

United Environmental Services Ltd

1 Booths Park,
Chelford Road,
Knutsford,
Cheshire
WA16 8QZ

www.ues.org.uk

enquiries@ues.org.uk

01565 757788



DRAFT BIODIVERSITY GAIN PLAN

At

Land off Marl Road

Knowsley Industrial Park
Knowsley
Merseyside
L33 7SY

NGR: SJ 43258 99477

Prepared for:	FI Real Estate Management Ltd.
Written by:	Osian Shirley, UES Graduate Ecologist
Approved by:	Tom Kenwright, UES Senior Ecologist

Tom Kenwright

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1 INTRODUCTION

1.1 Author and qualifications

This report is compiled and written by Osian Shirley MSci, Graduate Ecologist for United Environmental Services Ltd (UES).

It has been verified by Tom Kenwright MBiol, UES Senior Ecologist. Tom holds a level 6 Botanical Society for Britain and Ireland (BSBI) field identification skills certificate (FISC). Level 6 is only awarded in exceptional circumstances where the surveyor is a very competent professional field botanist and is of national status.

1.2 Proposed development

A planning application has been submitted to Knowsley Council (reference number 25/00550/FUL) for temporary (3-year) use of land for containerised self-storage and associated works.

1.3 Document objectives

This Biodiversity Gain Plan (BGP) has been prepared to support the planning application for the proposed development at Land at Marl Road, Knowsley. It sets out how the project will comply with the biodiversity net gain (BNG) requirements established under the Environment Act 2021 and associated secondary legislation. As planning permission has not yet been granted, this document is provided in draft form and will be updated, where necessary, prior to discharge of the statutory Biodiversity Gain Condition.

The purpose of this draft BGP is to:

- Demonstrate how the development will achieve a minimum 10% net gain in biodiversity units, in accordance with statutory requirements.
- Summarise the baseline ecological conditions and quantify the biodiversity losses and gains using the Statutory Biodiversity Metric.
- Explain the approach to on-site and off-site habitat creation and enhancement, including how long-term management will be secured.
- Set out the proposed governance, monitoring, and legal mechanisms that will secure BNG delivery for a minimum of 30 years.



2 PLANNING POLICY

Paragraph 180 of the National Planning Policy Framework (NPPF, 2023) set out requirements for the delivery of BNG. In England, BNG is mandatory under a statutory framework introduced by Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021).

Under the statutory framework, subject to some exceptions, every grant of planning permission is granted subject to the condition that the biodiversity gain objective is met (Biodiversity Gain Condition). This objective is for development to deliver at least a 10% increase in biodiversity value relative to the pre-development biodiversity value of the on-site habitats.

Mandatory BNG only applies for planning permission applications made on or after 12th February 2024. Permissions granted for applications made before this date are not subject to BNG. A temporary exclusion applies for non-major developments whereby mandatory BNG only applies for planning permission applications made on or after 2nd April 2024.

The Environment Act 2021 sets out the following key components to mandatory BNG:

- Minimum 10% gain required calculated using DEFRA Statutory Biodiversity Metric & approval of net gain plan
- Habitat secured for at least 30 years via obligations / conservation covenant
- Habitat can be delivered on-site, off-site or via statutory biodiversity credits
- There is a national register for net gain delivery sites
- The mitigation hierarchy still applies of avoidance, mitigation and compensation for biodiversity loss
- Also applies to Nationally Significant Infrastructure Projects (NSIPs)
- Does not apply to marine development
- Does not change existing legal environmental and wildlife protections

3 METHODOLOGY – ON-SITE HABITATS

3.1 Baseline assessment

3.1.1 Habitat & hedgerow units

A UK Habitat (UKHab) classification survey of the proposed development site was undertaken by UES Senior Ecologist Tom Kenwright and UES Graduate Ecologist Osian Shirley. This was undertaken as part of a Preliminary Ecological Appraisal (PEA), with a site walkover survey conducted on the 22nd January 2026. The survey and habitat mapping followed the UKHab methodology, providing a standardised approach that is suitable for use within the Statutory Biodiversity Metric.

A UKHab plan showing all habitats recorded on-site during the survey is provided at Appendix 1.

Full descriptions of all habitats recorded on-site are provided in the PEA report that has been prepared for the site (report reference UES05235/01).

