

FPCR Response to Merseyside Environmental Advisory Service Consultation response (26/00006/OUT)

Bellway Homes.

Cronton Road, Cronton

6th July 2026

1.0 INTRODUCTION

- 1.1 We have been asked by Bellway Homes to provide a response to the comments that were received from Merseyside Environmental Advisory Service (MEAS) regarding the planning application at land Cronton Road, Cronton.
- 1.2 To inform the response otter and water vole surveys have been carried out on watercourses adjacent to the Site, the methodology and results of which are provided below in Section 2.
- 1.3 Section 3 of the report addresses the comments relating specifically to the Biodiversity Net Gain Assessment. Alongside this response we have also provided an updated Biodiversity Net Gain Report and Metric, to incorporate the amendments discussed herein.
- 1.4 Where there is need to address specific comments made by MEAS we have quoted these in underlined italics:

2.0 RIPARIAN MAMMAL SURVEYS

The watercourse and ditches immediately adjacent to the sites boundary may provide habitat for otter and water vole. Furthermore, records of water vole are identified within waterways connected to the site. Otter and water vole which are protected species and Local Plan policy CS8 applies. Protected species are a material consideration. An otter and water vole survey is required prior to determination.

Survey Methodology

- 2.1 A riparian mammal survey was completed on 14th May 2026 by suitably experienced FPCR ecologists.

Otters

- 2.2 Surveying for evidence of otter was undertaken in accordance with guidance¹. Searches concentrated on the waterbodies within the Site and those with direct connectivity to the on-site waterbodies, including 100m upstream and downstream of Site, where access was possible.
- 2.3 Due to the unlikely event of actual observation, surveys concentrated on locating field signs indicating otter presence or use:
 - Spraints – characteristic sweet-smelling, black tar-like (where fresh/relatively recent i.e. within a few weeks) or grey crumbly (when old) faecal deposits usually containing fish scales, bones and occasionally invertebrate exoskeleton and bird feathers.

¹ Chanin, P (2003) *Ecology of the European Otter*. Conserving Natura 2000 Rivers Ecology Series No. 10. English Nature, Peterborough

- Footprints – in good substrate typically asymmetrical and showing five toes arched around a large pad and depending on substrate, webbing and claw marks. Poorer, generally coarser substrates do not often enable the identification of otter footprints.

2.4 Additional signs which may indicate otter presence in combination with the above include:

- Feeding remains – Remains of fish and aquatic invertebrates.
- Slides/haul-outs – Routes into and out of the water, which are usually associated with terrestrial routes such as short cuts around meanders or along traditionally, used otter paths/routes.
- Couches/hovers – above ground resting place. Usually associated with cover such as dense scrub, rushes or reed, flood debris or fallen trees. Many couches are rarely used whilst others more so. Difficult to prove use without radio tracking.
- Holts – below ground resting site usually associated with spraints. Sometimes used with greater frequency than couches and can be important for breeding (natal holts) where other signs are usually absent. Notoriously difficult to find or prove without radio tracking.

Water Voles

2.5 An initial habitat assessment was made by an experienced FPCR surveyor on 3rd January 2025 to determine the suitability of the Site to support water voles. An updated walkover was undertaken on 16th April 2025.

2.6 Habitat requirements were based on those detailed in current guidance^{2,3} and include:

- dry areas above water level for nesting, either in burrows or above-ground woven nests
- steep bank profiles
- suitable bank substrate for burrowing
- daily water level fluctuations
- herbaceous marginal and bankside vegetation
- suitable water depth (as a means of escape from predators)

2.7 The habitats can then be categorised according to the following matrix:

Table 1: Water Vole Habitat Categories

Habitat Category	Bank Profile	Bank Substrate	Variation in Water Level	Herbaceous Vegetation	Water Permanence
Optimal (all criteria need to be met)	Steep (approaching 1:1) on at least one side of a watercourse. Steep or shallow banks on static waterbodies or fen-type habitat, where water levels do not fluctuate significantly.	Earth or peat	No noticeable variation during the summer months. Banks are not topped regularly (overtopping every 5-10 years likely to be too frequent).	Continuous swathe of bankside or in-channel (emergent) vegetation providing at least 60% ground cover. May be dominated by grasses and weeds, rather than luxurious riparian vegetation. The vegetation should generally be tall, except in urban or suburban areas, where shortened	Permanent water or routinely wet for at least 2-3 months during the summer, and where other 'good' habitat is present in immediately adjacent areas with permanent water.

² Dean, M., Strachan, R., Gow, D & Andrews, (2016) The Water Vole Mitigation Handbook. The Mammal Society Guidance Series. The Mammal Society, London.

