

TECHNICAL NOTE: ECOLOGY CONSULTEE COMMENTS/REVIEW PLANNING REF: 25/00486/OUT

Hallam Land Management Ltd.

Land at Knowsley Estate, Home Farm Road, Knowsley.

January 2026

1.0 INTRODUCTION

- 1.1 The following note has been prepared by FPCR Environment and Design Ltd. (FPCR) on behalf of Hallam Land Management Ltd. to accompany an application for an outline planning permission (Planning Ref: 25/00486/OUT) for the erection of up to 700 dwellings (c3 use class) with vehicular access from Knowsley lane together with public open space, landscaping, sustainable urban drainage systems and other associated works at Land at Knowsley Estate, Home Farm Road, Knowsley.

Scope of This Note

- 1.2 The following information is provided in response to comments received from Merseyside Environmental Advisory Service (MEAS) dated 2.12.2025 regarding the Ecology Chapter 7 (FPCR 2025) of the Environmental Statement (Pegasus Group, August 2025, ref P21-3399) accompanying the above application. In summary, these comments request further consideration and provision of additional information relating to irreplaceable habitat, bats, breeding birds, wintering birds and biodiversity net gain.

Irreplaceable Habitat – Ancient Woodland

- 1.3 MEAS Comment Para 16:

Section 7.5.11 of the Environmental Statement: Ecology and Biodiversity proposes to include protective fencing around the woodland during construction. This is accepted, however a minimum of 15m buffer should be maintained from the ancient woodlands during the construction phase, but more where possible.

- 1.4 The Arboricultural Assessment Appendix 7.11 of the Environmental Statement (FPCR 2025) para 4.11 notes that:

While the Multi Agency Geographic Information for the Countryside (MAGIC) website did not identify any woodlands within or immediately adjacent to the site as Ancient Woodland. Ecological surveys identified ancient woodland indicator species and with ancient woodland in England being defined as an area that has been continuously wooded since at least 1600 AD due to the proximity of the woodlands to an historic estate which dates to the late 15th century, all the recorded woodland is assumed to be ancient and a 15m ancient woodland buffer has been provided in accordance with government guidance on ancient woodland, ancient trees and veteran trees: advice for making planning decisions.

- 1.5 Moreover, this ancient woodland Buffer is indicated on the Tree Retention Plan (Drawing number 10793-T-03 and 10793-T-04) as included within Appendix 7.11 of the Environmental Statement. Therefore, the minimum 15m buffer from ancient woodlands has already been incorporated into the scheme.

1.6 In addition, a detailed CEMP will be provided as detailed in para 1.24 to address the mitigation measures for construction phase impacts on ancient woodland.

1.7 MEAS Comment Para 19:

I advise that a detailed Recreational Management Plan is required to provide details of how the ancient woodlands on site and nearby ancient woodlands, will be managed to ensure that increase recreational pressure does not have a detrimental impact. This is required prior to determination. This should include (but is not limited to):

- *Creation of formal footpaths to reduce trampling;*
- *Erecting signage;*
- *Introducing dog waste bins;*
- *Providing alternative footpaths outside of the woodlands;*
- *Restricting access to the woodland via fencing;*
- *How potential garden escapees would be managed.*

1.8 Provision of a detailed Recreational Management plan would not be practicable at outline planning stage as there are currently no detailed layouts provided to inform such a plan. Based on the indicative layout as provided with the outline application, a Recreational Management Plan could provide very little additional information beyond the list of recommended measures above and those included within Section 7.5 of the Ecology Chapter. A planning condition requiring provision of a detailed Recreational Management Plan based on detailed layouts and landscape plans would provide the required detailed information at reserved matters stage.

1.9 MEAS Comment Para 15 and 20:

15. *Potential impacts to ancient woodland relate to:*

- *construction related impacts which may damage habitats or result in pollution;*
- *Air quality impacts;*
- *Recreational pressure impacts from new residents*
- *Other operations impacts such as light spill, cat predation to associated fauna, impacts from garden escapes.*

20. *In addition, as the development will have an effect on the ancient woodland, the applicant should provide a statement which demonstrates the wholly exceptional circumstances which exist in this case, along with a compensation strategy. This further information is required prior to determination.*

1.10 Following an update to the Magic Map Ancient Woodland Layer since submission (see updated Figure 7.4), the assessment of impacts to ancient woodland has been updated.

