

Report to Inform Habitat Regulations Assessment

Survey site:

Land off Archway Road, Huyton, Merseyside L36 9XD

Client:

Genr8 Kajima Regeneration (Huyton) Limited

Date:

10/03/2026

Project:

This report is prepared to inform a planning application with Knowsley Metropolitan Council. The proposal is described as: *'Detailed application for the erection of a new Council Headquarters, hotel, public realm change of use of Cavendish Walk to flexible Class E and/or F1 uses, site-wide enabling and associated works following demolition of existing buildings. Outline application comprising details of access, with all other matters reserved for a mixed-use development comprising residential (Classes C2 and C3) uses, commercial and community uses (Classes E and F1), replacement car parking provision at Lathom Road, public realm and associated works, with provision for meanwhile uses.'*

Executive Summary

Following the HRA Stage 1: Screening outlined within, it is considered that risks from the proposed development (alone or in conjunction with other development) to Mersey Estuary SPA Ramsar **cannot be dismissed**, as pathways exist which could lead to significant adverse effects on the integrity of the European site.

These are as follows:

- **Increase in recreational pressure**

Accordingly, an “Appropriate Assessment” **will be** required under Article 6(3) and 6(4) of the Habitats Directive. This should be completed or authorised by the Competent Authority before they undertake, or give any consent, permission or other authorisation for this plan. Consultation with Natural England may also be required.

The report also contains a shadow assessment to account for mitigation and providing measures within the following works are adhered to, the proposal is deemed to cause **NO SIGNIFICANT ADVERSE EFFECT;**

Liverpool Recreation Management Strategy – Interim Approach (LRMS IA)

Contribution to be made to mitigate recreational pressures.

Decisions as appropriateness and proportionality of full Appropriate Assessment vs financial contributions to existing schemes lies with the Local Planning Authority in consultation with Natural England or other stakeholders.

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Version control

Status	Issue	Name	Date
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Final	1.0	Harry Webster BSc (Hons), Consultant Ecologist	12/03/2026

Proportionality

The work involved in preparing and implementing all ecological surveys, impact assessments and measures for avoidance, mitigation, compensation and enhancement should be proportionate to the predicted degree of risk to biodiversity and to the nature and scale of the proposed development. Consequently, the decision-maker should only request supporting information and conservation measures that are relevant, necessary and material to the application in question. Similarly, the decision-maker and their consultees should ensure that any comments and advice made over an application are also proportionate.

This approach is enshrined in Government planning guidance, for example, paragraph 185 of the National Planning Policy Framework for England.

The desk studies and field surveys undertaken to provide a Preliminary Ecological Appraisal (PEA) or the HRA screening process might in some cases be all that is necessary.
(BS 42020, 2013)

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1.0 Introduction and Context

1.1 Background

Arbtech Consulting Limited (Arbtech) was instructed by Genr8 Kajima Regeneration (Huyton) Limited to undertake a Shadow Habitats Regulations Assessment, to assess the likelihood and scope of likely significant impacts on European and Ramsar sites within 10km of Land off Archway Road, Huyton, Merseyside L36 9XD (henceforth described as “the site”) of activities related to construction activities within the proposed development area and activities relating to its subsequent use.

Knowsley Metropolitan Borough Council may be required to undertake a Habitat Regulations Assessment (HRA) to assess the likelihood of adverse impacts of the proposed development on these designations in the form of an Appropriate Assessment (AA). This report represents an initial screening process that determines what if any likely significant effects may arise from the development and what further information is likely to be required to inform a full AA or other local mitigation strategies (such as financial contributions to access schemes). Impacts to the following sites have been screened within this assessment:

- Mersey Estuary SPA & Ramsar site ~8.1 km southwest of the site

1.2 Site Context

The site is centred at National Grid Reference SJ 44183 90863. The site consists of multiple buildings (B1-5), associated hardstanding and landscaping including grassland, ornamental shrubs, tree lines and hedgerows. The site is adjacent to Huyton Village Shopping Centre to the south, within the urban town of Huyton. The surrounding landscape is comprised of urban development including tarmacked roads subject to heavy traffic, urban buildings and residential dwellings with associated vegetated gardens. There are amenity green spaces including that associated with Lord Derby Academy situated ~400m east and Bowring Park and Golf Course situated ~800m west.