³ Dean, M, (2021) Water Vole Field Signs and Habitat Assessment: A Practical Guide to Water vole Surveys, Pelagic Publishing.

Habitat Category	Bank Profile	Bank Substrate	Variation in Water Level	Herbaceous Vegetation	Water Permanence
				bankside vegetation may also qualify.	
Good (all criteria need to be met)	Steep (approaching 1:1) on at least one side of a watercourse. Steep or shallow banks on static waterbodies or fen-type habitat, where water levels do not fluctuate significantly	Earth or peat bank, or stony/reinforced bank with gaps allowing access to the earth behind	No noticeable variation during the summer months; banks are not overtopped regularly	Continuous swathe of bankside or in-channel (emergent) vegetation providing at least 60% ground cover. May be dominated by grasses and weeds, rather than luxurious riparian vegetation. The vegetation should generally be tall, except in urban or suburban areas, where shorted bankside vegetation may also qualify	Permanent water. Or routinely wet for at least 2-3 months during the summer, and where other 'good' habitat is present in immediately adjacent areas with permanent water
Suitable but poor	Any habitat that falls short of the criteria to qualify as 'good' but does not meet the criteria of 'negligible' could reasonably be considered to be suitable but 'poor'				
Negligible (need to meet vegetation criteria and at least one other)	Shallow profile on both banks.	Rocky or gravel	Considerable variation in water level. The bank toe can move by more than 1m horizontally over the breeding season.	None or limited bankside and marginal vegetation due to shading or other 'permanent' factors. (Management can change and is often a 'temporary' factor)	N/A
	Vertical bank face with no burrowing opportunities behind it.	Reinforced banks with no gaps	N/A		N/A

- 2.8 The water vole survey was completed at the same time as the otter survey on 14th May 2026 in accordance with guidance⁴.
- 2.9 The survey involved searching for evidence of water vole activity within 5m of the banks of waterbodies and any suitable habitat, including ditches. Examples of evidence include:
- Water voles – live sightings
 - Latrines - distinct piles of water vole droppings found near nest sites, at the ranges of territorial boundaries and where the animals enter and leave the water. The presence of droppings is the only field sign which can be used reliably on its own.
 - Burrows - burrow entrances are typically wider than high with a diameter between 4 and 8cm. Generally, these burrow entrances are located at the water's edge.
 - Feeding stations - areas with distinct neat piles of chewed lengths of vegetation along pathways or haul out platforms along the water's edge.
 - Footprints - identifiable prints in soft margins of the watercourse.
 - Runways - low tunnels that are pushed through the vegetation and often leading to burrows or feeding stations.

⁴ Dean, M., Strachan, R., Gow, D & Andrews, (2016) The Water Vole Mitigation Handbook. The Mammal Society Guidance Series. The Mammal Society, London.

- Nest balls – woven vegetation of approximately the size and shape of a rugby ball, usually found within a tuft of vegetation above the water line.

Results

Desktop Study

- 2.10 Consultation with the record centre identified no otter records within 2km of the Site. However, a total of seven recent water vole records were returned within 2km of the Site, the nearest of which is recorded 0.47km west of the Site and is dated August 2010.
- 2.11 An additional 18 historical water vole records were also returned, dating pre-2001.
- 2.12 Records of riparian mammals are summarised in Table 2.

Table 2: Summary of Riparian Mammal Records

Distance from Site	Date of Most Recent Record	Description
0.47km W	August 2010	No description provided.
1.25km SW	July 2006	Small population in pond.
1.29km SW	January 2008	No description provided.
1.36km SW	September 2006	12 burrows.
1.36km SW	September 2010	Nine burrows and two sets of footprints.
1.94km SW	September 2010	Latrines, burrows and tracks.
Unknown*	August 2008	Active burrows.

* Exact distance from site unknown as four figure grid reference provided is only accurate to 1km.

Habitat Descriptions

- 2.13 Figure 1 illustrates the location of waterbodies across the Site and adjacent areas. One stream and two ditches were present adjacent the Site boundary (R1 & D1 – D2). R1, known as Dog Clog Brook, starts west of Norland's Lane to the northeast of the site, continues for several kilometres before it joins Ochre Brook. The watercourse eventually joins the River Mersey. Dog Clog Brook passes along the northern boundary of the Site, entering from the east and flowing out to the west.
- 2.14 The first survey section (D) was located upstream to the east. Here the watercourse had a relatively wide channel (1-2m) containing shallow (<0.50cm) moderate flowing water. The substrate comprised predominantly silt, mud and stones. The banks were steep (~45°), comprised of earth with small stones and vegetated on the northern bank by ruderal vegetation and to the south by bankside trees and scrub. Further west, in section C where the watercourse is recorded adjacent the dog walking field, bank side trees and scrub are present along both banks.



