

OTTERPOOL PARK

Environmental Statement (ES) Appendix 7.17: Invertebrate Scoping Report – Update to include 2020 and 2021 Survey Data

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CONTENTS

EXE	CUTIVE SUMMARYI
1	INTRODUCTION1
1.1	Overview1
1.2	Site Location and Setting1
1.3	Proposed Development2
1.4	Survey Aims2
2	METHODOLOGY
2.1	Desk Study3
2.2	Field Survey
3	RESULTS
3.1	Desk Study7
3.2	Field Survey9
4	DISCUSSION13
4.1	Discussion of Results13
5	MITIGATION RECOMMENDATIONS AND FURTHER WORK
5.1	Introduction15
5.2	Design Mitigation15
5.3	Construction Mitigation19
5.4	Additional Mitigation
5.5	Further Survey
6	CONCLUSIONS
7	REFERENCES
APP	ENDIX A : HISTORICAL RECORDS
APP	ENDIX B : KEY SURVEYOR PEN PORTRAIT (2018)43
APP	ENDIX C : PHOTOGRAPHS44

TABLES

Table 1: Transects and position of actinic light traps for adult glow-worms. Yellow line = path of transec cross = position of actinic light trap; Green circles = position of LED lures	
Table 2: Desk study data sources	7
Table 3: Site(s) subject to statutory designations due to their nature conservation interest within proxim the site	•
Table 4: Summary of further surveys recommended	21
Table 5: Conservation concern species inventory provided by Kent and Medway Biological Records Ce (edited to remove duplicates and pre-1998 records)	
Table 6: Status and protection codes utilised in this report	31

FIGURES

APPENDICES

APPENDIX A : HISTORICAL RECORDS

APPENDIX B : KEY SURVEYOR PEN PORTRAIT (2018)

APPENDIX C : PHOTOGRAPHS

Executive Summary

Arcadis Consulting (UK) Limited has been commissioned on behalf of Otterpool Park LLP to undertake an invertebrate scoping survey to inform an Environmental Impact Assessment (EIA) for the proposed new development and accompany an outline planning application. The proposed Development is 'Otterpool Park', a garden settlement located within Folkestone, Kent. The development area has been identified as an 'area of search'; hereafter, the area of search is referred to as "the site".

The site is located within Folkestone, Kent within the administrative boundary of Folkestone and Hythe District Council (F&HDC) and spans a large area located immediately south of Junction 11 of the M20. The site is largely agricultural in nature with the majority of the site comprising arable and pasture fields, a disused horseracing course with an artificial lake ('Folkestone Racecourse Lake'), areas modified from historical use (airfields), existing historic settlements and relatively new industrial areas. The site area encompasses the proposed Otterpool Park Area Development application site which is approximately 589 ha in area.

A walkover of the site was conducted on the 8 of August 2018. The areas that are to be lost or degraded as a component of the proposed Development were visited and photographed along with all the areas that present the most promising habitats for invertebrates. Most of the site has been intensively farmed for many decades (arable/grazing) and is of limited value to invertebrates. The field margins and hedgerows in the intensively farmed areas are species poor and would support impoverished invertebrate communities. Indeed, very few species of conservation concern have been recorded from the site.

In 2020, habitat assessment updates were undertaken as part of the Phase 1 habitat survey to update the validity of the survey. The habitat assessment update identified no significant change in the status of invertebrate habitat within the site. The results of the 2020 survey concluded that:

- No further invertebrate surveys are required to inform a 2020 resubmission of the ES; and
- The valuations utilised in the 2018 submission are considered to be valid, with no evidence of any invertebrate habitats increasing in value.

Targeted glow worm surveys were undertaken in 2021 in three locations: the old airfield, east of Westenhanger Castle and fields west of Barrow Hill. Two records of glow worm were found near Sandling, approximately 0.9km and 1.4km to the east of the site boundary.

The more ecologically sensitive habitats within the site include species rich hedgerows, neutral grassland, ancient woodland, water bodies and riparian habitats. Desk study data suggests the more florally rich areas around the site, including those within Lympne Airfield are of value for invertebrates, particularly bees. With the exception of the riparian corridor, these habitats are poorly connected at the landscape scale, which places invertebrates, especially those with limited dispersal abilities at risk of localised extinction.

Within the masterplanning design, the most valuable ecological habitats are retained and buffered and so the potential for significant habitat loss, degradation and or fragmentation has been avoided. The plan for the Otterpool Park development retains the vast majority of the better-quality habitats and has the potential to enhance them by creating buffers and margins between around these existing features as part of 'green infrastructure' proposed throughout the site. Details of the buffers and design are outlined within the Biodiversity section of the Otterpool Park ES and the associated Design and Access Statement (Application Ref.: 3.6). Not only will this increase the amount and variety of potentially valuable invertebrate habitats, but it will also improve connectivity. A network of water-bodies will be created throughout the development, including SuDs features, ponds designed for amphibians and ditched designed primarily for water voles. These features will enhance the whole area for invertebrates. In addition, a new nature reserve

created in the west of the development has the potential to offer a diverse range of habitats of principal importance that are likely to sustain a diverse community of invertebrates.

For glow worm, managing the airfield in a way that nurtures areas of rough grassland and minimises eutrophication would benefit this species. The glow-worm will certainly benefit from the cessation of intensive agriculture and there is the potential for the development to be executed in a way that benefits many other species, not just the glow-worm. Planting throughout the development should be native species with a focus on those plant species that are currently found in the woodland edges, field margins and less improved grassland. Planting in this way will increase the habitat available for the species currently found in the existing margins and will allow them to disperse through the landscape more easily. It is crucial there is a system in place for the long-term management of these margins and the planted areas on the development.

The houses and the gardens of the development of the site should also be an integral part of this 'green infrastructure'. Using green roofs where possible and the planting of residential areas with native species to create a mosaic of trees, species rich grassland and areas of bare ground will ultimately benefit many species and enhance the biodiversity of the whole area. The parameters for the built areas will be set out in the associated Otterpool Park ES.

On the basis of the walkover survey undertaken it is considered that no specific invertebrate surveys were required to further inform the masterplanning and EIA. There are three discrete areas where detailed invertebrate surveys are likely to be warranted following outline planning determination to inform additional design and mitigation. One of these areas consists of two large mounds with large areas of bare ground in a mosaic of grassland and scrub (TN165 and 167), located to the north of Link Park (Ordnance Survey Grid Reference (OSGR) TR 110 358). The other two are the Folkestone Racecourse lake and margins (OSGR TR 123 368), and a hedgerow and ditch to the west of the site which is to be bisected (TN118). These surveys are likely to include detailed, standardised terrestrial and freshwater invertebrate sampling carried out on three occasions between May and July using a sweep net, suction sampler, pan traps, beating tray and pond net.

It is crucial that subsequent to outline planning permission a long-term management plan for the 'green infrastructure' and the landscaped areas of the proposed Development is in place before the development of each associated zone commences. Executed correctly, the proposed Development has the potential to greatly improve the value if the site for invertebrates on a site that is currently an ecologically impoverished, intensively farmed landscape.

1 Introduction

1.1 Overview

1.1.1 Arcadis Consulting (UK) Limited has been commissioned on behalf of Otterpool Park LLP to undertake an invertebrate survey to inform an Environmental Impact Assessment (EIA) for the proposed new development and accompany an outline planning application. The proposed Development is 'Otterpool Park', a garden settlement located within Folkestone, Kent. The development area has been identified as an 'area of search'; hereafter, the area of search is referred to as "the site".

1.2 Site Location and Setting

- 1.2.1 The site is located within Folkestone, Kent within the administrative boundary of Folkestone and Hythe District Council (F&HDC) and spans a large area located immediately south of Junction 11 of the M20. The site is largely agricultural in nature with the majority of the site comprising arable and pasture fields, a disused horseracing course with an artificial lake ('Folkestone Racecourse Lake'), areas modified from historical use (airfields), existing historic settlements and relatively new industrial areas.
- 1.2.2 The M20 motorway, Channel Tunnel Rail Link and Westenhanger Station are located to the north of the site, beyond which lie the villages of Stanford and Postling within a largely rural setting including the Kent Downs Area of Outstanding Natural Beauty (AONB). This AONB extends to the east, beyond which lies the town of Hythe, and to the south where it includes Lympne village. The site also includes the settlements of Barrowhill, Sellindge, Westenhanger and Newingreen. Lympne Industrial Park and some areas of woodland are located immediately south of the site. In addition, East Stour River flows through the site in a north-east to west direction. The site is centred on Ordnance Survey Grid Reference TR 111 363.
- 1.2.3 An aerial image illustrating the site as surveyed is presented in Image 1. Photographs of the site can be found in Appendix C.



Image 1: Aerial imagery of the site

1.3 Proposed Development

1.3.1 The proposed Otterpool Park Area Development is located on approximately 589 ha of land. The development proposals are to be submitted in outline for a new garden settlement accommodating up to 8,500 homes (Use Class C2 and C3) and Use Class E, F, B2, C1, Sui Generis development, including use of retained buildings as identified, with related infrastructure, highway works, green and blue infrastructure, with access, appearance, landscaping, layout and scale matters to be reserved. A summary of the maximum floorspace areas for each land use type is provided in Chapter 4: The Site and the proposed Development of the Environmental Statement (ES).

1.4 Survey Aims

- 1.4.1 The aim of the survey was to scope the potential conservation value of invertebrate habitat within the site, considering the habitats present, species observed during the walkover and species recorded within the site and surrounding area within biological records. The objectives of the survey were to:
 - Highlight those areas likely to be of greatest importance for rare invertebrates or notable assemblages to inform the masterplanning design;
 - Provide sufficient information to identify the likely impact and required mitigation to inform the EIA; and
 - Identify the need for any further surveys, to inform the planning process, either for detailed planning permission or within the process of informing detailed design.

2 Methodology

2.1 Desk Study

- 2.1.1 Prior to conducting fieldwork, existing information obtained in March 2018 from the Kent and Medway Biological Records Centre (KMBRC) relating to the invertebrate fauna of the site was reviewed. This included a review of historic invertebrate records from within a two-kilometre radius of the site as well as statutory and non-statutory sites of nature conservation importance within a five-kilometre radius.
- 2.1.2 MAGIC Mapping was reviewed to identify any statutory sites designated for invertebrates in the vicinity of the site.
- 2.1.3 In addition, a previous planning application from an ecological appraisal for former Lympne Airfield Housing Development conducted in 2012 (CSa 2012) was reviewed. Updated information relating to invertebrate fauna was obtained from KMBRC in April 2020. In 2021, NBN Atlas (NBN, 2021) data was accessed prior to the glow-worm (*Lampyris noctiluca*) surveys. The results of the desk study are presented in Section 3.
- 2.1.4 A survey from the Lympne Airfield site (Kirby 2020) which was provided to Arcadis by Nikki Gammans (one of the report authors) in 2021 was also reviewed. This provided records from a walkover survey which focussed on bumblebees and solitary bee species, along with flower species.

2.2 Field Survey

Invertebrate scoping survey (2018)

2.2.1 Using a 1:25,000 Ordnance Survey (OS) map of the site and information collected during the Phase 1 habitat surveys, habitats of potential value to invertebrates were initially identified within the site. A dedicated walkover survey focussed on the habitats most likely to be of value for invertebrates. The survey was undertaken by Arcadis Principal Ecologist Brandon Murray (CIEEM) and entomologist Dr Ross Piper on the 8 of August 2018. Pen Portraits of surveyors are presented in Appendix B. For ease of reference, the Target Notes utilised within the invertebrate survey reporting follow the Target Note locations referenced within the ES Appendix 7.3 Habitat and Hedgerow Survey Report. A photographic record was also made of key features recorded during the survey, this is presented in Appendix C.

