Rebuttal Proof– Mitch Cooke
Employment Land North of Maple Cross Lodge, Proof of Evidence in Respect to Biodiversity

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1.0 BACKGROUND AND PURPOSE OF REBUTTAL EVIDENCE

BACKGROUND

1.1 This rebuttal addresses matters in respect of biodiversity. This rebuttal has been prepared by myself (Mitchel Cooke), Director of Greengage Environmental. It has been prepared following Exchange of Evidence wherein my main proof includes full details of my qualifications and experience.

PURPOSE OF REBUTTAL EVIDENCE

1.2 My rebuttal evidence responds to evidence advanced by the Rule 6 Maple Cross Residents Environment Group in respect of Ecology and Nature Conservation. This is set out in Matt Dodds' Proof of Evidence.

1.3 I do not need to respond to every point in his evidence. Where I do not specifically respond to a point, it does not mean I agree with it. My professional evidence remains as stated in my proof of evidence.

2.0 SCOPE OF EVIDENCE

INTRODUCTION

2.1 Matt Dodds' Proof of Evidence raises a number of points in respect of biodiversity. I consider these points and provide my responses below. In summary, I find that none of the points hold weight and all are addressed by the proposals.

SCOPE

2.2 The points I address are as follows;

- Forester moth conservation
- Biodiversity net gain

2.3 I have also provided a response to the comments made with respect to ecological impacts associated with Maple Lodge Marsh Local Wildlife Site.

3.0 REVIEW OF BIODIVERSITY MATTERS

FORESTER MOTH CONSERVATION

3.1 Matthew Dodds' Proof of Evidence states (paragraph 3.8) that the Forester moth is "of the highest conservation interest for the area". This is not correct.

3.2 In my Proof of Evidence Section 4.0 sets out the nature conservation framework associated with species, showing the highest level of nature conservation interest for the area are those species protected the Conservation of Habitats and Species Regulations 2017. In particular, those listed in Schedule 2 of those regulations are protected through the transposition of a European Directive, indicating their nature conservation status is European wide. These terrestrial species relevant to the Appeal Site and Hertfordshire include bats, Dormouse, and Great Crested Newts, which are absent from the Appeal Site. The Forester Moth is not, therefore, of the highest conservation interest for the area.

3.3 The Forester moth is a UK BAP species and a S41 Priority Species (as set out in my Proof of Evidence in paragraph 9.4). Such species should be taken into consideration when a public body performs any of its functions with a view to conserving biodiversity under the Natural Environment and Rural Communities (NERC) Act 2006. The legal duties in respect of the Forester Moth are, therefore, materially different from species of the highest conservation interest for the area.

3.4 The presence of the Forester moth on the Appeal Site (either individually or as a species) has not been confirmed in any formal survey. There is a single photograph of a single moth, that is uncorroborated and from a single site visit in 2021. Since 1993, the Appeal Site has been repeatedly surveyed by 7 separate organisations and ecological consultancies, all of whom are technically competent to undertake such a technical survey. The presence or potential presence of this species has never been recorded.

3.5 This amounts to over 1000 hours of survey time, up to the Forester moth was asserted to be present on the Appeal Site, and over 50 hours since. I attach significant weight to this consensus of independent technical ecological survey work, which has been consistent over the last 30 years in the non-recording of the Forester Moth.

3.6 In any event, a single uncorroborated sighting of a single individual moth is not confirmation of a species being present on site or that it is resident on the Appeal Site.

3.7 Furthermore, the Appeal Site would usually be managed by an annual vegetation cut towards the Autumn, as is normal for a site of this nature, to ensure it is maintained to prevent it becoming encroached by scrub and early woodland. This annual cut did not happen during the pandemic period but will resume (in the absence of any proposed development coming forward) with the grassland being kept at ankle height. Such maintenance can take place at the discretion of the landowner and it is unsuitable for the

Forester moth. If the usual maintenance regime were to resume, conditions would not be suitable for the Forester Moth, if (which is not accepted) it is present at all.

3.8 Alternatively, if this annual cut were not to resume, then the scrub encroachment would make the habitats unsuitable for the Forester moth in any event. In either scenario, the appeal site will not be a suitable habitat.

3.9 Without prejudice to such points, the Forester moth has nonetheless been a consideration in the wider biodiversity compensation approach. If (which is not accepted), the NERC Act applies because of unconfirmed sighting of a single moth, there has been compliance with it.

