



**Leicestershire
& Rutland**
Wildlife Trust

Response to 2024/0066/MIN - Proposed extensions to Grange Top Quarry

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The Leicestershire and Rutland Wildlife Trust (LRWT) 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.

Before commenting, it is very concerning to see that the locations of badgers and their setts have been disclosed to the public within the Preliminary Ecological Appraisal – clearly watermarked in bold as “**CONFIDENTIAL**”. The locations of badgers and their setts should not be disclosed to the general public and must be kept confidential in order to avoid any unnecessary disturbance or persecution on this Protected Species. This sensitive information should therefore be removed from the planning portal site as a priority and redacted accordingly.

Key Comments:

Both sites are largely comprised of arable land, however significant areas of priority habitat exist including a network of ponds, hedgerows and woodland - providing an important resource for a range of species within this part of Rutland. It is acknowledged that the proposed scheme seeks to retain and enhance these habitats during quarrying operations and enhance them further once both sites are fully restored.

The significance of the proximity of both sites within existing established ecological corridors appears to have been missed within the supporting ecological assessments and associated recommendations, focussing rather on the likely impacts or otherwise, on designated sites for nature conservation. Both sites are functionally connected to Ketton Quarry SSSI/nature reserve and coupled with the large size of both areas, a significant opportunity exists to maximise the quarry restoration proposals to make major gains for the recovery of nature in the future. In accordance with NPPF, 2023 – 180 developments must enhance the local environment by (d) “...*establishing coherent ecological networks that are more resilient to current and future pressures*”.

There are no major objections in principle to the proposed scheme, however on this basis the developer and LPA are **strongly encouraged to adopt a wholly biodiversity-focussed restoration approach for both sites**, as opposed to the proposed mixed agricultural/biodiversity approach.

Bringing the larger “NW land” parcel forward for ecological restoration, together with “Field 14”, would likely be more cost-effective and lead to much greater outcomes for people and nature via the creation of more robust/resilient ecological networks within this strategically important area of the county.

Further comments:

- It is not clear from the information provided whether the suggested level of biodiversity net gain uplift of 13.80% in habitat units, is achievable based on the proposed site/s restoration strategy. Conflicting figures are given across the application documentation for this, with another figure of 16.74% given elsewhere. Crucially, the supplied BNG report does not discuss the implications of the **temporal risk multiplier** within the metric calculations, instead suggesting that *“assumptions have been made”* within the metric itself, presumably addressing the approach adopted on this important element. Given that the completed BNG metric itself is not available on the planning portal, it will be necessary to ensure that any assumptions made here are reasonable to take account of the time differences between inevitable habitat losses during quarrying operations and compensation of habitats thereafter.
- The inclusion of areas of Calcareous/Neutral Grassland within both site restoration approaches is welcomed, however the proposed list of species for seeding/planting does not closely match those listed within regional Local Wildlife Site selection criteria. It is strongly recommended that the species selected for restoration of these locally and nationally important habitats mirror those outlined within local guidance – favouring Calcareous species listed within: [Guidelines for the selection of Sites of Importance for Nature Conservation \(leicestershire.gov.uk\)](http://leicestershire.gov.uk) Page 16-19.
- There is concern over the use of non-native species in the site/s restoration approach. Specifically with reference to - *“All new areas of grassland (Calcareous / neutral) to based on a combined calcareous grassland and nurse species seed mixture.... Annual crop grass **Westerwolds Rygrass** may also be used in combination with the main mixture to speed up the establishment of ground cover, suppress weed species, stabilise the soil faster and give a better visual effect.”* Given the importance of Calcareous Grassland as a priority habitat in this part of the county, the use of non-native species in this way is considered inappropriate and unnecessary.
- Information about the proposed ongoing management of post-restoration agricultural areas is given within the supporting documentation, however is not outlined with reference those areas restored for biodiversity. It is advised that a specialist nature conservation organisation is involved with the management of these areas in order to maximise their value for local biodiversity and communities in perpetuity.