

**The Ridgeway Primary School  
Hillbrow  
Reading  
Berkshire  
RG2 8JD**

## **Biodiversity Net Gain Assessment**

Ref.: R309\_BNG\_a

| <b>Report Quality Control Information</b> |                           |
|-------------------------------------------|---------------------------|
| <i>Author</i>                             | <i>Sarah Foot MCIEEM</i>  |
| <i>Reviewer</i>                           | <i>John Wenman MCIEEM</i> |

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1 Diesel House, Honey Hill, Wokingham, Berkshire RG40 3BL  
Telephone: 0118 327 1810 Mobile: 07979 403099 E-mail: [info@wenman-ecology.co.uk](mailto:info@wenman-ecology.co.uk)  
[www.wenman-ecology.co.uk](http://www.wenman-ecology.co.uk)

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Registered office: 1 Diesel House, Honey Hill, Wokingham RG40 3BL where you may look at a list of members' names.

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## **1 EXECUTIVE SUMMARY**

- 1.1.1** John Wenman Ecological Consultancy LLP was instructed by ACG Architects to provide a Biodiversity Net Gain (BNG) Assessment of Ridgeway Primary School in Reading. The BNG Assessment was commissioned to accompany a full planning application to be submitted to Reading Borough Council seeking consent for new parking, landscaping and boundary treatment at the site.
- 1.1.2** This report follows a Preliminary Ecological Appraisal carried out in June 2025 (JWEC; August 2026; R309\_PEA\_b). The baseline habitats for the redline application site comprise: u1b5 Buildings; u1b Developed land, sealed surface; g4 Modified grassland; g3c Other neutral grassland; h3h Mixed scrub; h3j Willow scrub; w~27 traditional orchard; u1~847 Introduced shrub; and individual urban trees (including a veteran oak tree). The proposed habitats within the redline application site are derived from the Landscape General Arrangement (site wide).
- 1.1.3** The Statutory Biodiversity Metric calculation tool demonstrates that the proposals cannot achieve the minimum mandatory requirement of 10% net gain for biodiversity by delivering on-site habitat changes only and additional off-site habitat units will be purchased to achieve 10% net gain. The tool shows the application can achieve a net % change of -23.64% in habitat units and a net % change of -100.00% in hedgerow units on-site. The '*The Ridgeway Primary School, Reading – Statutory Biodiversity Metric (R309\_BNG\_a)*' document should be referred to separately for the full calculation. The land-use requirements for the school within the redline boundary restrict the ability to achieve the minimum mandatory requirement of 10% net gain and offsite options will be investigated, either through the use of land within the wider ownership/site or purchase of units from a local habitat bank.

## **2 INTRODUCTION**

### **2.1 Project Background**

**2.1.1** John Wenman Ecological Consultancy LLP was instructed by ACG Architects to provide a Biodiversity Net Gain (BNG) Assessment of Ridgeway Primary School in Reading. The BNG Assessment was commissioned to accompany a full planning application to be submitted to Reading Borough Council seeking consent for new parking, landscaping and boundary treatment at the site.

**2.1.2** This report follows a Preliminary Ecological Appraisal carried out in June 2025 (JWEC; August 2026; R309\_PEA\_b).

### **2.2 Site Location and Context**

**2.2.1** The site comprises The Ridgeway Primary School and its associated grounds in Reading, Berkshire (OS Grid Reference: SU 72979 70419).

**2.2.2** The redline boundary for the BNG strategy comprises 1.75ha of school grounds comprised of multiple buildings surrounded by hard standing and a large area of modified grassland and other neutral grassland to the west of the school buildings and a parcel of lowland mixed deciduous woodland used for forest school on the northwest boundary and a second parcel to the south adjacent to the school access. The land immediately surrounding the school site is predominantly residential to the west and The Cowsey LWS borders the site boundaries to the north, west and south. In the wider area, it is the urban conurbation of Reading town between the Whitley and Earley areas.

