

**The Leicestershire and Rutland Wildlife Trust (LRWR) upholds that development should not come at the expense of our natural environment. All development, be it housing, commercial or mineral extraction must be designed and delivered in a way that contributes to nature's recovery, not its decline.**

The proposed scheme would result in the loss of a wide range of nationally and regionally significant areas of irreplaceable and priority habitats, including Ancient Woodland/Lowland Mixed Woodland, Parkland, Acid Grassland, Open Mosaic Habitats on Previously Developed Land, Hedgerows and Veteran Trees. Priority and Protected Species including e.g. Bats, Badgers, Barn Owls, Peregrine Falcons, Otters, Slow Worms, scarce invertebrates and others would be significantly impacted. Further significant portions of designated sites for nature conservation including Ancient Woodland, Sites of Special Scientific Interest (SSSI) and Local Wildlife Sites (LWS) will be lost within the Soar Valley, an established and strategically important ecological corridor for nature's recovery.

In accordance with **NPPF, 2021 Paragraph 179**. ***“To protect and enhance biodiversity and geodiversity, plans should: ...**(b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.**”***

Given the scale and proximity of the scheme within existing ecological networks and the likelihood of adverse impacts on nationally/regionally important habitats and species, a detailed and transparent mitigation strategy should be available to demonstrate how measurable net gains for biodiversity would be secured, monitored and maintained. According to the submitted Ecological Impact Assessment (EclA) (Blakemere Consultants 2023), a Defra Metric has been prepared in order to demonstrate how the scheme will achieve at least +10% gains in all areas, however this information does not appear to be available for public scrutiny. No information is available to demonstrate how the proposed habitat enhancement measures will be created, maintained and monitored in the form of a Landscape and Ecological Management Plan (LEMP) or Habitat Management and Monitoring Plan (HMMP) over a period of at least 30 years.

Importantly, where irreplaceable habitats such as Ancient Woodland is proposed for loss, developers are required to deliver bespoke compensation agreed with local planning authorities (LPA) on a case-by-case basis. Again, no evidence of the details of an agreed bespoke mitigation strategy with the LPA has been provided. Given that the EclA clearly states that *“...the proposed scheme with its full implementation of compensation, mitigation and enhancement measures, the likely effects on ecology and biodiversity over the 25-30 year life of the development can be concluded as being Significant and Moderate Adverse...”*, a fit for purpose bespoke mitigation strategy is required in order to ensure this scheme does not contribute towards the decline of nature in this part of the Leicestershire during this period.

In accordance with **NPPF, 2021 Paragraph 180**. ***“When determining planning applications, local planning authorities should apply the following principles:***

***(a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;***

***(b) development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments),***

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

*(c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists;”*

It is not clear from the information available whether the proposed scheme complies with the required national planning policy listed above. Further details of the agreed bespoke mitigation strategy with the LPA must be provided, along with supporting HMMP documentation prior to any planning decisions being made.

The Leicestershire and Rutland Wildlife Trust is concerned that the proposed scheme, along with its proposed inadequate mitigation measures, does not comply with planning policy and is, in its current form, likely to contribute towards the decline of nature in this strategically important area of the county for nature’s recovery.

Mr. Ben Devine

Head of Nature Recovery

**Leicestershire and Rutland Wildlife Trust**

*9<sup>th</sup> November 2023*