1.11 The following woodlands are included within the assessment, with four additional woodlands (in bold):

- Howards Pits and Knowles' Pits (within the Site).
- Knowsley Park LWS (adjacent to the south and east boundaries)
- Little Wood LWS (290m west);

- Meakins Pits LWS (496m northwest).
- **Syder's Grove (40m N)**
- **Little Wood Lodge (94m SW)**
- **Admiral's Belt (461m S)**
- **Pinfold Wood (365m N)**

Construction Phase impacts

- 1.12 Meakins Pits, Little Wood, Little Wood Lodge, Admiral's Belt and Pinfold Wood are located over 50m from the Site. At this distance construction dust impacts are considered unlikely. A small part (approximately 0.4% of the total) of Syder's wood is located within 50m, however the majority of the area over 50m from the Site and also over 75m from areas of proposed development. Given the area of likely impact, construction dust impacts to Syder's Grove are considered negligible.
- 1.13 Given the distance, lack of obvious hydrological linkage and location of ancient woodland, the assessment of potential construction impacts remains unchanged and in the absence of mitigation, there is potential for a **Not-Significant Negative Effect** at a **Metropolitan level** on Knowsley Park, and Howards and Knowles Pit ancient woodland from construction phase dust deposition and to onsite Howards and Knowles Pit from accidental damage.
- 1.14 In the absence of mitigation, construction effects on Little Wood, Meakins Pits, Syder's Grove, Little Wood Lodge, Admiral's Belt and Pinfold Wood ancient woodlands are expected to be **Neutral**.

Operational Phase impacts

Recreational impacts

- 1.15 The Proposed Development will result in an increase in the local residential population and therefore increase the risk of disturbance, including compaction and trampling of ground flora and dog fouling within the onsite ancient woodlands Howards Pits and Knowles Pit. Given the relatively species-poor nature of the ground flora at present, and the existing informal paths present within W-1 and W-2, the resulting effect would be considered not significant. Additionally, improving the existing informal paths through the woodland and provision of alternative walking routes outside of the woodland as outlined within the embedded mitigation in Section 7.5 of the Ecology Chapter, will further mitigate recreational effects during the operational phase.
- 1.16 Within the illustrative layout, additional tree, woodland, native scrub and hedgerow planting is proposed which will buffer and connect the retained woodland areas. The planting, as outlined within the embedded mitigation, has been specifically designed to provide a buffer from recreational disturbance and lighting impacts. This will enhance the retained woodland habitat and ensure functionality of the woodland will be maintained. The enhancements to woodland will be monitored and managed for at least 30 years, in line with the BNG condition.
- 1.17 Recreational impacts have been discounted within Knowsley Park and Meakins Pits due to a lack of public access. No formal public access is available to Little Wood Lodge or Admiral's Belt and given the availability of alternative closer publicly accessible woodlands it is considered

unlikely that significant numbers of new residents from the development would use Little Wood Lodge, Admiral's Belt or Pinfold woodlands for recreation.

- 1.18 Little Wood LWS is already surrounded by residential development and is actively managed to encourage public access, as part of its Statutory designation. Additionally, Syder's Grove wood is located 40m north of the Site and is likely to be used recreationally by new residents. Given the location and current management of both of these woodlands, the residual impacts are unlikely to impact the functionality of the woodlands or cause a deterioration of the woodland habitat. Both woods are currently actively managed for recreational use with strategies in place to manage potential impacts. It is therefore expected that in the absence of any additional mitigation, that the resulting negative residual effect would not be significant. Additionally, proposed areas of greenspace onsite will provide alternative recreation opportunities, to minimise impacts.
- 1.19 Impacts relating to cat predation and lighting are considered as part of the assessment of impacts to fauna, therefore these pathways will not be included separately within the consideration of ancient woodland in the updated assessment.

Air quality

- 1.20 The Air Quality Assessment did not formally model impacts to the additional ancient woodland parcels within Syder's Grove, Little Wood Lodge, Admiral's Belt and Pinfold Wood as they were designated following submission and were not identified as potential ancient woodlands within the MEAS consultation. However, given that the assessment has scoped out air quality impacts for all the included woodlands, it is considered unlikely that impacts to these additional areas would occur, given their similar locations close to existing residential areas or roads. Air quality impacts on ancient woodlands are therefore discounted.