Photograph 1: Watercourse R1 – Section D



Photograph 2: Watercourse R1 – Section C

- 2.15 As the watercourse borders the Site, within section B the channel meanders gently and the bankside woody vegetation significantly reduces, replaced by areas of rough grassland, bramble scrub and individual trees directly adjacent to the watercourse. The banks remain steep with the channel width in this section narrowing slightly. The section continues to the west of the Site where the channel runs straighter.
- 2.16 In the final survey section (section A), the watercourse runs along the northern edge of Georges Wood LWS
- 2.17 R1 was considered to offer 'suitable but poor' value habitat for water vole due to relatively low water levels and poor in channel vegetation structure. The watercourse did however offer burrowing opportunities along the length of the watercourse and structural vegetation cover for shelter and foraging purposes.



Photograph 1: Watercourse R1 – Section B



Photograph 4: Watercourse R1 – Section A

Ditch D1

- 2.18 Ditch D1 runs westwards from the south extent of hedgerow H1 and featured a wet channel approximately 1.5m wide with shallow still water. The banks were steep, but only 0.5m high. No aquatic vegetation was noted but reed canary-grass and rosebay willowherb characterised the tall bankside vegetation. D1 was considered to offer 'suitable but poor' habitat for water vole due to relatively low water levels.



Photograph 5: Watercourse D1

Ditch D2

- 2.19 Ditch D2 was recorded on the south-western boundary between Lot1 and H2. The ditch featured a narrow-wet channel approximately 0.5m wide, with steep almost vertical banks. The banks featured a rough grassland community. As above, D2 was considered to offer 'suitable but poor' habitat for water vole due to relatively low water levels

Field Survey Results

- 2.20 Three watercourses bordering the Site, were considered to offer 'suitable but poor' habitat value for water vole. While all the watercourses were predominantly wet throughout the survey season, holding shallow static / flowing water, the water levels were insufficient to support water vole populations. However, other factors such as vegetation providing structural cover and/or banks suitable for burrowing offer sheltering and foraging opportunities for water vole.
- 2.21 No field signs indicating presence of water vole or otter were recorded within the waterbodies and adjacent areas on Site.

Discussion

- 2.22 The results of the habitat assessment and the field survey indicate that some habitat with the potential to support water vole is present onsite. However, given that the desk study did not return any water vole records in the vicinity of the Site from the last 16 years, and no field evidence of water vole was recorded during the Site survey, it is likely that the species is currently absent from the Site. As such, no further surveys are considered necessary to inform an application. No mitigation or licensing is likely to be required.
- 2.23 Impacts to water vole are considered to be unlikely, however this species can rapidly recolonise sites, so it is recommended that a pre-works survey is undertaken to confirm continued absence (or presence).
- 2.24 If it was found that water voles are present, the only direct impacts from the proposed development would be minor such as construction of drainage outflows. In most cases these features could be micro-sighted to avoid impacts, otherwise these types of impacts could readily be mitigated and compensated for through a low impact class licence.

3.0 BIODIVERSITY NET GAIN

It is not clear how many trees are present at baseline...

- 3.1 A minor typo has been corrected in the BNG report and metric, which omitted three small trees in error.

However, a number of trees appear to be outside of the red line boundary and would not need to be included within the metric. I advise that the ecologist reviews the trees present at baseline and amends the metric and report where necessary. It would also be beneficial for the ecologist to include the number and trees and their size within the user comments of the metric.

- 3.2 All the trees included within the metric calculations are within the site, or on the boundary of the Site and so have been included within the baseline as they are considered to be within the zone of influence for the Site. The metric has been updated to include tree numbers and sizes within the comments.

Strategic Significance

- 3.3 The Strategic significance has been updated to include the following, as outlined in the updated BNG report:

- Wet woodland in the baseline (North Merseyside BAP habitat);
- Created Other neutral grassland, as Urban Grassland in the North Merseyside BAP
- Native hedgerows and treelines in the baseline (field boundaries BAP action plan);
- Other rivers and streams as the watercourse to the north is identified as a linear feature in the LCR Ecological Network;
- The planting of urban trees.