3.1.2 Previous survey information

The 2026 PEA survey and BNG condition assessments undertaken by UES form an update to a previous PEA produced by Biora Ltd in August 2021 (report reference: SE0950-01_E0a_PEA_AS Marl Road, Knowsley) to support a previous application for an electricity generation plant on the same site (planning application reference: 21/00718/FUL).

3.1.3 Habitat degradation

Recent works to cover parts of the site with crushed stone have resulted in the removal of ephemeral vegetation, grassland and small areas of woodland. These activities were not undertaken in accordance with an approved planning permission that has been implemented in full, and they occurred after the statutory BNG baseline cut-off date of January 2020. As the unauthorised works led to the loss or degradation of habitats before UES could complete an updated UKHab survey, the baseline for the affected areas has been derived from the habitats assessed to have been present immediately prior to the works.

Retrospective habitat classification and condition assessment have been informed by the 2021 Preliminary Ecological Appraisal undertaken by Biora Ltd, supplemented by aerial imagery, the condition of retained offsite habitat present during the 2026 updated PEA survey, and professional ecological judgement. A precautionary approach has been applied throughout, including the assumption of higher habitat condition where evidence to the contrary was not available.

The habitats used to inform the baseline assessment are shown on the UKHab plan in Appendix 2.

Details of retrospective baseline condition assessment data for on-site habitats is provided at Appendix 3.

3.2 Post-development assessment

The post-development habitat assessment for the on-site Metric calculation was derived from the indicative landscape plans produced by Domus Architecture in 2025 (see Drawing No. 2143-A1-03-C Site Layout as Proposed).

Habitat areas were calculated by digitising the scaled indicative landscaping drawings. Target condition scores were assigned using the Statutory Biodiversity Metric habitat condition criteria and achievable management intentions. Only condition criteria that are realistically achievable within the required timeframes were passed. Details are provided within the user comments section on the relevant tab of the Metric.

All post-development habitat parcels were entered into the Statutory Biodiversity Metric as either:

- Habitat creation - new habitats replacing existing habitats; or
- Habitat enhancement - where an existing habitat is to be retained and improved in condition or distinctiveness.

A UKHab plan illustrating all proposed on-site post-development habitats is provided at Appendix 4.

3.3 Strategic significance

Following publication of the Liverpool City Region Local Nature Recovery Strategy (LNRS), strategic significance scores for all baseline and proposed habitat creation and enhancement areas have been assigned using the LNRS spatial priorities and the criteria set out in Table 7 of the BNG User Guide.

3.3.1 Baseline habitats

In accordance with the following wording within the BNG User Guide, baseline scores for all on-site habitats have been assigned low strategic significance i.e. 'Area/compensation not in local strategy/ no local strategy':

"Once an LNRS has been published, the baseline strategic significance values for habitat parcels in that area should always be scored as low."

3.3.2 Post-development habitats

The proposed habitats on-site were assessed individually against the Liverpool City Region LNRS spatial data and the strict criteria in Table 7 of the BNG User Guide.

The proposed development site does not lie within any LNRS opportunity zones for the habitats that are due to be created onsite. A very small section in the south-eastern corner of the site lies within the Urban (17d) opportunity zone, however there will be no proposed habitat creation within this area. As such, all proposed on-site habitat creation and enhancement have been assigned low strategic significance i.e. 'Area / compensation not in local strategy'.



3.4 Limitations

The UKHab mapping and condition assessment of on-site habitats was undertaken outside the optimal period for botanical assessment, however this is not considered to represent a significant constraint due to the low ecological value and simple structure of the habitats present, the need for a retrospective assessment of habitats due to clearance works, combined with the experience of the lead surveyor.

As such, no significant limitations were identified that would affect the robustness of the Biodiversity Net Gain assessment or the surveys used to inform it.



4 BNG METRIC CALCULATION

4.1 Excluding off-site compensation

The Statutory Biodiversity Metric has been used to assess the biodiversity losses and gains associated with the proposed development. Table 1 below shows that prior to the inclusion of any off-site compensation, the development would result in a net loss of habitat units. There will be no impact on watercourse or hedgerow units as no relevant habitats are present on-site at the baseline or post-development stage.