3.10 Mr Dodds states (paragraphs 3.11 and 3.12) that HE's consideration that nature conservation measure are speculative and not evidence based.

3.11 Mr Dodds goes on to indicate (paragraph 3.12) that there is only a single stated example of conservation activities benefitting the Forester moth. This is not the case. The Norfolk Brecks Heathland Restoration for Threatened Butterflies and Moths Project included 15 project sites with benefits for the Forester moth and East Midlands Clearwing and Forester Moth Project 2021-23 has identified habitat management for the benefit of Forester moths (Lepidoptera Conservation Bulletin April 2012-March 2013; and East Midlands Bufferfly Autumn 2021 contained in Appendix 1 of this rebuttal).

3.12 In addition, Natural England in their s41 Species Actions Spreadsheet May 2014 (contained in Appendix 2 of this rebuttal) identify Habitat Management and Land & Woodland Management Schemes are the delivery mechanisms for the Species Action Plan for the Forester moth setting out that this is the recognised route for conservation action for the moth.

BIODIVERSITY NET GAIN

3.13 Matthew Dodds' Proof of Evidence references (paragraph 1.4) the Stevenage Borough Council (BC) 'Impact of Development on Biodiversity Supplementary Planning Document' (contained as CD4.60)as a robust and tested mechanism for calculating accurate biodiversity offset unit costs. This is not correct.

3.14 The weight to be attached to this SPD can be addressed by others, in the light of detail on the level of public consultation, process of examination, Sustainability Appraisal and formal adoption. However, I do not consider that a Stevenage SPD can have any material weight in this LPA (and Mr Dodds does not explain the contrary).

3.15 The SPD was adopted by Stevenage BC on 18th March 2021. Section 4 of the SPD states that the Defra Biodiversity Metric must be applied and allows efficient and standardisation of impacts. Hertfordshire Ecology (HE) are the independent expert nature conservation body advising Three Rivers on ecological and biodiversity issues. HE

undertook the biodiversity net gain calculation using the Defra 2.0 metric to determine the number of habitat units that would be lost to the proposed development (reference CD7.1.64) to be 9.86.

3.16 The calculator provided by the Rule 6 party (reference CD7.2.5) shows the habitat units required to be 18.83 (Mr Dodds at 5.2).

3.17 Furthermore, the calculator indicates the area required is 4.14ha which is incorrect (see Mr Dodds Table at 5.7). The overall site size is 3.4ha.

3.18 In addition, the Rule 6 party calculator shows all of this area to be Lowland Meadow (see Table at 5.7) which is not correct. The HE Defra 2.0 metric calculator sets out those habitat types recorded by HE on site and Lowland Meadow is not identified as a habitat on site (reference CD2.2.6).

3.19 The HE calculator correctly identifies those habitats as:

- *Grassland – Other Neutral Grassland*
- *Grassland – Modified Grassland*
- *Bramble Scrub*
- *Sparsely vegetated land – Ruderal / Ephemeral*
- *Woodland and forest – Wet woodland*

3.20 In paragraphs 4.9-4.12 of Mr Dodds' Evidence, he refers to the Defra metric calculations undertaken by HE and their assessor's comments in the calculation on the grassland type. The description corresponds to the site survey comments in their survey in July 2021 (reference CD2.2.6) and they state:

".(e) a mosaic of grassland characterised by areas of rank, species-poor grassland interspersed with patches of more herb-rich neutral and acid communities. Past Herts Ecology Surveys in the 1992 and 1996 identified a similar community, but the grassland was not considered to be sufficiently species-rich to represent a significant ecological interest…

(f) The areas of greater species diversity and acid grassland were not extensive enough or consistently species-rich enough to represent a priority grassland habitat.

3.21 This confirms that Lowland Meadow is not a habitat recorded on site and Mr Dodds comments in 4.11 of his Proof of Evidence is not correct. The site does not comprise a priority habitat.