Incidental species recording (2018)

- 2.2.2 No systematic sampling was undertaken during the survey; rather, a basic list of species identifiable without the requirement of microscopic identification was collected. Some notable specimens were collected in clear plastic sampling pots with white screw on lids and identified subsequent to the surveys.
- 2.2.3 In key areas, a closer inspection was conducted around bare earth and aggregate material and within areas of vegetation, to locate and identify a subset of the species present.

Habitat assessment update (2020)

2.2.4 An updated Phase 1 habitat survey was undertaken in May 2020. As part of this survey, habitat within the site was assessed to identify any change in the status of invertebrate habitat since the previous invertebrate surveys. The habitat surveys were undertaken by Brandon Murray and Rory Roche (Ecologist).

Glow-worm survey (2021)

2.2.5 Targeted glow-worm *Lampyris noctiluca* surveys were undertaken on 22 July and 05 August 2021 in three locations: the old airfield, east of Westenhanger Castle and fields west of

Barrow Hill. At each location two diurnal and two nocturnal visits, one of each in July and August were undertaken, see Table 1 below for start and end times for the nocturnal surveys. In the day the areas of suitable micro-habitats were searched, including beneath possible refugia such as rocks and logs. At each location as part of the nocturnal survey LED lures and a single actinic trap were set to attract male glow-worms. These lures and traps and checked as part of walked transect routes, which were targeted at observing glowing females. The transects walked and the locations of the traps are shown in Table 1. The transects were selected to cover the areas that offered the optimum habitats for glow worm.

Table 1: Transects and position of actinic light traps for adult glow-worms. Yellow line = path of transect; Red cross = position of actinic light trap; Green circles = position of LED lures



Otterpool Park Environmental Statement

Appendix 7.17: Invertebrate Scoping Report – Updated to Include 2020 and 2021 Survey Data



Limitations

- 2.2.6 Given the incidental nature of the survey the species recorded were those that were most conspicuous. These consist mainly of common generalist invertebrates.
- 2.2.7 Local record centre species data provides positive records of species recorded; however, the species records within a given area are dependent on the recording effort of individuals and are often biased towards certain well-recorded groups e.g. butterflies and moths, dragonflies and damselflies etc. and the paucity of recording of less easily recognised species cannot be proof of a lack or absence of such species.
- 2.2.8 This is a dedicated invertebrate scoping survey rather than a full dedicated invertebrate survey. Therefore, these results do not provide a comprehensive representation of the site's invertebrate fauna.
- 2.2.9 Due to the outbreak of the COVID-19 virus in 2020, survey scope was greatly impacted and had to be altered to what was safe and practical to achieve. As such, the 2020 surveys endeavoured to collect the information intrinsic to ensuring the submission is founded on robust survey data, whilst acknowledging that the surveys needed to be proportionate in light of the additional risks to Arcadis employees and members of the public. As a result, the following changes were made to the scopes:
 - For the update surveys, access was not requested to parcels of land where members of the public were likely to be at increased risk of coming into contact with Arcadis employees.
 - Access to private homes and businesses (excluding farms) was not requested, both to reduce exposure risk and to avoid potential for negative reactions to interaction with Arcadis staff.
 - Where it was felt that the revised three-tiered approach for a reduce presence on site, without impacting upon the needs of the submission, this approach was adopted to reduce risk associated with surveyor travel

2.2.10 Despite these limitations, it is considered that the survey conducted provided sufficient information to fulfil the objectives of the survey.

Glow worm survey (2021)

- 2.2.11 Even though this is a very distinctive species it is still easy to overlook as adult females stop glowing after mating and the long period of larval development means adults might not be present in any given population in that particular year.
- 2.2.12 Warm and humid nights in the peak glowing season are the best time to search for adult females and males. The weather during the surveys was not optimal and the summer of 2021 was very poor for many insects because of the long period of cold weather in May and high rainfall.

3 Results

3.1 Desk Study

Data sources

3.1.1 Information was received from the sources presented in Table 2. A composite list of the species recorded is presented in Appendix B.

Table 2: Desk study data sources

Organisation	Data Received
Kent and Medway Biological Records Centre obtained March 2018, updated April 2020	Conservation Concern Species Inventory
Kent and Medway Biological Records Centre obtained March 2018, updated April 2020	Kent Scarce and Red list Species
CSa Environmental Planning	Ecological appraisal for former Lympne Airfield Housing Development conducted in 2012.
NBN Atlas was searched in 2021	Nearby glow-worm records
Lympne Airfield bumblebee and solitary bee survey	Multople bee species were recorded during the survey on 28/07/2020: Three were considered 'rarer' bees, brown banded carder, Ruderal bumblebee and Moss carder bee.

Statutory designated sites

3.1.2 No statutory designations were identified on the site, although the edge of the Kent Downs AONB extends south from the Aldington Road on the southern site boundary. No internationally designated nature conservation sites occur within 5km of the central grid reference for the site. Three nationally designated Sites of Special Scientific Interest (SSSIs), two of which are designated for biological value, occur within 5km as summarised in Table 3.

Table 3: Site(s) subject to statutory designations due to their nature conservation interest within proximity to the site

Site	Location / distance	Summary of designation
Lympne Escarpment SSSI	South of site between Aldington Road and the Royal Military Canal 300m south of the site	A steep escarpment of Kentish ragstone comprising notable grasslands and woodland, including ancient woodland. Grassland and woodland habitats are among the best remaining examples of semi-natural habitats on ragstone in the country. Numerous springs and flushes also present.
Otterpool Quarry SSSI	Within the site.	A geological conservation site. Not considered to have particular interest for invertebrates.

Otterpool Park Environmental Statement

Appendix 7.17: Invertebrate Scoping Report – Updated to Include 2020 and 2021 Survey Data

Site	Location / distance	Summary of designation
Gibbins Brook SSSI	North, beyond the M20/rail corridor 650m north	Marshy grassland on peaty soils which has developed from an acidic valley bog and still retains features characteristics of a bog. Alder carr, dry acidic grassland, hedgerows, a small pond and stream habitats also present. The site is also notable for its invertebrates, particularly moths.

Non-statutory designated sites

- 3.1.3 A number of sites listed within the ancient woodland inventory occur across the wider landscape surrounding the site. Two lie within 1km of the site: Lympne Park Wood and Folks Wood. Harringe Brooks Wood is adjacent to the site and Aldergate Wood lie just over 1km south-west. Lowland calcareous grassland inventory sites occur at Lympne Escarpment SSSI.
- 3.1.4 The data request response from the KMBRC confirmed that no locally designated County Wildlife Sites (CWS) occur on or immediately adjacent to application site. Two Local Wildlife sites (LWS) occur within 1km of the site Folks Wood LWS (essentially overlapping the ancient woodland listed above) and the Royal Military Canal LWS. Harringe Brooks Wood LWS (also ancient woodland) lies just over 1km west and 'Pasture & Woods Below Court-at-Street-Lympne' is approximately 1.4km south west.

Species

- 3.1.5 The invertebrate surveys conducted on the former Lympne Airfield Housing Development (CSa 2012) recorded two nationally scarce species, both of which are flea beetles (*Longitarsus parvulus* Na and *Longitarsus dorsalis* Nb). In addition, eight 'nationally local species' were recorded: a flea beetle (*Aphthona euphorbiae*), a seed weevil (*Aspidapion aenuem*); a seed weevil (*Ceratapion carduorum*); a flower beetle (*Oedemera lurida*); a weevil (*Phyllobius maculicornis*); a weevil (*Sitona humeralis*); short-winged cone-head (*Conocephalus dorsalis*) and Roesel's bush-cricket (*Metrioptera roeselli*). The two latter species have both undergone dramatic range expansions in recent years and their conservation status requires revising as they are not considered to be species of conservation concern.
- 3.1.6 The following species were recorded during the bumblebee and solitary bee survey of Lympne Airfield on 28/07/2020:
 - Common Carder Bee, Bombus pascuorum;
 - Buff-tailed Bumblebee, Bombus terrestris;
 - Red-tailed Bumblebee, Bombus lapidaries;
 - Southern Cuckoo Bumblebee, Bombus vestalis;
 - White-tailed Bumblebee, Bombus lucorum;
 - Brown-banded Carder Bee, Bombus humilis;
 - Ruderal Bumblebee, Bombus ruderatus;
 - Red-tailed Cuckoo Bee, Bombus rupestris;
 - Moss Carder Bee, Bombus muscorum;
 - Honey Bee, Apis mellifera;
 - Common Wasp, Vespula vulgaris;
 - Red Bartsia Bee, Melitta tricinta;

Otterpool Park Environmental Statement

Appendix 7.17: Invertebrate Scoping Report – Updated to Include 2020 and 2021 Survey Data

- Clover Bunthorn Bee, *Melitta leporine and*
- Yellow Legged Mining Bee, Andrena flavipes.
- 3.1.7 Of these species, three were considered 'rarer' bees, brown banded carder, Ruderal bumblebee and Moss carder bee.
- 3.1.8 Full details of the conservation status of the listed species including listing on section 41 of the NBERC Act is presented in Appendix B.
- 3.1.9 The KMBRC species information obtained in March 2018 returned a list of 120 species of conservation concern within a 2km radius around the centre of the site (see Appendix A). The data was collated and analysed to present only the most recent record for each species. All pre-1998 records have not been included as this historical records are considered to be too old to be of relevance.
- 3.1.10 Most of the records were for Lepidoptera, which is likely to be an effect of survey bias, as these are the most conspicuous and commonly recorded group of insects. Most of the Lepidoptera on the list are UK Biodiversity Action Plan (BAP) for research only species. Notable exceptions to this include the Sussex emerald moth (*Thalera fimbrialis*) and the four-spotted moth (*Tyta luctuosa*).
- 3.1.11 The list also included a number of nationally scarce and locally scarce Coleoptera and a small number of nationally scarce Hymenoptera, Diptera and Hemiptera. Some of the species on the list, such as the beewolf (*Philanthus triangulum*) can no longer be considered as of conservation concern because of recent, rapid range expansions.
- 3.1.12 The majority of these records are from Gibbin's Brook, Brockhill Country Park and Lympne Park Wood.
- 3.1.13 The updated KMBRC species information obtained in April 2020 did not return any additional records of invertebrate species of conservation concern or Kent Scarce or Red listed species.

Glow-worm (2021)

3.1.14 Two records of glow worm were found near Sandling, approximately 0.9km and 1.4km to the east of the site boundary.

3.2 Field Survey

Survey area

3.2.1 The area covered by the survey is outlined in Figure 1 and a table of habitat specific Target Notes corresponding to numbers on the map is included on Figure 1 and photographs are provided in Appendix C.

General habitat

3.2.2 Full details of the habitats present on the site and plant species present are presented within ES Appendix 7.3 Habitat and Hedgerow Survey Report. The majority of the site comprised arable land and agriculturally improved grassland of limited value to invertebrates, habitats that have the potential to support invertebrates are described below.

Hedgerow, scrub and woodland edge

3.2.3 The site supported a significant resource of woody habitat in the form of hedgerow, scrub and woodland edge. With a small number of exceptions, the network of hedgerows within the more managed agricultural parts of the site were regularly cut by flailing and such management is generally detrimental to more specialised hedgerow invertebrates. Notable hedgerows and woodland edges that are less regularly cut provided habitat of much higher potential to support scrub edge invertebrate assemblages.

- 3.2.4 The best hedgerow habitat for invertebrates was found in the west of the site along the tributary from Harringe Brooks Wood to the East Stour River (TN118) and north of the East Stour within two hedgerows (TN115). These areas also supported wood-decay habitat favourable for saproxylic invertebrates. This resource was mainly standing wood-decay habitat in living trees, including both old hedgerow shrubs and oak or ash standard trees.
- 3.2.5 Besides the hedgerow habitat, small amounts of scrub/woodland edge resource were recorded around a small patch of woodland in the west of the site (TN110).
- 3.2.6 With very few exceptions, these habitats will be retained within the green corridors and buffers within the site and will be enhanced with buffers supporting semi-natural habitat. These habitats will also benefit from greater connectivity and the provision of more native foodplants and nectar sources throughout the site.

