

PRECAUTIONARY METHOD OF WORKS

FEBRUARY 2026

Sandy Brow RFP,
Perimeter Road,
Knowsley,
L33 3AN

U R B A N
G R E E N

QUALITY MANAGEMENT

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Legend: Red Line Boundary	0.85 Kilometers	U R B A N G R E E N A: Ground Floor, The Tower, Deva City Office Park, Trinity Way, Manchester M3 7BF T: +44 (0) 161 312 3131 weareurbangreen.co.uk
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1 Introduction

1.1 Scope

- 1.1.1.1 Balance Power Ltd are proposing to develop land off Perimeter Road in Knowsley (hereafter referred to as ‘the site’). The proposals include the development of a battery storage site, with power grid infrastructure and associated hard landscaping.
- 1.1.1.2 Urban Green has been appointed to produce a Precautionary Method of Works (PMoW) for the site, based on the findings of a series of ecological surveys undertaken Urban Green. The surveys have included:
- Preliminary Ecological Appraisal (PEA) completed in September 2023
 - Water vole (*Arvicola amphibius*) surveys completed in September 2024
 - Reptile surveys completed in October 2024
 - An ecological walkover completed in April 2025

1.2 Site Context

- 1.2.1.1 The site is located at National Grid Reference SJ 44170 98325 and comprises a total area of approximately 2.7ha (see Figure 1).
- 1.2.1.2 The site is located in the rural outskirts of the greater Liverpool built-up area, ~2.2km north of Knowsley. The site is bounded west by Perimeter Road, immediately beyond which lies an extensive retail/industrial estate. Expansive rural land dominates the wider landscape to the north, east, and south of site – mostly agricultural land, and notably Knowsley Park & Safari, ~3km to the south.

1.3 Purpose of Report

- 1.3.1.1 The purpose of the report is to provide precautionary working methods, which are to be followed throughout the construction phase of the development by all site operatives. These precautionary working methods will cover ecological features of interest, which include;
- Amphibians,
 - Reptiles,
 - and water voles.

2 Amphibians

2.1 Ecology Background

- 2.1.1.1 One pond was located within 250m of the site, ~170m west. The pond is artificial, located within the Knowsley Industrial Park and first appearing in satellite imagery in 2015, considered to be a SUDS pond for the surrounding urban development built at the same time. Considering this, and the pond's separation from site by extensive hardstanding land - notably a large car park, its access road, and adjoined Perimeter Road – the pond is not thought suitable for newts, nor commuting to site feasible. No further natural ponds are within 250m. As great crested newts' upper dispersal limit is generally considered to be up to 250m from a waterbody (though occurrence of greater distances does exist), great crested newts are not anticipated to breed or reside on site (English Nature, 2001).
- 2.1.1.2 There were however, found to be records of natural ponds across similar habitat in the 500m-1km range of site, and the mossy, peaty wetland habitat may feature several temporary waterbodies throughout the year.

2.2 Rationale

- 2.2.1.1 Overall, GCN presence is considered a low probability, however, the mosaic of unmanaged and wetland/aquatic habitats on site, may provide suitable foraging resources and cover for common amphibians such as common frog (*Rana temporaria*) and common toad (*Bufo bufo*).

2.3 Precautionary Method of Works

- 2.3.1.1 A toolbox talk will be delivered to all operatives prior to construction commencing. This will include an overview of amphibian biology, species identification, species legal protection, and the precautionary method of works.
- 2.3.1.2 Fingertip search of complex habitats will be carried out, as required, immediately prior to or when works are being carried out. This includes lifting refugia, and carefully clearing any debris, by hand and moving to outside the development area.
- 2.3.1.3 If any amphibians (excluding GCN) are found onsite during development construction, an ecologist must be contacted to carefully remove them by hand to a suitable off-site receptor site.
- 2.3.1.4 In the event that great crested newt is found on site at any time during the site investigation phase of the project, the works should pause whilst an ecologist is contacted about how best to proceed.

3 Reptiles

3.1 Ecology Background

- 3.1.1.1 The site's habitats were deemed moderately suitable for the potential presence of reptiles, featuring an unmanaged mosaic of variable, structurally complex, wet grassland, interspersed by minor ponds, bramble and gorse scrub, and rocky outcrops, with woodland bordering.
- 3.1.1.2 No evidence of reptiles was found during the reptile surveys undertaken on site; however, their presence on site cannot be fully discounted.