3.22 A previous assessment of the grassland community and habitat classification was undertaken by RPS in June 2017 (ref CD7.1.58 Appendix 5 pages 193 -202) which also states:

The grassland is generally species poor and has weak affinities for the National Vegetation Classification (NVC) communities MG9b Holcus lanatus-Deschampsia

cespitosa grassland, Arrhenatherum elatius sub-community and U1e Festuca ovina-Agrostis capillaris-Rumex acetosella grassland, Galium saxatile-Potentilla erecta sub-community. Lowland dry acid grassland' is listed on Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006 as being a habitat of principal importance. It includes the Festuca ovina - Agrostis capillaris - Rumex acetosella (U1), Deschampsia flexuosa (U2), Agrostis curtisii (U3) and Festuca ovina - Agrostis capillaris - Galium saxatile (U4) NVC grassland plant communities. This community can be rich in herbaceous species and support an extensive cover of bryophytes and lichens. The community at Maple Lodge lacks this diversity, with just two species of grass and two species of commonly occurring moss present together with a small patch of Sheep's Sorrel. It is not typical of good quality acid grassland and therefore should not be considered within this habitat of principal importance. No mitigation is therefore considered to be necessary.

3.23 Mr Dodds is therefore not correct in considering that habitats on the Appeal Site to constitute: (a) a Lowland Meadow; and/or (b) a priority habitat. The HE Defra metric 2.0 calculations are correct and consistent with the independent technical assessments.

3.24 Further, it should be noted that the Defra metric is a beta version of what will be used to calculate BNG requirements once the secondary legislation is passed and BNG becomes mandatory. As such it is still being updated and consulted on. As part of this process, a new Defra 3.0 metric was released in July 2021.

3.25 As part of our review of the HE calculations, I have undertaken an updated BNG calculation (reference CD7.1.65). ,

3.26 Applying the Defra 3.0 metric, using the same baseline habitat areas and condition assessment by HE (and reviewed by myself and confirmed to be correct), the number of habitat units that are lost as a result of the proposed development is 6.52. This is a reduction from the Defra 2.0 metric. Accordingly, HE's position is conservative (at best), in the light of the latest Defra Metric.

3.27 Mr Dodds (paragraph 4.13) doubts the accuracy of the habitat mapping for the grassland types and indicates that 0.63ha of modified grassland are recorded. This is not correct and the HE Defra metric 2.0 calculations (REF) show that modified grassland is 1.26ha and neutral grassland is 0.78ha with some separation based on the Condition assessment of these being different.

3.28 I have reviewed lines 1-3 of the HE Defra metric 2.0 calculator and have measured these using current aeriel photographs of the site[1] and consider these areas to be 0.57ha, 0.61ha and 0.71ha respectively for lines 1-3 on the HE calculator. These then result in a change of the headline results from a loss of 9.86 habitat units to a loss of 9.46 habitat units. This is not a significant change and is in fact a reduction of the loss of habitat units.

3.29 I have also used these areas to populate the Defra metric 3.0 calculator and this changes the loss of habitat units from 6.52 to 6.12 habitat units.

3.30 In both regards, the HE assessment is conservative and, if inaccurate, favours greater biodiversity net gain (not less).

Assumed Cost per Unit:

3.31 HE are the nature conservation body advising Three Rivers on the appropriate cost for delivering the necessary habitat units to meet any biodiversity net gain requirement. As the Defra metric and the secondary legislation required to determine the mechanism for the delivery of BNG within Three Rivers is not adopted, it is appropriate for them to apply their own expertise and professional judgment in determining the offset costs. There is no recognised methodology for this and no formal statutory requirements, policy or guidance. This means the LPA and their specialist advisers are afforded a significant measure of discretion.

3.32 The Warwickshire cost calculator referenced by Mr Dodds in paragraph 1.4 of his Proof of Evidence has been superseded by the Defra metric and Warwickshire have confirmed that they expect this to be phased out by the Defra metric.

3.33 As such, HE are correct in applying the best available estimate provided by the government £12,000 per habitat unit in determining what the offset cost would be and I agree that this is a robust and appropriate mechanism, which will deliver a BNG in accordance with national policy (as it currently stands).

3.34 In paragraph 3.16 of Mr Dodds' Proof of Evidence, he incorrectly indicates that priority habitat is present on the Appeal Site. In my Proof of Evidence I set out the ecological assessments and surveys undertaken on site since 1992 (reference CD 7.1.58) and these have stated that no priority habitat was been recorded on site. This was further confirmed by the HE survey carried out in 2021 (reference paragraph 4 of CD2.2.11).

3.35 Mr Dodds in paragraph 5.8 of his Proof of Evidence suggests that the Hertfordshire biodiversity offset cost calculator is a legitimate cost breakdown for the creation of the required number of lowland meadow habitat units. This is not correct.