Grassland, field margins and bare ground

- 3.2.7 Much of the in-field habitat either comprised arable, grazing or species-poor improved grassland, these habitats being generally of low potential for invertebrates. Some of the more diverse grassland was recorded at the north and the south of the site (TN73, around Westenhanger Castle and TN193, within the disused airfield, along the runway, respectively).
- 3.2.8 There was a limited resource of bare ground habitat, largely isolated areas within the site's grassland and scrub habitat. There are some large, predominantly bare mounds and areas of bare ground in the grassland surrounding these mounds north of the Link Park area (TN165 and TN167). Ground nesting solitary bees (probably *Lasioglossum* spp.) were observed to be active in this area. There were also significant areas of bare ground in the disused lorry park (TN180 and TN182), but little aculeate (bees, wasps and ants) activity was observed in this area.

Wetland

- 3.2.9 Wetland habitat include the East Stour River and its tributaries, the Folkestone Racecourse Lake, ponds, ephemeral pools and an extensive network of ditches.
- 3.2.10 All of the waterbodies assessed for habitat potential were considered to have potential to support aquatic invertebrate populations of conservation value and potentially the waterbody with the highest potential value was the Folkestone Racecourse Lake (TN19). This lake supports a fairly species-rich wetland plant (macrophyte) flora which created structural diversity of benefit to aquatic invertebrates. The lake supported habitat of varying depth, including extensive shallow areas favourable to invertebrates.
- 3.2.11 Many of the other ponds were also well vegetated and several supported a diverse macrophyte flora.
- 3.2.12 Besides the ponds, there were a number of ditches and ephemeral pools within the site. Many of the former were linear and trapezoidal channels, poorly vegetated, heavily shaded, eutrophic, lacking in structure and unlikely to support invertebrate assemblages of high conservation value. One exception to this was the ditch to the west of the racecourse lake (TN41) as it was comparatively wide with greater plant diversity, including many nectar sources. The network of ditches and ephemeral pools to the west of the lake is likely to support invertebrates associated with wet grassland as well as 'Litter-rich fluctuating wetland' and 'mineral marsh and open water' as described in Drake et al., (2007). Such wetland mosaic habitat can support specialist invertebrate assemblages and species of conservation value.

Invertebrate species recorded (2018)

3.2.13 The walkover survey was conducted in August 2018 and a period of vary hot weather in the months prior to the survey had dried out many habitats. No strategic sampling was undertaken during the survey; however, incidentally observed species were noted. The ditch

and pool complex to the west of the lake supported many fly species 'nectaring' on the water mint (*Mentha aquatica*) flowers. The hornet hoverfly *Volucella zonaria*, the larvae of which are associated with wasp's nests, was observed in this area. On the marginal vegetation of the racecourse lake large numbers of the reed beetle *Donacia marginata* were observed. The larvae of these feed on the roots of aquatic plants and the genus includes many rare species. In the few areas of bare ground in the site that isn't intensive arable land, solitary bees were observed (primarily *Lasioglossum* spp.). It is highly likely the site as a whole supports a considerable assemblage of solitary bees and wasps.

3.2.14 Butterflies recorded were all common and widespread. The larvae of common blue *Polyommatus icarus*, in common with various other insect species associated with less improved grassland habitats, feeds on Common Bird's-foot-trefoil *Lotus corniculatus*. common damselflies including blue-tailed damselfly *Ischnura elegans* and azure damselfly *Coenagrion puella* were well distributed on site, indicating the presence of wetland habitat and broad-bodied chaser *Libellula depressa*, a dragonfly which commonly colonises newly created waterbodies, was also recorded.

Habitat assessment update (2020)

3.2.15 The habitat assessment update identified no significant change in the type or condition of the invertebrate habitat within the site.

Glow-worm survey (2021)

- 3.2.16 Two incidental records of adult female glow-worm were made during the bat activity surveys on 14 July 2021. The first of these was sighted at OSGR TR121372, to the west of Westenhanger Castle and the second at OSGR TR110375, along a hedgerow to the south of the railway line. An indicative location of these sightings is presented as orange dots in Image 2 below.
- 3.2.17 No observations of glow-worm were made during the glow-worm field surveys.
- 3.2.18 Anecdotal reports from people in the local area reported that adult female glow-worms had been observed on the disused Lympne airfield area, albeit more three years prior to 2021 (pers. comm. with surveyors with unnamed residents during the surveys).



Image 2: Locations of incidental sightings of glow worm in 2021

4 Discussion

4.1 Discussion of Results

- 4.1.1 The desk study revealed that few species of high conservation concern are known from the site or the surrounding area (within a radius of 2km). Previous invertebrate surveys that have been carried out in the southern part of the site revealed two 'nationally scarce' species and eight 'nationally local' species; however, two of the latter (the short-winged conehead and Roesel's bush-cricket) have undergone range expansions and their status is due for revision as they are no longer considered to be of conservation concern as they are undergoing an expansion in their range potentially due to climate change.
- 4.1.2 Within a 5km radius of the site there are two biological SSSIs. The most notable is Gibbin's Brook SSSI designated because it retains features of a bog and supports an interesting invertebrate assemblage, especially moths. This site is the source of many of the records obtained from KMBRC.
- 4.1.3 The invertebrate scoping survey in 2018 identified that much of the site is intensively farmed, which will have impoverished the invertebrate biodiversity significantly. Arable margins if wide and sympathetically managed can support a notable assemblage of invertebrates, but the margins in the site were largely narrow and botanically homogenous, which would severely limit the number their invertebrate diversity. The high-density grazing of sheep and the 'improvement' of pasture land has severely reduced the ability of pasture fields throughout the site to support anything other than a small community of widespread, generalist invertebrate species.
- 4.1.4 Beyond the arable land there are pockets of habitat that offer more potential for invertebrates. There is a good network of hedgerows, some of which are old, species rich and probably support a good diversity of invertebrates. Likewise, for the small blocks of woodland throughout the site. Many of the species in these woodland habitats are currently 'marooned' in a sea of intensively farmed land.
- 4.1.5 The most interesting habitats across the site are the wetland features, which range from small ditches to large open water bodies and a small river. Many of the ditches are botanically species poor and have suffered due to agricultural run-off and regular and excessive cutting, all of which would limit their value to invertebrates. The most notable aquatic features on site for invertebrates are Folkestone Racecourse Lake, its margins and the network of ditches and ephemeral pools to the west of this lake, and the East Stour River corridor. Both of these features are to be retained and enhanced within the development.
- 4.1.6 A few areas with a mosaic of ruderal grassland, scrub and bare-ground were identified, which can be valuable to a range of invertebrates, some of which are of conservation concern. Lympne Airfield, particularly the areas that are not cut for hay (largely the airfield periphery (TN249) and the runway (TN193)) are of value for invertebrates, as evidenced by the bee survey conducted in 2020 (Kirby 2020).
- 4.1.7 The habitat assessment updates in 2020 identified no significant change which modified the assessment of the status of invertebrate habitat within the site. The results of the 2020 survey concluded that:
 - No further invertebrate surveys are required to inform a 2020 resubmission of the ES; and
 - The valuations utilised in the 2018 submission are considered to be valid, with no evidence of any invertebrate habitats increasing in value.
- 4.1.8 Glow-worms were found to be present on site during bat activity surveys in 2021 but no further observations were made during the targeted glow-worm surveys. Habitats on site are

potentially suitable for this species, including but not limited to arable margins, woodland edges, Folkestone Racecourse and the disused Lympne Airfield.

5 Mitigation Recommendations and Further Work

5.1 Introduction

5.1.1 This section of this report outlines the mitigation proposed to enhance the site, which will ensure it supports a greater diversity of invertebrate species and contributes to the achievement of biodiversity net gain. This section does not constitute a full outline of the mitigation on the site, this will be provided and will be evolved during detailed design of each of the zones. Consideration of mitigation to be implemented has followed the mitigation hierarchy of avoid, mitigate, compensate, or enhance.

5.2 Design Mitigation

Avoidance of impacts to invertebrate populations

- 5.2.1 In line with the mitigation hierarchy, the first step of the mitigation for impacts to invertebrate populations is avoidance. From the start of the masterplanning process, notable habitats with the potential to support notable fauna, including invertebrates, were ranked in terms of relative importance. The vast majority of areas of potentially notable value for invertebrates will be retained, buffered and enhanced. These areas with specific value for invertebrates identified during the scoping surveys which are to be retained within the development are:
 - **Hedgerows**: The majority of hedgerows are maintained, where hedgerows are to be bisected, these sections will be translocated. Additional hedgerows are to be planted within the proposed Development;
 - **Woodlands**: All woodlands within the development area are to be retained and buffered. Details of the buffers are provided within the Otterpool Park Environmental Statement (ES) Chapter 7: Biodiversity and Otterpool Park Design and Access Statement (DAS) (ES Appendix 4.16);
 - **Running water**: The East Stour River corridor, and the two main tributaries on site are being retained and buffered. Details of the buffers are provided within the ES Chapter 7: Biodiversity and DAS (ES Appendix 4.16);
 - **Individual trees**: The vast majority of the trees are being retained within green infrastructure (GI). Where trees fall within development parcels, there will be a design parameter that specifies retention of these trees where practicable;
 - Semi-improved neutral grassland: most of the grassland is improved or species poor semi-improved, the areas around TN73 is semi-improved neutral grassland which is to be retained; and
 - **Standing water**: The Folkestone Racecourse Lake (TN19) is being retained and buffered. With the exception of one pond (at TN66) the majority of ponds within the site are being retained within GI.

Mitigation for unavoidable impacts

- 5.2.2 The bullet points below outline the key habitat typologies within the site for invertebrates which are to be lost or modified as a component of the development. Appropriate mitigation is proposed and specified. The target notes referred to are taken from the Habitat and Hedgerow Survey (ES Appendix 7.3) and are also presented in Figure 1:
 - TN20 An area of 600m of ditches. This network of ditches to the east of Folkestone Racecourse Lake is being lost during the development. These ditches have suffered from eutrophication and regular flailing. They are therefore of limited value to invertebrates. Approximately 1000 of ditches are being created specifically to replace these ditches, slightly to the east of the ditches to be lost (adjacent to Westenhanger

village) and to the west of the tributary of the East Stour to the south of the A20. These new ditches and the similar habitats that are to be created and restored during the development have the potential to be much more valuable to invertebrates. Targets for these new habitats will be included within the BAP (ES Appendix 7.20).