3.2 Rationale

- 3.2.1.1 Grass snakes and slow-worm are not a European Protected Species, though they are covered under domestic law by the Wildlife and Countryside Act (1981), and the Natural Environment and Rural Communities Act (2006). Under this legislation, it is a criminal offence to recklessly injure or kill these species.
- 3.2.1.2 The habitats on site were assessed to be of low value for reptiles, though occasional low numbers of transient populations passing through the site cannot be ruled out entirely.

3.3 Phased Grassland Clearance

- 3.3.1.1 The phased approach to vegetation clearance is intended to gradually displace reptiles from the working area, encouraging their movement towards the receptor sites while minimizing the risk of harm. Each phase requires ECoW oversight and careful planning to align with reptile active periods (April to September). All works should be conducted in warm, dry weather (at least 10°C), avoiding early mornings and evenings to maximize reptile detectability. Phased cuts will be conducted as such:

3.3.2 Phase 1 – Initial Cut (150mm height)

- 3.3.2.1 This initial cut reduces vegetation height and discourages reptiles from using the area while still providing cover, allowing them the opportunity to relocate to nearby receptor habitats such as the adjacent northwestern field.
- 3.3.2.2 The cutting should start from the centre of the grassland and gradually work outward toward the designated woodland boundary of the site. This 'centre-out' approach minimizes risk by gently guiding reptiles towards the receptor area.
- 3.3.2.3 Tools & Personnel: Only hand tools (such as strimmers and hedge trimmers) should be used during this phase to maintain a low disturbance level. The ECoW will supervise the cutting process and be on hand to conduct fingertip searches, particularly in denser areas where reptiles might be hidden.

3.3.3 Phase 2 – Secondary Cut (50mm height)

- 3.3.3.1 The second phase further reduces vegetation cover, significantly reducing the likelihood of reptiles remaining on-site while still allowing them to move to safer habitats.
- 3.3.3.2 Following a 48-hour rest period after the initial cut, the remaining grassland should be cut down to 50mm.
- 3.3.3.3 Mechanical trimmers can be used under direct ECoW supervision, as reptiles are more likely to have already moved, and the area's visibility is improved for monitoring purposes.

3.3.4 Final Clearance (10mm height)

- 3.3.4.1 The final cut reduces vegetation to minimal levels, effectively removing any remaining reptile habitat and preparing the site for development.
- 3.3.4.2 Following the secondary cut, an additional 48-hour period should be observed to allow any remaining reptiles to relocate, after which, the remaining vegetation should be cut down to a final height of 10mm but only once the ECoW confirms no reptiles are present.

3.4 Fingertip Searches

- 3.4.1.1 Fingertip searches should be conducted by the ECoW after each cut. Fingertip searches involve a careful, hands-on examination of ground-level vegetation and potential refuges within the vicinity, such as stones, logs, and leaf litter, which reptiles may use as cover.
- 3.4.1.2 The ECoW will document any reptiles found, noting their species, age class, and condition, and will photograph or record sightings where possible.

4 Water vole

4.1 Ecology Background

- 4.1.1.1 The site's unmanaged, aquatic habitat may offer suitable habitat for foraging, though the site's lack of a stream or raised bank substrates would limit burrow-building potential. The site runs by a more suitable narrow ditch, though the habitat was bordered by dense scrub and abundant Himalayan balsam, with only shallow and seasonally variable water – limiting foraging potential. The ditch does, however, hydrologically link with a network of other small watercourses in the area, and records were returned for the species in the nearby Acornfield Plantation; a commute over Perimeter Road is not infeasible.
- 4.1.1.2 During the water vole survey (Urban Green, 2024), an abundance of small burrows along the brook banks were observed to be utilised by rats. No other mammal signs of any kind were recorded during the survey.

4.2 Rationale

- 4.2.1.1 Water Vole are protected under the Schedule 5 of the Wildlife and Countryside Act 1981 (as amended) and are listed as a species of principal importance under Section 41 of the Natural Environment and Rural Communities Act (2006). Otters are protected under the Conservation of Habitats and Species Regulations 2019 and are listed under Schedule 5 of the Wildlife and Countryside Act 1981.
- 4.2.1.2 No evidence of water vole was identified within the site extent or in habitats directly adjacent during the 2024 survey, and on-site habitats were considered unsuitable due to significant agricultural disturbance and polluted waters; however, water vole may still use the site for commuting.
- 4.2.1.3 To that end, precautionary measures are detailed in Section 4.3 (below) to avoid unnecessary impacts to water vole.

