

**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 development site is situated immediately adjacent to the Leicestershire and Rutland Wildlife Trust (LRWT) owned Tilton Cutting Nature Reserve. The reserve is designated as a Site of Special Scientific Interest (SSSI), primary for its geological interest, however the site is and especially valuable wildlife corridor for a range of local biodiversity including protected species such as bats, badgers and breeding birds.

The proposed scheme must avoid any adverse impacts on local biodiversity (SSSI) and provide sufficient offsetting to mitigate for habitat losses within the redline boundary. In accordance with NPPF, 2021 Paragraph 180 (B) 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 submitted Ecology Report (FPCR, 2023) highlights the need for further survey work required in order to fully determine the significance of potential impacts on Bats and Great Crested Newts. This information is required up-front and prior to any determination of the application.

The potential impact of any artificial lighting appears to be overlooked for the scheme. It is not clear whether the inevitable requirement for artificial lighting, will lead to any adverse impacts on the sensitive biodiversity features of the nature reserve. An appropriate Lighting Plan should therefore be submitted/conditioned to ensure that lighting levels do not exceed those levels outlined within standard guidance for the protection of bats (i.e. BCT, Bats and Artificial Lighting at Night 2023).

In terms of avoidance of adverse impacts on the nature reserve from increased levels of disturbance, comments submitted by Natural England (NE) outline the need for suitable protection of the designated geological features within the SSSI in form of fencing/barriers to restrict access to Tilton Cutting. This requirement is supported by LRWT and would likely help to protect the valuable biodiversity features of the site from increased levels of disturbance.

With reference to the achievement of Biodiversity Net Gain (NPPF, 2021 P.174 (d)), a high level Biodiversity Impact Assessment (BIA) is included within the Ecology Report and indicates that an overall net gain of +10.8% in area based habitat units could be achieved. Whilst this may be possible on this site, it appears that no further information had been provided to support this requirement, including a full Defra Metric or associated habitat/monitoring plan. This information is required up-front before any planning decision is made, including where appropriate, a sufficiently detailed Landscape and Ecological Management Plan (LEMP) in order to demonstrate how biodiversity gains will be secured over a period of at least 30 years.

Ben Devine

(Head of Nature Recovery – LRWT)