- TN51 A seasonal flush in sheep grazed field. This habitat is being lost, but its value to invertebrates is very limited due to grazing pressure. There are similar habitats nearby that are being retained and the creation and restoration of other habitats across the site will mitigate for this loss, specifically the extensive creation of sustainable drainage systems (SuDS) features.
- TN52 Ditch. This is being lost within the development, but it is botanically species poor, has suffered from eutrophication and is of therefore of little value to invertebrates. There are similar habitats nearby that are being retained and the creation and restoration of other habitats across the site will mitigate for this loss.
- TN53 Neutral semi improved grassland bordering railway and roundabout. This is being lost, but it is of little value to invertebrates in its current state. Nearby margins, buffers and vegetation along the nearby railway line will be much more valuable to invertebrates. The proposed green infrastructure (GI) for the development will create extensive areas of this habitat.
- TN65 Young, species poor hawthorn hedge. This hedge is being lost in development, but its value to invertebrates is very limited and there are similar, better quality resources available nearby. The margins of the development will also include the planting of many native species, including hawthorn.
- 5.2.3 Where hedgerow sections across the site are to be removed, these will be translocated.
 - TN66 Pond. This will be lost in the development, but the current value to invertebrates is limited because of the amount of grazing and resultant eutrophication. The creation and restoration of other habitats across the site will mitigate for this loss.
 - TN180 / 182 Lorry park. This area will be lost in the development. At present it
 probably supports an assemblage of aculeates (insects having or resembling a stinger or
 barb; such as bees and wasps) and ground-active thermophilic (heat loving) species.
 The habitats required for these species would be replaced within the buffers of the
 developed site.
 - TN165 and 167 Ruderal grassland and mostly bare earth and rubble mounds. These
 habitats will be lost in the development, but the community of invertebrates using these
 areas could be supported in the green spaces of the development if there are sufficient
 areas of nectar sources, scrub and bare ground. This mosaic of habitats would be
 recreated on the nearby bunds.
- 5.2.4 For glow-worm, managing the airfield in a way that nurtures areas of rough grassland and minimises eutrophication would benefit this species. The glow-worm will certainly benefit from the cessation of intensive agriculture and there is the potential for the development to be executed in a way that benefits many other species, not just the glow-worm. Planting throughout the development should be native species with a focus on those plant species that are currently found in the woodland edges, field margins and less improved grassland. Planting in this way will increase the habitat available for the species currently found in the existing margins and will allow them to disperse through the landscape more easily. It is crucial there is a system in place for the long-term management of these margins and the planted areas on the development.

Enhancements proposed within the design

5.2.5 Across the site, a diverse range of habitats are to be created to maximise the value of the GI around the site, for a range of species, including invertebrates. These areas include a

Otterpool Park Environmental Statement

Appendix 7.17: Invertebrate Scoping Report - Updated to Include 2020 and 2021 Survey Data

Country Park in the centre of the site, a River Park and a new nature area / wetland in the north west of the development. Habitats to be created include:

- Ponds created for biodiversity, these will be designed to meet the prescriptions of the relevant 'habitat of principal importance' description. Areas where ponds are to be created include the buffer around Harringe Brooks Wood, south of the Folkestone Racecourse Lake (TN21), adjacent to the East Stour (around TN102), and to the west of Lympne Village.
- Areas of woodland planting, these areas are to be planted to screen the Otterpool park development and to create connectivity. This includes panting linking Harringe Brooks Wood to the river corridor to the north. This tree planting will be to the west of the development.
- SuDS features including ponds, drainage ditches, swales and rain gardens (these will not primarily be 'for biodiversity but will have biodiversity value).
- Hedgerows will be planted across the development. These will be native species hedgerows and will be planted to subdivide parcels within the development, but also to provide a permeable barrier for wildlife between properties and GI. These features will provide a notable habitat for a range of species, especially invertebrates.
- Areas of species rich wildflower grassland will be created across the site. The habitat composition / seed and planting mix should be based upon the soil present but should be based upon the descriptions of priority habitat (lowland meadow) this will benefit invertebrates.
- Scattered trees are to be planted through the GI of the development. The species of these will be designed to safeguard against disease and climate change but will be native where appropriate.
- Areas of scrub will be created/allowed to develop, which will have value for invertebrates.
- 5.2.6 General enhancement will also occur and includes (but is not limited to):
 - Hedgerow enhancements tom improve connectivity in the form of gapping up; improved management and restoration of ground flora;
 - Pond enhancement to achieve the parameters of the 'habitats of principal importance' descriptions.
- 5.2.7 The Otterpool Park ES biodiversity net gain report (ES Appendix 7.21) outlines how the creation of these habitats across the site will ensure that the Otterpool Park Development achieves net gain, in line with the Prescriptions of the NPPF (2021).
- 5.2.8 In addition to this general habitat creation, key areas are to be enhanced for invertebrates (Target Notes are presented on Figure 1).
 - Folkestone Racecourse Lake: This area (TN19) is to be retained and enhanced. Enhancement includes an increase in the structural complexity of the lake margin and creation of bare ground and dead wood micro-habitats. In addition, a new area of seminatural water will be created to the south of the lake, to provide a buffer to the lake to the north. This area will also have value for invertebrates.
 - **Ephemeral pools and ditches**: The network of ephemeral pools and ditches (TN41) to the west of the Folkestone Racecourse Lake will be enhanced by using management to increase the amount and variety of nectar sources in the surrounding grassland.
 - **The East Stour River corridor**: This habitat will benefit from an increased >50m buffer on both sides (TN100). This buffer will include grassland, scrub, trees and SuDS features. The river banks will be improved in areas for invertebrates by increasing the plant diversity, through thinning the overgrowing vegetation. Any trees that are removed

from the river banks will be left as a mixture of standing dead and dead wood on the ground, which are valuable resources for many species. It is considered that this area will benefit from the removal of the adjacent area from agricultural usage, as this will reduce the effect of pesticides and fertilisers on these areas, which is likely to be impacting upon the diversity of invertebrates.

- Areas of woodland: Management of the boundary between retained woodlands and land proposed for other uses and enhancement with high value GI. Within these woodland buffer areas, a species rich grassland mosaic and SuDs features ware to be created with will form a valuable ecotone for invertebrates.
- Hedgerow / ditch connectivity: Hedgerows and ditches cross the site providing valuable wildlife corridors. An area in the west of the site around TN118, 225, 227 connects Harringe Brooks Wood to the river corridor to the south. This will be enhanced with buffers of grassland. Although there will be three areas of fragmentation for new road accesses, the planting of native plants after the development work and ensuring that an unbroken line of vegetation develops under the crossings after they have been built (where possible) will minimise this impact.
- Landscape bunds: These bunds are to be retained within the development (TN197 and 198). These are currently succeeding to scrub and the grassland habitats on them are becoming rank. These could be very valuable habitats because of the steep slopes and warmth they offer in south and south-east-facing aspects. It is proposed that these bunds be enhanced with annual hay cuts and the creation of bare-ground scrapes for thermophilic species. Retaining and maintaining a good age range of scrub on these bunds would also benefit many invertebrates.
- 5.2.9 The installation and maintenance of the features listed above will be specified within a site BAP (ES Appendix 7.20).

Summary of Avoidance, Mitigation and Enhancement

- 5.2.10 Within the development, there will be embedded design mitigation to ensure that the current habitats are enhanced and that invertebrates can more easily move through the landscape. Crucial to this is the creation of buffers around existing and new habitats. To support a diverse assemblage of invertebrates these areas need to species-rich grassland with abundant, native nectar sources. The plant species planted in these areas would reflect the underlying soil types and managed with an annual hay cut.
- 5.2.11 Trees planted throughout the site would be those that offer the most potential to the greatest range of species and would include native Oak, Willow, Ash, Field Maple, Hawthorn and Dogwood. Hawthorn and Dogwood are particularly important nectar sources in the early part of the summer for a large variety of insect species.
- 5.2.12 In those areas where the margins/buffers are sufficiently wide a scrub ecotone would be allowed to develop as these habitats provide food-plants and enhance the dispersal of many insect species through the wider landscape.
- 5.2.13 Bare-ground and deadwood are crucial elements in the green infrastructure of the site as they are often neglected but support a wealth of species. Bare-ground on slopes and small cliff type structures in south and southeast facing aspects are the most valuable and these would be dotted throughout the entire site and managed on a rotational basis, i.e. letting some areas grow over and creating new sites in nearby areas. The species that use bare-ground either to nest, bask or hunt will also benefit from the close proximity of nectar sources in the margins/buffers.
- 5.2.14 The proposed cutting of trees along the river corridor (proposed as an enhancement for other species, specifically water vole) provides the opportunity for creating an abundance of dead-wood habitat. Dead wood in a variety of situations (i.e. standing, fallen, in full sun and in

Appendix 7.17: Invertebrate Scoping Report - Updated to Include 2020 and 2021 Survey Data

shade) will create the greatest variety of niches. Many dead wood invertebrates also need access to nectar sources, especially in the early part of the year (e.g. Hawthorn and Dogwood), so the close proximity of such sources to dead wood habitat as proposed within the riparian corridor buffer would provide a valuable habitat.

- 5.2.15 The development proposes the creation of wetlands throughout the site, which have the greatest potential for invertebrates as they would be designed to offer a range of micro-habitats, e.g. a range of water depths, aspects, diverse margin vegetation, basking spots, etc. These wetlands can also serve as corridors for the dispersal and movement of species through the landscape.
- 5.2.16 Proposed wetland feature design is shown within the Otterpool Park EIA, specifically within the sections relating to mitigation for water voles and great crested newts (ES Appendices 7.9, 7.10 and 7.18).

5.3 Construction Mitigation

- 5.3.1 In addition to the design mitigation above, during detailed design and construction of the development, it is likely that additional actions may be required to safeguard the current invertebrate populations. These actions would be specified within a Code of Construction Practice (CoCP) plan and would include:
 - Clear demarcation of areas that are to be retained with minimal disturbance to the buffers. Many species of invertebrate overwinter as eggs, larvae or adults in the soil, leaf-litter, under bark, etc. so it is imperative that these habitats are not disturbed in the buffers surrounding the more important retained habitats;
 - Appropriate measures are put in place to control dust and other emissions that could affect air quality;
 - Site compounds, storage facilities and staff facilities are suitably bunded and located in
 places that would not have an adverse effect on the environment; in particular, the CoCP
 would ensure that retained trees are protected;
 - In advance of site clearance, protective fencing is installed to protect retained and/or ecologically sensitive habitats (woodlands, mature trees and hedgerows) and their associated buffer zones to ensure that they are not subject to accidental damage (to be determined on a phase by phase basis);
 - Haul routes, storage compounds and staff facilities would be located away from retained habitats to minimise disturbance to the species they support;
 - An ecological clerk of works is in place to oversee site clearance, in particular any works that have the potential to disturb notable receptors. They would also ensure that the mitigation measures proposed adhere to best practice guidelines and take account of any changes in legislation that may have occurred;
 - The ecological clerk of works would ensure that hedgerow translocation is undertaken in accordance with an agreed method statement. They would also ensure that the retained and translocated hedgerows are monitored to ensure that they are managed appropriately;
 - An ecological clerk of works would be employed to ensure that the ecological protection measures outlined in the CoCP are adhered to. They would also undertake regular monitoring to ensure that the protection measures remain in place for the time that they are required; and
 - The Ecological Clerk of Works would report to the Site Manager and/or Environmental Clerk of Works to ensure that remedial actions are undertaken in a timely manner.

5.4 Additional Mitigation

- 5.4.1 Additional actions may be required to safeguard the current invertebrate populations. These actions may include:
 - Habitat manipulation to displace invertebrates into retained habitats adjacent to habitats to be removed prior to removal;
 - Any large pieces of dead wood in areas that are to be developed can be moved to retained areas and deposited in a range of situations, i.e. full shade through to full sun; and
 - Any trees that are cut in the retained areas should be left as dead-wood with a mixture of standing (2-3m high) and boughs and trunks on the ground.

Operational Mitigation

Safeguarding habitats

- 5.4.2 In order to minimise operational impacts to retained and enhanced invertebrate populations. The following approaches would be implemented:
 - GI would be designed to limit human accessibility to the most sensitive areas, GI design will minimise impacts to these areas, utilising topography, habitat and fencing to control recreational pressures;
 - Buffers will be created and maintained around retained and created notable invertebrate areas;
 - Newly created habitats, particularly the are in the north west will be positioned away from development where possible to minimise impacts from humans.

Maintenance and monitoring

- 5.4.3 It is imperative that the long-term management of the habitats (both retained and created) be agreed before the development. This will need to be specified in a management plan at the appropriate time in the planning process, likely within an EMP (Ecological Management Plan) prior to any parcel of the development being developed.
- 5.4.4 The Otterpool Park BAP (ES Appendix 7.20) will specify broad target for species and groups, including invertebrates. This will drive future management and conservation actions. It is envisioned that this will be alive document, to be updated with input from key stakeholders, including the town's residents.

