

Merseyside Environmental Advisory Service
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Director: Alan Jemmett, PhD, MBA

Enquiries:

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DEVELOPMENT MANAGEMENT ADVICE

To: Lee Osborne
Organisation: Knowsley Council

From: Sophie Leadsom

Your Ref: 25/00521/FUL
File Ref: KN25-034
W/P Ref: e-DM
Date: 24 March 2026

**PROPOSED BATTERY ENERGY STORAGE SYSTEM (BESS), TOGETHER WITH
ASSOCIATED INFRASTRUCTURE INCLUDING INVERTERS; TRANSFORMERS;
SWITCHGEAR; CONTROL ROOM; DNO ROOM; WELFARE AND STORAGE BUILDINGS;
FENCING AND SECURITY INFRASTRUCTURE; CCTV; ACCESS TRACK; EMERGENCY
ACCESS TRACK; AND LANDSCAPING**

Land To The East Of, Perimeter Road, Knowsley Industrial Park, Kirkby, Knowsley

1. Thank you for consulting Merseyside Environmental Advisory Service in respect of this planning application. The proposals comprise the construction of a solar farm.
2. Having reviewed the application and supporting documentation, our advice is set out below in two parts.
 - Part One deals with issues of regulatory compliance, action required **prior to determination** and matters to be dealt with through planning conditions. Advice is only included here where action is required or where a positive statement of compliance is necessary for statutory purposes.
 - Should the Council decide to adopt an alternative approach to MEAS Part 1 advice, I request that you let us know. MEAS may be able to provide further advice on options to manage risks in the determination of the application.
 - Part Two sets out guidance to facilitate the implementation of Part One advice and informative notes.

In this case Part One comprises paragraphs 3 to 22. There is no part Two.

Part One

Merseyside Environmental Advisory Service – delivering high quality environmental advice and sustainable solutions to the Districts of Halton, Knowsley, Liverpool, St.Helens, Sefton and Wirral



3. The applicant has submitted the following to address previous concerns (*Memo from Peter McKeon to Lee Osborne, 28 January 2026, KN25-034*) regarding the previously submitted non-breeding bird survey and breeding birds:
- *Letter from Urban Green to Peter McKeon, 5 February 2026, Re: Sandy Brow Lane – Urban Green Response to Comments – Ecology;*
 - *Wintering Bird Survey Report, Urban Green, February 2026, Ref: UG2142;*
4. The submitted letter provides the following clarification (MEAS previous comments in italics):
- It is not clear whether survey visits were timed to coincide with high tide when waterbirds, such as pink-footed geese, move inland*
5. The letter states that 16 survey visits were conducted fortnightly between September and April for approximately two hours, at dawn. Whilst targeting high tides was not an explicit consideration, it is considered that the adopted method is sufficient due to the high number of survey visits, many of which would have coincided with high tide.
6. The clarification provided by the letter is accepted.
- The location of the vantage points and line transects used during the survey have not been included in the survey report*
7. The letter states that the locations of the vantage points are marked on Figure 1 of the Wintering Bird Report.
8. This is accepted. However, line transects have not been provided. This is considered a limitation, however, due to the small scale of the site it is considered that the omission of line transects is not a significant limitation.
- For schemes which may impact functionally linked land, MEAS usually require two years of survey*
9. The letter states it is Urban Greens understanding that two years survey is required because typical winter bird survey methods – of four monthly visits – can often miss out more transient species and having two years survey doubles this effort to eight surveys, lowering the chances of missing key species. It is not clear which methods are referred to as four monthly visits is not something MEAS would recommend and is not in accordance with NatureScot which is the generally accepted best practice guidance for non-breeding bird survey methods.
10. The letter goes on to state that this survey comprises 16 visits which is considered sufficient (exceeding the recommended number of visits under standard methods) to capture transient species. For this reason, it is assessed that two years survey is not required, especially considering the lack of Pink footed goose recorded.

Urban Green is happy to hear that the above clarifications and amendments have been accepted.