Table 1 – On-site biodiversity metric outcomes (excluding off-site compensation)

Unit type	Baseline units	On-site units post-development	Post development net change	Post development net change (percentage)	Trading rules satisfied?
Habitat	0.98	0.09	-0.89	-90.87%	No
Hedgerow	0	0	0	0	N/A
Watercourse	0	0	0	0	N/A

4.2 Eligibility of biodiversity units

All habitat creation and enhancement measures included within this draft Biodiversity Gain Plan meet the eligibility requirements of the BNG Regulations and Statutory Biodiversity Metric. No habitats have been counted towards more than one statutory or non-statutory obligation, and none of the proposed measures are required solely for protected species licensing, nutrient neutrality, flood mitigation, or any other regulatory process. All biodiversity units generated are therefore eligible for inclusion within the Statutory Biodiversity Metric and compliant with the requirements for non-duplication and unit eligibility.

5 FURTHER OFFSETTING REQUIREMENTS

The Biodiversity Metric assessment demonstrates that the proposed development cannot achieve the required biodiversity gains through on-site habitat retention, creation, or enhancement alone. Although reasonable opportunities for on-site delivery have been explored, the part retrospective nature of the application and the prior removal of all habitats on-site limits the extent and quality of habitats that can be delivered within the redline boundary.

As such, it is proposed that the residual deficit will be addressed through the purchase of the units from a third-party habitat bank, where suitable units are available.

The type and number of units required are detailed below in Table 2.

Table 2 – Further offsetting requirements

Unit type	Distinctiveness / Habitat type	Units required	Required Replacement
Habitat	Any	0.6	Can be provided by units of any habitat type and distinctiveness.
Habitat	Woodland – other woodland, broadleaved – Medium distinctiveness	0.23	Must be the same broad habitat type and distinctiveness, or any high distinctiveness habitat.
Habitat	Grassland – other neutral grassland – Medium distinctiveness	0.25	Must be the same broad habitat type and distinctiveness, or any high distinctiveness habitat.

If sufficient third-party units cannot be sourced at the time of discharging the Biodiversity Gain Condition, the remaining deficit will be met through the purchase of statutory biodiversity credits from the UK Government as a last resort. Evidence of securing the required units will be provided within the final BGP submitted post-determination of the planning application.

This approach ensures that the development can fully comply with the statutory requirement to achieve a minimum 10% net gain across all unit types.

6 LONG-TERM MANAGEMENT & MONITORING

Long-term management and monitoring are essential components of delivering the biodiversity outcomes and achieving the BNG requirements. All created habitats will be actively managed for a minimum of 30 years to ensure they reach and maintain their target condition. This section summarises the overarching management and monitoring approach.

A draft Habitat Management and Monitoring Plan (HMMP) will be prepared to accompany this draft BGP. This draft HMMP will set out the proposed management objectives, prescriptions, monitoring indicators, and success criteria for all on-site habitats that contribute to achieving the 10% BNG. It will provide a framework for the long-term stewardship of the site and will be refined as the project progresses, with an updated report submitted post determination of the planning application but prior to discharge of the pre-commencement Biodiversity Gain Condition.

All on-site habitat creation and enhancement measures will be managed in accordance with the prescriptions set out in the draft HMMP. The proposed management approach will focus on:

- Establishing newly created habitats (species-rich wildflower grassland);
- Maintaining and improving habitat condition over time;
- Controlling invasive sub-optimal species;
- Ensuring appropriate cutting, or vegetation management regimes; and

Monitoring will be undertaken at scheduled intervals to assess progress towards target condition. Monitoring will include:

- Condition assessments using the Statutory Biodiversity Metric criteria;
- Checks on establishment success (e.g. grassland species composition); and
- Review of management effectiveness.

Monitoring results will be used to inform adaptive management, ensuring that interventions remain effective and habitats continue to develop towards their intended condition.

Monitoring of on-site and off-site habitats will be undertaken at intervals appropriate to the habitat type and stage of establishment. Monitoring will include:

- Early-stage establishment checks (Years 1–5)
- Periodic condition assessments (e.g. every 3–5 years thereafter dependent on habitat type)
- A final assessment at Year 30.

Monitoring outcomes will be used to confirm progress, identify any corrective actions, and ensure that all habitats continue to meet the requirements of the Statutory Biodiversity Metric.



7 LEGALLY SECURING BNG

The measures set out in this draft BGP can be secured through the planning application and associated conditions. This will secure the delivery, long-term management, and monitoring of all significant on-site habitat creation measures relied upon in the Metric calculation.