Dumping of household waste

- 1.21 Following a review of the Landscape proposals the assessment of potential impacts on ancient woodland and priority woodlands relating to dumping of household waste has been amended. The layout has avoided locating gardens adjacent to areas of woodland. A minimum 15m natural buffer has been included around all onsite and offsite ancient woodland and proposed scrub planting within the buffer zone will reduce access and provide further protection from impacts. Additionally, there are existing barriers to dumping of waste in the form of a high wall between the Site and Knowsley Park. Impacts from dumping of household waste have therefore been scoped out.
- 1.22 Any negative effect that results in the degradation or loss of ancient woodland would be considered significant. The impacts that have been identified as result of recreation are not considered likely to result in degradation or loss of ancient woodland and are therefore considered to be **Not Significant**. Therefore in the absence of mitigation, there is potential for a **Not-Significant Negative Effect** at a **Metropolitan level** on Knowles Pit and Howards Pit (onsite) and Syder's Grove and Little Wood (offsite) ancient woodland.
- 1.23 All other effects on ancient woodland are considered to be **Neutral**.

Mitigation

- 1.24 Mitigation for construction phase impacts on ancient woodland would be secured by provision of a detailed CEMP.

- 1.25 Mitigation for potential recreational impacts on Knowles Pit and Howards Pit (onsite) and Syder's Grove and Little Wood (offsite) ancient woodland can be secured via provision of a detailed Recreational Management Plan at the detailed design stage.
- 1.26 Additional mitigation for potential recreational impacts and dumping of household waste within the onsite ancient woodlands can be secured via the BNG condition, which will secure enhancements to and monitoring of the ancient woodland habitat condition for a minimum of 30 years.
- 1.27 Presently the onsite woodlands are in a 'poor' condition and are not actively managed for nature conservation. The current lack of structural management and presence of invasive rhododendron within the woods has resulted in a limited ground flora which is mostly absent within the eastern parcel W-2. Additionally, the onsite woodlands are currently subject to recreational use by dogwalkers which is also not formally managed.
- 1.28 Proposals aim to enhance on Site woodland from poor to moderate condition via management including control of invasive non-native rhododendron and selective felling to open up the ground layer, allowing native ground flora species to develop and improve the woodland structure. Within the illustrative BNG calculations an increase of 2.57 Lowland Mixed Deciduous Woodland units is predicted. Should planning permission be granted, the woodland enhancements, management and monitoring would be secured for a minimum 30 years via the BNG planning condition. Therefore the scheme will put the retained onsite ancient woodland habitat and also the proposed buffer habitat areas adjacent to the onsite and offsite woodlands into long-term positive management and provide an enhancement to their existing condition.

Residual Effects

- 1.29 Following implementation of the mitigation measures as described above, the residual effects on ancient woodlands are considered to be at least **Neutral** during both the operational and construction phase.

In Conclusion

- 1.30 NPPF, paragraph 193 advises Local Planning Authorities to refuse planning permission that would result in the loss or deterioration of ancient woodland. The Ecology chapter has considered the potential impacts above and concluded that following mitigation, no significant residual impacts on ancient woodland both onsite and adjacent were likely to occur. Therefore no loss or deterioration of ancient woodland is anticipated as a result of proposals. As such, it is considered that wholly exceptional circumstances do not apply.

Protected and Priority Species

Bats

1.31 MEAS Comment Para 21:

The Environmental Statement: Ecology and Biodiversity classifies foraging and commuting bats of local geographical importance. I disagree with this. Five species of bats were identified to species level (common pipistrelle, soprano pipistrelle, noctule, brown long-eared and Nathusius' pipistrelle). Using the Bat Mitigation Guidelines this assemblage would score 10 and therefore be of county importance. Myotis species have not been identified to species level, therefore it is possible that the site would score higher should more than one Myotis species be present.

1.32 Within the Bat Mitigation Guidelines, the guidance states that assigning a level of importance to a bat assemblage on Site provides contextual information only; it is not expected that the assemblage as a whole would be assessed as a single IEF (receptor).

1.33 Rather than assess the assemblage as a whole, an assessment of the importance to the Site for foraging and commuting bats was made as per the list in paragraph 3.4.22 of the guidelines. This was based on the survey information gathered which identified regular use of the Site by common pipistrelle bat, with much lower frequencies of use by soprano pipistrelle, Myotis spp, brown long-eared bat and noctule and occasional passes by Nathusius' pipistrelle. Overall bat activity was generally low, with periods of moderate activity in localised areas such as the woodlands within spring and summer. Local importance was assessed based on a low level of usage of features by generally common and widespread bat species and the presence of alternative good quality foraging habitat within the surrounding area.

1.34 Following mitigation, impacts to foraging, commuting and roosting bats are expected to be at least Neutral and no residual impacts are considered likely. Including an assessment of the bat assemblage would not change the assessment of impacts or recommended mitigation.