5.5 Further Survey

- 5.5.1 The vast majority of the habitats that have potential for invertebrates are being retained further detailed surveys are not deemed necessary to inform the masterplan design or ES.
- 5.5.2 There are a small number of areas which would benefit from further survey to inform the detailed design for the subsequent detailed planning applications. Due to the extended timeframe for build out of the development (19 years in duration), the timing of the surveys would be appropriate to be aligned with the phasing of the detailed design.
- 5.5.3 While the Folkestone racecourse lake is being retained, there will be landscaping around the northern margin to permit easier access for human recreation. This work would need to be proceeded by detailed surveys, which should be conducted at an appropriate time in the planning process.
- 5.5.4 If any modification works are required within this area, detailed invertebrate surveys may be required to inform the detailed planning, design and mitigation. These surveys should be conducted at an appropriate stage of the planning process and are outlined within Table 4.

- 5.5.5 There was a limited resource of bare ground habitat, largely isolated areas within the site's grassland and scrub habitat. There are some large, predominantly bare mounds and areas of bare ground in the grassland surrounding these mounds north of the Link Park area (TN165 and 167). Ground nesting solitary bees (probably *Lasioglossum* spp.) were observed to be active in this area. It may be necessary to conduct invertebrate surveys to inform detailed design and mitigation prior to development within this area. There were also significant areas of bare ground in the disused lorry park (TN180 and 182), but minimal aculeate activity (insects having or resembling a stinger or barb; such as bees and wasps) was observed in this area. Surveys, where required should be conducted at an appropriate stage of the planning process and are outlined within Table 4.
- 5.5.6 The areas where further surveys are recommended are around the Folkestone Racecourse Lake, an area to the north of Link Park and a long hedgerow / ditch which is to be bisected in the west of the site (around TN118).

Location	Habitat	Timing of survey within planning process	Type of survey to be conducted	Seasonal timings
Folkestone Racecourse Lake	Freshwater Pond	Prior to detailed planning application	Standardised pond netting and sweeping/beating of marginal vegetation*	May, June and July
Bunds to the north of link park	Bare ground slopes, bae ground, scrub	Prior to detailed planning application	Standardised sweep netting, beating, suction sampling and pan-trapping*	May, June and July
Hedgerow in the west of the site.	Hedgerow, shallow ditch.	Prior to detailed planning application	Standardised sweep netting, beating, suction sampling and pan-trapping*	May, June and July

 Table 4: Summary of further surveys recommended

*Sampling protocol after Drake *et al.* 2007

5.5.7 Any changes to the plans that have impacts on the retained areas/green infrastructure will need to be reviewed and further detailed surveys carried out where appropriate.

Otterpool Park Environmental Statement

Appendix 7.17: Invertebrate Scoping Report - Updated to Include 2020 and 2021 Survey Data

6 Conclusions

- 6.1.1 A walkover of the site was conducted on the 8 August 2018 with a habitat assessment update undertaken in May 2020 to update the validity of the survey The areas that were to be lost in the development were visited and photographed along with all the areas that present the likely most valuable habitats for invertebrates. The majority of the site has been intensively farmed for many decades (arable/grazing) and is of limited value to invertebrates. The field margins and hedgerows in the intensively farmed areas are species poor and would support impoverished invertebrate communities.
- 6.1.2 The more interesting habitats in the development site includes species rich hedgerows, semi-improved neutral grassland, woodland, water bodies and riparian habitats. However, with the exception of the riparian corridor there is limited connectivity of these habitats at the landscape scale, which places invertebrates, especially those with limited dispersal abilities, at rick of localised extinction.
- 6.1.3 The vast majority of the habitats that have potential for invertebrates are being retained. Further detailed surveys are not deemed necessary to inform the masterplan design or EIA. It is considered that the information collated to date is sufficient to inform the masterplan design and provide ample information for the EIA. There are three discrete areas where detailed invertebrate surveys are warranted at the appropriate time within the planning process, to inform detailed design and mitigation and provide a baseline for monitoring. One of these consists of two large mounds with large areas of bare ground in a mosaic of grassland and scrub (TN 165 and 167) and the others are Folkestone Racecourse Lake (TN19) and its margins and a hedgerow / line of trees and ditch in the west of the site (TN18).
- 6.1.4 The habitat assessment update in 2020 identified no significant change in the status of invertebrate habitat within the site. The results of the 2020 survey concluded that:
 - No further invertebrate surveys are required to inform a 2020 resubmission of the ES; and
 - The valuations utilised in the 2018 submission are considered to be valid, with no evidence of any invertebrate habitats increasing in value.
- 6.1.5 The plan for the Otterpool development retains the vast majority of the higher-quality habitats and will achieve biodiversity net gain by creating buffers and margins around these existing features as part of 'green infrastructure' throughout the site. Not only will this increase the amount and variety of potentially valuable invertebrate habitats, but it will also improve connectivity. A network of waterbodies will be created throughout the development that will enhance the value of the site for invertebrates. In addition, a new wetland area created in the north-west of the development has the potential to offer a range of interesting habitats that could sustain a diverse community of invertebrates.

7 References

Ref	Reference Description
Ref 1	CSa Environmental Planning (2012). Ecological appraisal for former Lympne Airfield Housing Development.
Ref 2	Drake, C.M., Lott, D.A., Alexander, K.N.A. and Webb, J. 2007. Surveying terrestrial and freshwater invertebrates for conservation evaluation. Natural England Research Report NERR005.
Ref 3	Kirby, G, ed. Gammans, N. (2020) Lympne Airfield Site, Ecological Survey Report, September 2020.
Ref 4	Ministry of Housing, Communities and Local Government (2021). National Planning Policy Framework, 2021. Ministry of Housing, Communities and Local Government London.
Ref 5	HMSO (1981) Wildlife and Countryside Act 1981. HMSO, London.
Ref 6	HMSO (2006) Natural Environment and Rural Communities Act 2006. HMSO, London.
Ref 7	Kent Biodiversity Partnership (2017) <i>UK BAP priority species are</i> available at: http://www.kentbap.org.uk/habitats-and-species/priority-species/ [Accessed: October 2017].
Ref 8	HMSO (2000) Countryside and Rights of Way Act 2000. HMSO, London.
Ref 9	HMSO (2017) The Conservation of Habitats and Species Regulations 2017. HMSO, London

Otterpool Park Environmental Statement Appendix 7.17: Invertebrate Scoping Report – Updated to Include 2020 and 2021 Survey Data Figure 1: Habitats on Site and Target Notes Relating to the value of Each Area to Invertebrates

N.B. Target Notes are those utilised in the Habitat and Hedgerow report for clarity between reports



APPENDIX A: Historical Records

Table 5: Conservation concern species inventory provided by Kent and Medway Biological Records Centre (edited to remove duplicates and pre-1998 records).

Scientific Name	Common Name	Species Status (Definitions of these status codes is presented below the table in Table 6)	Grid Ref.	Location
DIPLOPODA				
Polyzonium germanicum	Boring Millipede	UKBAP_P, NERC_S.41	TR13E	Gibbins' Brook
GASTROPODA				
Arion ater	Large Black Slug	п	TR13J	
Helicigona lapicida	Lapidary Snail	Kent RDB2	TR099347	Aldergate Wood
MALACOSTRATA: DECAPODA				
Austropotamobius pallipes	White-clawed Freshwater Crayfish	RedList_Global_post2 001- EN, UKBAP_P, NERC_S.41	TR13	Seabrook
INSECTA: LEPIDOPTERA				
Hepialus humuli	Ghost Moth	UKBAP_P, NERC_S.41	TR077388	M20 N verge nr Sellinge converter stn
Lasiommata megera	Wall	11	TR122351	Lympne
Coenonympha pamphilus	Small Heath	11	TR1334	Hythe
Limenitis camilla	White Admiral	11	TR1335	Pedlinge, Folks Wood
Satyrium w-album	White-letter Hairstreak	n	TR1434	Hythe, The Roughs
Watsonalla binaria	Oak Hook-tip	"	TR1335	Folks' Wood
Malacosoma neustria	Lackey	"	TR1234	Hythe, West Hythe (Lympne Park Wood)

Scientific Name	Common Name	Species Status (Definitions of these status codes is presented below the table in Table 6)	Grid Ref.	Location
Scopula marginepunctata	Mullein Wave	u	TR13H	West Hythe
Timandra comae	Blood-Vein	"	TR1233	Nickolls Quarry
Scotopteryx chenopodiata	Shaded Broad- bar	"	TR1137	Sellindge, Hythe
Xanthorhoe ferrugata	Dark-barred Twin-spot Carpet	n	TR1536	Heane Wood
Ecliptopera silaceata	Small Phoenix	"	TR123343	West Hythe, Hythe
Melanthia procellata	Pretty Chalk Carpet	н	TR1234	Hythe, Lympne Royal Military Canal
Chiasmia clathrata subsp. clathrata	Latticed Heath	n	TR1034	Hythe, Lympne (Royal Military Canal)
Ennomos quercinaria	August Thorn	n	TR1038	The Silver Spray, Sellindge
Ennomos fuscantaria	Dusky Thorn	11	TR1038	Hythe, Sellindge ("The Silver Spray")
Hemistola chrysoprasaria	Small Emerald	11	TR1234	Hythe, West Hythe (Lympne Park Wood)
Thalera fimbrialis	Sussex Emerald	RedList_GB_Pre94- EN, UKBAP_P, NERC_S.41	TR123343	West Hythe, Hythe
Spilosoma lutea	Buff Ermine	"	TR1536	Heane Wood
Spilosoma lubricipeda	White Ermine	"	TR123343	West Hythe,
Arctia caja	Garden Tiger	UKBAP_P, NERC_S.41	TR1038	Hythe, Sellindge ("The Silver Spray")
Tyria jacobaeae	Cinnabar	n	TR1173338645	Hythe, Sellindge (Gibbin's Brook)
Paracolax tristalis	Clay Fan-foot	ű	TR135356	Hythe, Folks' Wood
Tyta luctuosa	Four-spotted	RedList_GB_Pre94- VU, UKBAP_P, NERC_S.41	TR1234	Hythe, West Hythe (Lympne Park Wood)
Acronicta psi	Grey Dagger	I	TR1234	Hythe, Lympne Royal Military Canal
Acronicta rumicis	Knot Grass	n	TR123343	West Hythe, Hythe

Scientific Name	Common Name	Species Status (Definitions of these status codes is presented below the table in Table 6)	Grid Ref.	Location
Amphipyra tragopoginis	Mouse Moth	"	TR123343	West Hythe, Hythe
Allophyes oxyacanthae	Green-brindled Crescent	11	TR1537	Cowtye Wood
Caradrina morpheus	Mottled Rustic	UKBAP_P, NERC_S.41	TR1234	Hythe, West Hythe (Lympne Park Wood)
Hoplodrina blanda	Rustic	"	TR123343	West Hythe, Hythe
Hydraecia micacea	Rosy Rustic	11	TR1233	Nickolls Quarry
Amphipoea oculea	Ear Moth	11	TR135356	Hythe, Folks' Wood
Rhizedra lutosa	Large Wainscot	"	TR13C	Lympne
Cirrhia icteritia	Sallow	"	TR1537	Cowtye Wood
Cirrhia gilvago	Dusky-lemon Sallow	n	TR1034	Hythe, Port Lympne
Agrochola lychnidis	Beaded Chestnut	n	TR1034	Hythe, Port Lympne
Atethmia centrago	Centre-barred Sallow	"	TR1034	Hythe, Port Lympne
Brachylomia viminalis	Minor Shoulder-knot	"	TR1234	Hythe, West Hythe (Lympne Park Wood)
Aporophyla lutulenta	Deep-brown Dart	"	TR1333	
Tholera cespitis	Hedge Rustic	"	TR1333	
Tholera decimalis	Feathered Gothic	11	TR0833	Dymchurch, Lower Wal Farm
Melanchra persicariae	Dot Moth	"	TR123343	West Hythe, Hythe
Leucania comma	Shoulder- striped Wainscot	n	TR1034	Hythe, Port Lympne
Euxoa tritici	White-line Dart	n	TR124344	West Hythe, RM Canal
Diarsia rubi	Small Square- spot	"	TR1233	Nickolls Quarry