### **2.3 Objectives**

**2.3.1** The aim of this BNG Assessment is to demonstrate that a minimum of 10% net gain in biodiversity can be achieved as part of the proposed development. The key objectives are to:

- detail the approach taken for the BNG calculation (i.e. the Statutory Biodiversity Metric);
- describe and map the baseline habitats and important ecological features on site;
- describe and map the proposed habitats based on post-development design;
- complete the biodiversity metric tool with supporting condition assessment sheets; and

- outline the implementation of the design concepts and the long-term management to deliver BNG.

**2.3.2** This BNG Assessment report should be read in conjunction with the completed Statutory Biodiversity Metric calculation tool and habitat condition assessment documents.

### **3 POLICY BACKGROUND**

#### **3.1 National Planning Policy**

**3.1.1** The biodiversity duty imposed through the Environment Act 2021 states that Local Planning Authorities (LPAs) must consider what action they can take to conserve and enhance biodiversity in England.

**3.1.2** The revised National Planning Policy Framework (NPPF), published in December 2024 and last updated in August 2026, sets out the Government's planning policies for England and how they should be applied. Section 19 of the NPPF sets out the approach local authorities should adopt to conserve and enhancing the natural environment when preparing planning policy and when considering planning applications. N2: Improving the natural environment sets out the principles LPAs should apply when determining planning applications, as follows:

*'To contribute positively to the natural environment, and support nature's recovery, development proposals should:*

*a. Consider the environmental qualities of land proposed for development, including habitats, landscape character and the natural beauty of the countryside, and identify opportunities for those qualities to be conserved or enhanced (including through requirements for biodiversity net gain where these apply);*

*b. Take into account the quality of agricultural land (including that classified as best and most versatile agricultural land, and its grade), and if significant development of agricultural land is necessary, use areas of poorer quality land where possible;*

*c. Take suitable opportunities to connect to and strengthen ecological networks that extend beyond the site, drawing on the measures proposed by Local Nature Recovery Strategies, National Forest Strategies and Community Forest Plans, where present, and other relevant assessments;*

*d. Conserve and enhance existing natural features of visual, historic or nature conservation value (such as established trees and hedgerows) where possible; and*

*use appropriate landscaping to help create a well-designed place and integrate the development into its surroundings;*

*e. Use green infrastructure provided as part of the scheme and nature-based solutions to secure multiple benefits: such as for biodiversity; surface water and pollution management (including maintaining flow rates and water quality); climate change mitigation and adaptation, and recreation;*

*f. Minimise any adverse impacts on biodiversity and include features which support priority or threatened species such as swifts, bats and hedgehogs. Development proposals should incorporate integrated nest boxes (commonly known as swift bricks) into their construction unless there are compelling technical reasons which prevent their use, or would make them ineffective; and*

*g. Ensure that green infrastructure and other features to support nature are located and designed to minimise risk of future failure, and that appropriate measures are in place for any necessary long-term management.*

*2. 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 the development should be refused.*

*3. Development proposals may incorporate biodiversity enhancements which exceed the statutory objective for biodiversity net gain, but this should only be a requirement where it is set out in up-to-date development plan policies for specific site allocations. Decision makers should not give weight to other development plan policies which require biodiversity gains which go beyond the statutory framework, including where a policy requires gains for development proposals which are exempt.'*

**3.1.3** In England, BNG became mandatory for major development from the 12<sup>th</sup> February 2024 and for minor development (small sites) from the 2<sup>nd</sup> April 2024 under Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021). In practice, planning permission in England is now subject to a condition to secure a minimum 10% net gain for biodiversity, unless the development is a type that is exempt from mandatory BNG requirements.

