 30, 31, 32, 33, 35, 36 and 39. As this forms part of the CLS these have not been included within the site calculations for the site.

Much of the site is open and exposed reducing the potential for large trees with wide canopies to develop. Sheltered valleys to the north and south of the site have more established trees and woodland however these have been excluded from the current proposal area and will be made inaccessible during the event via security fencing.

6. METRIC CALCULATION RESULTS AND DISCUSSION

6.1. Baseline Habitat Units

6.1.1. Baseline habitats within the red line application boundary

The baseline habitat calculation for the site from the metric is 585.64. The baseline hedgerow units calculation is 128.38.

6.2. Results of the Defra Metric

The table below displays the metric calculation “final results” as a representation of the habitats pre and post-development. Full details of calculations can be found within the filled metric file “Metric 4.0 Calculation Tool_Boardmasters 2023_Issue 2, October_V2b”.

The metric predicts that the proposed enhancements for the site as detailed above will provide an additional 36.05 habitat units and an additional 4.45 hedgerow units. This amounts to a 6.15% gain in habitat units and a 3.47% gain in hedgerow units across the site and mitigation areas to the north.

Table extracted showing “Final results” from metric calculator. File reference: “Metric 4.0 Calculation Tool_Boardmasters 2023_Issue 3, January_V1”.

FINAL RESULTS		
Total net unit change (Including all on-site & off-site habitat retention, creation & enhancement)	<i>Habitat units</i>	36.05
	<i>Hedgerow units</i>	4.45
	<i>Watercourse units</i>	0.00
Total net % change (Including all on-site & off-site habitat retention, creation & enhancement)	<i>Habitat units</i>	6.15%
	<i>Hedgerow units</i>	3.47%
	<i>Watercourse units</i>	0.00%
Trading rules satisfied?	Yes ✓	

6.3. Results from the Cornwall Tree Canopy Calculator

The table below displays the final calculations from the Cornwall Tree Canopy Calculator. There is no specific tree planting planned in line with the proposals and the calculator suggests that 1.3% of the site’s total area is currently covered with tree canopy. Full details of calculations can be found within the filled metric file “Cornwall Tree Canopy Calculator ccc_v3.1_clean_25102023 - TEST_Boardmasters Filled_V1”.

Table extracted showing final calculations from most recent available Cornwall Tree Canopy Calculator. File reference: “Cornwall Tree Canopy Calculator ccc_v3.1_clean_25102023 - TEST_Boardmasters Filled_V1”.

Cornwall Canopy Calculator

2. Retained Canopy Calculator

Site Name/ Address:	Boardmasters Festival, Permanent Planning	KEY Enter value Drop-down menu Calculation Automatic looku Result	Running Total %	1.3%
Applicant:	Vision 9		Retained Canopy	New Canopy
Assessor:	Amy Horn-Norris		1.3%	0.0%
Date:	9th November 2023			

Version 3.1

Canopy Measurements at the 4 cardinal points (for individual

6.4. Discussion of results

Defra Metric Calculations

If the site is developed with the habitat interventions recommended in this report, and calculated by the latest Defra metric, it has the potential to deliver a 6.15% gain in habitat units and a 3.47% gain in hedgerow units across the site and mitigation areas to the north.

Although this is below the 10% which is usually targeted it is considered an appropriate level of enhancement based on the temporary nature of the event and above one twelfth of the delivery for both area and linear habitats. Also, large areas have also been provided for Corn bunting, approximately 4.5 hectares of additional habitat, which do not provide any score within the metric (which does not value cereal crops) but are crucial habitats for Corn Bunting nesting and foraging.

Tree Canopy Calculations

The Cornwall Tree Canopy Calculator suggests that the retention of the existing canopy amounts to 1.3% of the total site area. This is mainly due to the restriction of the redline back from trees and woody canopy along the streams at the north and south of the site. The main driving factor for this is via recommendations by flooding and drainage consultants. Including these areas would raise this percentage delivery, however, ecologically speaking excluding these habitats from the area of the festival and human access will benefit ecology by protecting them from potential damage and degradation albeit temporary.

The most recent relevant Supplementary Planning Document (SPD) regarding tree canopy “Climate Emergency Development Plan Document” calls for 15% delivery of tree canopy for major developments although there is no information on what should be included for a temporary event such as this. In line with the strategy thus far a one twelfth delivery would be 1.25% and retained canopy on site slightly exceeds this target.

As stated in section 5.2 above through a current Countryside Stewardship agreement (CLS) additional fencing is to be installed over Autumn 2023 which will result in several of the

higher quality BAP hedgebanks being better protected and as a result will develop a more extensive canopy by the time the festival is operational. As this forms part of the CLS these have not been included within the site calculations for the site but it is expected that these hedgebanks would develop a larger canopy as a result of this new fencing.

In line with point 3 of G3 (extract below) it should be remembered that the majority of the festival site is open and exposed coastal farmland. Hedgebanks, particularly those close to the cliff top and coast path, from a historical and landscape point of view would naturally be low vegetation with limited woody canopy. Also, these open hedgebanks provide important ecological function for species including ground-nesting bees on sunny bare-soil banks and also reptiles through the provision of basking spots.

Policy G3, point 3. Where there are significant ecological, historical, landscape or operational reasons to justify a canopy requirement of less than 15% on site and this can be fully evidenced, an alternative percentage of canopy provision shall be agreed with the Council.

6.4. Further recommendations to maintain and enhance the value of the site

The metric considers habitats but does not consider the presence of species. Corn Bunting has been discussed above. Below is a summary of other species likely to benefit from the proposed enhancements:

- The new coastal grassland strip would enhance the site for invertebrates as well as in turn bats and birds.
- The enhancement of the lower wet field would provide enhancement for amphibians, potentially reptiles, invertebrates and in turn bats and birds.
- The proposed new Cornish hedgebank would provide enhancement for a range of species including invertebrates and reptiles but also bats and birds in terms of foraging.
- The hedgebanks fenced through CLS will act to enhance their value as nesting habitat for birds and foraging habitat for bats and birds.

