



The Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 2017

APPLICATION NUMBER: 25/00233/SO

SITE ADDRESS: Land at Home Farm Road, Knowsley.

DESCRIPTION OF DEVELOPMENT : EIA SCOPING OPINION REQUEST FOR AN INDICATIVE RESIDENTIAL DEVELOPMENT OF UP TO 730NO. RESIDENTIAL DWELLINGS (USE CLASS C3) INCLUDING DETAILS OF ACCESS.

EIA SCOPING OPINION.

SCOPING OPINION. (GENERAL COMMENTS)

The applicant has submitted an EIA Scoping Report (*Pegasus Group on behalf of Hallam Land Management Ltd, dated 26 March 2025 ref: P21-3399*) which has been used to inform this Scoping Opinion.

The EIA Scoping report indicates that the EIA will be based on defined parameters, identifying the extent of different land use areas, maximum building heights, proposed ground levels and key landscape mitigation proposals. This will allow key elements of the proposal to be assessed whilst maintaining a degree of flexibility for the applicant. I confirm that this approach along with the proposed methodology, and structure for the Environment Statement (ES), is acceptable.

It is important that the conclusions of the environmental impact assessment are transparent, and that all information used to draw conclusions is clearly presented and objective (including survey/assessment results) to enable third party verification.

I advise the applicant to consult best practice guidance that could assist in the EIA methodology. For example, Environment Agency Best Practice guidance, CIEEM Guidelines for Ecological Impact Assessment.

It is important that an integrated approach is taken to the EIA methodology to ensure consideration of interactions and in-combination effects. In addition, it is necessary to ensure that the results of the assessment are used to inform development design and the master plan.

It is noted that cumulative and in-combination effects will be included in each chapter, and as a summary, which will allow the inter and intra-project effects to be assessed across all topics. The applicant has identified several projects in the area which may have a cumulative impact.

With regard to 22/00163/FUL in table 3.1 it should be noted that the development is now complete.

I concur with the topics identified to be scoped in the EIA.

The following topics are proposed to be **scoped out** of the EIA:

Ground Conditions (no significant effects in EIA terms anticipated. Can be dealt with through standalone assessment outside of the ES);

- Climate (no significant effects anticipated. It is therefore not proposed that climate change will be assessed as an individual topic, however, will be addressed within relevant chapters, as appropriate, such as Water Resources, Air Quality and Ecology & Biodiversity).
- Agricultural Land & Soils (Site is unlikely to include significant areas of contamination. The loss of any best and most versatile (BMV) soils would likely be under 20ha. Consideration should be given to making good use of the BMV soils associated with this loss);
- Lighting (No significant impacts identified. Potential effects on biodiversity will be considered in the Ecology and Biodiversity chapter);
- Material Assets (no effects on any material assets not already covered in other chapters);
- Wind microclimate;
- Daylight, sunlight and overshadowing;
- Electrical interference;
- Waste (to be managed in accordance with applicable legislation and best practice. No significant effects anticipated);
- Vulnerability to Major Accidents and Disasters (no significant effects anticipated).

It is acceptable for waste to be scoped out of the EIA. However, consideration must be given to policies WM8 and WM9 of the Merseyside and Halton Joint Waste Local Plan.

Ecology

The EIA scoping report confirms that the Environmental Statement will include an Ecology and Biodiversity Chapter.

MEAS has previously provided pre-application advice (MEAS reference KN24-021) which identified a number of ecological issues which would be required to be addressed by any future planning application. Chapter 7 of the EIA scoping report has been informed by the MEAS pre-application advice and has incorporated the ecological issues raised by MEAS.

The Scoping report identifies the following issues. This is in line with our previous pre-application advice and agreed:

- Habitat Regulation Assessment;
- Local Wildlife Sites (LWS) on site and adjacent/near to the site;
- The potential for irreplaceable habitat Ancient semi-natural woodland to be present on or adjacent/near to the site;
- The requirement to meet mandatory 10% Biodiversity Net Gain;
- The potential for protected and priority species to be present; and
- The potential for priority habitat to be present.

The EIA scoping report confirms that the following ecological surveys will be updated or completed in 2025:

- Updated desk study;
- Updated UKHAB habitat survey;
- Great crested newt of ponds within 250m of the site;
- Breeding bird survey;
- Wintering bird survey;
- Bat activity survey and roost assessment of any trees;
- Badger presence / likely absence survey;
- Red squirrel presence / likely absence survey; and
- Water vole survey.

I agree with the scope of the surveys required. Surveys must follow relevant best practice guidelines and be carried out by suitably qualified and experienced ecologists. Any deviation from these guidelines must be fully justified.

The applicant should note that ecological surveys are time limited and typically remain valid for 1 to 2 years only, therefore dependent on the time elapsed between the current ecological survey and the submission of the planning application updated survey may be required. Further guidance is available at <https://cieem.net/wp-content/uploads/2019/04/Advice-Note.pdf>

The scoping report states that ecological impact assessment will follow CIEEM guidelines and this is appropriate.

The indicative masterplan shows that habitat linkages between existing woodland and LWS's will be maintained. The EIA scoping states that green infrastructure is likely to include the retention of existing hedgerows and trees where possible and creating new opportunities for ecological enhancement. This is welcomed. However, full comment cannot be provided until final masterplans are submitted.

Air quality can impact on ancient woodland communities (irreplaceable habitat). Should detailed botanical survey confirm existing woodlands on and adjacent / near to the site to be ancient semi-natural woodland then the air quality chapter should also assess impacts on these woodlands and they should be included as a receptor in air quality assessments. This will need to feed into assessment of impacts to ancient semi-natural woodlands (if confirmed) within the ecology and biodiversity chapter.