3.36 The Hertfordshire cost calculator only considers Lowland Meadow as the habitat to be provided. This is based on an incorrect classification of the habitats on the Appeal site, and an incorrect size of the Appeal Site. In addition, The impact of development on Biodiversity SPD (page 45 shown in Appendix 3) states that the biodiversity offset contribution will include monitoring and management fees *that costs of the Herts Environmental Records Centre associated with collecting data, managing databases, strategic mapping, to be used to determine where best to locate offsets based on supply of units and meeting agreed biodiversity priorities, for sample on-site monitoring and formal reporting of scheme progress*

3.37 This maybe applicable for Stevenage where HERC (administered by Herts & Middlesex Wildlife Trust) have this responsibility, but this is not the case for Three Rivers where HE are the nature conservation advisory body to the authority. As such this element of the calculation is wrong and the total cost for offset figure in Mr Dodds table in paragraph 5.7of his Proof of Evidence is wrong.

MAPLE LODGE MARSH LOCAL WILDLIFE SITE.

3.38 In the Maple Lodge Environment Groups Statement of Case prepared by Carolyn Weston and Keith Pursall, comments are made in paragraph 1.2.2, 7.2.5 and in Section 10 Conclusions that there has been no consideration of the potential impact on Maple Lodge Marsh Local Wildlife Site habitats.

3.39 For the avoidance of doubt, the groundwater modelling and assessment has shown that there are no groundwater impacts affecting this LWS and as such there are no biodiversity or ecological / habitat impacts to consider.

4.0 CONCLUSION

4.1 Following consideration of the issues raised, I conclude that these matters are fully addressed, and the conclusion set out in my proof remains valid, in that survey work is robust and appropriate, and the appeal proposals can clearly demonstrate a positive outcome in terms of ecology which would give rise to a biodiversity net gain in line with national and local policy. Accordingly, I consider that ecological matters are fully addressed.

APPENDIX EAST MIDLANDS CLEARWING AND FORESTER MOTH PROJECT 2021-23; LEPIDOPTERA CONSERVATION BULLETIN APRIL 2012-MARCH 2013; EAST MIDLANDS BUFFERFLY AUTUMN 2021 (pages extracted)

East Midlands Clearwing and Forester Moth Project 2021-23

As part of the Severn Trent Biodiversity Funding, our Branch has been busy visiting the sites with Priority Butterflies and Moths over the 2021 season. Clearwing and forester moths are all Priority Species in each of our four Counties and what records there are, show that they are under-recorded even with the recent rise in use of pheromone lures for clearwings.

Of the fifteen clearwing species recorded nationally, we have ten in the East Midlands, of which only Lunar-hornet clearwing is at all widespread, across all four counties but even this is still regarded as of conservation concern. Nottinghamshire has a Nationally Important population of Welsh clearwing in Sherwood Forest, with two other English locations; in Cannock Chase in Staffordshire and a site in Cumbria. Welsh clearwing and all of the other eight clearwing species are also classified as Nationally Scarce B, i.e. found in between 31 and 100 of the Nation's 10km squares. They are all restricted to very specific habitats, some of which are threatened with development. Red-belted clearwing and orange-tailed clearwing are found here at the northern edge of their ranges. There is a possibility that we may have an eleventh species: Raspberry clearwing, which has been found on fruit farms and in gardens in Cambridgeshire and is spreading northwards (or more people are looking for it).

Six Belted Clearwing at West Hallam Tip
(Photo Melanie Penson)

We have two of the three forester moths in our region too; the Forester is thinly spread across all four Counties and is found in herb-rich calcareous and neutral grassland. It has been added to the Conservation Priority List due to significant declines nationally but is easy to overlook. We also have the Cistus Forester in a restricted area of the Western Derbyshire Dales and across the River Dove into Staffordshire.

Whilst habitat management work is being carried out on our Priority Sites over the next few years, we have an excellent opportunity to improve habitats for clearwing and forester moths, funded by Severn Trent Water at little or no extra cost to the work being done for dingy skippers and other Priority butterflies. But first we need to know a lot more about clearwing and forester moth distribution and population sizes across our region. We will start by visiting all the known sites for clearwing and forester moths across our region, assessing habitats and conducting surveys. We will then move on to searching for new sites.

This project aims to increase our knowledge of these fascinating insects, including larval habitat requirements, with a view to improving habitats and connectivity, allowing their populations to increase over time. It also aims to raise awareness amongst seasoned moth-ers and the general public with a view to improved recording effort. The Branch will purchase two sets of the clearwing pheromone lures covering all ten of our resident species, which will be used throughout the clearwing season (mid-May to early August) over the next two years in a series of training days and public events across our four Counties, networking with landowners, local authorities, all three Wildlife Trusts, other conservation groups, the Miner2Major Project on former coalfield areas in Nottinghamshire and moth enthusiasts generally. It is not feasible to survey for clearwing moths without using pheromone lures although transects for forester moths will be encouraged on sites where there are existing populations.