The information presented within this draft BGP is sufficient to enable the Local Planning Authority to determine the planning application. It includes a complete baseline assessment, a detailed post-development assessment, identification of all habitat creation measures, and a clear summary of the biodiversity units to be delivered on-site. A draft HMMP will also be prepared to accompany this submission, providing an initial framework for the long-term stewardship of the on-site habitats.

Following the grant of planning permission, the Biodiversity Gain Condition will be applied, requiring further detailed information to be submitted prior to commencement of works. To discharge this condition, a full and final BGP will be prepared, incorporating the finalised habitat designs, updated Metric calculations, confirmation of secured off-site land, and evidence that the required biodiversity units can be delivered. A finalised HMMP will also be prepared for the on-site habitats, setting out detailed management prescriptions, monitoring requirements, success criteria, and adaptive management measures.

8 SUMMARY & CONCLUSIONS

This draft BGP for the proposed development at Land at Marl Road, Knowsley demonstrates that the scheme has been designed and assessed in full accordance with the statutory requirements introduced under the Environment Act 2021. A comprehensive and up-to-date ecological baseline has been established for all on-site habitats through detailed UKHab mapping and condition assessment, supplemented where necessary by precautionary retrospective evaluation of areas affected by historic unauthorised works.

The post-development scenario has been derived directly from the indicative landscape design, with each habitat assigned a realistic target condition based on the Statutory Biodiversity Metric criteria and the long-term management regime. Strategic significance scores have been applied in accordance with the Liverpool City Region LNRS and the BNG User Guide.

To address the residual biodiversity losses that cannot be compensated for within the development boundary, additional units will be secured from a third-party habitat bank.

The combined on-site and proposed off-site measures will result in a measurable net gain in biodiversity units that meets the statutory minimum 10% requirement. All habitats contributing to BNG delivery will be secured and managed for a minimum of 30 years through an appropriate legal mechanism, supported by a long-term management and monitoring framework that includes periodic condition assessments and adaptive management.

This draft BGP provides a robust strategy for achieving biodiversity net gain associated with the proposed development. It demonstrates that the baseline has been accurately established, that habitat creation and enhancement have been maximised and that the resulting net gain will be secured and maintained for the required duration. The proposals therefore meet all statutory BNG obligations.

Together, this draft Biodiversity Gain Plan and the forthcoming draft HMMP provide sufficient information for the Local Planning Authority to determine the relevant planning application, with the understanding that updated versions of these documents will be submitted and purchase of offsite units will be legally secured prior to discharge of the Biodiversity Gain Condition and commencement of works on-site.



APPENDICES

Appendix 1 – On-site UKHab Survey Plan



On-site UKHab Survey Plan

Site: Land off Marl Road,
Knowsley
NGR: SJ 43258 99484
Author: Osian Shirley
Date: 18/03/2026



Key

-  w1g - other broadleaved woodland
-  u1c - artificial unvegetated unsealed surface
-  32 - scattered trees
-  Development boundary

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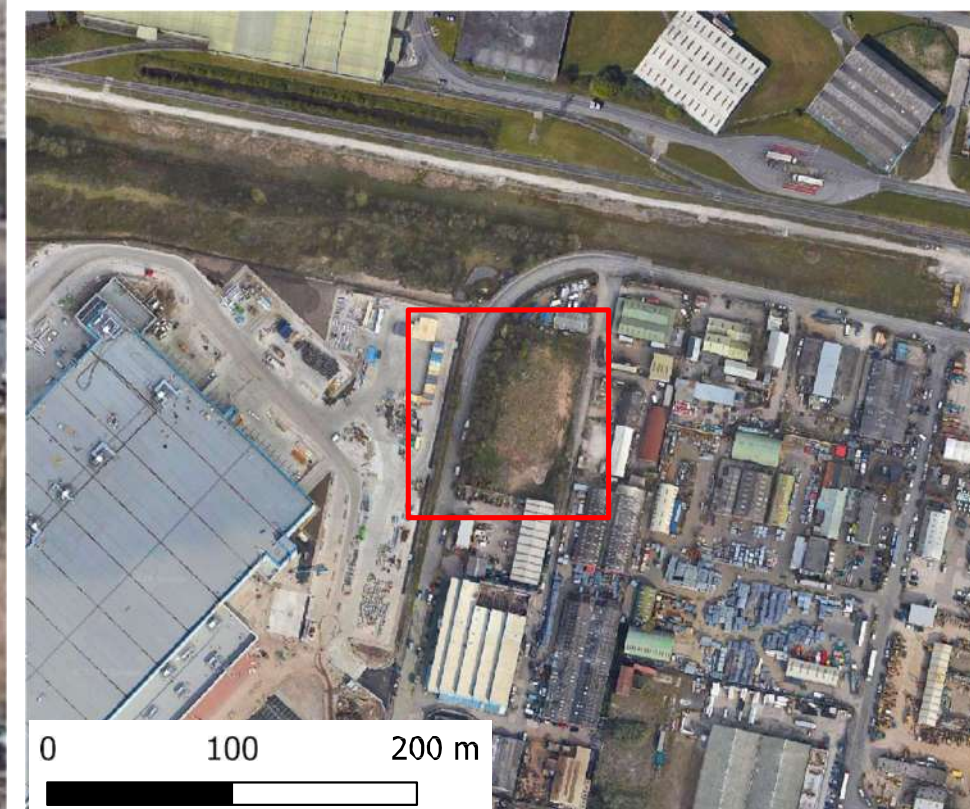