Archaeology

The EIA scoping report includes Chapter 8 on Cultural Heritage. Section 8.5.9 notes the pre-application advice previously provided by MEAS there are HER entries within the wider area and that the site has the potential to contain archaeological remains. It proposes that this will be covered in the ES. Section 8.6.1 proposes a 1km study area and thereby addresses the concerns previously raised at pre-application stage.

The proposed methodology for the ES with respect to archaeology is acceptable.

TRANSPORT AND ACCESS (NATIONAL HIGHWAYS)

Astute Transport Planning have been appointed by Hallam Land Management Ltd to provide transport and access advice in relation to land at Home Farm Road, Knowsley for residential development. The Environmental Impact Assessment Scoping Report (EIASR) submitted to National Highways produced by Pegasus, with Astute authoring the Transport and Access Chapter, seeks to agree a scope of assessment to enable the land to be promoted for future residential use.

WSP have been commissioned by National Highways, working on the North West Spatial Planning Framework, to review the EIASR to understand the assessment that is to be undertaken and how the proposed development may impact the SRN. In addition, WSP have reviewed the Transport Access and Appraisal Note (TAA), submitted to support that planning application comments and advice have been provided on the parameters to be incorporated into a forthcoming Transport Assessment (TA). This Review Note will draw on some of those points previously raised by WSP.

Access

Vehicular Access

Vehicular access to the site will be provided via two junctions with Knowsley Lane to the west of the site.

The TAA states that more precise vehicular access arrangements will be confirmed in more detail at the appropriate stage of the planning process. Though following an initial assessment, vehicular access will be achieved by:

- Widening the carriageway of Knowsley Lane along the site frontage, within either public highway or land controlled by the Applicant. It is proposed that two priority-controlled junctions with ghost island right-turn facilities will be provided to access the site on Knowsley Lane.
- Provision to accommodate right turning vehicles to Fluker's Brook Lane from Knowsley Lane.
- Installation of a pedestrian crossing island on Knowsley Lane, to the north of the proposed northern site access, to allow pedestrians to safely access the bus stop on Knowsley Lane.
- The residential access roads within the site will be 5.5m wide and include 2.0m wide footways (as a minimum) on each side of the access roads.
- Emergency access to be provided from Home Farm Road or Parklands.

CHAPTER 9: TRANSPORT AND ACCESS

Chapter 9 of the EIASR focuses on Transport and Access. It states that the baseline situation will be considered before the likely environmental impacts of the development during construction and operational phases.

As discussed previously in this Note, WSP have reviewed the Transport and Access Report submitted by Astute. This Note should therefore be read in conjunction with that advice.

Policy and Guidance

It is noted that the EIASR includes reference to the National Highways The Strategic Road Network: Planning for the Future, 2015 Guidance.

WSP request that any assessments carried out comply with National Highways Policy and Guidance. Key elements of that Policy and Guidance are set out below.

DFT CIRCULAR 01/2022, STRATEGIC ROAD NETWORK AND THE DELIVERY OF SUSTAINABLE DEVELOPMENT

Paragraph 55 of the Circular states that:

The company will engage in the relevant screening or scoping process where a potential impact on the SRN is identified. Environmental assessments must be comprehensive enough to establish the likely impacts on air quality, light pollution and noise arising from traffic generated by a development, along with the impacts from any proposed works to the SRN and identify measures to mitigate these impacts. Requirements and advice for undertaking environmental assessments in respect of transport impacts can be found in the DMRB.

NATIONAL HIGHWAYS' PLANNING FOR THE FUTURE

With regards to Environmental Impact the Planning for the Future Guidance sets out that:

- Paragraph 45. Development promoters will need to provide sufficient environmental information to satisfy the relevant local planning authority, and any other consenting authorities, that all environmental implications of the proposals have been appropriately considered.
- Paragraph 46. We will expect to see measures implemented that fully mitigate all environmental impacts arising from and relating to the interaction between developments and the SRN. There are four aspects to this:
 - o The environmental impacts arising from the temporary construction works.
 - o The environmental impacts of the permanent transport solution associated with the development.
 - o The environmental impacts of the road network upon the development itself (for example, vehicle emissions).
 - o The environmental impacts of any decommissioning phase.
- Paragraph 47. If a development promoter wishes to use land within the highway boundary (including landscaped areas) for the storage of construction materials or other such reasons, they should discuss this at the earliest opportunity with the relevant regional spatial planning team.

Baseline Conditions

The EIASR sets out the intention to review the baseline transport and access characteristics of the site including the highway network as well as an analysis of injury accident records. It is noted that the M57 Junction 4 – grade-separated junction is included in the geographical scope of assessment.

WSP Comment: The existing operation of the M57 Junctions 4, 3 and 2 should be included, noting any observed queuing on the slip roads.

As well as existing walking, cycling and public transport opportunities available from the site, WSP would expect Astute to include the following in their upcoming assessment:

- Current traffic flows on links and at junctions within the study area based on recent survey data.
- Queue length survey data for SRN study area junctions.
- Identification of SRN peak hours.

It is expected that the EIA provides an up-to-date analysis of collision data, including causality analysis to identify if there are any patterns or trends, which could be exacerbated by the proposed development and requires further investigation.

The analysis of collision data should also include the SRN (specifically M57 Junctions 4, 3 and 2) using STATS19 data.

Potential Effects

CONSTRUCTION STAGE

The Primary Factors identified that may generate environmental impacts are:

- Transportation of construction materials to and from the Site;
- Travel to and from the Site by the construction workforce;
- Movement of construction materials and the construction workforce within the Site;
- Disruption and disturbance caused by construction traffic including heavy goods vehicles (HGVs) during the construction phase; and
- Increase in proportion of HGVs causing detrimental impact on residential amenity.

WSP Comment: The EIASR confirms that there is an intention to produce a Construction Environment Management Plan, for which the Applicant would accept a Planning Condition. National Highways should be consulted on the details of such Plan.