1.3 HRA Informative

European Sites

European sites include Special Protection Areas (SPAs) and Special Areas of Conservation (SACs), also collectively referred to as Natura 2000 sites (throughout Europe) or the National Site Network (following Brexit). The European Union Habitats Directive on the conservation of natural habitats and of wild fauna and flora (Council Directive 92/43/EEC) and the Birds Directive on the conservation of wild birds (Council Directive 79/409/EEC) place obligations on the UK to take certain actions for nature conservation. The Habitats Directive aims to maintain biodiversity and details measures to maintain or restore natural habitats and species at favourable conservation status. The Birds Directive protects all wild birds and their habitats and details special measures for migratory species and those that are considered to be vulnerable and/or rare. The Conservation of Habitats and Species Regulations 2017 (as amended), commonly known as 'The Habitats Regulations', transpose the Habitats Directive into national law and sets out the provisions for the protection and management of species, and habitats of European importance, including European sites.

Habitat Regulations Assessment

An HRA is required for any proposed plan or project which may have an adverse effect on one or more European sites. The purpose of HRA is to determine whether or not there are any likely significant effects (LSEs) on the integrity of any European site and, where LSE are identified, to provide mitigation measures to avoid, reduce or off-set the effects. HRA only legally applies to European sites. However, the National Planning Policy Framework (NPPF) recommends that the same level of protection is given to proposed or listed Ramsar sites.

All European and Ramsar sites overlap to some degree with nationally designated Sites of Special Scientific Interest (SSSIs). The HRA process does not apply to the broader conservation interests of the SSSI designations. However, the latter are addressed separately in the supporting ecological assessments produced in relation to the proposals.

HRA can be divided into the following stages:

1. HRA Stage 1: Screening for likely significant effects – identifying whether a project is likely to have a significant effect on a European site.
2. HRA Stage 2: Appropriate Assessment (AA) – collection of information, and determination of the effect the Proposed Development is likely to have on the integrity and designated features of the European sites 'screened in' during Stage 1.
3. HRA Stage 3: Mitigation and alternative solutions – where adverse effects are identified in Stage 2, the project should either be altered, or alternative solutions and mitigation specified to fully cancel out the adverse effects.

Habitat Regulations Assessment Screening Assessment

This step is a simple assessment to check or screen if a proposal:

- is directly connected with or necessary for the conservation management of a European site.
- risks enacting a significant effect on a European site on its own or in combination with other proposals.

Integral design features or characteristics, such as layout, timing and location will be considered to inform the screening decision. These, when well considered by the developer may mean that any risk to a European site is avoided and they do not need to do an appropriate assessment. The assessment will also examine the risk and scale of any indirect issues such as net increases in residents (and associated increases in recreational impacts)

Appropriate Assessment

Should likely significant effects be identified, it is the responsibility of the LPA to conduct an Appropriate Assessment to quantify the scale of any likely adverse effect upon the integrity of The National Network Site, and to factor in any mitigation measures. Additional survey work is likely to be required to inform this. **At this stage, the report should not consider any mitigation measures included by the proposer for the purpose of avoiding or minimising risk to a European site. Mitigation measures are considered at Appropriate Assessment.**¹

¹Gov.UK (2019) Guidance on the use of Habitats Regulations Assessment. <https://www.gov.uk/guidance/appropriate-assessment#what-is-the-impact-of-the-people-over-wind-judgment-on-neighbourhood-plans-permission-in-principle-development-orders-and-planning-zones>

Local Planning Policy

Knowsley Local Plan Core Strategy (Adopted January 2016)

The Knowsley Local Plan Core Strategy is the principal strategic planning policy guiding development and environmental protection in the borough up to 2028. Relevant policies within the Core Strategy that contribute to biodiversity protection and could be applied to avoidance, mitigation or enhancement of impacts concerning European sites including the Mersey Estuary SPA & Ramsar:

Policy CS8 – Green Infrastructure

- Seeks to protect, maintain and enhance biodiversity and ecological networks across the borough, requiring new development to contribute positively to green infrastructure outcomes.
- Policy CS8 underpins how development proposals should consider biodiversity at the earliest stages, supporting multifunctional natural assets.