Appendix 2 – On-site BNG Baseline UKHab Plan



On-site BNG Baseline UKHab Plan

Site: Land off Marl Road,
Knowsley
NGR: SJ 43258 99484
Author: Osian Shirley
Date: 18/02/2026



Key

- g3c - other neutral grassland
- w1g - other broadleaved woodland
- u1b - developed land. sealed surface
- u1f - sparsely vegetated urban land
- Development boundary

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Appendix 3 – On-site Retrospective Baseline Condition Assessment

Table 3 – Other neutral grassland retrospective condition assessment

Condition criteria	Pass / Fail	Justification
A - The parcel represents a good example of its habitat type, with a consistently high proportion of characteristic indicator species present relevant to the specific habitat type (and relative to Footnote 3 suboptimal species which may be listed in the UKHab description). Note - this criterion is essential for achieving moderate or good condition for non-acid grassland types only.	Fail	Photos, descriptions and the species list of the grassland from the Biora 2021 PEA survey suggest that the grassland had somewhat recently formed over previously disturbed ground and contained a variety of grasses, forbs and some encroaching butterfly bush <i>Buddleja davidii</i> and bramble <i>Rubus fruticosus</i> agg. The grassland was predominantly dominated by ruderal and annual species, most of which are indicative of disturbed ground and / or nutrient enrichment e.g. broadleaved dock <i>Rumex obtusifolius</i>, stinging nettle <i>Urtica dioica</i>, spear thistle <i>Cirsium vulgare</i>, hedge bindweed <i>Calystegia sepium</i>, and common poppy <i>Papaver rhoeas</i>. Species indicative of higher quality grassland appear to have been limited in abundance and diversity, and only included species commonly associated within early successional grasslands. This was limited to ribwort plantain <i>Plantago lanceolata</i> and black medick <i>Medicago lupulina</i>. Given the early successional state, lack of characteristic indicator species and abundance of sub-optimal species, it is considered that the grassland would have failed this criterion.
B - Sward height is varied (at least 20% of the sward is less than 7 cm and at least 20% is more than 7 cm) creating microclimates which provide opportunities for insects, birds and small mammals to live and breed.	Pass	Given its early successional state and succession from bare ground, the grassland had a varied sward height, as visible in the photos from the Biora 2021 PEA survey.
C - Cover of bare ground is between 1% and 5%, including localised areas, for example, rabbit warrens.	Fail	Given its early successional state and succession from bare ground, the grassland contained numerous areas of bare ground greater than 5% in area, as is visible in the photos from the Biora 2021 PEA survey.
D - Cover of bracken <i>Pteridium aquilinum</i> is less than 20% and cover of scrub (including bramble <i>Rubus fruticosus</i> agg.) is less than 5%.	Fail	The 2021 PEA report from Biora details the encroachment of bramble and butterfly bush within the grassland, very likely accounting for more than 5% of the area given the small size of the grassland parcel.
E - Combined cover of species indicative of suboptimal condition and physical damage (such as excessive poaching, damage from machinery use or storage, damaging levels of access, or any other damaging management activities) accounts for less than 5% of total area.	Fail	The 2021 Biora PEA report details the presence of Himalayan balsam <i>Impatiens glandulifera</i> within part of the grassland and the photos show that other species indicative of nutrient enrichment (stinging nettle, broadleaved dock, spear thistle etc). account for more than 5% cover.