OPERATIONAL STAGE

The EIASN identifies the SRN as a potential Receptor, that there may be an impact on Driver Delay and safety and that the effect of that may lead to increased delay on the SRN and increase to risk of accidents.

Scope of Methodology of Assessment (including significance criteria)

The assessment methodology is based on the IEMA guidelines which states that in scoping out the extent of assessment 'two broad rules of thumb' can be applied:

- Rule 1 - Include highway links where traffic flows will increase by more than 30% (or the number of heavy goods vehicles will increase by more than 30%); and
- Rule 2 - Include any other specifically sensitive areas where traffic flows will increase by 10% or more.

The IEMA Guidelines set out Driver delay is of importance to the SRN and the IEMA determines that, delays,

‘... are only likely to be significant when the traffic on the network surrounding the development is already at, or close to, the capacity of the system.’. With regards to safety, ‘Professional judgement will be needed to assess the implications of local circumstances, or factors, which may elevate or lessen risks of accidents, e.g. junction conflicts.’

WSP Comment: The points set out above highlight the importance of establishing a baseline that is reflective of current conditions. In order to establish that the data collection set out previously in this Note is essential.

Cumulative Assessment

Consideration will be given to other developments in the area that are due to come forward.

WSP Comment: Confirmation of committed and relevant developments nearby, not allocated in the Local Plan, in line with Circular 01/2022, should be included. Committed developments should be discussed and agreed with the Local Planning Authority, with confirmation included in the EIA.

SUMMARY AND CONCLUSIONS

WSP have reviewed the Transport and Access Chapter of the EIASN and provided comments which should be taken into account when developing the Environmental Statement.

This Note should be read in conjunction with the comments already provided to Astute during the scoping discussions regarding the production of a Transport Assessment. For ease of reference a summary of those comments are set out below:

- Up-to-date policy section to be provided, which includes DfT Circular 01/2022 and Planning for the future documents.
- Baseline traffic conditions to include current traffic flows, queue length survey data of the SRN junctions and existing operation of the SRN.
- Up to date collision data analysis to be provided including the SRN using STATS 19 data.

- TRICS assessment to be updated.
- Evidence to be provided for the routing assignment of the trip distribution and include M57 Junction 3.
- Confirmation of committed developments to be included, through liaison with the Local Planning Authority.
- Confirmation of opening year of development, which should be used in the assessment and include full build out of the proposal.
- Merge-Diverge Assessment to be undertaken of SRN Junctions M57 Junctions 4 and 2.
- How the Local Planning Authority will review and assess the site in light of the land being allocated as 'Safeguarded Land' and not allocated for development before 2028.

KMBC HIGHWAYS

Highways note the EIA Scoping Report Document (ref: P21-3399) and are satisfied that the proposed scope of assessment is appropriate for the proposed development. The methodology is based upon the IEMA (The Institute of Sustainability and Environmental Professionals 2025 - formerly the Institute of Environmental Management and Assessment) New IEMA Guidance: Environmental Assessment of Traffic and Movement 2023.

HISTORIC ENGLAND

We would expect the EIA to contain an examination of the potential impacts upon all heritage assets likely to be affected, including designated heritage assets and their settings together with potential impacts on non-designated features of historic, architectural, archaeological or artistic interest, since these can also be of national importance and make an important contribution to the character and local distinctiveness of an area and its sense of place. This covers buildings, historic open spaces, historic features and the wider historic landscape including below-ground archaeology.

We advise that the local authority's conservation and archaeology advisers are closely involved throughout the preparation of the Environmental Statement. They are best placed to advise on: local historic environment issues and priorities (including access to data held in the Historic Environment Record); how the proposal can be tailored to minimise potential adverse impacts on the historic environment; the nature and design of any required mitigation measures; and

opportunities for securing wider benefits for the future conservation and management of heritage assets.

ENVIRONMENTAL HEALTH

Environmental Health are satisfied with the content of the scoping report.

As part of the Environmental Statement (ES), the applicant will be submitting both an air quality assessment and a noise assessment.

With regard to the noise assessment, we note that if air source heat pumps are proposed for the dwellings, potential noise from the compressor and fan units must be taken into account in the assessment.

Contaminated land has been excluded from the scope of the ES; however, a separate assessment will be undertaken, which is acceptable.

Comments on the Preliminary Geoenvironmental Report

1. Section 6.3 of the Preliminary Geoenvironmental Investigation Report sets out the proposed ground investigation strategy. Whilst we are broadly in agreement with the proposed approach, several matters require clarification as set out below. It would be prudent for these matters to be addressed, and the approach agreed with the LPA prior to undertaking the ground investigation.

Ground Gas

2. It is proposed that ground gas monitoring and subsequent gas risk assessment will be undertaken if significant made ground with a high TOC content is encountered in the area of the identified infilled pond. I advise that clarification is required on the proposed assessment methodology and assessment criterion for TOC which will inform the decision as to whether ground gas monitoring is required or not. The decision not to undertake ground gas monitoring must be fully justified and agreed with the LPA.
3. Should it be proposed to adopt an empirical approach to ground gas characterisation, such as that described in *Contaminated Land: Applications in Real Environments. A Pragmatic Approach to Ground Gas Risk Assessment. RB17. CL:AIRE, 2012*, the approach adopted must be in strict accordance with the guidance document and form an integral part of the ground investigation strategy.
4. Of the 170no. machine dug trial pits proposed, 3no. trial pits have been identified for the purpose of delineating the identified infilled pond. I advise that the need for additional trial pits should be anticipated for this purpose. I acknowledge that

the ground investigation strategy does note that additional exploratory locations will be scheduled as necessary in the light of the ground conditions encountered.

5. Further areas of infilling should be anticipated, and the above approach, once agreed, should be applied to other areas where made ground is encountered.

