

Rev	Date	Notes
A	26/09/17	Initial map production

Legend

 Site boundary

0 50 100 200 300 Metres



Site Location

Goodison Park Legacy  
Everton Football Club

Scale at A3:	Project No:	Drawing No:	Revision:
1:10,000	A100795-1	Figure 1	A
Drawn by:	Drawn date:	Approved by:	
Ben Blowers	26/09/2017	Mike Brown	

© Crown Copyright. All rights reserved. Licence number: 100010980  
Open Government Data approved cartography and/or information licensed under the Open Government Licence v3.0  
Other Credits: Content: OS data © Crown Copyright and database right 2017



## Appendix C – Consultation

Merseyside Environmental Advisory Service  
1<sup>st</sup> Floor Merton House, Stanley Road  
Bootle, Merseyside, L20 3DL  
Director: Alan Jemmett, PhD, MBA

Enquiries: 0151 934 4951

Contact: Lucy Atkinson  
Direct Dial: 0151 934 4953  
Email: Lucy.atkinson@eas.sefton.gov.uk

## **DEVELOPMENT MANAGEMENT ADVICE**

To: Peter Jones  
Organisation: Development Management  
Liverpool City Council

From: Lucy Atkinson

Your Ref: PreApp  
File Ref: LI17-027  
W/P Ref:  
Date: 23<sup>rd</sup> June 2017

### **Proposed EFC Stadium, Bramley Moore Dock, Liverpool EIA Scoping Opinion**

1. Thank you for consulting Merseyside Environmental Advisory Service in respect of this planning application. The proposals comprises involve infilling/partial infilling of BMD, demolition of non-listed structures, partial demolition of listed structures; construction of 60,000 seater stadium with retail, museum, ancillary offices, betting shop, associated facilities, concourse, 900 space car park, footways and public realm.
2. Having reviewed the application and supporting documentation, our advice is set out below in two parts.
  - Part One deals with issues of regulatory compliance, action required **prior to determination** and matters to be dealt with through planning conditions. Advice is only included here where action is required or where a positive statement of compliance is necessary for statutory purposes.
  - Part Two sets out guidance to facilitate the implementation of Part One advice and informative notes.

In this case Part One comprises paragraphs 3 to 42, while Part Two comprises paragraphs 43 and 44.

#### **Part One**

3. The applicant has submitted an EIA Scoping Report (*CBRE May 2017*) to inform the request and identify the EIA process and identify areas that will be scoped in and scoped out. The scoping opinion has been submitted under the 2011 Regulations

*Merseyside Environmental Advisory Service – delivering high quality environmental advice and sustainable solutions to the Districts of Halton, Knowsley, Liverpool, St.Helens, Sefton and Wirral*





but in the spirit of the 2017 Regulations will consider climate change, biodiversity, human health, major accidents and disasters. This is welcomed.

The EIA Scoping Report discusses the EIA methodology, phasing, the structure of the EIA, and the topics that will be scoped in and scoped out, as well as methods for assessing the impacts. The ES will also consider cumulative impacts with other significant developments and in-combination effects between different topics within the EIA. The report also refers to provision of qualifications and expertise of authors of the individual topic specialists.

4. The topic areas that will be scoped in are: transportation, air quality, noise, water environment, biodiversity, ground conditions, archaeology, heritage, townscape and visual amenity and socio-economics. In addition to this human health impacts will be considered under relevant chapters such as socioeconomics, air quality and noise and vibration. Climate change will also be considered under relevant chapters and will include vulnerability of baseline assessments to projected changes, vulnerability of proposed changes and the effect of proposed development within the context of climate change. The ES will also consider major accidents/disasters.
5. Also, the ES will consider the impacts on land particularly the change from a waterbody to an infilled site. I advise that consideration is also given to the impacts on the Port of Liverpool with respect to loss of this operational dock, and the displacement of existing businesses. For example, the dock is a minerals wharf for marine-won sand. NPPF paragraph 143 (bullet point 4) states that mineral wharves are safeguarded from development, and a recent aggregate assessment report for the NW (*North West Marine Aggregates Study, The Crown Estate November 2016*) identified the increasing importance of safeguarding wharfage for marine won aggregates in response to decreasing supply and minerals planning consents from land-won sources.
6. It is proposed that Solid Waste Management should be scoped down in the ES i.e. the scoping report indicates that scoped down technical topics are considered unlikely to exhibit significant environmental effects and does not merit detailed consideration in the main body of the ES document. I do not agree with this position as significant volumes of waste are likely to be generated during both the construction and operational phases of the development. This is discussed in more detail later in this memo.
7. I have not considered the proposed methodologies for each chapter as this will be role of individual specialists.
8. **In the main, I consider the submitted EIA Scoping Report satisfactorily addresses the issues that should be covered by the Environmental Statement and an appropriate basis for undertaking the EIA, subject to the following issues on specific topics/ES chapters being taken into account.**

## Archaeology

*Merseyside Environmental Advisory Service – delivering high quality environmental advice and sustainable solutions to the Districts of Halton, Knowsley, Liverpool, St.Helens, Sefton and Wirral*



9. The proposed development lies within the World Heritage Site and its buffer zone. There are also a number of other heritage assets, both designated and non-designated, that lie within the proposed development and its redline boundary. Recent archaeological work at the adjacent Wellington Dock encountered the buried remains of a number of former Dock-related structures, and it would not be unreasonable to expect a similar state of affairs within the current proposals.
10. The proposal (section 6.10 & 6.11 of the CBRE Scoping Report), to include Chapters in the Environmental Statement on both Archaeology & Heritage, as well as the appointment of Oxford Archaeology North (OAN) to undertake the Archaeology desk-based assessment and walkover in accordance with ClfA standards and guidance, is welcomed, as is the statement on p.6.77 that:

“The study will identify and characterise the significance of the below ground archaeological assets identified. In accordance with the extent of that significance, it will identify strategies to record, preserve or manage those archaeological assets, and any necessity for further evaluation, where their character or value is not sufficiently defined. The assessment will be informed by WHS, national and local planning policy relating to the historic environment, and appropriate curatorial bodies will be consulted regarding mitigation strategy.”
11. MEAS can confirm that this approach is considered to be an appropriate means of quantifying the archaeological resource, assessing its significance and informing any mitigation required for the proposed development.

