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16th February 2024

23/00456/FUL - Ecological Addendum for Vacant Land at Alchemy Way, Knowsley Industrial Park, Kirby, Knowsley – Rev.B

Introduction & Background

Rachel Hacking Ecology Limited (RHE) was commissioned in 2023 by Network Space to provide a response to the consultation responses provided by Merseyside Environmental Advisory Service (MEAS), with regards to the proposed planning application at Alchemy Way, Knowsley (Application number: 23/00456/FUL). The proposals comprise the erection of 2 no. units with ancillary office space, car parking and vehicular, pedestrian circulation with access onto Alchemy Way.

The following ecological report was submitted in support of the planning application, produced by Rachel Hacking Ecology:

- *Extended Phase 1 Habitat Survey of Land at Alchemy Way, Knowsley 2022 REV.A*

After reviewing this document, MEAS provided two responses to the application. Both responses are summarised below, with RHE receiving them both on 7th December 2023:

MEAS Consultation response dated 5th October 2023

In their October 2023 response, MEAS mainly queried the following; 1) validity of the survey timings, 2) absence of a data search, specifically regarding non-statutory protected sites and 3) the requirement for an updated PEA. MEAS pointed out that three Local Wildlife Sites lie within 300 metres of the site, with one (Kraft Operational Land LWS) lying adjacent to the eastern boundary of the site. MEAS went on to explain their

concerns, such as a lack of mitigation and protection of the LWS, consideration of mobile species, and lack of a habitat buffer between the development and the LWS. A higher quality landscaping strategy was requested as well as recommended planning conditions such as a Construction Environment Management Plan (CEMP). MEAS also raised previous mitigation that has not been delivered i.e. 2ha of grassland and requested a Biodiversity Net Gain assessment.

MEAS Consultation response dated 23rd November 2023

As part of the second MEAS response, MEAS revised their comment on validity and agreed the survey data is still valid. However, MEAS continued to request an updated PEA or an addendum report, with limitations included. MEAS reiterated the need for an adequate buffer to the adjacent LWS (taking into account the applicants' concerns regarding viability) and reiterated their request for suitable landscaping and protection measures.

RHE Response

Survey validity

It is not considered necessary to carry out updated surveys at the site. The initial site visit was carried out on the 25th May 2022 and therefore, the data is 21 months old (at the time of producing this document). The surveyor confirms that the assessment of the site should still be considered relevant due to the habitat types present on the site and the age of the data and certainly would have been considered still relevant at 18 months old when the comments were originally put forward by MEAS.

Protected sites

The proposals are adjacent and close to designated sites the measures proposed to protect these habitats is indicated below:

- **Kraft Operational Land Local Wildlife Site (LWS):** this proposed development site lies immediately east of this LWS. A CEMP will be used to protect the development during the proposed works. The CEMP will be robust and will need to be approved by the LPA prior to work commencing. It should be imposed by a suitably worded condition.
- **Otis Meadow LWS:** this lies approximately 30m from the northern boundary of the site - should be protected with a buffer habitat and CEMP as indicated within the PH1 report.
- **Knowsley Brook LWS:** this lies approximately 300m to the south of the site. The East Lancs Road and areas of infrastructure lie between the site and the Knowsley Brook there is expected to be no deleterious impacts (directly or indirectly) on the Brook as a result of the proposed development.

Buffer Zones

The site has been the subject of the previous hybrid application (16/00567/HYB), with off-setting and mitigation for this application including the creation of the bund on the northern boundary, which was seeded with wildflower seed harvested from the site. Trespassing on the site has unfavourably impacted upon the viability of the mitigation work and has limited the value of this embankment as a mitigation feature. Unfortunately, Japanese Knotweed has also established, an invasive non-native species (INNS).

However, the embankment offers a sufficient buffer zone for Otis Meadow LWS to the north and with enhancements to the landscaping along the bank (removal of the INNS and increasing biodiversity provision with planting and seeding) will offer a dedicated wildlife corridor between Otis Meadow and Kraft Operational Field LWS.

Kraft Operational Field LWS, to the west of the site, will be protected and enhanced with a species-rich native hedgerow along the western boundary of the site. This hedgerow provides a wildlife dispersal route, linking to the wildlife corridor (see below) and enhances the LWS through inclusion of a more species-rich habitat. In addition, the tree protection area for the Kraft Operational Field LWS indicates the construction of the unit will have no direct impact on the adjacent trees (G4 within the Arb report). The RPA for G4 will provide a buffer zone and the LWS will be protected with a CEMP.

Habitat connectivity

The site currently provides a habitat link between Otis Meadow LWS and Kraft Operational Field LWS. The proposed development will not sever the link between these two sites and the proposed planting along the northern and western boundaries will provide cover from predation as well as improve foraging opportunities. This area of site will continue to be undisturbed and unlit (see Figure 1).



Figure 1 indicating the post development wildlife corridor (yellow) between the LWS sites (Blue) and the site (red line)

Badger and other mammals

Only a single Badger pawprint was located on the site during the survey. Due to the limited evidence of field signs, it is not considered that the site is an important foraging resource for Badger in the locality. Foraging habitat of equal or greater quality lies to the north and west of the site (woodland and grassland mosaic), within the LWS's. The proposed wildlife corridor along the northern boundary (where the bund exists) and the western boundary (where the RPA exists) will ensure that Badger and other mammals are free to move between the two sites easily. Given no Badger sett will be impacted upon by the development, no further Badger survey work is considered necessary. General mitigation measures can be implemented within the CEMP such as Reasonable Avoidance Measures (RAMs).

Construction and Environmental Management Plan (CEMP)

The CEMP will detail the measures, the persons responsible and the operations that will be in place on the site to protect the LWS's from harm. It will highlight any proposed activities on the site from site set-up to completion which could potentially be damaging to the LWS sites to the northern and western boundaries. The practical measures that will be implemented to avoid (or reduce) the impact of the identified damaging activities, who will be responsible for implementing these measures on site and when.

Examples of measures to be included with the CEMP are a clear and easily available list of which activities or locations of the site will require an ecological clerk of works (ECow) to be present or identifying any times of

the when the risk of carrying out the activities is reduced such as clearing vegetation outside of the bird nesting season.

Biodiversity Enhancements

Recommendations for biodiversity enhancement on the site include:

- Where practicable using native species in the landscaping proposals.
- Removal of the invasive species on the site (Japanese Knotweed) will increase the condition of the existing habitats on site therefore increasing the biodiversity units.
- Inclusion of bat and bird boxes on the new building.

Delivery of the mitigation measures laid out within application 16/00567/HYB

This existing bund to the north of the site falls within the ownership of Network Space who have seeded the bund with wildflower. Network Space are aware of trespassing issues and that this has impacted upon the growth of the wildflower in places, but as they are the landowner and this land will remain within their control, therefore it is hoped this gives MEAS comfort that this will be maintained to a sufficient standard.

Network Space will provide an updated Location Plan showing the application site within the red line and all their other land holdings included within a wider blue line. This will explicitly show the implemented bund to the north of the application site and hopefully make it clearer to MEAS that the connectivity here is enhanced and an additional bund to the north is therefore not practical in this location.



Kate Reed (Senior Ecologist)

5th February 2024