A pilot study was carried out during 2021, searching for six-belted and lunar hornet clearwings using lures and searching for larval evidence too. Lunar hornet was found in Cotgrave Forest (3 individuals) and a single in Cloud Wood in North-West Leicestershire. Six-belted clearwing was found in three sites in Derbyshire (including Hoe Grange Quarry), six sites in Nottinghamshire and one in Leicestershire. There are a great many other potentially suitable sites which did not get sampled due to time constraints and weather conditions. Larval evidence of Welsh clearwing was found again at known sites in Sherwood Forest and new records of Red-belted clearwing and Currant clearwing were found in private gardens in West Bridgford, Nottinghamshire. It is possible that the former, found during an Open Garden visit, is the most northerly record to date in the UK.

Above:
Currant Clearwing
(Photo Melanie Penson)

Left:
A pheromone lure in action
(Photo Melanie Penson)

Cistus Forester (Photo Melanie Penson)

Further information on how to get involved with this exciting new project will be provided on the website prior to the clearwing and forester moth season in 2022. Although the Severn Trent funding comes to an end in early 2024, it is hoped that these surveys will continue in future years to monitor the success (or otherwise) of habitat management works. It is also hoped to publish the results online and in book form sometime in the future.

Melanie Penson

Hockwold and Weeting Heath to view the soil inversion work but will probably be best remembered for the torrential rain.

Contributed by Sharon Hearle, *Regional Officer,* shearle@butterfly-conservation.org.

4.6.1 Norfolk Brecks Heathland Restoration for Threatened Butterflies and Moths Project

The Norfolk Brecks Heathland project focuses on restoring heathland habitat on 15 Norfolk Breckland sites to benefit a wide suite of threatened moths, as well as some butterflies. This £220k project is principally funded by WREN. It started in January 2010 and finished in December 2012. The principal objective of practical management is ground disturbance (scarification, rotovation and turf stripping) but on some sites scrub and bracken management is also undertaken. Over half the sites are FCE woodlands where rides have been targeted to increase the area of heathland but also improve connectivity.

Practical projects with contractors have been completed at 15 separate sites and included both large scale and small scale projects in 2012. At Cranwich Camp four new turf stripped plots were created to build on the success of those dug in 2011. At Brettenham Heath, Cranwich Heath, Methwold Rides and Cranwich Ride 58, 11 large rotovated plots were completed building on known positive results for **Lunar Yellow Underwing** *Noctua orbona*, **Basil-thyme Case-bearer** *Coleophora tricolor*, **Forester** *Adscita statices* and **Grey Carpet** *Lithostege griseata*. At East Harling Heath scrub clearance work was targeted at restoring old pits and sheltered corners to improve habitat for **Grizzled Skipper**. Scrub was cleared at Cranwich Camp and also at West Tofts Pit to expose south facing banks of bare soil for Dingy Skipper which is known to occur at both sites. Along forest rides just south of Thetford two new terraced pits have been created for Dingy Skipper which is present in a forest re-stock plot nearby. Tree clearance was completed at one large site to reduce shading and competition for a large area of privet known to support **Barred Tooth-striped** *Trichopteryx polycommata* which was found in early 2012. BC worked in partnership with Plantlife to complete an ambitious deep ploughing (soil inversion) project at Hockwold and East Harling resulting in 3 plots covering 23 hectares on former forestry land. Several events have been organised in conjunction with volunteers to ensure monitoring continues in 2013.

Contributed by Sharon Hearle, *Regional Officer,* shearle@butterfly-conservation.org

4.6.2 Managing elms for the White-spotted Pinion in the Cambridgeshire Fens

A large area of Cambridgeshire is the national stronghold for the **White-spotted Pinion** *Cosmia diffinis*. There is evidence of Dutch Elm Disease across Cambridgeshire and Huntingdonshire but many old stands of trees remain unaffected. This £55k project is principally funded by SITA Trust