#### Ecology and Habitats Regulations

12. In support of the EIA Scoping Opinion request, the applicant has submitted an EIA Scoping Report (*CBRE, 15 May 2017, 150517\_EFCStadium\_Scoping\_Final.docx, F1*) and a letter from the applicant's ecological consultant which sets out the proposed scope of the ecological surveys and assessments which will be undertaken to inform the Ecological Impact Assessment (*WYG, 10 May 2017, A100795*). I have reviewed these documents and make the following comments.

#### *Desktop study*

13. The proposed desktop study is to include consultation with the local biological record centre (Merseyside BioBank) which is welcome. The EIA Scoping Report refers to the use of aquatic ecology data from the NBN Gateway (now known as NBN Atlas). However, in accordance with the NBN Terms and Conditions, permission from the data provider will be required to use this information otherwise the data could not be relied upon during the determination of the planning application.

#### *Extended Phase 1 Habitat Survey*

14. I understand that the Extended Phase 1 Habitat Survey has already been undertaken and that no invasive plant species were recorded within the site.

#### *Breeding birds*

15. The breeding bird survey is proposed to comprise a single visit in April 2017, two visits in May 2017 and a single visit in June 2017. Considering the scale of the

proposals and potential impacts, weekly visits during the April to June period would have been preferable.

15. There was a common tern nesting site is present at the adjacent Sandon half-tide dock in 2015 which will need to be considered as part of a breeding bird survey. The Liverpool Bay proposed SPA extension, which lies directly adjacent to the application site, includes foraging areas important for common tern, from the Mersey Narrows and North Wirral Foreshore SPA, during their breeding season.
17. In addition to this, kittiwakes are known to breed on the outside of the Bramley Moore Dock wall and impacts upon this species as a result of the proposed development will need to be assessed. However, it will not be possible to view them for survey from the landward side. One option to enable a survey is to board the Mersey ferry, which runs adjacent to the breeding site, and take video footage of them, alternatively a small boat or drone could be used.

#### *Bats*

18. I understand that bat roost potential surveys of the structures on the site, including the boundary wall, have already been undertaken. Due to timescales, I advise that the applicant submits the bat roost potential survey report to the Council as soon as possible, to ensure that the recommendations made by the applicant's ecological consultant with regard to further survey requirements are acceptable. The survey report should include photographs and detailed descriptions of the buildings and structures which have been assessed.
19. The results of the aquatic surveys (see below) should be used to determine the requirement for bat activity surveys to be undertaken. If large aquatic invertebrate population, for example, flies or emerging larvae, are found to be present, bat activity surveys will be warranted.

#### *Passage and wintering birds*

20. Wintering bird surveys have been undertaken on the site from November 2016 to February 2017 inclusive, using two vantage points (VP1 and VP2). According to the applicant's ecological consultant, VP1 allowed for monthly bird counts of the site, whereas VP2 covered a wider area encompassing half way across the Mersey and adjacent docks.
21. The winter surveys have not included autumn passage and, from the vantage point locations which have been provided, it does not appear that the entire zone of influence of the proposed development has been included in the wintering bird surveys undertaken to date.
22. The applicant must ensure that further wintering bird surveys are undertaken to include autumn passage (commencing in September) and the entire zone of influence of the proposed development. A minimum of 36 hours vantage point survey will be required (in accordance with the current best practice for vantage point surveys (*currently Recommended Bird Survey Methods to Inform Impact Assessment of Onshore Wind Farms, Scottish Natural Heritage, 2014*)).



### *Aquatic Surveys*

23. An integrated aquatic survey sampling methodology is needed to (i) characterize the aquatic communities / habitats present (ii) enable impact assessment to be completed and (iii) advise on any avoidance measures, mitigation and compensation needed. A key point will be to identify potential prey items, such as fish species, for any of the designation features of the Mersey Estuary and Liverpool Bay Natura 2000 sites e.g. cormorant / grebe, which form part of the overwintering water bird assemblage. The ROV survey will be undertaken of dock walls to provide information on the benthic communities present within the dock. The video must be of a good quality to ensure that benthic communities and any invasive species can be adequately identified and be recorded at different water depths. The applicant should also give consideration to undertaking scrapes of the dock wall to provide further information on the species present if the video quality is not sufficient as can occur within docks.
24. I advise that a biosecurity plan will be required in support of the application which describes how the spread of invasive non-native marine species will be prevented during the works. Grab samples of fauna within the dock sediment are also proposed. The grabs should be of a sufficient size and number to ensure that sampling effort is robust.
25. Sediment samples taken at the same time as the grab samples are also to be analysed for chemical contamination. This analysis must be undertaken at an accredited laboratory. The physical and chemical composition of the dock sediments to be removed and/or disturbed by the proposed development will need to be known to inform impact assessment and mitigation, re-use potential and disposal options e.g. environmental permit requirements.
26. The applicant's ecological consultant considers that sufficient data on water quality and fish will be available from existing sources. However, the sources and age of these data have not been specified and will be required within the Environmental Statement. They should be no older than 3 years.

### *Ecological Impact Assessment (EcIA)*

27. The proposed EcIA should follow the CIEEM (2010 and 2016) guidelines. As part of the EcIA, the applicant's ecological consultant proposes undertaking a cumulative impact assessment which is based upon details of schemes obtained from the Local Authority. However, in addition to the Local Planning Authority, details of schemes should also be obtained from other authorities, including Wirral and Sefton Councils and the Marine Maritime Organisation.

### *Habitats Regulations Assessment (HRA)*

28. The applicant's ecological consultant proposes to undertake a shadow HRA Stage 1 Screening Report in order to determine whether the scheme is likely to impact upon features of the Mersey Estuary SPA.



29. Rather than screening, this should be referred to as an Assessment of Likely Significant Effects (ALSE) and it will be used by the Council to determine whether the scheme is likely to impact upon European sites. In addition to the Mersey Estuary SPA (and Ramsar sites), the ALSE will also need to include, but not be limited to, the following European sites:
- the Liverpool Bay proposed SPA extension (which lies immediately adjacent to the application site boundary);
  - Mersey Narrows and North Wirral Foreshore SPA and Ramsar sites;
  - Ribble and Alt Estuaries SPA and Ramsar sites; and
  - The Dee Estuary SPA and Ramsar sites.