Re-use of Site Won Topsoil

6. The ground investigation strategy proposes limited sampling of topsoil to confirm its suitability for re-use. Currently at least 20no. samples are proposed to be subject to chemical analysis. I advise that the applicant should ensure that sufficient representative sampling and analysis is undertaken (relative to the volume to be re-used) to demonstrate that it is suitable for its proposed use.

NATURAL ENGLAND

A robust assessment of environmental impacts and opportunities based on relevant and up to date environmental information should be undertaken prior to a decision on whether to grant planning permission.

Further guidance is set out in Planning Practice Guidance on environmental assessment, natural environment and climate change.

Schedule 4 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017, sets out the information that should be included in an Environmental Statement (ES) to assess impacts on the natural environment. This includes:

- A description of the development – including physical characteristics and the full land use requirements of the site during construction and operational phases
- Expected residues and emissions (water, air and soil pollution, noise, vibration, light, heat, radiation etc.) resulting from the operation of the proposed development
- An assessment of alternatives and clear reasoning as to why the preferred option has been chosen
- A description of the aspects of the environment likely to be significantly affected by the development including biodiversity (for example fauna and flora), land, including land take, soil, water, air, climate (for example greenhouse gas emissions, impacts relevant to adaptation, cultural heritage and landscape and the interrelationship between the above factors
- A description of the likely significant effects of the development on the environment – this should cover direct effects but also any indirect, secondary, cumulative, short,

medium, and long term, permanent and temporary, positive, and negative effects. Effects should relate to the existence of the development, the use of natural resources (in particular land, soil, water and biodiversity) and the emissions from pollutants. This should also include a description of the forecasting methods to predict the likely effects on the environment

- A description of the measures envisaged to prevent, reduce and where possible offset any significant adverse effects on the environment
- A non-technical summary of the information
- An indication of any difficulties (technical deficiencies or lack of know-how) encountered by the applicant in compiling the required information

Further guidance is set out in Planning Practice Guidance on environmental assessment and natural environment.

Cumulative and in-combination effects

The ES should fully consider the implications of the whole development proposal. This should include an assessment of all supporting infrastructure.

An impact assessment should identify, describe, and evaluate the effects that are likely to result from the project in combination with other projects and activities that are being, have been or will be carried out. The following types of projects should be included in such an assessment (subject to available information):

- a. existing completed projects;
- b. approved but uncompleted projects;
- c. ongoing activities;
- d. plans or projects for which an application has been made and which are under consideration by the consenting authorities; and
- e. plans and projects which are reasonably foreseeable, i.e. projects for which an application has not yet been submitted, but which are likely to progress before completion of the development and for which sufficient information is available to assess the likelihood of cumulative and in-combination effects.

Environmental data

Natural England is required to make available information it holds where requested to do so. National datasets held by Natural England are available at

<http://www.naturalengland.org.uk/publications/data/default.aspx>.

Detailed information on the natural environment is available at www.magic.gov.uk.

Natural England's SSSI Impact Risk Zones are a GIS dataset which can be used to help identify the potential for the development to impact on a SSSI. The dataset and user guidance can be accessed from the Natural England Open Data Geoportal.

Natural England does not hold local information on local sites, local landscape character, priority habitats and species or protected species. Local environmental data should be obtained from the appropriate local bodies. This may include the local environmental records centre, the local wildlife trust, local geo-conservation group or other recording society.

Biodiversity and Geodiversity

General principles

The National Planning Policy Framework (paragraphs 192-196) sets out how to take account of biodiversity and geodiversity interests in planning decisions. Further guidance is set out in Planning Practice Guidance on the natural environment.

The potential impact of the proposal upon sites and features of nature conservation interest and opportunities for nature recovery and biodiversity net gain should be included in the assessment.

Ecological Impact Assessment (EclA) is the process of identifying, quantifying, and evaluating the potential impacts of defined actions on ecosystems or their components. EclA may be carried out as part of the EIA process or to support other forms of environmental assessment or appraisal.

Guidelines have been developed by the Chartered Institute of Ecology and Environmental Management (CIEEM).

Local planning authorities have a duty to conserve and enhance biodiversity as part of their decision making. Conserving biodiversity can include habitat restoration or enhancement.

Designated nature conservation sites

The proposal is unlikely to adversely impact any European or internationally designated nature conservation sites (including 'habitats sites' under the NPPF) or nationally designated sites (Sites of Special Scientific Interest, National Nature Reserves or Marine Conservation Zones).

Regionally and Locally Important Sites

The ES should consider any impacts upon local wildlife and geological sites, including local nature reserves. Local Sites are identified by the local wildlife trust,

geoconservation group or other local group and protected under the NPPF (paragraph 192 and 193). The ES should set out proposals for mitigation of any impacts and if appropriate, compensation measures and opportunities for enhancement and improving connectivity with wider ecological networks. Contact the relevant local body for further information.

Environmental data

Natural England is required to make available information it holds where requested to do so.

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Natural England's SSSI Impact Risk Zones are a GIS dataset which can be used to help identify the potential for the development to impact on a SSSI. The dataset and user guidance can be accessed from the Natural England Open Data Geoportal.

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Protected Species

The conservation of species protected under the Wildlife and Countryside Act 1981 and the Conservation of Habitats and Species Regulations 2017 is explained in Part IV and Annex A of Government Circular 06/2005 Biodiversity and Geological Conservation: Statutory Obligations and their Impact within the Planning System.

The ES should assess the impact of all phases of the proposal on protected species (including, for example, great crested newts, reptiles, birds, water voles, badgers and bats). Natural England does not hold comprehensive information regarding the locations of species protected by law. Records of protected species should be obtained from appropriate local biological record centres, nature conservation organisations and local groups. Consideration should be given to the wider context of the site, for example in terms of habitat linkages and protected species populations in the wider area.

The area likely to be affected by the development should be thoroughly surveyed by competent ecologists at appropriate times of year for relevant species and the survey results, impact assessments and appropriate accompanying mitigation strategies included as part of the ES.