Other policies that relate to supporting natural assests include:

- **Policy CS19** – Design Quality and Accessibility in New Development
- **Policy CS21** – Greenspaces and Trees
- **Policy CS24** – Managing Flood Risk

2.0 Baseline Information

The following table describes qualifying features and site conservation objectives as cited by the JNCC.

European Site	European Site Descriptions
Mersey Estuary SPA & Ramsar (Located ~8.1km SW)	The Mersey Estuary is an internationally important estuarine wetland located on the Irish Sea coast in northwest England, designated as both a Special Protection Area (SPA) under the Birds Directive and a Ramsar wetland of international importance. The Ramsar site (ID: 785) covers approximately 5,033 ha, extending along the tidal Mersey Estuary within a mosaic of rural and industrial landscapes. The estuary comprises large expanses of saltmarsh and extensive intertidal sand and mudflats, with smaller areas of brackish marsh, rocky shoreline, and boulder clay cliffs. These habitats provide critical feeding, roosting and staging areas for nationally and internationally important populations of waterbirds. Designated habitats • Intertidal mudflats and sandflats • Saltmarshes • Brackish marsh and rocky shoreline Qualifying Species (SPA) and Waterbird Assemblage The Mersey Estuary SPA qualifies under the EU Birds Directive for supporting internationally significant populations of non-breeding waterbirds. Key qualifying species regularly present include: • Common shelduck (<i>Tadorna tadorna</i>) • Eurasian teal (<i>Anas crecca</i>) • Northern pintail (<i>Anas acuta</i>) • Black-tailed godwit (<i>Limosa limosa islandica</i>) • Dunlin (<i>Calidris alpina alpina</i>) • Common redshank (<i>Tringa totanus</i>) • Golden plover (<i>Pluvialis apricaria</i>)

	In addition to these individual species, the estuary supports an internationally important waterbird assemblage, regularly exceeding thresholds of internationally significant numbers of wintering birds. Ramsar Designation & Criteria The Mersey Estuary Ramsar site is recognised under Ramsar Convention criteria for wetland importance: • Criterion 5 – The site regularly supports a waterbird assemblage of international importance (i.e., large numbers of migratory wildfowl and waders). • Criterion 6 – The site supports populations of specific waterbird species at levels of international importance (e.g., shelduck, teal, pintail, dunlin, redshank, black-tailed godwit). Threats: Official conservation advice and HRA documentation² identify a range of pressures and threats to the integrity of the Mersey Estuary SPA & Ramsar, including: • Public access and recreational disturbance • Water pollution • Physical modification and changes in freshwater inputs
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²Environment Agency (2022). North West Flood Risk Management Plan Habitats Regulations Assessment. Published December 2022.
<https://assets.publishing.service.gov.uk/media/6391dae6e90e076630f0b0fb/North-West-FRMP-HRA.pdf>

3.0 HRA Stage 1: Screening for Likely Significant Effects

3.1 Potential Impacts of the Proposed Development on European Sites

The following potential impacts on a European site from the proposed development are given consideration were considered relevant:

- Generation of particulate matter (pm30) during construction
- Watercourse/body and groundwater pollution
- Light pollution
- Noise disturbance
- Loss of associated habitat
- Fragmentation of associated habitat
- Hydrological changes
- Impacts to qualifying species of the European site, either directly or indirectly where they are considered to be functionally linked to the site.
- Recreational disturbance (especially dog walking)
- Vehicular emissions

Any impact requires a pathway to exist (direct or indirect) between the proposal and European Site, or functionally linked habitat. The Environmental Risk Management model, decrees that an environmental risk is present when there exists an unbroken risk pathway chain between the source of risk and the ecological receptor (Site and qualifying features), as illustrated below.

