



Peter McKeon,
Merseyside Environmental Advisory Service,

The Barn,
Court Hey Park,
Roby Road,
Huyton,
L16 3NA

Date: 5th February 2026

RE: Sandy Brow Lane – Urban Green Response to Consultee Comments - Ecology

Dear Peter,

Thank you for your comments on the Ecology documents provided by Urban Green to support the planning application for the Balance Power's development at Sandy Brow Lane (25/00521/FUL).

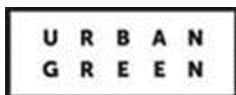
Please find a summary of Urban Green responses below.

I hope this letter provides sufficient information, however, if you require anything further, please let us know.

Kind regards,

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1. Wintering Bird Survey Report

“Further information regarding wintering birds is required prior to determination as set out below. There are some limitations with the wintering bird survey and report, which includes the following:

*It is **not clear whether survey visits were timed to coincide with high tide** when waterbirds, such as pink-footed geese, move inland;*

*The **location of the vantage points and line transects used during the survey have not been included** in the survey report;*

*For schemes which may impact **functionally linked land**, MEAS usually require **two years of survey**. Note the use of ‘usually’. Not a requirement. Urban Green to prepare a rebuttal to this requirement.*

*To overcome these limitations and to enable MEAS to accept the conclusions of the survey report, further information is required prior to determination. In addition to an **amended survey report**, I advise that an **ornithological desktop study** is required in the first instance which includes, but is not limited to, waterbird data obtained from the County Bird Recorder (Steve White)”*

Urban Green Response -

Urban Green’s Wintering Bird Survey report details (Section 3.1) that the survey methodology for wintering bird surveys conducted at the site adopted a bespoke methodology, “*based on NatureScot Guidance that advises [on] feeding distribution surveys of Pink-footed Goose*”. Specifically, a total of **sixteen survey visits** were conducted, fortnightly, between September 2023 and April 2024; each was conducted for ~two hours at dawn. Whilst targeting high tides was not an explicit consideration, it is considered that the adopted methodology is sufficient due to the high number of survey visits; many of which would have coincided with high tide.

The locations of vantage points are marked on Figure 1 of the Wintering Bird Survey report.

We understand that MEAS usually requires two years of surveys on Functionally Linked Land. It is our understanding that this is because the typical wintering bird survey methodology – of four monthly visits – can often miss out more transient species, and having two years of surveys doubles this effort to eight surveys, lowering the chances of missing key species. Urban Green’s survey methodology included sixteen surveys; we consider this sufficient (exceeding the recommended number of visits under standard methodology) to capture transient species. For this reason, in this particular case, it is assessed that two years’ of survey is not required, especially considering the lack of pink-footed geese recorded.

Urban Green will produce an updated Wintering Bird Survey report to include:

- Data directly obtained from the County Bird Recorder;
- Other relevant biological information sources
- Expand on the justification for the methodology adapted; and
- Update the conclusion of the report accordingly.

This report will be made available to MEAS for review.

2. Breeding Bird Survey

“MEAS previously advised that the breeding bird survey, recommended in the submitted Preliminary Ecological Appraisal, is submitted prior to determination and this is still required.”

Urban Green Response -

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

Moreover, following a review of all known correspondence between Urban Green, Balance Power, and MEAS, we also cannot find any record of a survey recommendation from MEAS for breeding bird surveys.

We believe the source of this confusion has likely arisen from email correspondence where the term ‘breeding bird surveys’ was (erroneously) detailed in the subject line, however, all information contained within this email chain only and correctly pertained to ‘wintering bird surveys.’ For this reason, we kindly request that breeding bird surveys are excluded moving forward.

3. Precautionary Method of Works

“No evidence of reptiles was recorded during the reptile survey, although common toad (a Priority Species) were found to be present. Previously MEAS advised that Reasonable Avoidance Measures are undertaken for reptiles and amphibians and this advice still applies.”

Urban Green Response -

Urban Green will produce a Precautionary Method of Works document, covering reasonable avoidance measures pertaining to reptiles, amphibians, and water voles, to address this point. This document will be made available to MEAS for review.

4. Pre-commencement checks

“The habitat along the adjacent stretch of Kirkby Brook was found to be sub-optimal for water vole due to the shallow water depths observed during the surveys and no water vole field signs were recorded. Proposed drainage works will include the creation of a new headwall into the banks of the brook. As a precaution, due to the transient nature of water voles, I advise that a pre-commencement inspection of the affected section of brook is undertaken by a suitably experienced ecologist prior to the commencement of these works. This can be secured by a suitably worded planning condition or alternatively can be included within the CEMP (see paragraph 16 of the previous MEAS advice of 17 December 2026).”

Urban Green Response -

Urban Green agrees with the recommended precautionary approach. We further agree that this item should be detailed as a planning condition. With respect to timings, Balance Power will advise Urban Green when works are to commence and an ecologist will be sent to site to carry out the inspections and report on the findings in a timely manner.