Surveys should always be carried out in optimal survey time periods and to current guidance by suitably qualified and, where necessary, licensed, consultants.

Natural England has adopted standing advice for protected species, which includes guidance on survey and mitigation measures. A separate protected species licence from Natural England or Defra may also be required.

District Level Licensing for Great Crested Newts

District level licensing (DLL) is a type of strategic mitigation licence for great crested newts (GCN) granted in certain areas at a local authority or wider scale. A DLL scheme for GCN may be in place at the location of the development site. If a DLL scheme is in place, developers can make a financial contribution to strategic, off-site habitat compensation instead of applying for a separate licence or carrying out individual detailed surveys. By demonstrating that DLL will be used, impacts on GCN can be scoped out of detailed assessment in the Environmental Statement.

Priority Habitats and Species

Priority Habitats and Species are of particular importance for nature conservation and included in the England Biodiversity List published under section 41 of the Natural Environment and Rural Communities Act 2006. Most priority habitats will be mapped either as Sites of Special Scientific Interest, on the Magic website or as Local Wildlife Sites. Lists of priority habitats and species can be found [here](#). Natural England does not routinely hold species data. Such data should be collected when impacts on priority habitats or species are considered likely.

Consideration should also be given to the potential environmental value of brownfield sites, often found in urban areas and former industrial land. Sites can be checked against the (draft) national Open Mosaic Habitat (OMH) inventory published by Natural England and freely available to download. Further information is also available [here](#).

An appropriate level habitat survey should be carried out on the site, to identify any important habitats present. In addition, ornithological, botanical, and invertebrate surveys should be carried out at appropriate times in the year, to establish whether any scarce or priority species are present.

The Environmental Statement should include details of:

- Any historical data for the site affected by the proposal (e.g. from previous surveys)
- Additional surveys carried out as part of this proposal
- The habitats and species present
- The status of these habitats and species (e.g. whether priority species or habitat)
- The direct and indirect effects of the development upon those habitats and species
- Full details of any mitigation or compensation measures

- Opportunities for biodiversity net gain or other environmental enhancement

Ancient Woodland, ancient and veteran trees

The ES should assess the impacts of the proposal on any ancient woodland, ancient and veteran trees, and the scope to avoid and mitigate for adverse impacts. It should also consider opportunities for enhancement.

Natural England maintains the Ancient Woodland Inventory which can help identify ancient woodland. The wood pasture and parkland inventory sets out information on wood pasture and parkland.

The ancient tree inventory provides information on the location of ancient and veteran trees.

Natural England and the Forestry Commission have prepared standing advice on ancient woodland, ancient and veteran trees.

Biodiversity net gain

Paragraph 193 of the NPPF states that decisions should contribute to and enhance the natural and local environment by minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures.

Biodiversity Net Gain is additional to statutory requirements relating to designated nature conservation sites and protected species.

Proposals for mandatory biodiversity net gain should be in line with the Environment Act 2021 and supporting regulations.

The statutory biodiversity metric, together with ecological advice, should be used to calculate the change in biodiversity resulting from proposed development and demonstrate how proposals can achieve a net gain.

The metric should be used to:

- assess or audit the biodiversity unit value of land within the application area
- calculate the losses and gains in biodiversity unit value resulting from proposed development
- demonstrate that the required percentage biodiversity net gain will be achieved

Biodiversity Net Gain outcomes can be achieved on site, off-site or through a combination of both.

On-site provision should be considered first. Delivery should create or enhance habitats of equal or higher value. When delivering net gain, opportunities should be sought to link delivery to relevant plans or strategies e.g. Green Infrastructure Strategies or Local Nature Recovery Strategies.

Opportunities for wider environmental gains should also be considered.

Landscape and visual impacts

The environmental assessment should refer to the relevant National Character Areas. Character area profiles set out descriptions of each landscape area and statements of environmental opportunity.

The ES should include a full assessment of the potential impacts of the development on local landscape character using landscape assessment methodologies. We encourage the use of Landscape Character Assessment (LCA), based on the good practice guidelines produced jointly by the Landscape Institute and Institute of Environmental Assessment in 2013. LCA provides a sound basis for guiding, informing, and understanding the ability of any location to accommodate change and to make positive proposals for conserving, enhancing or regenerating character.

A landscape and visual impact assessment should also be carried out for the proposed development and surrounding area. Natural England recommends use of the methodology set out in Guidelines for Landscape and Visual Impact Assessment 2013 (3rd edition) produced by the Landscape Institute and the Institute of Environmental Assessment and Management. For National Parks and AONBs, we advise that the assessment also includes effects on the 'special qualities' of the designated landscape, as set out in the statutory management plan for the area. These identify the particular landscape and related characteristics which underpin the natural beauty of the area and its designation status.

The assessment should also include the cumulative effect of the development with other relevant existing or proposed developments in the area. This should include an assessment of the impacts of other proposals currently at scoping stage.

To ensure high quality development that responds to and enhances local landscape character and distinctiveness, the siting and design of the proposed development should reflect local characteristics and, wherever possible, use local materials. Account should be taken of local design policies, design codes and guides as well as guidance in the National Design Guide and National Model Design Code. The ES should set out the measures to be taken to ensure the development will deliver high standards of design and green infrastructure. It should also set out detail of layout alternatives, where appropriate, with a justification of the selected option in terms of landscape impact and benefit.

Heritage Landscapes

The ES should include an assessment of the impacts on any land in the area affected by the development which qualifies for conditional exemption from capital taxes on the grounds of outstanding scenic, scientific, or historic interest. An up-to-date list is available at www.hmrc.gov.uk/heritage/lbsearch.htm.

Connecting People with nature

The ES should consider potential impacts on access land, common land, public rights of way and, where appropriate, the England Coast Path and coastal access routes and coastal margin in the vicinity of the development, in line with NPPF paragraph 105. It should assess the scope to mitigate for any adverse impacts. Rights of Way Improvement Plans (ROWIP) can be used to identify public rights of way within or adjacent to the proposed site that should be maintained or enhanced.