Risk → Pathway → Receptor

Where any element of this pathway is missing or broken, there can be no risk.

3.2 Evaluation of the Potential for Likely Significant Effects (LSE's) on European Sites

The below table details an assessment of potential for likely effects on any local sites of European Importance within locally defined zones of influence from the proposed development. A traffic lights system is employed, with green used to illustrate no LSE and amber used to illustrate a LSE. Whilst the significance of impacts is not determined at screening stage, red is used to flag any impact of obvious high impact.

Evaluation of likely Risk Pathways	
Particulate Matter (pm30)	
Pathway	The risk that generation of constructional or operational aerial outputs such as dust, may impact air quality and damage habitats associated with protected sites to a degree likely to impact the integrity of the site.
Evaluation of risk	The proposed development is of moderate scale and will not generate operational aerial outputs that would create significant accumulation by deposition nearby or on the Site. Constructional dusts are expected to fall-out within 250m ³ . Mersey Estuary (SPA & Ramsar site) is located over this distance from the proposed development area and therefore is out of range.
No likely significant effect	
Ground or Surface Water Pollution	
Pathway	The risk that the transfer of pollutants from the site to the protected sites could take place via hydraulic connectivity of groundwater resources, via overland flow of surface waters or via watercourses to any standing running or groundwater resources linked to the ecological functioning of any qualifying habitat or species within or functionally linked to the European site and impact it to a degree impacting long term integrity.
Evaluation of risk	Groundwater The development is in a groundwater vulnerability zone of medium groundwater vulnerability, indicating that while there is limited potential for contaminants to infiltrate the subsurface. The underlying geology across Knowsley and south Liverpool is dominated by Permo-Triassic sandstones of the Sherwood Sandstone Group, which form a principal aquifer of regional importance. This aquifer also extends beneath the Mersey Estuary. However, in the vicinity of the site the sandstone bedrock is typically overlain by glacial till and superficial deposits, which are generally of lower

³ Holman et al (2014). IAQM Guidance on the assessment of dust from demolition and construction, Institute of Air Quality Management, London. www.iaqm.co.uk/text/guidance/construction-dust-2014.pdf.

²National Highways et al (2020). CG 501 Design of highway drainage systems. Design Manual for Roads and Bridges.

	permeability and act as a partial barrier to vertical contaminant migration. Additionally, approximately 75% of the site is existing hardstanding, which further reduces opportunities for infiltration of surface pollutants into shallow soils or groundwater by limiting direct percolation during construction. Whilst pathways exist and groundwater to surface water interactions can occur locally in estuarine environments, the Mersey Estuary is not primarily groundwater-fed. Its hydrology is dominated by surface water inflows from the River Mersey catchment and tidal exchange with the Irish Sea. Studies and conservation documentation⁴ indicate that groundwater beneath the estuary is often brackish or saline, influenced by tidal processes and seawater intrusion, rather than functioning as a conduit for freshwater groundwater discharge from inland areas. As such, the protected features of the Mersey Estuary SPA and Ramsar site are not dependent on groundwater flows from inland principal aquifers. Surface waters (Watercourses and Waterbodies) There are no direct links between the proposed development area and Mersey Estuary via running water courses or other drainage mechanisms (according to mapping). There is no possible risk pathway for surface water contamination of the European Site. A surface water evaluation will not be required to support an Appropriate Assessment decision. Overland Flow (run off) Any risk that pollutants or suspended solids carried in overland surface water movements may reach Mersey Estuary from the development area are rendered nugatory by distance attenuation and/or intervening land uses, in which flow is likely to be halted or slowed. There is no reasonable likelihood that such contaminants could reach the Site from the proposed development area.
No likely significant effect	
Hydrological Changes	
Pathway	The risk that construction may enact alterations to the hydrological regimes underpinning the functioning of habitats associated with protected sites and enact adverse impacts upon any associated flora or fauna.
Evaluation of risk	The construction will be of moderate scale and will involve substantial groundworks. However, given the urban location and proximity to the protected site, the construction is unlikely to result in any alterations in the movement of groundwater or functioning of surface waters likely to affect hydrological functionality of Mersey Estuary.