#### *Other issues*

30. I advise that an integrated approach and liaison between the applicant's environmental specialists will be required to ensure that any archaeological or intrusive site investigation works do not have harmful ecological impacts.
31. Air quality, noise and lighting assessments are proposed to inform the EIA. These assessments should consider impacts upon statutory designated nature conservation sites.
32. The application site lies adjacent to the Mersey Estuary Nature Improvement Area (NIA), although the site only provides very limited opportunities for the creation of additional habitat. Any planting of trees on the site should form part of an integrated green infrastructure approach which includes other options for enhancing the site's ecological value, such as the creation of green walls / roof areas. There may be potential to use connections along the canal to improve accessibility (links into Ecological Network, emerging LCR SUD and The Mersey Forest GI Strategy and Nature Connected GI prospectus). Widespread planting of trees is however not appropriate for the site. This could be realized through a Green Infrastructure Plan for the proposal.

#### Waste

33. As raised in paragraph 8 above, I do not agree with the proposed position to scope down waste as significant volumes of waste are likely to be generated during both the construction and operational phases of the development. Generation of waste during both construction and operation may have impacts on air quality, noise, management of ground conditions, water environment and visual amenity. An assessment of waste impacts is proposed is intended to focus on the ability of the existing waste infrastructure capacity to cope with this development. Whilst it is appreciated that many of the waste impacts can be dealt with through other ES chapters, there are some issues which have not been considered and which do merit further consideration as part of the proposed development and its impact assessment. I advise that a Sustainable Resource Management Plan or similar approach, which considers sustainable resource matters, beyond WLP policy, such as minerals and energy, may be appropriate.



34. Given the location of the proposed stadium, and the windiness of the site, match day litter and litter from events is an issue which does need to be assessed. This has not been considered as part of the scoped down assessment. For example, generation of litter on-site and along the main access routes to the proposed stadium could have pollution and amenity impacts on the water environment including the River Mersey, docks and canal systems. Effects on the designated sites and biodiversity of the river, as well as a visual impact for local residents, businesses and visitors will need to be assessed within the ES and appropriate avoidance and mitigation measures proposed. Consideration should also be given to the provision of information to users of the stadium / venue (litter management policy / code) to help avoid litter generation.
35. In addition, consideration should be given to food waste generated during the operation of the new stadium (e.g. match days, and through day to day operation of the club) with a view to managing this as far up the waste hierarchy as possible, perhaps through an on-site, small-scale AD or CHP facility that could also make a positive contribution to meeting the energy needs of the proposed stadium and reduce carbon emissions.
36. Further, it is proposed that BMD will be infilled with marine-won sand, NPPF paragraph 143 bullet point 2 encourages the substitution of secondary and recycled aggregates over primary minerals. Construction, demolition and excavation waste (CDEW) is how many of the Liverpool docks have been infilled in the past, but would obviously be subject to an Environmental Permit and the necessary controls to avoid pollution. Therefore I will advise that infilling with CDEW and not just relying on virgin marine won sand would be appropriate subject to supply and engineering considerations.
37. The 'Relevant Planning Policy section' should also refer to the Merseyside and Halton Joint Waste Local Plan. Policies WM8 and WM9 apply.

#### Minerals

38. As referred to in paragraph 7 above, consideration needs to be given to the displacement of existing businesses, and the impacts the proposal will have on land, and in this case the Port of Liverpool operations in terms of loss of the dock. Specifically, the loss of a minerals wharf for marine-won sand which should be safeguarded under NPPF paragraph 143.
39. Merseyside has very limited minerals resources with only two active quarries and two active wharves for marine-won sand and gravel. Protecting these primary resources for the highest end uses would be preferable, and as referred to in paragraph 29 above, consideration should be given to using secondary or recycled aggregates for the infilling of the dock.

#### Low Carbon/Renewable Energy

40. The EIA Scoping report does not discuss inclusion of low carbon or renewable energy for the proposed stadium. This is a significant omission, given the scale of

the proposed development. Consideration should be given to this in ES and stadium design as a means of reducing the GHG emissions and climate change impacts arising from the proposed development. This could be linked to the sustainable resource management plan referred to in paragraph 33 above. There are many examples around the world of sports stadiums that are reducing their grid energy requirements and energy consumption through a range of measures including energy conservation and efficiency measures and; installation of renewable technologies e.g. sensitively located and designed on-building solar photovoltaics. Whilst all proposed renewable energy technologies would need to be assessed, installation of wind turbines in this location is likely to raise impact pathways with bird receptors and some designs may not be appropriate. The following links provide useful examples:

<http://www.power-technology.com/features/featuregreen-clean-mean---the-worlds-most-environmentally-friendly-sports-stadiums-4278520/>

<http://www.energysavingtrust.org.uk/blog/sports-stadiums-seek-score-high-sustainability>

#### Construction Environment Management Plan

41. The applicant should also prepare a Construction Environmental Management Plan (CEMP) document to manage and mitigate the main environmental effects during the construction phases of the proposed development. The CEMP should address and propose measures to minimise the main construction effects of the development and, amongst other things, should include details of ecological mitigation, construction and demolition waste management, pollution prevention and soil resource management. The CEMP would normally be expected to include the agreed method statements to mitigate or avoid adverse environmental impacts.
42. The CEMP should be compiled in a coherent and integrated document and should be accessible to site managers, all contractors and sub-contractors working on site as a simple point of reference for site environmental management systems and procedures.

## **Part Two**

43. MEAS can offer advice on the relevant archives and other sources that should be consulted.
44. Guidance on the Merseyside and Halton Joint Waste Local Plan can be found here: [http://meas.org.uk/media/4981/ADP-001-WasteLocalPlan\\_Final\\_LoRes\\_opt.pdf](http://meas.org.uk/media/4981/ADP-001-WasteLocalPlan_Final_LoRes_opt.pdf)

I would be pleased to discuss these issues further and to provide additional information in respect of any of the matters raised.