Measures to help people to better access the countryside for quiet enjoyment and opportunities to connect with nature should be considered. Such measures could include reinstating existing footpaths or the creation of new footpaths, cycleways, and bridleways. Links to other green networks and, where appropriate, urban fringe areas should also be explored to help promote the creation of wider green infrastructure. Access to nature within the development site should also be considered, including the role that natural links have in connecting habitats and providing potential pathways for movements of species.

Relevant aspects of local authority green infrastructure strategies should be incorporated where appropriate.

Soils and Agricultural Land Quality

Soils are a valuable, finite natural resource and should also be considered for the ecosystem services they provide, including for food production, water storage and flood mitigation, as a carbon store, reservoir of biodiversity and buffer against pollution. It is therefore important that the soil resources are protected and sustainably managed. Impacts from the development on soils and best and most versatile (BMV) agricultural land should be considered in line with paragraphs 187 and 188 of the NPPF. Further guidance is set out in the Natural England Guide to assessing development proposals on agricultural land. As set out in paragraph 223 of the NPPF, new sites or extensions to sites for peat extraction should not be granted planning permission.

The following issues should be considered and, where appropriate, included as part of the Environmental Statement (ES):

- The degree to which soils would be disturbed or damaged as part of the development

- The extent to which agricultural land would be disturbed or lost as part of this development, including whether any best and most versatile (BMV) agricultural land would be impacted.

This may require a detailed Agricultural Land Classification (ALC) survey if one is not already available. For information on the availability of existing ALC information see www.magic.gov.uk.

- Where an ALC and soil survey of the land is required, this should normally be at a detailed level, e.g. one auger boring per hectare, (or more detailed for a small site) supported by pits dug in each main soil type to confirm the physical characteristics of the full depth of the soil resource, i.e. 1.2 metres. The survey data can inform suitable soil handling methods and appropriate reuse of the soil resource where required (e.g. agricultural reinstatement, habitat creation, landscaping, allotments and public open space).
- The ES should set out details of how any adverse impacts on BMV agricultural land can be minimised through site design/masterplan.
- The ES should set out details of how any adverse impacts on soils can be avoided or minimised and demonstrate how soils will be sustainably used and managed, including consideration in site design and master planning, and areas for green infrastructure or biodiversity net gain. The aim will be to minimise soil handling and maximise the sustainable use and management of the available soil to achieve successful after-uses and minimise offsite impacts.

Further information is available in the Defra Construction Code of Practice for the Sustainable Use of Soil on Development Sites and

The British Society of Soil Science Guidance Note Benefitting from Soil Management in Development and Construction.

Air Quality

Air quality in the UK has improved over recent decades but air pollution remains a significant issue. For example, approximately 85% of protected nature conservation sites are currently in exceedance of nitrogen levels where harm is expected (critical load) and approximately 87% of sites exceed the level of ammonia where harm is expected for lower plants (critical level of 1µg) [1]. A priority action in the England Biodiversity Strategy is to reduce air pollution impacts on biodiversity. The Government's Clean Air Strategy also has a number of targets to reduce emissions

Including to reduce damaging deposition of reactive forms of nitrogen by 17% over England's protected priority sensitive habitats by 2030, to reduce emissions of ammonia against the 2005 baseline by 16% by 2030 and to reduce emissions of NOx and SO2

against a 2005 baseline of 73% and 88% respectively by 2030. Shared Nitrogen Action Plans (SNAPs) have also been identified as a tool to reduce environmental damage from air pollution.

The planning system plays a key role in determining the location of developments which may give rise to pollution, either directly, or from traffic generation, and hence planning decisions can have a significant impact on the quality of air, water and land. The ES should take account of the risks of air pollution and how these can be managed or reduced. This should include taking account of any strategic solutions or SNAPs, which may be being developed or implemented to mitigate the impacts on air quality. Further information on air pollution impacts and the sensitivity of different habitats/designated sites can be found on the Air Pollution Information System (www.apis.ac.uk).

Information on air pollution modelling, screening and assessment can be found on the following websites:

- SCAIL Combustion and SCAIL Agriculture - <http://www.scail.ceh.ac.uk/>
- Ammonia assessment for agricultural development
<https://www.gov.uk/guidance/intensivefarming-risk-assessment-for-your-environmental-permit>
- Environment Agency Screening Tool for industrial emissions
<https://www.gov.uk/guidance/airemissions-risk-assessment-for-your-environmental-permit>
- Defra Local Air Quality Management Area Tool (Industrial Emission Screening Tool) – England

<http://www.airqualityengland.co.uk/laqm>

[1] Report: Trends Report 2020: Trends in critical load and critical level exceedances in the UK - Defra, UK

Water Quality

The planning system plays a key role in determining the location of developments which may give rise to water pollution, and hence planning decisions can have a significant impact on water quality, and land. The assessment should take account of the risks of water pollution and how these can be managed or reduced. A number of water dependent protected nature conservation sites have been identified as failing condition due to elevated nutrient levels and nutrient neutrality is consequently required to enable development to proceed without causing further damage to these sites. If your planning application is affected by Nutrient Neutrality, the ES needs to take account of any strategic solutions for nutrient neutrality or Diffuse Water Pollution Plans, which may be being developed or implemented to mitigate and address the impacts of elevated

nutrient levels. These solutions or plans should be relevant to the specific planning consultation site.

Climate Change

The ES should identify how the development affects the ability of the natural environment (including habitats, species, and natural processes) to adapt to climate change, including its ability to provide adaptation for people. This should include impacts on the vulnerability or resilience of a natural feature (i.e. what's already there and affected) as well as impacts on how the environment can accommodate change for both nature and people, for example whether the development affects species ability to move and adapt. Nature-based solutions, such as providing green infrastructure on-site and in the surrounding area (e.g. to adapt to flooding, drought and heatwave events), habitat creation and peatland restoration, should be considered. The ES should set out the measures that will be adopted to address impacts.