Scientific Name	Common Name	Species Status (Definitions of these status codes is presented below the table in Table 6)	Grid Ref.	Location
Eugnorisma glareosa subsp. glareosa	Autumnal Rustic	n	TR1333	
Oegoconia caradjai	Straw Obscure	Notable-B	TR1234	Hythe, West Hythe (Lympne Park Wood)
Bisigna procerella	Kent Tubic	Kent RDB2	TR1234	Hythe, West Hythe (Lympne Park Wood)
Pexicopia malvella	Hollyhock Seed Moth	Notable-B	TR15383668	Froggies, Saltwood
Cochylidia subroseana	Dingy Roseate Conch	Kent RDB2	TR1234	Hythe, West Hythe (Lympne Park Wood)
Argynnis paphia	Silver-washed Fritillary	Kent RDB1	TR1335	Pedlinge, Folks Wood
Moitrelia obductella	Kent Knot-horn	RedList_GB_Pre94- VU	TR123343	West Hythe, Hythe
Oncocera semirubella	Rosy-striped Knot-horn	u.	TR123343	West Hythe, Hythe
Pempelia genistella	Gorse Knot- horn	u	TR1234	Hythe, West Hythe (Lympne Park Wood)
Gymnancyla canella	Hoary Knot- horn	Notable-	TR124344	Hythe, West Hythe (Royal Military Canal)
Synaphe punctalis	Long-legged Tabby	u	TR1434	
Sitochroa palealis	Sulphur Pearl	Notable	TR1234	Hythe, West Hythe (Lympne Park Wood)
Anania verbascalis	Golden Pearl	Notable-B	TR135356	Hythe, Folks' Wood
Evergestis extimalis	Marbled Yellow Pearl	Notable-B	TR123343	West Hythe, Hythe
Calamotropha paludella	Bulrush Veneer	п	TR1234	Hythe, West Hythe (Lympne Park Wood)
Platytes alpinella	Hook-tipped Grass-veneer	RedList_GB_Pre94-R	TR1234	Hythe, West Hythe (Lympne Park Wood)
Scopula nigropunctata	Sub-angled Wave	Kent RDB1, RedList_GB_Pre94- VU	TR1234	Hythe, West Hythe (Lympne Park Wood)
Calophasia lunula	Toadflax Brocade	Kent RDB1, RedList_GB_Pre94-R	TR13	Hythe Ranges, just to the east

Scientific Name	Common Name	Species Status (Definitions of these status codes is presented below the table in Table 6)	Grid Ref.	Location
INSECTA: DIPTERA				
Dorycera graminum	Phoenix Fly	RedList_GB_Pre94-R, UKBAP_P, NERC_S.41	TR12253540	Walnut Tree Cottage, Lympne
Stratiomys potamida	Banded General	Notable	TR12253540	Walnut Tree Cottage, Lympne
Cheilosia barbata	A fly	Notable, NS-excludes	TR1435	Brockhill Country Park
Dioxyna bidentis	A fly	Notable	TR14933558	Brockhill Country Park
Trypeta zoe	A fly	RedList_GB_Pre94- EN	TR14683595	Brockhill Country Park
Piezura graminicola	A fly	Kent RDB1, Kent RDB2, RedList_GB_Pre94- Insu	TR14683595	Brockhill Country Park
Helina abdominalis	A fly	Notable	TR14683595	Brockhill Country Park
INSECTA: HEMIPTERA				
	A bug	Natabla D	TD14702545	Brockhill Country Dark
Macrosteles cristatus Empicoris	A bug	Notable-B	TR14783545	Brockhill Country Park
baerensprungi	A bug	Notable-A	TR148357	Brockhill Country park
INSECTA: COLEOPTERA				
Gymnetron villosulum	A beetle	Notable-B	TR03U	
Polydrusus formosus	A beetle	Notable-A	TR130356	Woods at Bilsington,western section
Acrotona troglodytes	A beetle	RedList_GB_Pre94- Insu	TR1234	
Aleochara verna	A beetle	RedList_GB_Pre94- Insu	TR148357	Brockhill Country park
Gyrophaena congrua	A beetle	Notable	TR148357	Brockhill Country park
Gyrophaena manca	A beetle	Notable	TR148357	Brockhill Country park
Cypha discoidea	A beetle	Notable-B	TR13C	
Oligota apicata	A beetle	Notable	TR148357	Brockhill Country park
Carpelimus fuliginosus	A beetle	Notable	TR13C	

Scientific Name	Common Name	Species Status (Definitions of these status codes is presented below the table in Table 6)	Grid Ref.	Location
Philonthus confinis	A beetle	RedList_GB_Pre94- Inde	TR148357	Brockhill Country park
Quedius fulgidus	A beetle	Notable-B	TR1234	
Hypnogyra angularis	A beetle	Notable-A	TR1234	
Peltodytes caesus	A beetle	"	TR13E	Gibbins' Brook
Rhantus frontalis	A beetle	н	TR13M	Hythe
Dytiscus dimidiatus	A beetle	Kent RDB3, RedList_GB_post2001- NT	TR03S	Aldington Knoll
Tachys bistriatus	A beetle	п	TR13C	
Bembidion octomaculatum	A beetle	Kent RDBK, RedList_GB_Pre94- EX	TR13M	Hythe
Platyderus depressus	A beetle	Notable-B	TR13M	Hythe
Ophonus azureus	A beetle	Notable-B	TR13M	Hythe
Ophonus sabulicola	A beetle	RedList_GB_Pre94-R	TR13M	Hythe
Ophonus sabulicola	A beetle	п	TR1434	
Stenolophus skrimshiranus	A beetle	Notable-A	TR13C	
Acupalpus brunnipes	A beetle	Notable-A	TR13C	
Acupalpus exiguus	A beetle	Notable-B	TR13E	Gibbins' Brook
Demetrias imperialis	A beetle	Notable-B	TR13C	
Cryptopleurum crenatum	A beetle	Notable	TR14953555	Brockhill Country Park
Choleva cisteloides	A beetle	RedList_GB_Pre94- Insu	TR13C	
Elodes pseudominuta	A beetle	NS-excludes	TR1138	
Orthoperus nigrescens	A beetle	Notable-B	TR148357	Brockhill Country park
Orchesia minor	A beetle	Notable-B	TR148357	Brockhill Country park
Prionychus ater	A beetle	Notable-B	TR1234	
Scientific Name	Common Name	Species Status (Definitions of these status codes is presented below the table in Table 6)	Grid Ref.	Location
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Scaphidema metallicum	A beetle	Notable-B	TR13E	Gibbins' Brook
Pyrochroa coccinea	A beetle	Notable-B	TR148357	Brockhill Country park
Phyllotreta vittula	A beetle	Notable-A	TR148357	Brockhill Country park
Longitarsus parvulus	A beetle	Notable-A	TR148357	Brockhill Country park
Apion rubiginosum	A beetle	Kent RDB1, RedList_GB_Pre94-R	TR14813595	Brockhill Country Park
INSECTA: HYMENOPTERA				
Andrena bucephala	Big-headed Mining Bee	Notable-A	TR14863568	Brockhill Country Park
Andrena trimmerana	Trimmer's Mining Bee	Notable-B	TR14933558	Brockhill Country Park
Andrena labiata	Red-girdled Mining Bee	Notable-A	TR14863568	Brockhill Country Park
Lasioglossum pauxillum	Lobe-spurred Furrow Bee	Notable-A	TR148357	Brockhill Country Park
Dolichovespula media	A social wasp	Notable-A	TR122354	Walnut Tree Cottage; Lympne
Philanthus triangulum	Bee Wolf	RedList_GB_Pre94- VU	TR122354	Walnut Tree Cottage; Lympne
Nomada fucata	Painted Nomad Bee	Notable-A	TR14933558	Brockhill Country Park
Bombus rupestris	Red-tailed Cuckoo Bee	Notable-B	TR1034	Port Lympne Zoo

Table 6: Status and protection codes utilised in this report

Status - Short Name	Status - Long Name	Description
Kent RDB	Kent Red Data Book	Species whose stronghold in Kent, although not necessarily scarce here, the Kent populations are significant in a national context.

Status - Short Name	Status - Long Name	Description
Kent RDB1	Kent Red Data Book 1 - Endangered	Species that have been recorded in 1-2 tetrads only
Kent RDB2	Kent Red Data Book 2 - Vulnerable	Species that have been recorded in 3-5 tetrads or, if more than this, where the species is considered to be undergoing a significant decline.
Kent RDB3	Kent Red Data Book 3 - Rare	Species that have been recorded in 6-10 tetrads
Kent RDB4	Kent Red Data Book 4	(flies only) species which have been assigned RDB1, 2, 3, or K status nationally and which are nowknown from more than 10 discrete sites within Kent
Kent RDBK	Kent Red Data Book - County Important	Species of county importance: no further breakdown has been possible
Kent RDBX	Kent Red Data Book - Extinct	Species considered to be extinct in Kent
Marine-NR	Nationally rare marine species	Species which occur in eight or fewer 10km X 10km grid squares containing sea (or water of marine saline influence) within the three mile territorial limit.
Marine-NS	Nationally scarce marine species	Species which occur in nine to 55 10km X 10km grid squares containing sea (or water of marine saline influence) within the three mile territorial limit.
Notable	Nationally Notable	Species which are estimated to occur within the range of 16 to 100 10km squares. (subdivision into Notable A and Notable B is not always possible because there may be insufficient information
		available). Superseded by Nationally Scarce, and therefore no longer in use.
Notable-A	Nationally Notable A	Taxa which do not fall within RDB categories but which are none-the-less uncommon in Great Britain and thought to occur in 30 or fewer 10km squares of the National Grid or, for less well-recorded groups, within seven or fewer vice-counties. Superseded by Nationally Scarce, and therefore no longer in use.
Notable-B	Nationally Notable B	Taxa which do not fall within RDB categories but which are none-the-less uncommon in Great Britain and thought to occur in between 31 and 100 10km squares of the National Grid or, for less-well recorded groups between eight and twenty vice-counties. Superseded by Nationally Scarce, and therefore no longer in use.
RedList GB post 2001-CR	IUCN (2001) - Critically endangered	A taxon is Critically Endangered when it is facing an extremely high risk of extinction in the wild in theimmediate future, as defined by any of the criteria A to E.