Lucy Atkinson  
Waste Appraisal and Support Services Team Leader

*Merseyside Environmental Advisory Service – delivering high quality environmental advice and sustainable solutions to the Districts of Halton, Knowsley, Liverpool, St.Helens, Sefton and Wirral*





# Marine Management Organisation

## Scoping Opinion

### Marine Works (Environmental Impact Assessment) Regulations 2007 (as amended) (“the Regulations”)

**Title:** Everton Football Club Stadium, Bramley-Moore Dock

**Applicant:** Tom Wells, CBRE Ltd

**MMO Reference:** EIA/2017/00023

### Contents

1. Proposal.....	2
2. Location.....	2
3. Environmental Impact Assessment (EIA).....	3
4. Scoping Opinion.....	3
5. Project Description .....	3
6. Nature Conservation .....	3
7. Coastal Processes .....	3
8. Benthic Ecology.....	4
9. Fish Ecology and Fisheries.....	5
10. Dredging and Disposal .....	5
11. Underwater Noise.....	6
12. Baseline Assessments .....	6
13. Cumulative Effects.....	6
14. Conclusion.....	6
References.....	6

# 1. Proposal

Everton Football Club Stadium, Bramley-Moore Dock

## 1.1 Project Background

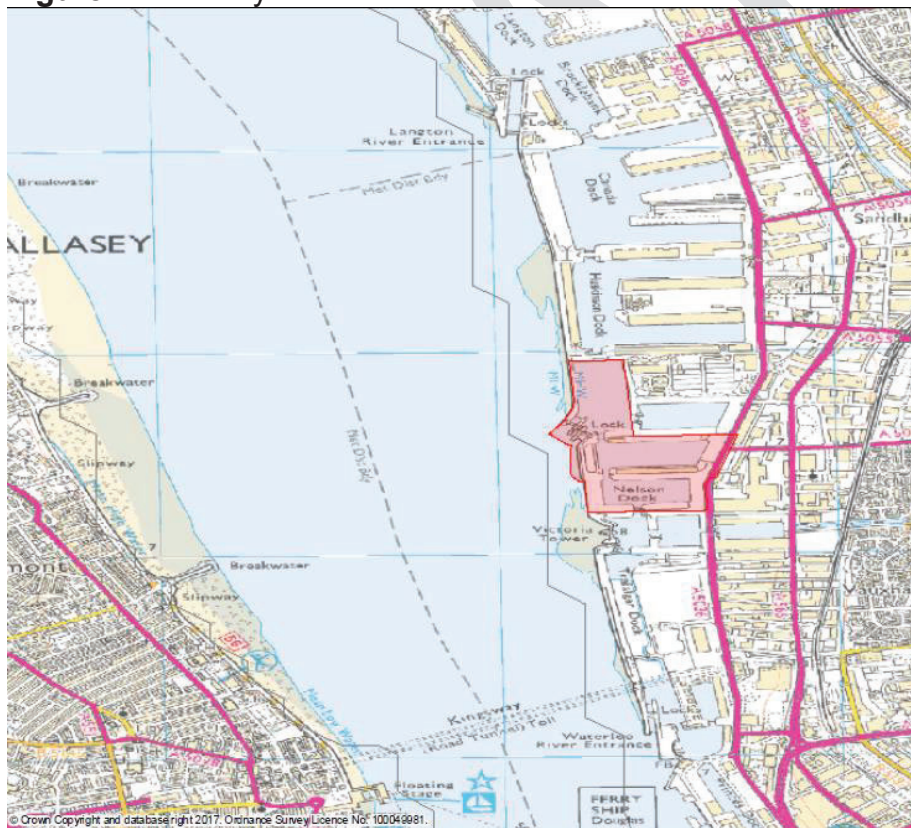
Everton Football Club (EFC) are seeking to relocate from Goodison Park to a proposed new stadium at Bramley-Moore Dock (BMD), Regent Road, Liverpool.

The proposed development comprises the demolition of non-listed structures; potential part-demolition of listed structures; potential infill/part infill of the listed dock; and the construction of a new stadium of up to 60,000 seats together with associated facilities.

## 2. Location

The EFC Stadium, BMD site is located to the west of Regent Road, Liverpool which is displayed in Figure 1 below.

**Figure 1: Bramley-Moore Docks**





### 3. Environmental Impact Assessment (EIA)

It is the understanding of the Marine Management Organisation (MMO) that, pursuant to Regulation 5 of the Regulations, it is agreed between the MMO and EFC that the proposed works constitute EIA development under Annex II 10 (b) - Urban development projects - of EU Directive 2011/92/EU COUNCIL (as amended).

The application required for the proposed works for a marine licence under Part 4 of the Marine and Coastal Access Act 2009 ("the Act") will be accompanied by an Environmental Statement ("ES").

### 4. Scoping Opinion

EFC have prepared a Scoping Report entitled "Environmental Impact Assessment, Scoping Report, Everton FC Stadium, Bramley-Moore Dock" submitted to the MMO on 15 May 2017.

The MMO agrees with the topics outlined in the Scoping Report and, in addition, recommends that the following aspects are considered further during the EIA and should be included in any resulting ES.

### 5. Project Description

5.1 The ES should contain a detailed description of the proposed works.

### 6. Nature Conservation

6.1 The report states in the 'EIA Methodology' that the proposed development site lies in close proximity to the Mersey Narrows & North Wirral Foreshore Special Protected Area (SPA) and Ramsar Site; the Dee Estuary Special Area of Conservation (SAC); the Ribble and Alt Estuaries SPA and Ramsar Site; the Sefton Coast SAC; and the Mersey Estuary SPA and Ramsar Site. In assessing the effects of the proposed development on these receptors, the MMO expects the ES to include potential impacts on any benthic species and/or habitats that these sites are designated to protect (and any other designated features within these sites). The potential impacts of underwater noise arising from construction activities should also be assessed for any sensitive receptors.

### 7. Coastal Processes

7.1. The figures in Appendix A (document 1) display the footprint of the stadium, which is greater in extent than the BMD. The impact of building out into the River Mersey will need to be assessed within the ES, including consideration of how the new footprint (including construction work) might impact the local marine environment (e.g. accretion and scouring of sediments, sediment transport and suspended sediment plumes).

7.2. The ES should consider the project in respect of storm surges and sea level rise.

## 8. Benthic Ecology

8.1. The possibility of releasing benthic non-native species present within Liverpool Docks (e.g. *Styela clava*, *Haliplanella lineata* and *Ficopotamus enigmaticus*) into the wider marine environment is a key issue that requires assessment within the ES.

8.2 While it is stated under the 'Aquatic Ecology' Baseline Conditions that dense populations of the blue mussel (*Mytilus edulis*) occur within a neighbouring dock, this species is not included in the section on 'Key Issues and Requirements for Assessment'. *M. edulis* populations are known to mediate water quality in Liverpool Docks (i.e. reduce algal blooms and prevent subsequent anoxia and release of foul odours) by filter-feeding on phytoplankton (Wilkinson et al. 1996). The potential impacts of the proposed development on *M. edulis* populations within the Liverpool Dock complex should therefore be included as a key issue within the EIA.