## 3.2 Local Planning Policy

**3.2.1** Planning policy within the Reading Borough is defined by the policies within the Local Plan (adopted Nov 2019). The policy relevant to biodiversity and natural environment is as follows:

### *'EN12: BIODIVERSITY AND THE GREEN NETWORK*

*a) The identified Green Network, the key elements of which are shown on the Proposals Map, shall be maintained, protected, consolidated, extended and enhanced. Permission will not be granted for development that negatively affects the sites with identified interest or fragments the overall network. The Green Network comprises:*

- Sites with identified biodiversity interest - Local Wildlife Sites, Local Nature Reserves, Biodiversity Opportunity Areas, protected and priority species and their habitats, Priority and Biodiversity Action Plan habitats, and the River Thames and all its tributaries (including the River Kennet and the Kennet & Avon Canal); and*
- Areas with potential for biodiversity value and which stitch the Green Network together – designated Local Green Space and open green spaces, and existing and potential Green Links.*

*New development shall demonstrate how the location and type of green space, landscaping and water features provided within a scheme have been arranged such that they maintain or link into the existing Green Network and contribute to its consolidation. Such features should be designed to maximise the opportunities for enhancing this network. All new development should maximise opportunities to create new assets and links into areas where opportunities are as yet unidentified on the Proposals Map.*

*b) 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. Development should:*

- Protect and wherever possible enhance features of biodiversity interest on and adjacent to the application site, incorporating and integrating them into development proposals wherever practicable; and*

- *Provide new tree planting, wildlife friendly landscaping and ecological enhancements (such as wildlife ponds, bird and bat boxes) wherever practicable.*

*In exceptional circumstances where the need for development clearly outweighs the need to protect the value of the site, and it is demonstrated that the impacts cannot be: 1) avoided; 2) mitigated or; 3) compensated for on-site; then new development will provide off-site compensation to ensure that there is “no net loss” of biodiversity. Provision of off-site compensation shall be calculated in accordance with nationally or locally recognised guidance and metrics. It should not replace existing alternative habitats and should be provided prior to development.’*

- 3.2.2** With regards to mandatory BNG for Reading Borough Council, an addendum to the validation requirements was published in February 2024 and gives a full description of how the biodiversity gain condition will function and provides links to relevant government guidelines outlining how it will work in practice and the requirements for both developers and the local authority.

## **4 METHODOLOGY**

### **4.1 Baseline Information**

#### *Desk Study*

- 4.1.1** A desktop study was conducted by Sarah Foot MCIEEM. The study utilised data from the local environmental records centre and online resources to acquire information on the nature of the site and its surroundings and highlight any potential ecological features.
- 4.1.2** Thames Valley Environmental Records Centre (TVERC) was commissioned to undertake a search of pre-existing records of protected and/or notable species and non-statutorily designated wildlife sites held by them within a 1km radius around a central point inside the site. NatureSpace impact risk zone maps were consulted which predict great crested newt (GCN) presence through the analysis of habitat suitability in the landscape.
- 4.1.3** The DEFRA Data Services Platform was used to obtain geospatial datasets for designated sites (i.e., RAMSAR, SPA, SAC, SSSI) and habitat inventories (i.e., Priority Habitat Inventory, Ancient Woodland Inventory) to be analysed in QGIS. The Multi-Agency Geographical Information Centre (MAGIC) website was examined for granted European Protected Species (EPS) licence applications. Furthermore, open access geospatial datasets and Google Earth satellite imagery were used to determine the extent and connectivity of habitats, how the site is linked to the surrounding landscape and whether the development could have wider scale impacts on biodiversity.
- 4.1.4** Google Earth satellite imagery was consulted to provide insight into historic and current land use; such information helps contextualise the continuity of habitats and determine the importance of existing ecological features.

#### *UK Habitat Classification*

- 4.1.5** A site walkover of the entire school site was undertaken on the 30<sup>th</sup> June 2025 by Steve Foot MCIEEM and Verity West (a qualifying member of CIEEM). The site was surveyed using the UK Habitat Classification (UKHab) system (UKHab Ltd 2023) in accordance with the CIEEM Guidelines for Preliminary Ecological Appraisal 2<sup>nd</sup> Edition (CIEEM 2017). Particular attention was given to evidence of protected and priority species (NERC Act 2006 Section 41 species of principal importance) and the site's

potential to support such species. Habitat condition assessments were carried out in accordance with the Statutory Biodiversity Metric (July 2025).