⁴ Abdelrahman. Mohamed, Essam (2007) *Groundwater and surface water geochemical evolution : Liverpool area, UK*. PhD thesis, University of Liverpool.

No likely significant effect	
Light Pollution	
Pathway	The risk that light spill into protected sites could impact upon light sensitive species population viability.
Evaluation of risk	No risk pathway for light pollution because of existing building screening/distance attenuation beyond the range of any light pollution generated by the site, which in the case of this small development would be unlikely to raise the cumulative impacts of local light pollution to a significant degree above the baseline.
No likely significant effect	
Noise Disturbance	
Pathway	The risk that noise generated during the development may disturb sensitive species present within protected sites.
Evaluation of risk	There is no risk pathway for noise disturbance to Mersey Estuary because of existing building screening and logarithmic distance attenuation.
No likely significant effect	
Loss, Damage or Fragmentation of Qualifying or Functionally Linked Habitat	
Pathway	The risk that the development may lead to loss or fragmentation of qualifying habitats or functionally linked habitats associated with protected sites.
Evaluation of risk	The site and its zone of influence contain no qualifying habitats and no associated habitat of importance to the functionality of the qualifying features of The Site.
No likely significant effect	

Impacts to Qualifying Species	
Pathway	The risk that the development may lead to impacts upon qualifying species in a manner that threatens the integrity (ability to persist) of their populations within protected sites (in this context “integrity” refers to ability to persist). This may be assessed in isolation or in combination with other developments. It addresses populations both within the site and any external “stepping stone” or other functionally linked habitats. Individual impacts pertaining to any relevant protected species legislation are beyond the scope of this assessment and where relevant are addressed separately.
Evaluation of risk	The development is isolated from habitats associated with Mersey Estuary and contains no habitats of significance to qualifying species. There is the potential that birds migrating or moving locally may transiently utilise the site, however the site makes up a relatively small amount of green space located within the local area. This in conjunction with the amount of green spaces between the development site and Mersey Estuary suggest the development will have a negligible impact upon qualifying species.
No likely significant effect	
Recreational disturbance	
Pathway	The risk in isolation, or in combination with other projects that the development may lead to adverse impacts upon habitats and species communities within The Site via increased recreational pressure, including; Trampling, litter, vandalism, arson, disturbance of and destruction of wildlife by walkers, cyclists, motorbikes, cats and dogs and nutrient input via dog fouling. Dogs may also cause disturbance of fauna. An additional recreational pressure may include the collecting of flora and fauna, in particular fungi and wildflowers.
Evaluation of risk	The proposed development would result in an estimated increase of approximately 575 new residential units + an increase in tourism with the proposed hotel within the local area with Mersey Estuary SPA & Ramsar site which lies approximately 8.1km from the development. There is a potential pathway for indirect recreational disturbance to the designated features via increased visitor pressure. Human recreational activity, particularly near coastal and estuarine sites, is a recognised impact pathway in Habitats Regulations Assessments where new housing growth may lead to greater frequency of visits.