8.3 The MMO does not agree with the stated assumption that the sediment on the dock floor will be largely barren. Docks act as artificial lagoons and can therefore be useful for the conservation of lagoon specialist species. Indeed, several lagoon specialist benthic species have been recorded in Liverpool Docks (Allen et al. 1995). The impact of the proposed development on sediment-dwelling species in BMD and neighbouring docks should therefore be assessed in the ES.

8.4 The report states that BMD will be dredged prior to infilling and that this material will possibly be disposed of at sea. If this procedure is undertaken, then the potential impacts of disposal on benthic communities at the disposal site should be considered in the ES.

8.5 The report proposes both a Phase I and Phase II habitat survey will be conducted for the terrestrial component, but very little information is presented regarding how the aquatic ecology features are to be characterised. It is stated that "the assessment methodology will be based on the Guidelines for Ecological Impact Assessment in Britain and Ireland – Marine and Coastal (IEEM, 2010)". These surveys must also include the acquisition of suitable data upon which the benthic ecology of the region can be characterised.

## 9. Fish Ecology and Fisheries

9.1 Atlantic salmon (*Salmo salar*) are known to be recolonising the River Mersey (Ikediashi et al., 2012) and migratory fish should be considered within the ES if they transit past the BMD site.

9.2 Fish spawning and nursery grounds may be located proximal to the site. Sole (*Solea solea*), European sprat (*Sprattus sprattus*) and European plaice (*Pleuronectes platessa*) spawning grounds, as well as high intensity European herring nursery grounds (*Clupea harengus*) are all potentially found within the vicinity

of the site (Ellis et al., 2012; Coull et al., 1998). Given the scale of the works the impacts on fish receptors may be limited, however consideration should be shown. The ES should describe fish habitat (including spawning and nursery grounds) and receptors in the proximity of the proposed works, followed by a concise assessment of the potential impacts on them. Where appropriate, justification and evidence that the works are unlikely to unfavourably affect these habitats, should be included in the ES.

## **10. Dredging and Disposal**

10.1 Mitigation measures and methodologies for reducing sediment disturbance and contamination issues should be provided in detail in the ES.

10.2 Details of dredge and disposal methodologies should be included within the ES and potential contaminant issues should be addressed.

10.3 The report states that environmentally harmful contaminants, such as Tributyltin (TBT), are likely to be present in the dock sediments, and that there is potential for these contaminants to be released into the Mersey estuary, and wider marine environment, during silt removal and disposal. The potential effects of these contaminants on fish species and benthic organisms should be assessed in the ES.

## **11. Underwater Noise**

11.1 The underwater noise arising from the construction activities, and the potential impacts of the noise on sensitive marine receptors should be considered within the ES. Considering the location and nature of the works, potential impacts would be fairly localised.

## **12. Baseline Assessments**

12.1 Appropriate references to support the aquatic ecology baseline assessments, and assessment of potential impacts on sensitive receptors, should be included within the ES.

## **13. Cumulative Effects**

13.1 The cumulative effects on the marine environment must be considered within the ES.

## **14. Conclusion**

The topics highlighted in this scoping opinion should be assessed during the EIA process and the outcome of these assessments should be documented in the ES in support of the marine licence application and the planning application. This statement, however, should not necessarily be seen as a definitive list of all EIA requirements. Given the scale and programme of these planned works other work may prove necessary.

Frances Edwards  
Marine Case Officer



[Date]

## References

Allen JR, Wilkinson SB, Hawkins SJ (1995) Redeveloped docks as artificial lagoons: The development of brackish-water communities and potential for conservation of lagoonal species. *Aquatic Conservation* 5: 299–309.

Coull, K.A., Johnstone, R., and S.I. Rogers. (1998). Fisheries Sensitivity Maps in British Waters. Published and distributed by UKOOA Ltd.

Ellis, J.R., Milligan, S.P., Readdy, L., Taylor, N. and Brown, M.J. (2012). Spawning and nursery grounds of selected fish species in UK waters. Sci. Ser. Tech. Rep., Cefas, Lowestoft, 147: 56 pp.

Ikediashi, C., Billington, S. and Stevens, J.R., 2012. The origins of Atlantic salmon (*Salmo salar*) recolonising the River Mersey in northwest England. *Ecology and Evolution* 10: 2537-2548.

Wilkinson SB, Zheng W, Allen JR, Fielding NJ, Wanstall VC, Russell G, and Hawkins SJ (1996) Water quality improvements in Liverpool docks: The role of filter feeders in algal and nutrient dynamics. *Marine Ecology* 17: 197–211.



Date: 29 June 2017  
Our ref: 12188\_216388



Chris Argent  
CBRE

chris.argent@cbre.com

**BY EMAIL ONLY**

Customer Services  
Hornbeam House  
Crewe Business Park  
Electra Way  
Crewe  
Cheshire  
CW1 6GJ

T 0300 060 3900

Dear Chris

This advice is being provided as part of Natural England's Discretionary Advice Service. Everton Football Club has asked Natural England to provide advice for 'Project Blue'.

This advice is provided in accordance with the undefined scope contract quotation and agreement no. DAS2809 dated 25<sup>th</sup> June 2017.

Further to our meeting on Tuesday 13<sup>th</sup> June, here is a summary of the advice Ella Howes (Lead Adviser - Marine) and I gave you.

#### Breeding Bird Surveys

We are satisfied with the approach taken to these surveys and are keen to see the full results of the surveys.

We also have local information that the wall between the dock and the estuary was being utilised by up to 200 pairs of breeding kittiwakes. We advise that surveys be carried out of this area (which cannot be seen from the dock itself) via the estuary/Mersey Ferry by videoing the area (during the breeding season) to confirm whether these birds are still using this area.

#### Bat Surveys

The number of surveys you are proposing is the minimum that should be undertaken and justification should be given if fewer than the minimum are undertaken. We would expect the number of surveys carried out, is enough to fully inform the ecologist of how the structures are being used by bats.

All potential roost entry/exit points must be visible to a surveyor during the emergence/dawn re-entry surveys. It is therefore not possible to confirm if the proposed number of surveys is appropriate at this stage. The building/structure inspections are generally used to determine how many surveyors are needed for each building/structure.

As the site is a flooded dock, we agree that there is little potential for any loss of commuting/foraging habitat.

Consideration needs to be given to the boundary wall adjacent to Regent Road as a potential hibernation site and investigations should be made to see if bats are hibernating in this structure.