### *Building Inspection*

- 4.1.6** A detailed inspection of the exterior of the building on-site to be impacted by the proposals was also undertaken on the 30th June 2025 by Stephen Foot registered under Natural England Bat Survey Class Licence CL18 (Registration no.: 2016-23400-CLS-CLS) and assisted by Verity West – a Qualifying member of CIEEM - in accordance with good practice guidelines (Collins 2023). The findings of the building inspection are found in the accompanying Preliminary Ecological Appraisal carried out by John Wenman Ecological Consultancy LLP (JWEC; August 2026; R309\_PEA\_b).

## **4.2 Biodiversity Net Gain Approach**

- 4.2.1** This Biodiversity Net Gain (BNG) Assessment uses the Statutory Biodiversity Metric (July 2025) to calculate the losses and gains in biodiversity unit value resulting from the proposed redevelopment. The biodiversity metric tool has been used to guide the proposed site layout and landscaping in order to deliver a minimum 10% net gain for biodiversity.
- 4.2.2** The biodiversity metric rules must be followed for a valid biodiversity net gain and are as follows:

***Rule 1: The trading rules of this biodiversity metric must be followed.***

***Rule 2: Biodiversity unit outputs, for each type of unit, must not be summed, traded, or converted between types. The requirement to deliver at least a 10% net gain applies to each type of unit.***

***Rule 3: To accurately apply the biodiversity metric formula, you must use the statutory biodiversity metric calculation tool or small sites biodiversity metric tool (SSM) for small sites.***

*The tools remove the need for a user to manually calculate the change in biodiversity value.*

*The tool will summarise the results of the calculation and inform a user whether the biodiversity net gain objective has been met.*

***Rule 4: In exceptional ecological circumstances, deviation from this biodiversity***

*metric methodology may be permitted by the relevant planning authority.*

**4.2.3** The biodiversity metric principles inform the use of the biodiversity metric tool and are as follows:

***‘Principle 1: The metric assessment should be completed by a competent person.***

***Principle 2: The use of this biodiversity metric does not override existing biodiversity protections, statutory obligations, policy requirements, ecological mitigation hierarchy or any other requirements. This includes consenting or licensing processes, for example woodlands.***

***Principle 3: This biodiversity metric should be used in accordance with established good practice guidance and professional codes.***

***Principle 4: This biodiversity metric is not a complex or comprehensive ecological model and is not a substitute for expert ecological advice.***

***Principle 5: Biodiversity units are a proxy for biodiversity and should be treated as relative values.***

***Principle 6: This biodiversity metric is designed to inform decisions in conjunction with locally relevant evidence, expert input, or guidance.***

***Principle 7: Habitat interventions need to be realistic and deliverable within a relevant project timeframe.***

***Principle 8: Created and enhanced habitats should be, where practical and reasonable, local to any impact and deliver strategically important outcomes for nature conservation.***

***Principle 9: This biodiversity metric does not enforce a minimum habitat size ratio for compensation of losses. Proposals should aim to:***

- maintain habitat extent - supporting more, bigger, better and more joined up ecological networks***
- ensure that proposed or retained habitat parcels are of sufficient size for ecological function’***

## **5 BASELINE INFORMATION**

### **5.1 Desk Study**

#### *Designated Sites and Priority Habitats*

**5.1.1** The desk study revealed that the site is not statutorily designated for its wildlife interest and therefore is not currently recognised as being of international or national level conservation significance. No internationally designated sites for nature conservation were identified within a 5km radius of the application site and the site does not fall within any Impact Risk Zones (IRZ) for Sites of Special Scientific Interest (SSSI). There are two nationally designated sites – Pearman's Copse and Maiden Erlegh Park Local Nature Reserves (LNRs) – situated within a 2km radius and two non-statutory designated sites – The Cowsey and Shinfield Park, Nore's Hill Local Wildlife Sites (LWSs) - situated within a 1km radius. The Cowsey LWS borders the school site to the north, west and south. To ensure there are no indirect impacts that could impact the integrity of the LWS such as soil compaction, avoidance and mitigation measures are recommended during the construction phase.