APPENDIX 2 NATURAL ENGLAND S41 SPECIES ACTIONS SPREADSHEET MAY 2014

	A	B	C	D	E	F	G	H	I	J	K	L	M	N
	Taxon name (= synonym)	Common name	Taxonomic category	Taxon	Action text	Action priority	Action status	Site-specific Action	Site details	Action type	Revised delivery mechanism	Possible lead partner	Potential action lead	Priority Group (as defined by NE)
07	*Zygodon gracilis*	Nowell's Limestone Moss	Non-vascular plants	Moss	Investigate potential to restore sexual reproductive success through translocation.	High	Yet to start			Species management	Species: Targeted interventions	Bryophyte Taxon Group	NHM	1
08	*Acosmetia caliginosa*	Reddish Buff	Terrestrial invertebrates	Moth	Woodland grant schemes or agri-env schemes to conserve its early succesional habitat.	Urgent	Yet to start			Habitat management	Land and Woodland Management Schemes	Butterfly Conservation	Butterfly Conservation	3
09	*Acosmetia caliginosa*	Reddish Buff	Terrestrial invertebrates	Moth	Woodland grant schemes or agri-env schemes to conserve its early succesional habitat.	Urgent	Yet to start			Habitat management	Land and Woodland Management Schemes	Butterfly Conservation	Butterfly Conservation	3
10	*Acronicta psi*	Grey Dagger	Terrestrial invertebrates	Moth	Research needed to determine reasons for decline (which may not be habitat-related).	Medium	Yet to start			Research		Butterfly Conservation	Butterfly Conservation	3
11	*Acronicta rumicis*	Knot Grass	Terrestrial invertebrates	Moth	Research needed to determine reasons for decline (which may not be habitat-related). The known suite should be monitored regularly (annually).	Medium	Yet to start			Research		Butterfly Conservation	Butterfly Conservation	3
12	*Adscita statices*	The Forester	Terrestrial invertebrates	Moth	Agri-env schemes to preserve its habitat and ensure a suitable supply of nectaring plants and larval food plant.	Medium	Yet to start			Habitat management	Land and Woodland Management Schemes	Butterfly Conservation	Butterfly Conservation	3
13	*Agonopterix atomella*	Greenweed Flat-body Moth	Terrestrial invertebrates	Moth	Agri-env schemes to preserve and create the unimproved grassland containing a good supply of Dyer's greenweed (larval food plant).	Medium	Yet to start			Habitat management	Land and Woodland Management Schemes	Butterfly Conservation	Butterfly Conservation	4
14	*Agonopterix capreolella*	Fuscous Flat-body Moth	Terrestrial invertebrates	Moth	Status surveys required to ascertain its true status.	Urgent	Yet to start			Survey or monitoring		Butterfly Conservation	Butterfly Conservation	3
15	*Agrochola helvola*	Flounced Chestnut	Terrestrial invertebrates	Moth	Research needed to determine reasons for decline (which may not be habitat-related).	Medium	Yet to start			Research		Butterfly Conservation	Butterfly Conservation	3
16	*Agrochola litura*	Brown-spot Pinion	Terrestrial invertebrates	Moth	Research needed to determine reasons for decline (which may not be habitat-related).	Medium	Yet to start			Research		Butterfly Conservation	Butterfly Conservation	4
17	*Agrochola lychnidis*	Beaded Chestnut	Terrestrial invertebrates	Moth	Research needed to determine reasons for decline (which may not be habitat-related).	Medium	Yet to start			Research		Butterfly Conservation	Butterfly Conservation	3
18	*Agrotera nemoralis*	Beautiful Pearl	Terrestrial invertebrates	Moth	Research needed to determine reasons for decline (which may not be habitat-related). The known site should be monitored regularly (annually).	Medium	Yet to start			Research		Butterfly Conservation	Butterfly Conservation	4
19	*Aleucis distinctata*	Sloe Carpet	Terrestrial invertebrates	Moth	Agri-env schemes to manage blackthorn scrub/ hedgerows for this species.	Medium	Yet to start			Habitat management	Land and Woodland Management Schemes	Butterfly Conservation	Butterfly Conservation	3
	Allophyes oxyacanthae	Green-brindled Crescent	Terrestrial invertebrates	Moth	Research needed to determine reasons for decline (which may not be habitat-	Medium	Yet to start			Research		Butterfly Conservation	Butterfly Conservation	3

[1] https://www.google.com/maps/place/Maple+Cross,+UK/@51.6253299,-0.5028732,516m/data=!3m1!1e3!4m5!3m4!1s0x4876691093cd5373:0x61dbc615317a6984!8m2!3d51.625448!4d-0.5108819