#### Wintering Bird Surveys

The amount and length of the surveys undertaken are less than we would expect. We would normally expect you to undertake surveys from October to March inclusive with two visits per month.

We would also expect you to cover autumn and spring migration passages with weekly visits between September to November inclusive and March to Mid-May, inclusive.

You do have time to undertake autumn passage surveys this year but in the absence of full winter surveys and any spring passage surveys, through the desk stop study, you would need to demonstrate that you have enough information in order for the competent authority to determine whether or not there is likely to be likely significant effect to SPA birds.

#### Aquatic Surveys

We are happy with the proposed approach to the aquatic surveys. If the ROV survey is inconclusive, we would advise that wall scrapes are used to confirm the species present. If invasive species are found, we would advise that you produce a detailed disposal methodology for each species.

We would be happy to receive further details about the proposed grab sampling; however, we deem preliminary plans for 10 sampling points to be appropriate, subject to change depending on findings.

Sediment samples should be taken and assessed for contaminants, including: Metals (As, Cd, Cr, Cu, Hg, Ni, Pb, Zn), Organotins (TBT and DBT), Polychlorinated Biphenyls (PCBs) and Polycyclic aromatic hydrocarbons (PAHs).

Once we have received the details of these surveys, we will be happy to discuss proposed remediation options with you.

If wet piling is proposed, we would also advise the need for underwater noise assessments and suitable mitigation measures.

#### Dredging

If dredging is proposed, the impacts of this activity on the adjacent protected sites would need to be considered and appropriate disposal methods should be identified. In this event, we would be able to advise further on the appropriate way to dispose of the material.

#### Habitats Regulations Assessment

We look forward to seeing a draft structure of the HRA for comment.

You would need to include Liverpool Bay potential SPA within your assessment. This is being notified for foraging little tern and common tern and non-breeding little gulls. We would also advise that you consider the Liverpool Bay SPA and potential SPA as a whole rather than as separate SPAs.

The Liverpool Waters scheme includes proposed mitigation for cormorants in Nelson Dock comprising floating pontoons. You would need to ensure that your proposal does not undermine this proposed mitigation.

Your in-combination assessment will need to include all schemes which may impact on the interest features of the estuary. This could include plans or projects from neighbouring LPAs and the MMO.

You can also seek further advice from us regarding our conservation advice for the [designated sites](#).

#### Green Infrastructure

The proposed development is within an area that Natural England considers could benefit from enhanced green infrastructure (GI) provision. Multi-functional green infrastructure can perform a range of functions including improved flood risk management, provision of accessible green space, climate change adaptation and biodiversity enhancement. Natural England would encourage the incorporation of GI into this development.

#### Biodiversity

This development may provide opportunities to incorporate features into the design which are beneficial to wildlife such as the incorporation of roosting opportunities for bats the use of native

species in the landscape planting. This is in accordance with NPPF Paragraph 118 which states that 'opportunities to incorporate biodiversity in and around developments should be encouraged', Section 40(3) of the Natural Environment and Rural Communities Act (2006) which states that 'conserving biodiversity includes, in relation to a living organism or type of habitat, restoring or enhancing a population or habitat'. Biodiversity 2020: A strategy for England's wildlife and ecosystem services and Making Space for Nature (2010) also provide strong drivers for the inclusion of biodiversity enhancements through the planning process

#### Strategic Approach

As noted when we met, we are in contact with Liverpool City Council planning department about options for a strategic approach to the development of the Liverpool dock area and this is something which you may wish to be a part of.

Yours sincerely

Miss Elizabeth Knowles  
Lead Adviser  
Cheshire, Greater Manchester, Merseyside & Lancashire Area Team

Date: 07 June 2017  
Our ref: 216630  
Your ref: Bramley Moore Dock



FAO Peter Jones  
Liverpool City Council

peter.jones2@liverpool.gov.uk  
**BY EMAIL ONLY**

Customer Services  
Hornbeam House  
Crewe Business Park  
Electra Way  
Crewe  
Cheshire  
CW1 6GJ

T 0300 060 3900

Dear Peter

**Environmental Impact Assessment Scoping consultation (Regulation 15 (3) (i) of the EIA Regulations 2011): Construction of new 600000 seat stadium**  
**Location: Bramley Moore Dock, Regent Road, Liverpool**

Thank you for seeking our advice on the scope of the Environmental Statement (ES) in your consultation dated and received on 25 May 2017.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Case law<sup>1</sup> and guidance<sup>2</sup> has stressed the need for a full set of environmental information to be available for consideration prior to a decision being taken on whether or not to grant planning permission. Annex A to this letter provides Natural England's advice on the scope of the Environmental Impact Assessment (EIA) for this development.

Should the proposal be amended in a way which significantly affects its impact on the natural environment then, in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, Natural England should be consulted again.

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us. For any queries relating to the specific advice in this letter only please contact Elizabeth Knowles on 0208 225 7506. For any new consultations, or to provide further information on this consultation please send your correspondences to [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk).

We really value your feedback to help us improve the service we offer. We have attached a feedback form to this letter and welcome any comments you might have about our service.

Yours sincerely

Elizabeth Knowles  
Lead Adviser  
Cheshire, Greater Manchester, Merseyside & Lancashire Area Team

---

<sup>1</sup> Harrison, J in *R. v. Cornwall County Council ex parte Hardy* (2001)

<sup>2</sup> *Note on Environmental Impact Assessment Directive for Local Planning Authorities* Office of the Deputy Prime Minister (April 2004) available from <http://webarchive.nationalarchives.gov.uk/+http://www.communities.gov.uk/planningandbuilding/planning/sustainability/environmental/environmentalimpactassessment/noteenvironmental/>



## **Annex A – Advice related to EIA Scoping Requirements**

### **1. General Principles**

Schedule 4 of the Town & Country Planning (Environmental Impact Assessment) Regulations 2011, sets out the necessary information to assess impacts on the natural environment to be included in an ES, specifically:

- 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, in particular, population, fauna, flora, soil, water, air, climatic factors, material assets, including the architectural and archaeological heritage, 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 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.

It will be important for any assessment to consider the potential cumulative effects of this proposal, including all supporting infrastructure, with other similar proposals and a thorough assessment of the 'in combination' effects of the proposed development with any existing developments and current applications. A full consideration of the implications of the whole scheme should be included in the ES. All supporting infrastructure should be included within the assessment.