**5.1.2** The application site is characterised by urban habitats, i.e. hard standing and modified grassland – habitats of very low and low distinctiveness. The scattered trees (ranging from young to mature) and other neutral grassland are habitats of medium distinctiveness and hold ecological value at the site level. The parcels of lowland mixed deciduous woodland are priority habitat of high distinctiveness and hold ecological value at the local level and the veteran oak tree in the north is an irreplaceable habitat and of very high distinctiveness and holds ecological value up to county level.

#### *Protected and Notable Species*

**5.1.3** The search of the TVERC database revealed a range of protected and/or notable species records dating from 1960 onwards; no records were found for the application site.

**5.1.4** The NatureSpace GCN District Level Licensing Impact Risk Zone map for Reading Borough Council shows the application site falling within an amber zone, i.e.

suitable habitat where GCN may be present. No potential breeding ponds were identified on OS mapping within a 500m radius of the site.

- 5.1.5** The building inspection identified the building to be impacted by the proposals to be of low potential suitability for roosting bats. A bat emergence survey of the building was undertaken in 2025 as part of a wider bat scoping survey for essential asbestos removal works. No bats were observed emerging from the building.

#### *Baseline Habitats On-site*

- 5.1.6** The UK Habitat Classification (UKHab) habitats within the redline boundary were: u1b5 Buildings; u1b Developed land, sealed surface; g4 Modified grassland; g3c Other neutral grassland; h3h Mixed scrub; h3j Willow scrub; w~27 traditional orchard; u1~847 Introduced shrub; and individual urban trees (including a veteran oak tree) – refer to **Figure 1** below.

## **5.2 Strategic Significance**

- 5.2.1** The site does not fall within any Areas of Particular Importance to Biodiversity (APIB) or Areas that Could become important to Biodiversity (ACB) within the published Berkshire Local Nature Recovery Strategy (LNRS) and therefore is of low strategic significance.