Further information is available from the Committee on Climate Change's (CCC) Independent Assessment of UK Climate Risk, the National Adaptation Programme (NAP), the Climate Change Impacts Report Cards (biodiversity, infrastructure, water etc.) and the UKCP18 climate projections.

The Natural England and RSPB Climate Change Adaptation Manual (2020) provides extensive information on climate change impacts and adaptation for the natural environment and adaptation focussed nature-based solutions for people. It includes the Landscape Scale Climate Change Assessment Method that can help assess impacts and vulnerabilities on natural environment features and identify adaptation actions. Natural England's Nature Networks Evidence Handbook (2020) also provides extensive information on planning and delivering nature networks for people and biodiversity.

The ES should also identify how the development impacts the natural environment's ability to store and sequester greenhouse gases, in relation to climate change mitigation and the natural environment's contribution to achieving net zero by 2050. Natural England's Carbon Storage and Sequestration by Habitat report (2021) and the British Ecological Society's nature-based solutions report (2021) provide further information.

Contribution to local environmental initiatives and priorities

The ES should consider the contribution the development could make to relevant local environmental initiatives and priorities to enhance the environmental quality of the development and deliver wider environmental gains. This should include considering proposals set out in relevant local strategies or supplementary planning documents including landscape strategies, green infrastructure strategies, tree and woodland strategies, biodiversity strategies or biodiversity opportunity areas.

United Utilities

With reference to the above Scoping Opinion Request (Environmental Impact Assessment), United Utilities (UU) wishes to make the following comments at this early stage regarding the expectations for any future proposals and the scope of any future planning application.

The key areas for consideration by the applicant in the detailed design process and in the preparation of a planning application can be summarised as follows:

- The delivery of sustainable foul and surface water drainage.
- Asset protection for existing water and wastewater infrastructure which is located within or close to the proposed redline boundary.

If the applicant intends to obtain a water supply from United Utilities for the proposed development, we strongly recommend they engage with us at the earliest opportunity. If reinforcement of the water network is required to meet the demand, this could be a significant project and the design and construction period should be accounted for.

Foul And Surface Water Drainage

We would strongly recommend that a detailed, site-wide foul and surface water drainage strategy is prepared to inform any future outline or full planning application at this site. The foul and surface water strategy should fully assess site topography, infiltration potential, all forms of flood risk, existing water features and naturally occurring flow paths to identify where water will naturally accumulate and determine whether pumping may be required. Resultant layouts and levels should take account of such existing circumstances to ensure the most flood resilient solution is achieved.

All development proposals will be expected to fully investigate the hierarchy of drainage options for surface water. There is an opportunity to discharge surface water to a number of watercourses in the vicinity of the site so the minimum expectation is that no surface water will discharge to the combined sewer system.

Thought must be given to the ultimate point of connection for foul water. There are limited options for the discharge of foul water into the existing sewer network, and early communication between the applicant and United Utilities is critical. This is because the development may require improvements to the wastewater network, and the applicant is encouraged to engage in early dialogue via SewerAdoptions@uuplc.co.uk.

The applicant must demonstrate an understanding to how foul and surface water infrastructure will be delivered as part of any future application for the site. There is an expectation for any future planning submission to provide foul and surface water

drainage discharge details, including an acknowledgement for future infrastructure requirements to support any proposed development.

Hierarchy for Managing Surface Water

As mentioned above, it is expected that no surface water is to discharge into the combined sewer system. This is because it is likely that more sustainable solutions are available in accordance with the drainage hierarchy. It is critical that the hierarchy for managing surface water is investigated as soon as possible and prior to progressing the detail of any site design as the final outfall for managing surface water could be a critical determinant of site design.

Rights to Discharge to Watercourse or Other Receiving Water Body

Should surface water be unable to infiltrate at this site, we request that all land that is necessary to facilitate a discharge to a watercourse is fully identified within any future submission. The proposal must benefit from the requisite rights of discharge to more sustainable alternatives than the public sewer for the management of surface water, e.g., a right to discharge to a watercourse or other water body. Acquiring a right to discharge / changing permit details can be both a lengthy and costly exercise.

Please note, United Utilities is not responsible for advising on rates of discharge to the local watercourse system. This is a matter for discussion with the Lead Local Flood Authority and / or the Environment Agency (if the watercourse is classified as main river).

Asset Protection

We strongly advise the applicant engages with us at the earliest possible opportunity to identify United Utilities assets which may be impacted by these proposals. Our assets will need to be fully considered as part of the design process, with the potential impacts identified at an early stage and suitable mitigation and protection measures and/or diversions incorporated into the design, construction and ongoing operation of the application site. If the applicant hasn't already done so, they can take advantage of our free pre-development service by visiting our website

We strongly recommend that the applicant or any subsequent developer contacts United Utilities, using our pre-development enquiry service to discuss their proposals directly with our Developer Services team. They can find further advice, along with a pre-development enquiry form, on our website: Building & Developing - United Utilities

The location of our assets will be material to the development proposals, so it is deemed to be in the applicants' interest to clarify the exact position of these assets prior to the submission of any formal planning application. It is important to note that we will not permit development over or near our assets.

As noted in the Environmental Impact Assessment Scoping Report, a 225mm public foul sewer crosses the site. United Utilities will not allow a new building to be erected over or near a public sewer or any other wastewater pipeline. The applicant can contact United Utilities to discuss the implications of their proposal on our wastewater network via SewerAdoptions@uuplc.co.uk.

A water main is located in the road to the west of the site. The applicant should engage early dialogue with United Utilities to determine the implications of the proposal on this asset. They can do this by contacting DeveloperServicesWater@uuplc.co.uk.