If any invasive non-native plant species (as listed on Schedule 9 of WCA) are present, this criterion is automatically failed.		
F - There are 10 or more vascular plant species per m² present, including forbs that are characteristic of the habitat type (species referenced in Footnote 3 and 5 cannot contribute towards this count). Note - this criterion is essential for achieving good condition for non-acid grassland types only.	Pass	Given the self-established and early successional nature of the grassland that has colonised recently disturbed ground, a wide variety of grasses, tall forbs, annual species and encroaching scrub species are present. From the species list and photos in the Biora 2021 PEA report, it is considered very likely that the grassland would have passed this criterion.

Table 4 – Other broadleaved woodland retrospective condition assessment

Condition criteria	Condition score (1-3)	Justification
A – Age distribution of trees	Poor (1 point) – One age-classes present.	The retained areas of woodland have a single age-class of trees present and historical aerial imagery suggest that the woodland that has been removed was of the same age and condition.
B - Wild, domestic and feral herbivore damage	Good (3 points) - No significant browsing damage evident in woodland.	Browsing by herbivores would have been very unlikely given the urban locality of the site and fences at the site boundary.
C - Invasive plant species	Moderate (2 points) – <i>Rhododendron ponticum</i> , cherry laurel <i>Prunus laurocerasus</i> not present, and other invasive species <10% cover.	The PEA survey undertaken by Biora in 2021 found small quantities of Himalayan balsam to have been present at the edges of the woodland. Based on the details within the report, the photos and the absence of Himalayan balsam within the retained areas of woodland, it is considered unlikely that this accounted for more than 10% cover.
D - Number of native tree species.	Good (3 points) – Five or more native tree or shrub species found across woodland parcel.	The Biora 2021 PEA survey identified numerous native tree and shrub species within the woodland, including the following: Wild cherry <i>Prunus avium</i> , oak <i>Quercus sp.</i> , hawthorn <i>Crataegus monogyna</i> , alder <i>Alnus glutinosa</i> , willow <i>Salix sp.</i> , rowan <i>Sorbus aucuparia</i> , Hazel <i>Corylus avellana</i> , dogwood <i>Cornus sanguinea</i> , birch <i>Betula sp.</i>

E - Cover of native tree and shrub species	Moderate (2 points) – 50-80% of canopy trees and 50-80% of understory shrubs are native.	Whilst numerous native species are present, sycamore is frequent within the retained areas of woodland, accounting for more than 20%.
F - Open space within woodland	Good (3 points) - 10 – 20% of woodland has areas of temporary open space. Unless woodland is <10ha, in which case 0 - 20% temporary open space is permitted.	Woodland parcel was less than 10ha and there is no evidence to suggest that more than 20% open space was present throughout.
G - Woodland regeneration	Moderate (2 points) – One of two classes only present in woodland; trees 4 - 7 cm Diameter at Breast Height (DBH), saplings and seedlings or advanced coppice regrowth.	The retained areas of woodland only show one or two age class present, and this appears consistent with the photos from the Biora 2021 PEA.
H - Tree health	Moderate (2 points) – 11-25% tree mortality and or crown dieback or low-risk pest or disease present.	Numerous trees within the retained woodland are damaged or dead.
I - Vegetation and ground flora	Poor (1 point) - No recognisable woodland NVC plant community at ground layer present.	The woodland is relatively young and appears to have been planted or self-seeded on previously developed land. As such, the ground flora is limited and contains no ancient woodland indicator species. No recognisable NVC community is present.
J - Woodland vertical structure	Poor (1 point) – One or less storey across all survey plots.	Given the young age of the woodland, and likely planted or self-seeded origins, the trees are all a single age and a single canopy storey is present, with a predominantly absent understory. This was evidence within the retained areas of woodland on site and is supported in the photos from the Biora 2021 PEA.
K – Veteran trees	Poor (1 point) – No veteran tree per hectare.	Given the young age of the woodland, no veteran trees are considered to have been present.
L – Amount of deadwood	Moderate (2 points) – Between 25% and 50% of all survey plots within the woodland parcel	Some deadwood was present within the retained areas of woodland.