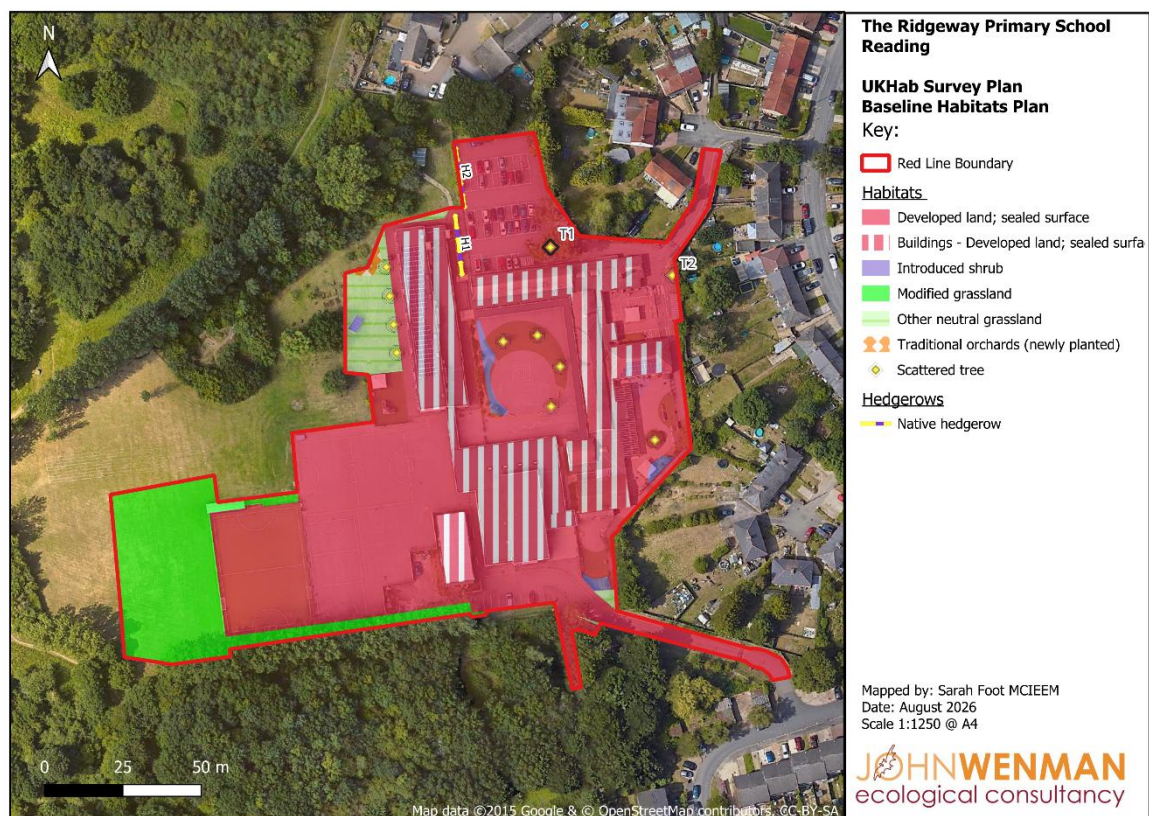


**Figure 1. Baseline Habitats Plan**

**5.2.2** Condition assessments of the grassland, hedgerows and individual trees were completed and are detailed in a separate document (The Ridgeway Primary School; Habitat Condition Assessments; R309\_BNG\_a) and the following was noted:

- The condition assessment for modified grassland was moderate and other neutral grassland was poor (refer to grassland quadrat data in **Appendix 1**).
- Condition assessments for the hedgerows (H1 & H2) were both moderate condition.
- The condition assessments for the trees shows that two are in good condition and seven are in moderate condition. **NB. The veteran oak is an irreplaceable habitat and will be retained; it is included within the irreplaceable habitat tab in the metric.**

### **5.3 Proposed Habitats On-site**

**5.3.1** The post-development habitats on-site are derived from the general landscape arrangement plan (refer to plans in **Appendix 2**) and include the following changes – refer to **Figure 2** below:

- Modified grassland, other neutral grassland and two trees being lost to developed land, sealed surface in the form of roads, footpaths and areas of playground with artificial surfaces.
- 14 small urban trees planted across the site to reach target moderate condition.