### **2. Biodiversity and Geology**

#### **2.1 Ecological Aspects of an Environmental Statement**

Natural England advises that the potential impact of the proposal upon features of nature conservation interest and opportunities for habitat creation/enhancement should be included within this assessment in accordance with appropriate guidance on such matters. Guidelines for Ecological Impact Assessment (EclA) have been developed by the Chartered Institute of Ecology and Environmental Management (CIEEM) and are available on their website.

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.

The National Planning Policy Framework sets out guidance in S.118 on how to take account of biodiversity interests in planning decisions and the framework that local authorities should provide to assist developers.

#### **2.2 Internationally and Nationally Designated Sites**

The ES should thoroughly assess the potential for the proposal to affect designated sites. European sites (eg designated Special Areas of Conservation and Special Protection Areas) fall within the scope of the Conservation of Habitats and Species Regulations 2010. In addition paragraph 118 of the National Planning Policy Framework requires that potential Special Protection

Areas, possible Special Areas of Conservation, listed or proposed Ramsar sites, and any site identified as being necessary to compensate for adverse impacts on classified, potential or possible SPAs, SACs and Ramsar sites be treated in the same way as classified sites.

Under Regulation 61 of the Conservation of Habitats and Species Regulations 2010 an appropriate assessment needs to be undertaken in respect of any plan or project which is (a) likely to have a significant effect on a European site (either alone or in combination with other plans or projects) and (b) not directly connected with or necessary to the management of the site.

Should a Likely Significant Effect on a European/Internationally designated site be identified or be uncertain, the competent authority (in this case the Local Planning Authority) may need to prepare an Appropriate Assessment, in addition to consideration of impacts through the EIA process.

### **Sites of Special Scientific Interest (SSSIs) and sites of European or international importance (Special Areas of Conservation (SAC), Special Protection Areas (SPA) and Ramsar sites)**

The development site is adjacent to Liverpool Bay Extension potential SPA and could also have a potential impact on the following designated nature conservation sites:

- Mersey Narrows SSSI
- North Wirral Foreshore SSSI
- Mersey Narrows & North Wirral Foreshore SPA
- Mersey Estuary SPA
- Dee Estuary SPA
- Liverpool Bay SPA
- Ribble & Alt Estuaries SPA
- Dee Estuary SAC
- Sefton Coast SAC
- Mersey Narrows & North Wirral Foreshore Ramsar
- Ribble & Alt Estuaries Ramsar

Further information on the SSSIs and their special interest features can be found at [www.magic.gov.uk](http://www.magic.gov.uk). The Environmental Statement should include a full assessment of the direct and indirect effects of the development on the features of special interest within these sites and should identify such mitigation measures as may be required in order to avoid, minimise or reduce any adverse significant effects.

Natura 2000 network site conservation objectives are available on our internet site <http://publications.naturalengland.org.uk/category/6490068894089216>

### **2.3 Regionally and Locally Important Sites**

The EIA will need to consider any impacts upon local wildlife and geological sites. Local Sites are identified by the local wildlife trust, geoconservation group or a local forum established for the purposes of identifying and selecting local sites. They are of county importance for wildlife or geodiversity. The Environmental Statement should therefore include an assessment of the likely impacts on the wildlife and geodiversity interests of such sites. The assessment should include proposals for mitigation of any impacts and if appropriate, compensation measures. Contact the local wildlife trust, geoconservation group or local sites body in this area for further information.

### **2.4 Protected Species - Species protected by the Wildlife and Countryside Act 1981 (as amended) and by the Conservation of Habitats and Species Regulations 2010**

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, but advises on the procedures and legislation relevant to such species. Records of protected species should be sought from appropriate local biological record centres, nature conservation organisations, groups and individuals; and 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, to assist in the impact assessment.

The conservation of species protected by law 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 area likely to be affected by the proposal 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.

In order to provide this information there may be a requirement for a survey at a particular time of year. 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 links to guidance on survey and mitigation.

## **2.5 Habitats and Species of Principal Importance**

The ES should thoroughly assess the impact of the proposals on habitats and/or species listed as 'Habitats and Species of Principal Importance' within the England Biodiversity List, published under the requirements of S41 of the Natural Environment and Rural Communities (NERC) Act 2006. Section 40 of the NERC Act 2006 places a general duty on all public authorities, including local planning authorities, to conserve and enhance biodiversity. Further information on this duty is available here <https://www.gov.uk/guidance/biodiversity-duty-public-authority-duty-to-have-regard-to-conserving-biodiversity>.

Government Circular 06/2005 states that Biodiversity Action Plan (BAP) species and habitats, 'are capable of being a material consideration...in the making of planning decisions'. Natural England therefore advises that survey, impact assessment and mitigation proposals for Habitats and Species of Principal Importance should be included in the ES. Consideration should also be given to those species and habitats included in the relevant Local BAP.

Natural England advises that a habitat survey (equivalent to Phase 2) is carried out on the site, in order 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 (eg from previous surveys);
- Additional surveys carried out as part of this proposal;
- The habitats and species present;
- The status of these habitats and species (eg 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 that might be required.

The development should seek if possible to avoid adverse impact on sensitive areas for wildlife within the site, and if possible provide opportunities for overall wildlife gain.

The record centre for the relevant Local Authorities should be able to provide the relevant information on the location and type of priority habitat for the area under consideration.

## **2.6 Contacts for Local Records**

Natural England does not hold local information on local sites, local landscape character and local or national biodiversity priority habitats and species. We recommend that you seek further information from the appropriate bodies (which may include the local records centre, the local wildlife trust, local geoconservation group or other recording society and a local landscape characterisation document).

## **3. Landscape Character**

## **Landscape and visual impacts**

Natural England would wish to see details of local landscape character areas mapped at a scale appropriate to the development site as well as any relevant management plans or strategies pertaining to the area. The EIA should include assessments of visual effects on the surrounding area and landscape together with any physical effects of the development, such as changes in topography. The European Landscape Convention places a duty on Local Planning Authorities to consider the impacts of landscape when exercising their functions.

The EIA 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, as detailed proposals are developed.

Natural England supports the publication *Guidelines for Landscape and Visual Impact Assessment*, produced by the Landscape Institute and the Institute of Environmental Assessment and Management in 2013 (3rd edition). The methodology set out is almost universally used for landscape and visual impact assessment.