4.3 Precautionary Method of Works

- 4.3.1.1 An ecologist should check for signs of water vole within 30m of all watercourses, prior to site clearance.
- 4.3.1.2 The following reasonable avoidance measures should be followed throughout the construction phase:
 - All site personnel are to be inducted through use of a toolbox talk on the presence of water vole, their legal protection and working limits.
 - The pre-commencement check should be carried out by an experienced ecologist, checking the water and its banks for signs of water vole burrows, and of general species activity such as footprints, feeding remains and latrines.
 - Any human-made excavations, trenches or pits relating to the development that must remain open overnight, will either be securely fenced off or covered up overnight to avoid entrapment of water vole, if left open, access ramps (e.g. mammal ladders, a roughened plank or even a ramp of earth) will be placed within the excavation each night near to crossing points to allow any animals that accidentally fall into the excavation as a means of climbing out.
 - Any temporarily exposed open pipe system will be capped in such a way as to prevent water vole gaining access, as this may happen when contractors are off site.

- A 10m buffer zone should be maintained around Kirby Brook to limit impacts to aquatic species, wherever possible.
- Nocturnal lighting should be directed away from the Kirby Brook.

5 References

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Urban Green (2024). Reptile Survey Report, Sandy Brow RFP. Ref: UG_2142_ECO_RS_01.

Urban Green (2024). Water Vole Survey Report, Sandy Brow RFP. Ref: UG_2142_ECO_WV_01.

Urban Green (2025). Ecological Walkover Letter Statement, Sandy Brow RFP. Ref: UG2142 - 2025 Ecological walkover.

Appendix 1 – Relevant Legislation

Legislation relating to European Protected Species (e.g. great crested newt)

European Protected Species and their resting places (e.g. bat roosts) are protected under the Wildlife and Countryside Act 1981 (as amended), the Countryside and Rights of Way (CROW) Act 2000, and the Conservation of Habitats and Species Regulations 2017.

The Conservation of Habitats and Species Regulations 2017 transpose the European Union's 'Habitats Directive' (Council Directive 92/43/EEC) on the Conservation of Natural Habitats and of Wild Fauna and Flora (EC Habitats Directive) into UK law. The Regulations provide for the designation and protection of 'European Sites', the protection of 'European Protected Species' (EPS), and the adaptation of planning and other controls for the protection of European Sites. EPS are listed on Schedule 2 of the Conservation of Habitats and Species Regulations 2017.

Under the Wildlife and Countryside Act 1981 (as amended) it is an offence to:

- Intentionally kill, injure or take certain animals listed in Schedule 5;
- Intentionally or recklessly damage or destroy any structure or place which any wild animal specified in Schedule 5 uses for shelter or protection;
- Intentionally or recklessly disturb any such animal while it is occupying a structure or place which it uses for shelter or protection; or
- Intentionally or recklessly obstruct access to any structure or place which any such animal uses for shelter or protection.

In addition, under this legislation there are offences relating to sale, possession and control of wild animals listed in Schedule 5.

Under the Conservation of Habitats and Species Regulations 2017 it is an offence to:

- Deliberately capture, injure or kill any wild animal listed as a European Protected Species;
- Deliberately disturb wild animals of any such species in such a way as to be likely:
- to impair their ability:
 - to survive, to breed or reproduce, or to rear or nurture their young, or;
 - in the case of animals of a hibernating or migratory species, to hibernate or migrate, or;
- to affect significantly the local distribution or abundance of the species to which they belong.
- Deliberately take or destroy the eggs of such an animal, or;
- Damage or destroy a breeding site or resting place of such an animal.

In addition, under this legislation there are offences relating to possession, control sale and exchange of an EPS.

Great crested newt, otter and several species of bat are listed as a SoPI under Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006.

Amphibians

Common toad and common frog are protection under Section 9(5) of The *Wildlife and Countryside Act 1981* (as amended), but only against trade (i.e. sale, barter, exchange, transporting for sale and advertising to sell or to buy). It is not an offence to collect or possess these species.

Common toad was added to the list of UK BAP species in 2007 and is on the Biodiversity Lists for England and Wales (Listed as species of principal importance under Section 41 of the NERC act 2006).

Water Vole

The water vole received limited legal protection in April 1998 through its inclusion in Schedule 5 of the *Wildlife and Countryside Act 1981* (as amended). This protection was extended in April 2008, so that Water voles were fully protected under Section 9.

Legal protection makes it an offence to:

- intentionally kill, injure or take (capture) a water vole
- possess or control a live or dead water vole, or any part of a water vole
- intentionally or recklessly damage, destroy or obstruct access to any structure or place which water voles use for shelter or protection or disturb water voles while they are using such a structure or place.