Please note that where possibly lighting for the festival should be kept away from hedgebanks and the sheltered valleys to the north and south. This is particularly important for those shown to be used by more light-adverse species of bats. There are also buildings at the site used by Barn Owl and bats which should remain unlit with clear passage to allow exit from the site. See ECoP (figure 1) and the bat report for further information.

Table of wet marginal plants appropriate for plug-planting. This mix is from Emorsgate seeds, EM8 – Meadow mixture for wetlands. It is recommended that at least 10 additional species be included in planting to enhance this.

	Marginal meadow Recommended source: Emorsgate seeds, EM8 – Meadow mixture for wetlands		
Wild flowers 20%	Scientific Name	Common name	
	<i>Achillea millefolium</i>	Yarrow	
	<i>Achillea ptarmica</i>	Sneezewort	
	<i>Betonica officinalis</i> - (<i>Stachys officinalis</i>)	Betony	
	<i>Centaurea nigra</i>	Common Knapweed	
	<i>Filipendula ulmaria</i>	Meadowsweet	
	<i>Galium verum</i>	Lady's Bedstraw	
	<i>Leontodon hispidus</i>	Rough Hawkbit	
	<i>Leucanthemum vulgare</i>	Oxeye Daisy	
	<i>Lotus corniculatus</i>	Birdsfoot Trefoil	
	<i>Lotus pedunculatus</i>	Greater Birdsfoot Trefoil	
	<i>Plantago lanceolata</i>	Ribwort Plantain	
	<i>Primula veris</i>	Cowslip	
	<i>Prunella vulgaris</i>	Selfheal	
	<i>Ranunculus acris</i>	Meadow Buttercup	
	<i>Rhinanthus minor</i>	Yellow Rattle	
	<i>Sanguisorba officinalis</i>	Great Burnet	
	<i>Silaum silaus</i>	Pepper Saxifrage	
	<i>Silene flos-cuculi</i> - (<i>Lychnis flos-cuculi</i>)	Ragged Robin	
	<i>Succisa pratensis</i>	Devil's-bit Scabious	
Grasses 80%	Scientific Name	Common name	
	<i>Agrostis capillaris</i>	Common Bent	
	<i>Alopecurus pratensis</i>	Meadow Foxtail (w)	
	<i>Anthoxanthum odoratum</i>	Sweet Vernal-grass (w)	
	<i>Briza media</i>	Quaking Grass (w)	
	<i>Cynosurus cristatus</i>	Crested Dogtail	
	<i>Deschampsia cespitosa</i>	Tufted Hair-grass (w)	
	<i>Festuca rubra</i>	Slender-creeping Red-fescue	
	<i>Hordeum secalinum</i>	Meadow Barley (w)	
	<i>Schedonorus pratensis</i> - (<i>Festuca pratensis</i>)	Meadow Fescue	

Table showing composition of BFS 11 – Coastal Meadow Grassland Seed Mix recommended for creation of enhanced strip of coastal grassland adjacent to the coast path. Other supplier mixes may be appropriate but should match or at least include at least 75% of the species noted below.

Wildflowers:

- 5% *Achillea millefolium* – (Yarrow)
- 8% *Anthyllis vulnearia* – (Kidney Vetch)
- 0.5% *Armeria maritima* – (Thrift)
- 5% *Centaurea scabiosa* – (Greater Knapweed)
- 7% *Daucus carota* – (Wild Carrot)
- 4% *Echium vulgare* – (Viper’s Bugloss)
- 7% *Galium verum* – (Lady’s Bedstraw)
- 2% *Hypericum perforatum* – (Perforate St John’s Wort)
- 2% *Hypochaeris radicata* – (Common Cat’s-Ear)
- 8% *Leucanthemum vulgare* – (Ox-Eye Daisy)
- 3% *Linaria vulgaris* – (Yellow Toadflax)
- 10% *Lotus Corniculatus* – (Bird’s-Foot Trefoil)
- 2% *Ononis repens* – (Common Restharrow)
- 1% *Plantago coronopus* – (Buck’s-Horn Plantain)
- 1% *Plantago maritima* – (Sea Plantain)
- 5% *Plantago media* – (Hoary Plantain)
- 7% *Prunella vulgaris* – (Selfheal)
- 7% *Rumex acetosa* – (Common Sorrel)
- 5% *Sanguisorba minor* – (Salad Burnet)
- 0.25% *Sedum album* – (Biting Stonecrop)
- 0.25% *Sedum anglicum* – (English Stonecrop)
- 3% *Silene maritima* – (Sea Champion)
- 4% *Silene vulgaris* – (Bladder Champion)
- 1% *Thymus praecox* – (Wild Thyme)
- 1% *Tragopogon pratensis* – (Goat’s Beard)
- 1% *Tripleurospermum maritimum* – (Sea Mayweed)

Grasses:

- 2% *Agrostis stolonifera* – (Creeping Bent)
- 1% *Briza media* – (Quaking Grass)
- 4% *Bromus erectus* – (Upright Brome)
- 32% *Cynosurus cristatus* – (Crested Dog’s-Tail)
- 30% *Festuca ovina* – (Sheep’s Fescue)
- 25% *Festuca rubra ssp rubra* – (Red Fescue)
- 1% *Koeleria macrantha* – (Crested Hair Grass)
- 4% *Phleum bertolonii* – (Small Timothy)
- 1% *Trisetum flavescens* – (Yellow Oat Grass)