Front gardens of properties have been input as modified grassland. Trees and introduced shrub have also been included where present within front gardens. Front gardens are also within the private ownership of the property and therefore should only be included as 'vegetated garden' or 'unvegetated garden'. This is in line with page 56 of the Statutory Biodiversity Metric User Guide

- 3.4 The habitats shown at the front of the properties on the Illustrative Landscape Masterplan and subsequently mapped as habitats other than vegetated garden are intended to be under developer control. Nevertheless, this is an outline application with detailed landscape design a reserved matter and so the BNG calculations in this respect are illustrative. With that in mind, vegetated garden, introduced shrub and modified grassland in poor condition all have the same biodiversity value in the metric, with the major influence on the detailed design therefore being whether any proposed street trees are under developer control.

It is difficult to discern what sections of ditch are proposed for enhancement with the information provided. I advise that the ecologist provides addition details within the user comments to allow adequate review.

- 3.5 This has been clarified within the report and in the comments section of the metric.

Post development condition assessments should also be provided for created and enhanced habitats.

- 3.6 Table 4 of the BNG report provides outline habitat creation and management prescriptions for all proposed habitats, which give a high degree of certainty that the proposed habitats and conditions can be met. Especially in the context of an outline application, without detailed landscape design and when on a precautionary basis, the majority of habitats are targeted in poor condition, with the exception of the scrub.

River Condition Assessment

I query whether the proposed increase in condition of 'Other rivers and streams' to fairly poor condition is achievable. The watercourse is off-site, and therefore any enhancements would need to be carried out within the riparian zone. It is unclear whether an post-development River Condition Assessment (RCA) has been undertaken (informed by the landscape plan) to understand if proposed enhancement options could increase the score. Currently the preliminary condition score is 0.4899 (poor) and the watercourse is identified as over deep. Therefore, to achieve fairly poor condition, riparian enhancements would have to increase the score to moderate which equates to a preliminary score of 2-2.4, which would then be adjusted to fairly poor to account for over deepening. This is quite a significant increase from 0.4. I advise that further assessment and evidence is required to understand if the uplift in watercourse condition is achievable

- 3.7 The proposed increase in condition of the watercourse has been modelled using the surveyed RCA data and FPCR's sub-reach planner. A summary of what is required to increase condition is in table 4 of the BNG report. The sub-reach planner results for a modelled scenario are provided in Appendix D3 of the BNG report and also shown below.
- 3.8 The preliminary condition score was 0.4899, which for river type H is at the top of the 'Fairly Poor' condition band and as such requires minimal intervention to increase condition. The modelled scenario below shows that even when an increase in post development bank top managed ground cover is accounted for (B5), an increase in condition is possible by:
- Controlling Himalayan balsam on the bank top (B4).
 - Creation of a pond SUDS basin along the left bank top (B3)
 - Removing existing large trash from the river (E10)

Subreach Planner

Reset Subreach Planner

	Preliminary Condition Score	Shape	Condition																															
			B1	B2	B3	B4	B5	C1	C2	C3	C4	C5	C6	C7	C8	C9	C10	D1	D2	D3	D4	D5	E1	E2	E3	E4	E5	E6	E7	E8	E9	E10	E11	E12
Baseline	0.4899	1.7	2	0	0	-3	-2	1	0	2	2	1	1	0	0	0	-1	1	0	2	1	0	0	1	2	1	1	3	0	0	0	-2	0	0
Proposed	0.7733	1.7	2	0	1	-1	-1	1	0	2	2	1	1	0	0	0	-1	1	0	2	1	0	0	1	2	1	1	3	0	0	0	0	0	0
Module Planner	0.4899	1.7	2	0	0	-3	-2	1	0	2	2	1	1	0	0	0	-1	1	0	2	1	0	0	1	2	1	1	3	0	0	0	-2	0	0

River Type

H

Thresholds

	Upper	Lower
Good	2.9	2.4
Fairly Good	2.4	1.6
Moderate	1.6	0.5
Fairly Poor	0.5	-0.9
Poor	-0.9	-2.5

Overdeep

to

Overdeep

Baseline Subreach overdeep?

Yes

Proposed Subreach overdeep?

Yes

Baseline to Proposed Prediction

Poor

to

Fairly Poor

Baseline to Module Planner Prediction

Poor

to

Poor

Target condition achieved through module planner?

No

Baseline matches Cartographer output?

Yes

Negative Indicators (-4 to 0)

Positive Indicators (0 to +4)

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0 25 50 m



Site Boundary



Watercourse Survey Sections

drawn date
06/07/26

drwn/chkd
DV / YK

client
Bellway Homes Ltd

project
**Cronton Road,
Cronton**

title
RIPARIAN MAMMAL PLAN

scale
1:1,700 @ A3

number
FIGURE 1

rev
-

FPCR | environment
& design