1.35 MEAS Comment Para 23:

The Illustrative Landscape Masterplan proposes native scrub and tree planting in the south-east corner of the site to ensure a habitat link between the woodlands on site and Ash Plantation and wider Knowsley Park LWS to the east. Whilst a sensitive lighting plan is recommended by the bat report, roads are proposed which separate the habitats which would most likely be well lit. In the absence of a dark corridor the potential roost would be negatively impacted as the woodlands would become isolated and cause indirect impact to roosting bats within the woodlands. I therefore advise that a larger habitat buffer is required to the south-east, connecting the ancient woodlands on site to Knowsley Park LWS. This will improve the dark corridor, allow potential roosting bats in the woodland to commute to Knowsley Park LWS and minimise potential indirect adverse impacts to roosting bats that may be present within Knowles's Pits and Howard's Pits. This update is required prior to determination.

1.36 In reflection of the comments it has been proposed to amend the scheme design to relocate some of the development in the south east corner to further increase the woodland and scrub habitat buffer adjacent to the retained hedgerow (H6) which connects the onsite woodland to Knowsley Park. The proposed updates are noted in Figure 1, below. This will result in a 57m

corridor which could allow for a 20m dark corridor at the road crossing connecting the onsite and offsite woodland. Additional tree and scrub planting within this area (which is not shown on the sketch below) would further enhance the habitat for foraging and commuting bats.



Figure 1: Proposed Landscape amendment to provide a dark corridor connecting onsite and offsite woodland.

1.37 MEAS Comment Para 24:

Additionally, habitats on-site and adjacent to the site provide roosting, foraging, commuting habitat for bats. Lighting for the development may affect the use of this/these areas. A lighting scheme can be designed so that it protects ecology and does not result in excessive light spill onto the habitats, areas in line with NPPF (paragraph 198c). An indicative lighting scheme/principals for lighting is required prior to determination as a roost may be negatively impacted. It would be helpful for the applicant to refer to the 'Bats and Artificial Lighting at Night' guidance which has been produced by the Institute of Lighting Professionals in conjunction with the Bat Conservation Trust.

1.38 Provision of an indicative lighting plan would not be practicable at outline planning stage as there are currently no detailed layouts provided to inform such a plan. Recommendations for provision of a detailed lighting plan at reserved matters stage to be informed by the principals provided in 'Bats and Artificial Lighting at Night' guidance are included within Para 7.5.11 of the Ecology chapter.

Breeding and Wintering Birds

1.39 MEAS Comment Para 26:

The proposed development will result in the loss of breeding and foraging habitat for locally important farmland bird population. Table 7.11 of the Environmental Statement: Ecology and Biodiversity proposes mitigation to include off-site habitat provision for farmland breeding birds due to the loss of skylark and lapwing on site. This is accepted, however, it is noted that mitigation should also be provided for the loss of linnet breeding habitat. No compensation has been proposed for the loss of habitat for wintering farmland bird habitat. This mitigation should be extended to consider wintering birds too, namely skylark, lapwing and linnet. The applicant is required to submit an appropriate compensation strategy for the loss of this habitat to ensure suitable mitigation can be met. This is required prior to determination.

- 1.40 A bird mitigation strategy has been provided as an addendum to the Wintering Bird Report and Breeding Bird Report appendices of the Ecology Chapter of the Environmental Statement in order to provide further information and detail on mitigation and compensation measures for both breeding and wintering birds.

Biodiversity Net Gain

- 1.41 MEAS Comment Para 27:

There are minor limitations with the submitted BNG information and therefore cannot currently be accepted. I advise the following amendments are required prior to determination:

Strategic significance

Section 5.3 of the report states 'In line with the Statutory metric guidance these areas will be recorded as low strategic significance in the baseline and high strategic significance in the post intervention habitats'. This is not in line with the Statutory Biodiversity Metric User Guide . Table 8 of the User Guide 'If the specified alternative documents identify existing habitat as locally ecologically important within a specified location, strategic significance may be recorded as high in the baseline'. Therefore, high strategic significance should be applied to baseline habitats too in line with MEAS BNG Guidance Note The following habitats should be input as high:

- o All woodland types within the site;*
- o Ponds; and*
- o Native hedgerows and native hedgerows with trees.*

Other neutral grassland' and 'Other woodland; broadleaved' may be input as high strategic significance post development as it is identified within the Urban Grasslands North Merseyside Biodiversity Action Plan Habitat (NMBAP).

Individual trees

193 small trees are proposed for creation and 9 small pleached trees are also proposed. The metric has inputted an area of 0.8102 ha for the 193, however this is not in line with the tree helper. The area within the tree helper equates to 0.7858 ha.