	The Liverpool Recreation Management Strategy – Interim Approach (LRMS IA) has been developed to address recreational disturbance on European coastal sites caused by population growth in the Liverpool City Region. The strategy: • Forms part of the Liverpool Local Plan evidence base • Applies particularly to residential development • Recognises that increased housing leads to greater recreational use of protected coastal sites. The strategy is intended as an interim mechanism until a full Liverpool City Region Recreation Mitigation Strategy and Supplementary Planning Document are adopted. The LRMS IA identifies that: • The primary pathway of impact is recreational disturbance, particularly dog walking. • Housing development can increase visitor numbers to coastal European sites. • Mitigation measures are required where development contributes to recreation pressure. The legislation operates under the precautionary principle. This means that the default position in law is that there will always be significant harm from new housing or other development which would increase visitor numbers to the protected sites.
Likely significant effect	
Vehicular emissions	
Pathway	The risk that the development either by itself or in combination with other LPA wide planning applications and projects may lead to adverse impacts upon qualifying habitats and species via atmospheric pollution caused by vehicles travelling on roads in close proximity to protected sites, resulting in deposition of toxic and nutrient enriching compounds, e.g Nitrogenous compounds on sensitive habitats, leading to alterations in species communities via the loss of air pollution/nutrient enrichment sensitive community members. Vehicle emissions can result in between 20 and 65% of total N deposition on European Sites in the UK. Development proposals (regardless of their type, size and location within the district) resulting in increases of one or more additional vehicles may contribute to increases in deposition. In addition, if other LPA wide projects result in increased traffic, the combined impacts may be greater than the sum of their individual parts.

<i>Evaluation of risk</i>	The proposed development would introduce parking for approximately 100 vehicles, resulting in an increase in local vehicular movements relative to baseline conditions. Traffic pollutants associated with road vehicles, including nitrogen oxides (NOx) and nitrogen deposition, are a recognised pathway through which residential development can potentially affect particularly sensitive habitats such as saltmarsh present in Mersey Estuary. Natural England guidance on air quality and HRAs indicates that significant effects from road traffic emissions on European sites are only likely where changes in traffic flows occur on roads within approximately 200m of a designated site boundary, and where those changes exceed recognised screening thresholds (typically an increase of more than 1,000 Annual Average Daily Traffic (AADT) or more than 1% of baseline traffic flows, including heavy goods vehicles). In this case, the Mersey Estuary SPA and Ramsar site is located approximately 8.7km from the development and is unlikely to experience any significant change in traffic flows as a result of the proposed development..
No likely significant effect	

4.0 Consideration of Need to Progress to Stage 2: Appropriate Assessment

The development is NOT directly connected with or necessary for the conservation management of a European site.

Following the HRA Stage 1: Screening outlined within, it is considered that risks from the proposed development (alone or in conjunction with other development) to Mersey Estuary SPA Ramsar **cannot be dismissed**, as pathways exist which could lead to significant adverse effects on the integrity of the European site.

These are as follows:

- **Increased recreational pressure both in isolation and in combination with other LPA wide projects.**

The nature and scale of any impacts arising from these risk pathways cannot be quantified at this stage and in these cases the precautionary principle⁵ will apply.

Accordingly, an “Appropriate Assessment” will be required under Article 6(3) and 6(4) of the Habitats Directive. This should be completed or authorised by the Competent Authority before they undertake, or give any consent, permission or other authorisation for this plan. Consultation with Natural England is likely to be required. The further works required to inform AA are detailed below;

The report also contains a shadow assessment to account for mitigation and providing measures within the following works are adhered to, the proposal is deemed to cause NO SIGNIFICANT ADVERSE EFFECT;

⁵ The Precautionary Principle is one of the key elements for policy decisions concerning environmental protection and management. It is applied in the circumstances where there are reasonable grounds for concern that an activity is, or could, cause harm but where there is uncertainty about the probability of the risk and the degree of harm. The principle is applied to Habitats Regulations Assessments. The Precautionary Principle has been endorsed internationally on many occasions. At the Earth Summit meeting at Rio in 1992, World leaders agreed Agenda 21, which advocated the widespread application of the Precautionary Principle in the following terms: “In order to protect the environment, the precautionary approach shall be widely applied by States according to their capabilities. Where there are threats of serious or irreversible damage, lack of full scientific certainty shall not be used as a reason for postponing cost-effective measures to prevent environmental degradation.”

5.0 Stage 2: Appropriate Assessment

The stage 1 screening assessment undertaken highlights potential impacts in respect of Mersey Estuary SPA and Ramsar site. While it is the duty of the Local Planning Authority (Knowsley Metropolitan Council) to undertake an Appropriate Assessment, an assessment of the proposals in light of the proposed mitigation measures is undertaken on behalf of the Local Planning Authority.