11. Due to consideration that the site is less than optimal for waterbirds due to the habitats present within it, particularly in comparison to the larger, nearby fields, MEAS advised that a desktop study, rather than further survey, may be acceptable and requested a desktop study in the first instance.
12. The amended Winter Bird Survey report includes a table of data sources obtained and included within the assessment. Reference is made, within the table to records obtained from the County Bird Recorder as previously requested.
13. The report states the following with regards to County Bird Recorder data:

Included 123 records of Pink footed goose in the local region, some records detail counts of over 3000. Of these records, however, only 12 were recorded within 1km of the site, non of these 12 indicated breeding and just five records indicated feeding behaviour on the ground.

All records of roosting were approximately 2km away at Simonswood Moss;

The closest records of Pink footed goose, recorded to at least a 6 figure grid reference, were of feeding on the ground 1.2km south east.

14. The analysis of the data obtained from the County Bird Recorder is vague and it is not clear why reference to breeding has been made when this is a non-breeding bird analysis.
15. The report refers to 12 records within 1km of the site and of those 12 records five were of feeding on the ground. However, no plan has been provided or details of how far from the site the 12 records are. Additionally, it is noted that records are often just of presence and/or absence so the five records of feeding do not discount the other records which may also be of feeding.

The records described as being “recorded within 1km” of the site were recorded to only monad scale (1km grid), hence it is implicated that an exact distance to the site cannot be accurately calculated nor mapped; it is for this reason that the next lines clarify the exact distance of the closest records that were recorded to an accurate (“at least six-figure”) grid reference.

We can appreciate the request for greater clarity here however, and Urban Green is happy to produce a scaled plan that illustrates these records.

16. A more detailed analysis of the records obtained from the County Bird Recorder is required. This can be submitted as a scaled plan, showing the locations and numbers of the records referred to in the report and particularly including the locations and numbers of the 12 records stated to be within 1 km of the site. This is required **prior**

to determination to assess whether further survey or Habitats Regulations Assessment is required.

Breeding Bird Surveys

17. Previous comments advised that breeding bird surveys are required prior to determination as mentioned in the PEA. Urban Green has responded stating the following:

The PEA report does not include a recommendation for breeding bird surveys. Breeding bird surveys were ruled out, as most suitable habitat such as woodland and scrub, is adjacent to the site and to be retained.

18. The above is not accepted. Section 4.4.3 of the PEA states that *“it is not expected the site will support any notable passerine breeding assemblages. There is, however, potential for ground nesting and overwintering birds on site for which surveys are recommended”*.

The above line in Section 4.4.3 is intended to inform that there is suitable habitat for ground nesting and overwintering birds but is only intended to imply surveys are needed for wintering birds. We can appreciate that it is easily read as implying a need for surveys of ground-nesting birds, however this is not intended, hence no recommendation of breeding bird surveys in Section 5.

Surveys of ground-nesting birds are not recommended for the site for the following reasons:

- The assessments of suitability in Section 3.3 are intended to be considered in isolation, with their context within the project proposals expanded upon in Sections 4 and 5. *In isolation*, the site does feature suitable ground-nesting habitat.
- However, the development footprint of the site is small and comprises only a fraction of suitable ground-nesting habitat within greater land ownership, the remainder of which is to be retained, and some enhanced.
- For this reason, the habitat within the development footprint is not assessed to be of importance to local populations and would not be anticipated to support any significant degree of ground nesting, regardless of the presence, in isolation, of suitable habitat. Accordingly, no significant impact is anticipated as consequence of development.
- It was assessed that reasonable avoidance measures, that are expanded upon in the section in question, would suitably address concerns around potential ground nesting on the site.

Urban Green is happy to amend the PEA and letter statement to clarify these points.

19. The letter also states that following a review of all correspondence Urban Green cannot find any record of a survey recommendation from MEAS for breeding bird surveys. Previous comments (*Memo from Nicola Hayes to Lee Osborne, 17 December 2025, SH25-034, Paragraphs 6 and 7*) advise that the submitted PEA either recommends or refers to the completion of breeding bird surveys and these are required **prior to determination**.

20. Section 3.3.7 of the PEA details that the site likely provides high quality nesting and foraging habitat for ground nesting birds and recommends further survey of these species. Further justification is required as to why the ecologist no longer feels these are necessary. This is required **prior to determination**.
21. The remainder of the letter regarding Reasonable Avoidance Measures (RAMs) is accepted.
22. Further comments will be provided on receipt of the additional information.

I would be pleased to discuss these issues further and to provide additional information in respect of any of the matters raised.

Sophie Leadsom
Principal Ecologist