- 1.42 An amended BNG calculation is provided to reflect the above changes to strategic significance and Individual trees. Following the update, proposals result in a 7.15% gain in habitat units and a 16.66% gain in hedgerow units. An additional 2.73 habitat units will be required to meet a 10%

gain. These can be of any distinctiveness. Trading rules will be met within proposals. For comparison, the original scoring was a 5.11% gain in habitat units and a 20.28% gain in hedgerow units. Therefore, whilst there is a slight loss on hedgerows, there is an overall increase in habitat gain.

Land East of Knowsley Lane, Knowsley		Return to results menu	
Headline Results			
Scroll down for final results 			
On-site baseline		Area habitat units	95.79
		Hedgerow units	9.02
		Watercourse units	0.00
On-site post-intervention (Including habitat retention, creation & enhancement)		Area habitat units	102.63
		Hedgerow units	10.52
		Watercourse units	0.00
On-site net change (units & percentage)		Area habitat units	6.85
		Hedgerow units	1.50
		Watercourse units	0.00
			7.15%
			16.66%
			0.00%

Woodland condition

The woodlands on site have been input as poor condition. Each woodland has only received a score of 1 for criterion D 'Number of native tree species'. The report references 'the upper canopy' for this criterion which is not part of the assessment. Appendix 8 of the report provides a species list that notes five or more native tree or shrub species across each of the woodland parcels and therefore the woodlands would achieve a higher score for this point. This is required to be reviewed and amended.

- 1.43 Tab '24A: Woodland' of The Statutory Biodiversity Metric -Technical Annex 1: Condition Assessment Sheets and Methodology, outlines the methodology for assessing woodland condition. The statutory metric woodland condition assessment is based on The EWBG Woodland Condition Survey Methodology, which has been adapted for the biodiversity metric.
- 1.44 The Woodland condition tab clearly states within the footnotes that the *woodland condition assessment survey methodology is outlined in the EWBG toolkit*.
- 1.45 Referencing the EWBG toolkit, a woodlands condition should be assessed based on a walkthrough of the woodland, supplemented by the collection of additional information within representative 10m radius, sample points within the woodland. The sample points provide quantitative data to inform the assessment of eight of the thirteen criteria.
- 1.46 Criterion D within the Statutory metric condition assessment is equivalent to indicator 4: Number of native trees, of the EWBG toolkit. The assessment methodology for this indicator within the toolkit states: Record the main tree and shrub species present in the upper canopy (>5m) within each survey plot.
- 1.47 Based on the above, the assessment of criterion D, should be made based on the total number of native tree or shrub species in the upper canopy recorded within the 10m radius sample points.
- 1.48 Fundamentally, Criterion D is a measure of woody species richness, which, in common with all vegetation sampling, is more effectively standardised across woodlands by collecting the information across representative sample points.
- 1.49 In summary, woodland condition assessment under the Statutory Biodiversity Metric guidance follows the EWBG methodology, which requires the use of representative 10m radius sample

points. Criterion D should therefore be assessed using the number of native tree and shrub species recorded in the upper canopy within these sample points, ensuring a consistent and standardised measure of woody species richness across woodlands.

2.0 CONCLUSION

2.1 In response to the comments received from MEAS, we conclude that:

- A 15m natural buffer around all onsite and offsite ancient woodland has been incorporated into the scheme.
- The provision of a Recreational Management Plan for onsite and nearby ancient woodlands would not be practicable at outline planning stage; however, this could be incorporated at reserved matters stage.
- As no loss or deterioration of ancient woodland is considered likely, demonstration of wholly exceptional circumstances is not applicable.
- Local rather than county level importance was assigned to foraging and commuting bats on the basis that there was overall low-level usage of the site by generally common and widespread bat species. Including a value of the overall bat assemblage would not alter the impact assessment or mitigation previously recommended in the ecology chapter.
- The scheme design will be amended to increase the extent of the habitat buffer which connects onsite ancient woodlands to Knowsley Park LWS, thereby providing a 57m corridor which could allow for a 20 m dark corridor.
- The provision of an indicative lighting plan would not be practicable at outline planning stage, however recommendations for provision of a detailed lighting plan at reserved matters stage are included within the Ecology chapter.
- A bird mitigation strategy has been provided as an addendum to give further detail on mitigation and compensation measures for both breeding and wintering birds.
- The BNG calculation has been updated, addressing the changes to strategic significance and individual trees. This has resulted in a slight loss on hedgerows and an overall increase in habitat gain.
- Following the EWBG methodology, it is considered that criterion D of the woodland condition assessment 'Number of native tree species' has been correctly assessed and amendment to the score is not required.

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