Status - Short Name	Status - Long Name	Description
RedList GB post 2001-DD	IUCN (2001) - Data Deficient	A taxon is Data Deficient when there is inadequate information to make a direct, or indirect, assessment of its risk of extinction based on its distribution and/or population status. A taxon in this category may be well studied, and its biology well known, but appropriate data on abundance and/or distribution are lacking. Data Deficient is therefore not a category of threat or Lower Risk. Listing of taxa in this category indicates that more information is required and acknowledges the possibility that future research will show that a threatened category is appropriate.
RedList GB post 2001-EN	IUCN (2001) - Endangered	A taxon is Endangered when it is not Critically endangered but is facing a very high risk of extinction in the wild in the near future.
RedList GB post 2001-EW	IUCN (2001) - Extinct in the wild	A taxon is Extinct in the wild in Great Britain when it is known to survive only in cultivation, in captivity or as a naturalised population (or populations) well outside the past range. A taxon is presumed extinctin the wild when exhaustive surveys in known and/or expected habitat, at appropriate times (diurnal, seasonal, annual) throughout its range have failed to record an individual. Surveys should be over a time frame appropriate to the taxon's life cycle and life form.
RedList GB post 2001-EX	IUCN (2001) - Extinct	A taxon is Extinct in Great Britain when there is no reasonable doubt that the last individual in Great Britain has died. A taxon is presumed extinct when exhaustive surveys in known and/or expected habitat, at appropriate times (diurnal, seasonal, annual), throughout its historical range have failed to record an individual. Surveys should be over a time scale appropriate to the taxon's life cycle and life form.
RedList GB post 2001-NT	IUCN (2001) - Lower risk - near threatened	Taxa which do not qualify for Lower Risk (conservation dependent), but which are close to qualifying for Vulnerable. In Britain, this category includes species which occur in 15 or fewer hectads but do not qualify as Critically Endangered, Endangered or Vulnerable.
RedList GB post 2001-RE	IUCN (2001) - Regionally Extinct	Category for a taxon when there is no reasonable doubt that the last individual potentially capable of reproduction within the region has died or has disappeared from the wild in the region, or when, if it is a former visiting taxon, the last individual has died or disappeared in the wild from the region. The setting of any time limit for listing under RE is left to the discretion of the regional Red List authority, but should not normally pre-date 1500 AD.
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RedList GB post 2001-VU	IUCN (2001) - Vulnerable	A taxon is Vulnerable when it is not Critically Endangered or Endangered but is facing a high risk of extinction in the wild in the medium term future.
RedList GB post 94-CR	IUCN (1994) - Critically endangered	A taxon is Critically Endangered when it is facing an extremely high risk of extinction in the wild in theimmediate future, as defined by any of the criteria A to E.

Status - Short Name	Status - Long Name	Description
RedList GB post 94-DD	IUCN (1994) - Data Deficient	A taxon is Data Deficient when there is inadequate information to make a direct, or indirect, assessment of its risk of extinction based on its distribution and/or population status. A taxon in this category may be well studied, and its biology well known, but appropriate data on abundance and/or distribution are lacking. Data Deficient is therefore not a category of threat or Lower Risk. Listing of taxa in this category indicates that more information is required and acknowledges the possibility that future research will show that a threatened category is appropriate.
RedList GB post 94-EN	IUCN (1994) - Endangered	A taxon is Endangered when it is not Critically endangered but is facing a very high risk of extinction in the wild in the near future.
RedList GB post 94-EX	IUCN (1994) - Extinct	Taxa which are no longer known to exist in the wild after repeated searches of their localities and other known likely places. Superseded by new IUCN categories in 1994, but still applicable to lists that have not been reviewed since 1994.
RedList GB post 94-NT	IUCN (1994) - Lower risk - near threatened	Taxa which do not qualify for Lower Risk (conservation dependent), but which are close to qualifying for Vulnerable. In Britain, this category includes species which occur in 15 or fewer hectads but do not qualify as Critically Endangered, Endangered or Vulnerable.
RedList GB post 94-VU	IUCN (1994) - Vulnerable	A taxon is Vulnerable when it is not Critically Endangered or Endangered but is facing a high risk of extinction in the wild in the medium term future.
RedList GB Pre 94-EN	IUCN (pre 1994) - Endangered	Taxa in danger of extinction and whose survival is unlikely if the causal factors continue operating. Superseded by new IUCN categories in 1994, but still applicable to lists that have not been reviewed since 1994.
RedList GB Pre 94-EX	IUCN (pre 1994) - Extinct	Taxa which are no longer known to exist in the wild after repeated searches of their localities and other known likely places. Superseded by new IUCN categories in 1994, but still applicable to lists that have not been reviewed since 1994.
RedList GB Pre 94-Inde	RDB - Indeterm	Taxa not seen since 1970 but require further survey before they can be declared extinct. Known to be Extinct, Endangered, Vulnerable or Rare, but where there is not enough information to say which of these categories is appropriate. Superseded by new IUCN categories in 1994, so no longer in use.
RedList GB Pre94-Insu	RDB - Insuff known	Taxa that are suspected but not definitely known to belong to any of the above categories (i.e. Endangered, Vulnerable, Rare), because of the lack of information. Superseded by new IUCN categories in 1994, so no longer in use.

Status - Short Name	Status - Long Name	Description
RedList GB Pre 94-R	IUCN (pre 1994) - Rare	Taxa with small populations that are not at present Endangered or Vulnerable, but are at risk. (In GB, this was interpreted as species which exist in fifteen or fewer 10km squares). Superseded by new IUCN categories in 1994, but still applicable to lists that have not been reviewed
		since 1994.
RedList GB Pre 94-Thre	RDB - Threatened endemic	Taxa which are not known to occur naturally outside Britain. Taxa within this category may also be inany of the other RDB categories or not threatened at all.
RedList GB Pre 94-VU	IUCN (pre 1994) - Vulnerable	Taxa believed likely to move into the Endangered category in the near future if the causal factors continue operating. Superseded by new IUCN categories in 1994, but still applicable to lists that have not been reviewed since 1994.
RedList Global post 2001DD	IUCN (2001) - Data Deficient	A taxon is Data Deficient when there is inadequate information to make a direct, or indirect, assessment of its risk of extinction based on its distribution and/or population status. A taxon in this category may be well studied, and its biology well known, but appropriate data on abundance and/or distribution are lacking. Data Deficient is therefore not a category of threat. Listing of taxa in this category indicates that more information is required and acknowledges the possibility that future research will show that threatened classification is appropriate. It is important to make positive use of whatever data are available. In many cases great care should be exercised in choosing between DD and a threatened status. If the range of a taxon is suspected to be relatively circumscribed, and a considerable period of time has elapsed since the last record of the taxon, threatened status may wellbe justified.
RedList Global post 2001EX	IUCN (2001) - Extinct	A taxon is Extinct when there is no reasonable doubt that the last individual has died. A taxon is presumed Extinct when exhaustive surveys in known and/or expected habitat, at appropriate times (diurnal, seasonal, annual), throughout its historic range have failed to record an individual. Surveys should be over a time frame appropriate to the taxon's life cycle and life form.
RedList Global post 2001NT	IUCN (2001) - Lower risk - near threatened	A taxon is Near Threatened when it has been evaluated against the criteria but does not qualify for Critically Endangered, Endangered or Vulnerable now, but is close to qualifying for or is likely to qualifyfor a threatened category in the near future.
RedList Global post 2001-CR	IUCN (2001) - Critically endangered	A taxon is Critically Endangered when the best available evidence indicates that it meets any of the criteria A to E for Critically Endangered (see Section V), and it is therefore considered to be facing an extremely high risk of extinction in the wild.
RedList Global post 2001-EN	IUCN (2001) - Endangered	A taxon is Endangered when the best available evidence indicates that it meets any of the criteria A to

Status - Short Name	Status - Long Name	Description
		E for Endangered (see Section V), and it is therefore considered to be facing a very high risk of extinction in the wild.
RedList Global post 2001-VU	IUCN (2001) - Vulnerable	A taxon is Vulnerable when the best available evidence indicates that it meets any of the criteria A to E for Vulnerable (see Section V), and it is therefore considered to be facing a high risk of extinction in the wild.
RedList Global post 94-CR	IUCN (1994) - Critically endangered	A taxon is Critically Endangered when it is facing an extremely high risk of extinction in the wild in theimmediate future, as defined by any of the criteria A to E.
RedList Global post 94-DD	IUCN (1994) - Data Deficient	A taxon is Data Deficient when there is inadequate information to make a direct, or indirect, assessment of its risk of extinction based on its distribution and/or population status. A taxon in this category may be well studied, and its biology well known, but appropriate data on abundance and/or distribution are lacking. Data Deficient is therefore not a category of threat or Lower Risk. Listing of taxa in this category indicates that more information is required and acknowledges the possibility that future research will show that a threatened category is appropriate.
RedList Global post 94-EN	IUCN (1994) - Endangered	Taxa in danger of extinction and whose survival is unlikely if the causal factors continue operating. Superseded by new IUCN categories in 1994, but still applicable to lists that have not been reviewed since 1994.
RedList Global post 94-LR(cd)	IUCN (1994) - Lower risk - conservation dependent	Taxa which are the focus of a continuing taxon-specific or habitat-specific conservation programme targeted towards the taxon in question, the cessation of which would result in the taxon qualifying for one of the threatened categories above within a period of five years.
RedList Global post 94-NT	IUCN (1994) - Lower risk - near threatened	Taxa which do not qualify for Lower Risk (conservation dependent), but which are close to qualifying for Vulnerable. In Britain, this category includes species which occur in 15 or fewer hectads but do not qualify as Critically Endangered, Endangered or Vulnerable.
RedList Global post 94-VU	IUCN (1994) - Vulnerable	Taxa believed likely to move into the Endangered category in the near future if the causal factors continue operating. Superseded by new IUCN categories in 1994, but still applicable to lists that have not been reviewed since 1994.
RedList Global pre 94- EN	IUCN (pre 1994) - Endangered	Taxa in danger of extinction and whose survival is unlikely if the causal factors continue operating. Superseded by new IUCN categories in 1994, but still applicable to lists that have not been reviewed since 1994.

Status - Short Name	Status - Long Name	Description
RedList Global pre 94- EX	IUCN (pre 1994) - Extinct	A taxon is Extinct when there is no reasonable doubt that the last individual has died. A taxon is presumed extinct when exhaustive surveys in known and/or expected habitat, at appropriate times (diurnal, seasonal, annual), throughout its historical range have failed to record an individual. Surveys should be over a time scale appropriate to the taxon's life cycle and life
		form. Taxa with small populations that are not at present Endangered or
RedList Global pre 94- NR	IUCN (pre 1994) - Rare	Vulnerable, but are at risk. (In GB, this was interpreted as species which exist in fifteen or fewer 10km squares). Superseded by new IUCN categories in 1994, but still applicable to lists that have not been reviewed since 1994.
RedList Global pre 94- VU	IUCN (pre 1994) - Vulnerable	Taxa believed likely to move into the Endangered category in the near future if the causal factors continue operating. Superseded by new IUCN categories in 1994, but still applicable to lists that have not been reviewed since 1994.
RedList post 94-CR	IUCN (1994) - Critically endangered	A taxon is Critically Endangered when it is facing an extremely high risk of extinction in the wild in theimmediate future, as defined by any of the criteria A to E.
RedList post 94-CR(A)	IUCN (1994) - Critically endangered- criterion A	Population reduction in the form of either of the following: 1. An observed, estimated, inferred or suspected reduction of at least 80% over the last 10 years or three generations, whichever is the longer, based on (and specifying) any of the following: a. direct observation b. an index of abundanceappropriate for the taxon c. a decline in area of occupancy, extent of occurrence and/or quality of habitat d. actual or potential levels of exploitation e. the effects of introduced taxa, hybridisation, pathogens, pollutants, competitors or parasites. 2. A reduction of at least 80%, projected or suspected to be met within the 10 years or three generations, whichever is the longer, based on (and specifying) any of b, c, d or e above.
RedList post 94-CR(B)	IUCN (1994) - Critically endangered- criterion B	Extent of occurrence estimated to be less than 100 km2 or areas of occupancy estimated to be less than 10 km2, and estimates indicating any two of the following: 1. Severely fragmented or known to exist at only a single location. 2. Continuing decline, observed, inferred or projected, in any of the following: a. extent of occurrence b. area of occupancy c. area, extent and/or quality of habitat d. number of locations or sub-populations e. number of mature individuals 3. Extreme fluctuations in any of the following: a. extent of occurrence b. area of occupancy c. number of locations or sub-populations d. number of mature individuals
RedList post 94-CR(C)	IUCN (1994) - Critically endangered- criterion C	Population estimated to number less than 250 mature individuals and either: 1. An estimated continuing decline of at least 25% within 3 years or one generation, whichever is longer or 2. A continuing decline, observed, projected, or inferred, in numbers of mature individuals and population structure in the form of either a. severely fragmented (i.e. no sub- population estimated to contain