Other Matters for Consideration

Wastewater Adoption – Including SuDS

If the applicant intends to offer wastewater assets forward for adoption by United Utilities, the proposed detailed design will be subject to a technical appraisal by an Adoptions Engineer as we need to be sure that the proposal meets the requirements of United Utilities' Asset Standards.

This is important as drainage design can be a key determining factor of site levels and layout.

The proposed design should give consideration to long term operability and give United Utilities a cost-effective proposal for the life of the assets. Therefore, should this application be approved and the applicant wishes to progress a Section 104 agreement, we strongly recommend that no construction commences until the detailed drainage design, submitted as part of the Section 104 agreement, has been assessed and accepted in writing by United Utilities. Any work carried out prior to the technical assessment being approved is done entirely at the developer's own risk and could be subject to change.

Water Efficiency

We request that the development considers how water efficiency measures can be incorporated into the future detailed design of the site. There are opportunities such as rainwater recycling and water butts and we would encourage the LPA to embrace all water efficiency measures.

Modern design techniques can promote measures for water recycling to reduce the impact on infrastructure requirements.

Water efficiency should be a fundamental component of any approach to carbon neutrality and we request that you clearly set out your water efficiency and sustainable drainage expectations in the delivery of new development at this site. A tighter water efficiency standard in new development has multiple benefits including a reduction in

water and energy use, as well as helping to reduce customer bills. Water efficiency is therefore a key component of your journey to carbon neutrality.

Local planning authorities have the option to set additional technical requirements in respect of water use for the construction of new build dwellings, exceeding the minimum standards required by Building Regulations. All new homes are required to meet the mandatory national standard of 125 litres of water used per person per day as set out in Building Regulations Approved Document G. Where there is a clear local need, a local planning authority's development plan policies can require new-build dwellings to meet the tighter Building Regulations optional requirement of 110 litres of water used per person per day. If your adopted development plan includes a policy that implements the tighter water efficiency standard for new-build dwellings in Part 3 of Building Regulations, you should ensure that this is a condition of any planning permission you may grant. As this is a matter for the local planning authority / building control body,

CONTACTS

We wish to highlight our free pre-application service for developers to discuss and agree drainage strategies and water supply requirements. We cannot stress highly enough the importance of developers contacting us as early as possible. Enquiries are encouraged by contacting:

Website

For detailed guidance on water and wastewater services, including application forms and the opportunity to talk to the Developer Services team using the 'Live Chat' function, please visit: <http://www.unitedutilities.com/builders-developers.aspx>

A number of providers offer a paid for mapping service including United Utilities. For more information, or to purchase a sewer and water plan from United Utilities, please visit <https://www.unitedutilities.com/property-searches/>

PUBLIC HEALTH

Health promotion will be key factor in the design to create a healthy community. If the considerations which are usually put into an HIA are to be embedded within the EIA this need to made explicit, with reference to the impact on the existing communities near to the site development as well as the new community this will create. The development should aim to improve some of the existing health (and wider determinants e.g. income, quality housing, employment, education) issues that the Knowsley population faces, rather than solely attracting new residents creating a wider divide between existing residents and new communities.

Consideration should be made to existing facilities in the area and the impact this will have on them e.g. schools, health centres, shops which sell quality and affordable food (of food growing opportunities on site) Need to ensure all properties have somewhere

safe and accessible to store bikes. How will the development be linked to public transport networks?

The protection of the wooded area and the inclusion of other accessible green space and informal play spaces within the development is good as well as pedestrian access in more than one location out into the existing estate. I have a small concern about the path around the edge not feeling very safe if not overlooked and could become overgrown - but as the planting scheme has not been defined yet this might be acceptable if not enclosed in large trees and bushes.

Should also think about how to keep the homes cool in the summer, particularly those with south facing windows, or if there are to be any bungalows where people may not want to leave windows open. We are experiencing more and prolonged periods of hot weather which can have adverse effect on health.

At the right point we should also consider opportunities for greater social value from the development process.

Just adding these links as reference points (the bottom one has lots more links within it)
https://www.udg.org.uk/sites/default/files/publications/files/14JULY20%20BFL%202020%20Brochure_3.pdf

<https://www.healthyurbandevelopment.nhs.uk/wp-content/uploads/2017/05/Healthy-Urban-Planning-Checklist-3rd-edition-April-2017.pdf>

<https://www.healthyurbandevelopment.nhs.uk/wp-content/uploads/2019/10/HUDU-Rapid-HIA-Tool-October-2019.pdf>

FLOOD RISK AND DRAINAGE

The LLFA has reviewed the EIA scoping report (V3 dated March 2025) and agree with the flood risk and drainage scope proposed. We only expect that the applicant add the following item in the proposed EIA scope:

Section 12.4.2: An increase in debris and sediment into local watercourses

Upon the addition of the above item to the EIA scope, the LLFA has no objection.

LANDSCAPE AND VISUAL AMENITY (KMBC)

The Environmental Impact Scoping will also need to include the Landscape Visual Impact Assessment, which will also need to include the vegetation in winter, so that the visual impact of the proposals can be considered in its fullest extent. Further, the visual envelope needs to be quantified, so it is understood what the visual impact assessment will be based upon.

The Preliminary Ecological Assessment is indicating native bluebells within the woodland, which in themselves can be an indicator of ancient woodlands.

Consequently, the two woodlands in the centre of the site are to be classed as Ancient Woodland until proven otherwise – as such they will need a 15m buffer around the boundary of the woodland in which no development is allowed to occur.

This 15m buffer zone can be a public open space (POS), but ancient woodlands themselves can't be classed as POS as public access should be restricted to protect this important habitat.

CULTURAL HERITAGE

The Local Planning Authority are in agreement with your approach for heritage to be scoped in the EIA. More detailed comments on this section of the scoping report will be submitted when available under a separate response.

END OF SCOPING OPINION