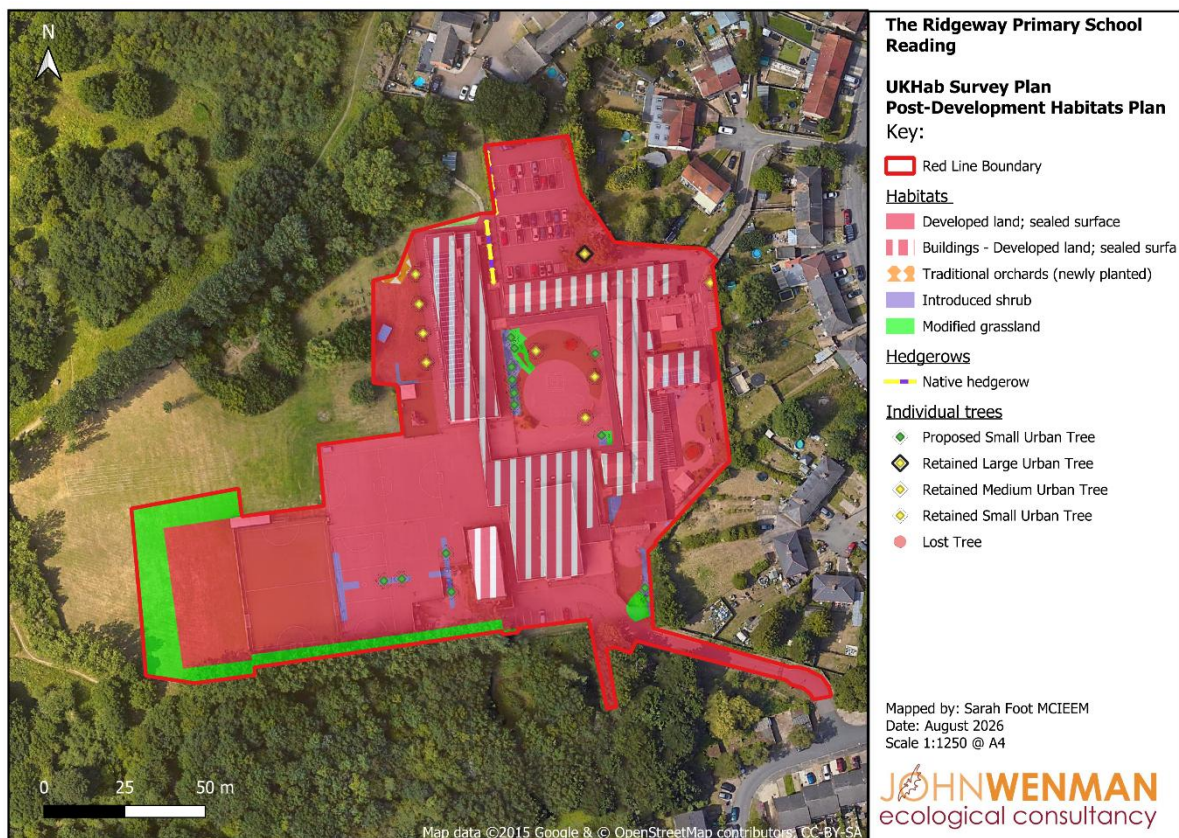


Figure 2. Post-Development Habitat Plan

## 5.4 Calculation Result

5.4.1 The Biodiversity Metric calculation tool demonstrates that delivering a minimum of 10% net gain for biodiversity is not feasible within the scope of the proposals – see metric calculation tool enclosed separately (The Ridgeway Primary School, Reading – Statutory Biodiversity Metric R309\_BNG\_a). The tool shows a net loss of habitat units (-23.64%) and a net loss in hedgerow units (-100.00%) – see **Figure 3** below.

| FINAL RESULTS                                                                                         |        |                                |                |                                                           |
|-------------------------------------------------------------------------------------------------------|--------|--------------------------------|----------------|-----------------------------------------------------------|
| Total net unit change<br>(Including all on-site & off-site habitat retention, creation & enhancement) |        | Area habitat units             | -0.28          |                                                           |
|                                                                                                       |        | Hedgerow units                 | -0.16          |                                                           |
|                                                                                                       |        | Watercourse units              | 0.00           |                                                           |
| Total net % change<br>(Including all on-site & off-site habitat retention, creation & enhancement)    |        | Area habitat units             | -23.64%        | Total net gain achieved is less than target set ▲         |
|                                                                                                       |        | Hedgerow units                 | -100.00%       | Total net gain achieved is less than target set ▲         |
|                                                                                                       |        | Watercourse units              | 0.00%          |                                                           |
| Trading rules satisfied?                                                                              |        | No - Check Trading Summaries ▲ |                |                                                           |
| Unit Type                                                                                             | Target | Baseline Units                 | Units Required | Unit Deficit                                              |
| Area habitat units                                                                                    | 10.00% | 1.17                           | 1.29           | 0.39                                                      |
| Hedgerow units                                                                                        | 10.00% | 0.16                           | 0.18           | 0.18                                                      |
| Watercourse units                                                                                     | 10.00% | 0.00                           | 0.00           | 0.00                                                      |
|                                                                                                       |        |                                |                | No additional watercourse units required to meet target ✓ |
| Input errors/rule breaks present in metric ▲                                                          |        |                                |                |                                                           |

Figure 3. Results taken from the Statutory Biodiversity Metric calculation tool.