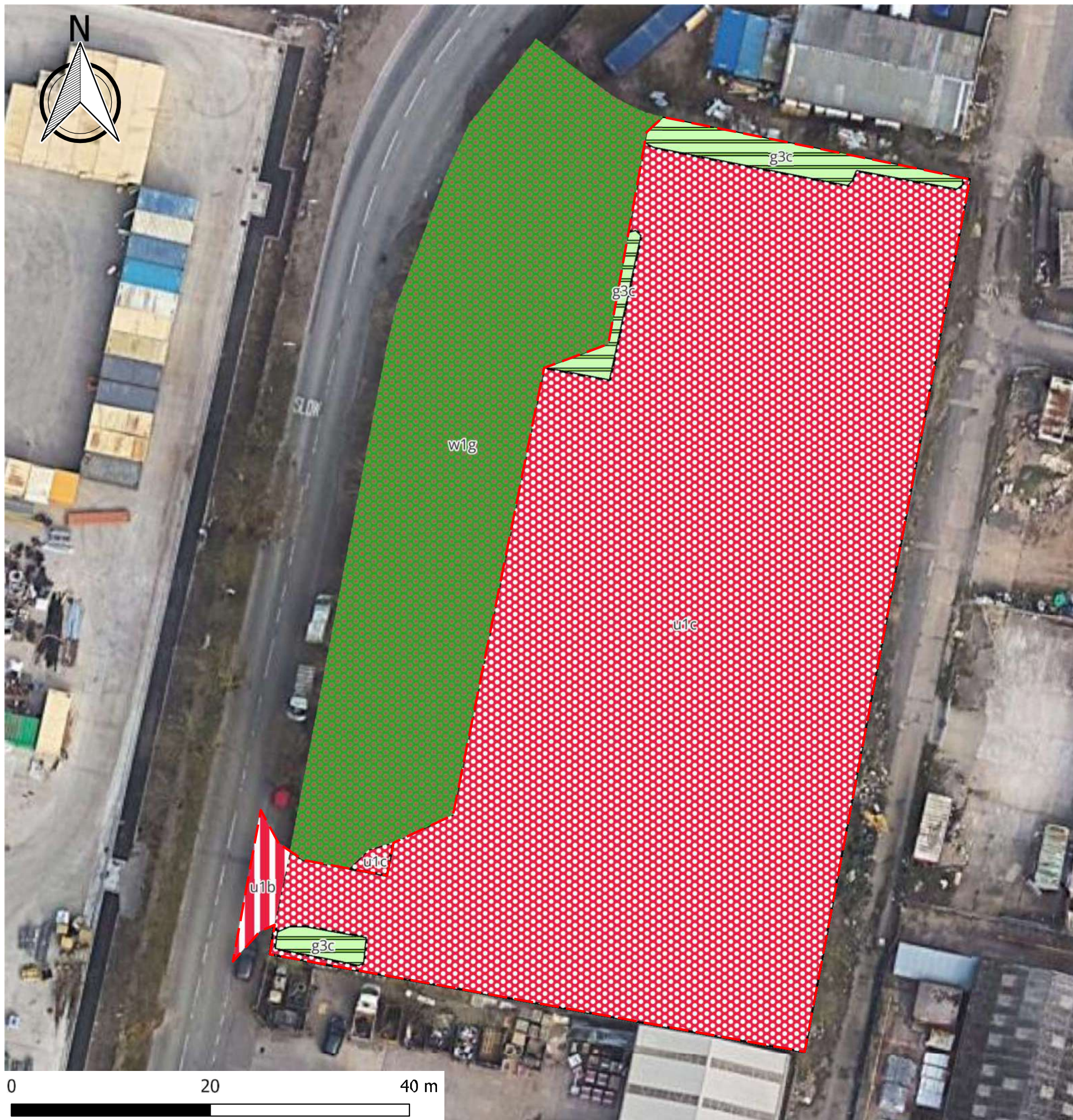
	have deadwood, such as standing and fallen deadwood, large dead branches and or stems, stubs and stumps, or an abundance of small cavities.	
M – Woodland disturbance	Poor (1 point) – 1 hectare or more of nutrient enrichment, and or 20% or more of woodland area has damaged ground.	The retained areas of woodland show signs of both recent and historic disturbance and significant levels of waste and discarded materials. Ground flora species present suggest nutrient enrichment, including stinging nettle.