Status - Short Name	Status - Long Name	Description
		more than 50 mature individuals) b. all individuals are in a single sub- population
RedList post 94-CR(D)	IUCN (1994) - Critically endangered- criterion D	Population estimated to number less than 50 mature individuals.
RedList post 94-DD	IUCN (1994) - Data Deficient	A taxon is Data Deficient when there is inadequate information to make a direct, or indirect, assessment of its risk of extinction based on its distribution and/or population status. A taxon in this category may be well studied, and its biology well known, but appropriate data on abundance and/or distribution are lacking. Data Deficient is therefore not a category of threat or Lower Risk. Listing of taxa in this category indicates that more information is required and acknowledges the possibility that future research will show that a threatened category is appropriate.
RedList post 94-EN	IUCN (1994) - Endangered	A taxon is Endangered when it is not Critically Endangered but is facing a very high risk of extinction in the wild in the near future, as defined by any of the criteria A to E.
RedList post 94-EN(A)	IUCN (1994) - Endangered- criterion A	Population reduction in the form of either of the following: 1. An observed, estimated, inferred or suspected reduction of at least 50% over the last 10 years or three generations, whichever is the longer, based on (and specifying) any of the following: a. direct observation b. an index of abundance appropriate for the taxon c. a decline in area of occupancy, extent of occurrence and/or quality of habitat d. actual or potential levels of exploitation e. the effects of introduced taxa, hybridisation, pathogens, pollutants, competitors or parasites. 2. A reduction of at least 50%, projected or suspected to be met within the next ten years or three generations, whichever is the longer, based on (and specifying) any of b, c, d, or e above.
RedList post 94-EN(B)	IUCN (1994) - Endangered- criterion B	Extent of occurrence estimated to be less than 5,000 km2 or area of occupancy estimated to be less than 500 km2, and estimates indicating any two of the following: 1. Severely fragmented or known to exist at no more than five locations. 2. Continuing decline, inferred, observed or projected, in any of the following: a. extent of occurrence b. area of occupancy c. area, extent and/or quality of habitat d. number of locations or sub-populations e. number of mature individuals 3. Extreme fluctuations in anyof the following: a. extent of occurrence < b. area of occupancy c. number of sub-populations or sub-populations
RedList post 94-EN(C)	IUCN (1994) - Endangered- criterion C	Population estimated to number less than 2,500 mature individuals and either: 1. An estimated continuing decline of at least 20% within 5 years or 2 generations, whichever is longer, or 2. A continuing decline, observed, projected or inferred, in numbers of mature individuals and population structure in the form of either: a. severely fragmented (i.e. no sub- population estimated to contain

Status - Short Name	Status - Long Name	Description
		more than 250 mature individuals) b. all individuals are in a single sub- population.
RedList post 94-EN(D)	IUCN (1994) - Endangered- criterion D	Population estimated to number less than 250 mature individuals.
RedList post 94-EW	IUCN (1994) - Extinct in the wild	A taxon is Extinct in the wild when it is known to survive only in cultivation, in captivity or as a naturalised population (or populations) well outside the past range. A taxon is presumed extinct in the wild when exhaustive surveys in known and/or expected habitat, at appropriate times (diurnal, seasonal, annual) throughout its range have failed to record an individual. Surveys should be over a time frame appropriate to the taxon's life cycle and life form.
RedList post 94-II	IUCN (1994) - Internationally Important	Taxa that are common and/or widespread, but considered to be Rare or Threatened in the European Community. These taxa are listed in Annex I of the Birds Directive and/or Appendix II of the Bern Convention and/or Annexes II,III and V of the Habitats Directive
RedList post 94-LR(cd)	IUCN (1994) - Lower risk - conservation dependent	Taxa which are the focus of a continuing taxon-specific or habitat-specific conservation programme targeted towards the taxon in question, the cessation of which would result in the taxon qualifying forone of the threatened categories above within a period of five years.
RedList post 94-LR(lc)	IUCN (1994) - Lower risk - least concern	Taxa which do not qualify for Lower Risk (conservation dependent) or Lower Risk (near threatened) or (in Britain) Nationally Scarce.
RedList post 94-LR(ns)	IUCN (1994) - Lower risk - nationally scarce	A taxon is Lower Risk when it has been evaluated but does not satisfy the criteria for any of the categories Critically Endangered, Endangered or Vulnerable. If taxa do not meet the criteria for NearThreatened or Conmservation Dependent sub-categories, but never the less, occur in only 16-100 hectads, they are classed as Nationally Scarce.
RedList post 94-LR(nt)	IUCN (1994) - Lower risk - near threatened	Taxa which do not qualify for Lower Risk (conservation dependent), but which are close to qualifying for Vulnerable. In Britain, this category includes species which occur in 15 or fewer hectads but do not qualify as Critically Endangered, Endangered or Vulnerable.
RedList post 94-V	IUCN (1994) - Vulnerable	A taxon is Vulnerable when it is not Critically Endangered or Endangered but is facing a high risk of extinction in the wild in the medium-term future, as defined by any of the criteria A to E.

Status - Short Name	Status - Long Name	Description
RedList post 94-V(A)	IUCN (1994) - Vulnerable- criterionA	Population reduction in the form of either of the following: 1. An observed, estimated, inferred or suspected reduction of at least 20% over the last 10 years or three generations, whichever is the longer, based on (and specifying) any of the following: a. direct observation b. an index of abundance appropriate for the taxon c. a decline in area of occupancy, extent of occurrence and/or quality of habita d. actual or potential levels of exploitation e. the effects of introduced taxa, hybridisation, pathogens, pollutants, competitors or parasites. 2. A reduction of at least 20%, projected or suspected to be met within the next ten years or three generations, whichever is the longer, based on (and specifying) any of b, c, d or e above.
RedList post 94-V(B)	IUCN (1994) - Vulnerable- criterionB	Extent of occurrence estimated to be less than 20,000 km2 or area of occupancy estimated to be less than 2000 km2, and estimates indicating any two of the following: 1. Severely fragmented or known to exist at no more than ten locations. 2. Continuing decline, inferred, observed or projected, in any of the following: a. extent of occurrence b. area of occupancy c. area, extent and/or quality of habitat d.number of locations or sub-populations e. number of mature individuals. 3. Extreme fluctuations in any of the following: a. extent of occurrence b. area of occupancy c. number of locations or sub-populations or sub-populations or sub-populations or sub-populations or sub-populations or sub-populations d. number of mature individuals.
RedList post 94-V(C)	IUCN (1994) - Vulnerable- criterionC	Population estimated to number less than 10,000 mature individuals and either: 1. An estimated continuing decline of at least 10% within 10 years or 3 generations, whichever is longer, or 2. A continuing decline, observed, projected, or inferred, in numbers of mature individuals and population structure in the form of either: a. Severely fragmented (i.e. no subpopulation estimated to contain more than 1000 mature individuals). b. All individuals are in a single subpopulation.
RedList post 94-V(D)	IUCN (1994) - Vulnerable- criterionD	Population very small or restricted in the form of either of the following: 1. Population estimated to number less than 1,000 mature individuals 2. Population is characterised by an acute restriction in its area of occupancy (typically less than 100 km2) or in the number of locations (typically less than 5). such a taxon would thus be prone to the effects of human activities (or stochastic events whose impactis increased by human activities) within a very short period of time in an unforeseeable future, and is thus capable of becoming Critically Endangered or even Extinct in a very short period.
RedList pre 94-EN	IUCN (pre 1994) - Endangered	Taxa in danger of extinction and whose survival is unlikely if the causal factors continue operating. Superseded by new IUCN categories in 1994, so no longer in use.
RedList pre 94-EX	IUCN (pre 1994) - Extinct	Taxa which are no longer known to exist in the wild after repeated searches of their localities and other known likely places. Superseded by new IUCN categories in 1994, so no longer in use.

Status - Short Name	Status - Long Name	Description
RedList pre 94-Inde	IUCN (pre 1994) - Indeterminate	Taxa not seen since 1970 but require further survey before they can be declared extinctknown to be Extinct, Endangered, Vulnerable or Rare, but where there is not enough information to say which of these categories is appropriate. Superseded by new IUCN categories in 1994, so no longer in use.
RedList pre 94-Insu	IUCN (pre 1994) - Insufficientlyknown	Taxa that are suspected but not definitely known to belong to any of the above categories (i.e. Endangered, Vulnerable, Rare), because of the lack of information. Superseded by new IUCN categories in 1994, so no longer in use.
RedList pre 94-NR	IUCN (pre 1994) - Rare	Taxa with small populations that are not at present Endangered or Vulnerable, but are at risk. (In GB, this was interpreted as species which exist in fifteen or fewer 10km squares). Superseded by new IUCNcategories in 1994, so no longer in use.
RedList pre 94-OD	IUCN (pre 1994) - Out of danger	Taxa formerly meeting the criteria of one of the RDB threat categories (Endangered, Vulnerable, Rare), but which are now considered relatively secure because effective conservation measures have been taken or the previous threat to their survival has been removed. Superseded by new IUCN categories in 1994, so no longer in use.
RedList pre 94-VU	IUCN (pre 1994) - Vulnerable	Taxa believed likely to move into the Endangered category in the near future if the causal factors continue operating. Superseded by new IUCN categories in 1994, so no longer in use.
Status-NR	Nationally rare	Occurring in 15 or fewer hectads in Great Britain. Excludes rare species qualifying under the main IUCN criteria.
Status-NR (excl RedListed)	Nationally rare	Occurring in 15 or fewer hectads in Great Britain. Excludes rare species qualifying under the main IUCN criteria.
Status-NR (incl RedListed)	Nationally rare	Occurring in 15 or fewer hectads in Great Britain (includes all red listed species under IUCN criteria
Status-NS	Nationally scarce	Occurring in 16-100 hectads in Great Britain.
Threatened endemic	RDB - Threatened endemic	Taxa which are not known to occur naturally outside Britain. Taxa within this category may also be in any of the other RDB categories or not threatened at all

Status - Short Name	Status - Long Name	Description	
CITES	Protected under the Convention on International Trade in Endangered Species of Wild Fauna and Flora		
CRoW	Listed on the Countryside and Rights of Way Act 2000		
NERC S41	Listed on section 41 of the NERC Act		
UK BAP	Listed on the UK BAP		
Kent BAP	Listed on the Kent BAP		

APPENDIX B: Key Surveyor Pen Portrait (2018)

Surveyor	Pen Portrait
Ross Piper PhD, BSc (hons)	Dr Ross Piper has been an entomologist and ecologist for 20 years. He has conducted entomological surveys around the world and discovered several new taxa. In addition, he advises several organisations on rare invertebrates, including habitat requirements and habitat management.
Brandon Murray BSc (hons) MCIEEM	Brandon has been an ecologist for over 11 years and has experience on a range of protected species surveys including those for bats, badgers, great crested newt, dormouse, reptiles and water voles.

APPENDIX C: Photographs

N.B. Target Note Numbers are shown on the map in Figure 1.





TN19 – Racecourse lake

TN19 - Racecourse lake margins





TN20 – 600m of ditches

TN41 – Ephemeral pools







TN51 – Large dead sallow







Otterpool Park Environmental Statement

Appendix 7.17: Invertebrate Scoping Report - Updated to Include 2020 and 2021 Survey Data



TN100 – Riparian habitat

TN110/111 - Woodland edge scrub



TN110/111 – Woodland edge scrub



TN115 - Mature, species-rich hedge



TN118/225/227 – Mature, species-rich hedge over which 3 crossings will be needed



TN165/167 – Mounds of debris, in a mosaic of bare ground, grassland and scrub.





TN180/182 – Lorry park spoil heaps and abundant bare-ground

TN193 – Neutral semi improved grassland



TN195 – Old runway

TN197/198 – Bunds



Glow worm on site



Glow worm on site



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