**5.4.2** The trading rules are not satisfied because 10% net gain in habitat and hedgerow units has not been achieved and there is a deficit of 0.39 habitat units and 0.18 hedgerow units. To achieve the minimum requirements, offsite options will be investigated, either through the use of land within the wider ownership/site or purchase of units from a local habitat bank.

## 6 REFERENCES

CIEEM (2021). *Biodiversity Net Gain Report and Audit Templates*. Chartered Institute of Ecology and Environmental Management, Winchester, UK.

DEFRA (2025). *The Statutory Biodiversity Metric – User Guide*. DEFRA

UKHab Ltd (2023). *UK Habitat Classification Version 2.0* ([www.ukhab.org](http://www.ukhab.org))

## APPENDIX 1 - GRASSLAND QUADRATS FOR CONDITION ASSESSMENT

| Plant<br>Species in Quadrats  | Quadrats                           |    |    |                                 |    |    |    |
|-------------------------------|------------------------------------|----|----|---------------------------------|----|----|----|
|                               | Q1                                 | Q2 | Q3 | Q4                              | Q5 | Q6 | Q7 |
| Common bent                   | ✓                                  | ✓  | ✓  | ✓                               |    |    | ✓  |
| Creeping bent                 | ✓                                  | ✓  | ✓  |                                 |    |    | ✓  |
| Yorkshire fog                 | ✓                                  | ✓  | ✓  | ✓                               |    | ✓  | ✓  |
| Barren brome                  | ✓                                  | ✓  | ✓  |                                 |    |    |    |
| Perennial rye grass           |                                    | ✓  | ✓  | ✓                               | ✓  | ✓  | ✓  |
| Cock's-foot                   |                                    |    |    | ✓                               | ✓  | ✓  |    |
| False oat grass               |                                    |    |    | ✓                               |    |    | ✓  |
| Red fescue                    |                                    |    |    |                                 |    |    | ✓  |
| Common cat's ear              | ✓                                  | ✓  | ✓  | ✓                               |    | ✓  |    |
| White clover                  | ✓                                  | ✓  | ✓  | ✓                               | ✓  | ✓  |    |
| Creeping cinquefoil           | ✓                                  | ✓  | ✓  |                                 |    |    |    |
| Bird's foot trefoil           |                                    | ✓  |    |                                 |    |    |    |
| Ribwort plantain              |                                    | ✓  |    |                                 |    |    |    |
| Yarrow                        |                                    | ✓  |    |                                 |    |    |    |
| Common daisy                  |                                    |    | ✓  |                                 |    |    |    |
| Creeping buttercup            |                                    |    | ✓  | ✓                               | ✓  | ✓  |    |
| Greater plantain              |                                    |    |    |                                 | ✓  |    |    |
| Dandelion                     |                                    |    |    |                                 | ✓  |    |    |
| Self-heal                     |                                    |    |    | ✓                               |    |    |    |
| Groundsel                     |                                    |    |    |                                 |    |    | ✓  |
| Wood avens                    |                                    |    |    |                                 |    |    | ✓  |
| Common ragwort                |                                    |    |    |                                 |    |    | ✓  |
| <b>Total Species Number</b>   | 7                                  | 11 | 10 | 9                               | 6  | 6  | 9  |
| <b>Average Species per m2</b> | <b>9 (Other neutral grassland)</b> |    |    | <b>7.5 (Modified grassland)</b> |    |    |    |

## APPENDIX 2 – PROPOSED LANDSCAPE PLAN