Table 5 – Ruderal / ephemeral retrospective condition assessment

Condition criteria	Pass / fail	Justification
A – Vegetation structure is varied, providing opportunities for vertebrates and invertebrates to live, eat and breed. A single structural habitat component or vegetation type does not account for more than 80% of the total habitat area.	Fail	At the time of the Biora PEA in August 2021, this habitat was mapped as artificial, unvegetated, unsealed surface, suggesting less than 10% cover of vegetation. Photos of this area within the 2021 PEA report confirm this and show a large area of predominantly unvegetated bare ground. As such, any vegetation present would have to have colonised and established after August 2021 and prior to site clearance in late 2025. As such, a varied vegetation structure is unlikely to have formed in this period. Historical aerial imagery of the site supports this and shows that a single vegetation type of ephemeral vegetation covered the entire area.
B – The habitat parcel contains different plant species that are beneficial for wildlife, for example flowering species providing nectar sources for a range of invertebrates at different times of year.	Pass	Given the species observed within the adjacent areas of self-established grassland, which likely spread to colonise these areas, it is considered very likely that a range of flowering species and other plants beneficial to wildlife were present within this habitat.
C - Invasive non-native plant species (listed on Schedule 9 of WCA) and other which are to the detriment of native wildlife (using professional judgement) cover less than 5% of the total vegetated area. Note – to achieve good condition, this criterion must be satisfied by a complete absence of invasive non-native species (rather than less than 5% cover).	Fail	Given the species observed within the adjacent areas of self-established grassland, which likely spread to colonise these areas. Coupled with the species observed within small areas of scattered vegetation at the peripheries of the site during the updated 2026 PEA by UES, it is considered reasonably likely that species indicative of sub-optimal conditions accounted for more than 5% of this habitat.



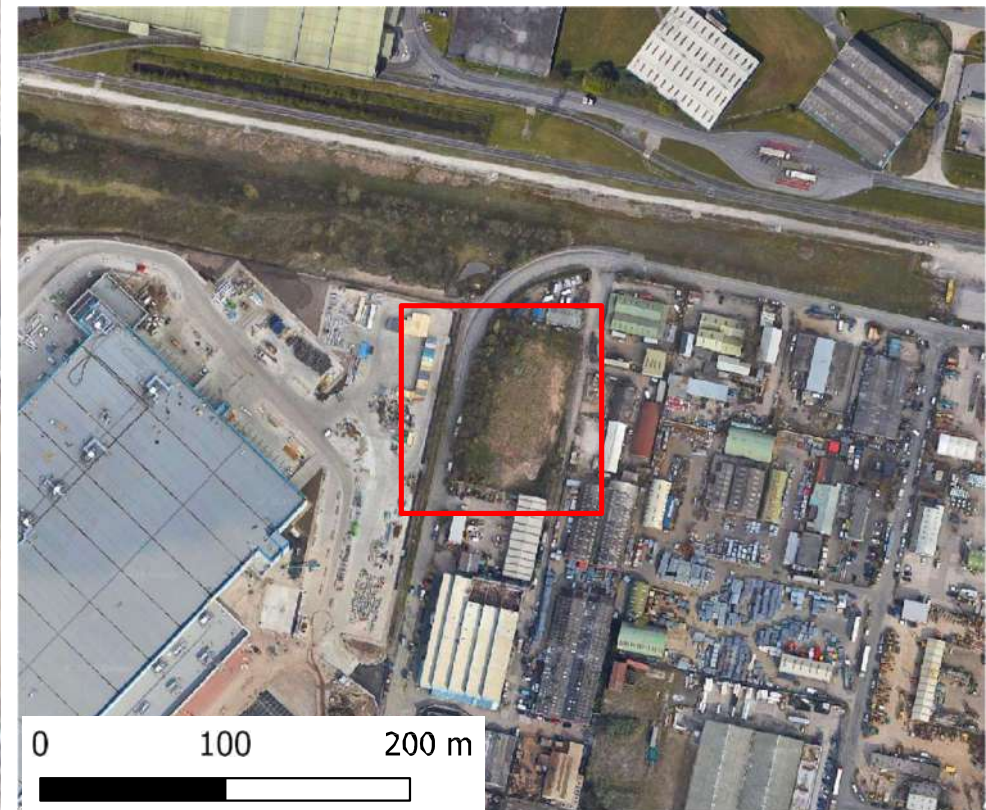
Appendix 4 – On-site Post-development UKHab Plan



On-site Post Development UKHab Plan

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 -  u1b - developed land. sealed surface
 -  u1c - artificial unvegetated unsealed surface
 -  Development boundary

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