Liverpool City Council, in consultation with Natural England have developed The Liverpool Recreation Management Strategy – Interim Approach⁶ (IA) which forms an Annex to the adopted Liverpool Local Plan and is designed to provide the required legal protection to designated sites. It must now be applied in the decision-making process specifically in respect of residential development. It is a short-term solution until an LCR Recreation Mitigation Strategy (RMS) wide approach is prepared and adopted. The Liverpool IA recommends that developers and their agents opt into the Liverpool Interim Approach as opposed to developing their own ‘shadow’ HRA.

5.1 Mitigation Measures for Liverpool Interim Approach

The proposed development comprising the development of a 130 bed hotel, 75 unit residential block, and at a later phase an additional 500 residential unit, represents an increase in residential population within the Knowsley District and lies within the Zone of Influence for the Mersey Estuary SPA and Ramsar site. Recreational pressure has been identified through the Liverpool Recreation Management Strategy – Interim Approach (LRMS IA) as a credible in-combination impact pathway for these European sites.

A spatial approach to recreation pressure avoidance and mitigation has been taken and the City has been split into 2 zones (core and outer) on recreation survey data for likelihood / frequency of visits to the European sites. **The site lies within the outer zone.**

There are three types of measures that can be used to mitigate recreation pressure:

- Suitable Alternative Natural Green Space (SANGs) in sites in Liverpool;
- Site Avoidance Mitigation Measures (SAMMs) on the Mersey Estuary SPA and Ramsar site and Liverpool Bay SPA;

⁶ Liverpool Recreation Management Strategy – Interim Approach, Liverpool City Council, April 2022

- Other mitigation measures which include on-development site mitigation measures such as additional green and open space provision, dog ownership restrictions and Household Information Pack provision. This can include provision of Household Information Packs, informing residents (owners and tenants) of the presence and importance of the European sites, and how residents can help protect them including an outline 'responsible coast user code'. This contributes to a maximum of 10% of the recreation mitigation package.

If the on-site provision meets these requirements, then the residual developer contribution payment payable is calculated as follows:

- Zone 1 = $(0.33 \times 278.26) \times \% \text{ of development site that is green / open space} \times \text{number of units}$
- Zone 2 = $(0.33 \times 69.56) \times \% \text{ of development site that is green / open space} \times \text{number of units}$

It is anticipated that the following mitigation measures could be implemented which would alleviate or partially reduce the risk to the European sites:

- Provision of Household Information Packs, informing residents (owners and tenants) of the presence and importance of the European sites, and how residents can help protect them including an outline 'responsible coast user code'. A Householder leaflet in respect of recreational disturbance for Liverpool may be accessed from Merseyside Environmental Advisory Service - https://eas.merseysidebiobank.org.uk/wpcontent/uploads/2024/01/lcr_leaflet_liverpool.pdf
- Payment of a developer contribution. The payment of £69.56 per dwelling in outer zone. These payments will be collected using via Section 106 agreement, with payment spent on:
 - Suitable Alternative Natural Green Space (SANGs) in sites in Liverpool; and/or
 - Site Avoidance Mitigation Measures (SAMMs) on the Mersey Estuary SPA and Ramsar site and Liverpool Bay SPA.

Confirmation of the proposed mitigation to be implemented should be provided to Knowsley Metropolitan Council in line with requirements of the Liverpool IA, in order for a Stage 2 Appropriate Assessment to be carried out.

The decision as to the appropriateness and proportionality of full Appropriate Assessment vs financial contributions to existing schemes lies with the Local Planning Authority in consultation with Natural England and any relevant stakeholders in line with current local policy.

Bibliography

This report has been written with due consideration to and compliance where relevant with the following industry standards, guidelines and supporting resources.

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- The Conservation of Habitats and Species Regulations 2017 (Part 2).

Appendix 1: Proposed Development Plan



Appendix 2: Landscape View