In order to foster high quality development that respects, maintains, or enhances, local landscape character and distinctiveness, Natural England encourages all new development to consider the character and distinctiveness of the area, with the siting and design of the proposed development reflecting local design characteristics and, wherever possible, using local materials. The Environmental Impact Assessment process should detail the measures to be taken to ensure the building design will be of a high standard, as well as detail of layout alternatives together with justification of the selected option in terms of landscape impact and benefit.

The assessment should also include the cumulative effect of the development with other relevant existing or proposed developments in the area. In this context Natural England advises that the cumulative impact assessment should include other proposals currently at Scoping stage. Due to the overlapping timescale of their progress through the planning system, cumulative impact of the proposed development with those proposals currently at Scoping stage would be likely to be a material consideration at the time of determination of the planning application.

The assessment should refer to the relevant [National Character Areas](#) which can be found on our website. Links for Landscape Character Assessment at a local level are also available on the same page.

## **4. Access and Recreation**

Natural England encourages any proposal to incorporate measures to help encourage people to access the natural environment ~~countryside for quiet enjoyment~~. Measures such as reinstating existing footpaths together with the creation of new footpaths and bridleways are to be encouraged. Links to other green networks and, where appropriate, urban fringe areas should also be explored to help promote the creation of wider green infrastructure. Relevant aspects of local authority green infrastructure strategies should be incorporated where appropriate.

## **Rights of Way, Access land, Coastal access and National Trails**

The EIA should consider potential impacts on access land, public open land, rights of way and coastal access routes in the vicinity of the development. Appropriate mitigation measures should be incorporated for any adverse impacts. We also recommend reference to the relevant Right of Way Improvement Plans (ROWIP) to identify public rights of way within or adjacent to the proposed site that should be maintained or enhanced.

## **5. Air Quality**

Air quality in the UK has improved over recent decades but air pollution remains a significant issue;



for example over 97% of sensitive habitat area in England is predicted to exceed the critical loads for ecosystem protection from atmospheric nitrogen deposition ([England Biodiversity Strategy](#), Defra 2011). A priority action in the England Biodiversity Strategy is to reduce air pollution impacts on biodiversity. 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 assessment should take account of the risks of air pollution and how these can be managed or reduced. 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](http://www.apis.ac.uk)). Further information on air pollution modelling and assessment can be found on the Environment Agency website.

## **6. Climate Change Adaptation**

The [England Biodiversity Strategy](#) published by Defra establishes principles for the consideration of biodiversity and the effects of climate change. The ES should reflect these principles and identify how the development's effects on the natural environment will be influenced by climate change, and how ecological networks will be maintained. The NPPF requires that the planning system should contribute to the enhancement of the natural environment 'by establishing coherent ecological networks that are more resilient to current and future pressures' ([NPPF](#) Para 109), which should be demonstrated through the ES.

## **7. Cumulative and in-combination effects**

A full consideration of the implications of the whole scheme should be included in the ES. All supporting infrastructure should be included within the assessment.

The ES should include an impact assessment to 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, ie 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.

Merseyside Environmental Advisory Service  
2<sup>nd</sup> Floor, Magdalen House  
Trinity Road, Bootle, L20 3NJ  
Director: Alan Jemmett, PhD, MBA

Enquiries: 0151 934 4951

Contact: Peter McKeon  
Email: measdcconsultations@sefton.gov.uk

## **DISCRETIONARY ADVICE**

To: Rachel Kerr / Phil Preston  
Organisation: WYG

From: Peter McKeon  
MEAS

Your Ref:  
File Ref: DISC19-012  
Date: 21 August 2019

### **Proposed football stadium at Bramley Moore Dock / Re-development of Goodison Park site**

1. Thank you for seeking discretionary advice from Merseyside Environmental Advisory Service on your proposal for the above developments.

1. I have summarised the matters discussed in our meeting of 19 August 2019 below.

#### Bramley Moore Dock

2. The ecological surveys undertaken to date and the results of these were discussed. Copies of draft survey reports are to be provided to both MEAS and NE to enable confirmation that the level of survey undertaken is sufficient. However, for MEAS there will be an additional charge for this at a rate to be confirmed when the draft reports are provided.
3. With regard to non-breeding birds, it was mentioned that a population of seven (or more) cormorant would be considered significant in terms of the Liverpool Bay SPA population. Seven equates to 1% of the SPA cormorant population.
4. It was confirmed that a shadow HRA will be produced for submission with the planning application. Aside from loss and disturbance to habitats, other issues mentioned that will require consideration in the shadow HRA include bird strike, increased litter and recreational pressure. The shadow HRA will also need to take account of construction methodologies, such as piling methodology.
5. The need for the in-combination assessment to consider effects on Nelson Dock was discussed. Nelson Dock had previously been identified as the location for mitigation in relation to the Liverpool Waters developments. The assessment will therefore need to identify how the BMD development will affect this.

*Merseyside Environmental Advisory Service – delivering high quality environmental advice and sustainable solutions to the Districts of Halton, Knowsley, Liverpool, St.Helens, Sefton and Wirral*



6. It was mentioned that non-breeding bird mitigation could be located outside of the application site in adjacent dock areas. Liaison with consultants undertaking assessments and providing mitigation in relation to the Liverpool Waters developments was recommended.
7. During bat surveys, a single building on site was found to support a single common pipistrelle bat. Options for mitigation are to be explored, although it was recognised that opportunities for bats on the site post-development will be limited due to lighting and disturbance due to noise and vibration.

Goodison Park

8. Extended phase 1 habitat survey had been undertaken and habitats on the site were limited.
9. The development provides opportunities for net gains and enhancements, including green / brown roofs, green walls and erection of bat roosting and bird nesting boxes.
10. Recreational pressure effects were discussed and the need for these to be mitigated. The situation with the draft Visitor Management Strategy (VMS) was explained and the requirement for each application to be dealt with on an ad hoc basis in the absence of an agreed VMS. Potential mitigation measures were discussed including provision of a commuted sum, using figure taken from draft VMS, and provision of leaflet to occupiers of new dwellings informing them of SANGs and responsible usage of the coast.
11. Net biodiversity gains were discussed in relation to both Goodison Park and BMD. However, attempting to achieve a net gain of 10% mentioned, although it was added that this figure is not supported by any current planning policy.

Our advice is based on our understanding of your proposal. If there are any subsequent changes to your proposal, or to legislation, policy and/or statutory guidance, when your planning application is considered, our advice to Liverpool City Council Local Planning Authority may change or raise additional matters.

Our invoice will follow within 14 days as agreed.

Please let me know if you have any specific queries regarding the advice provided.

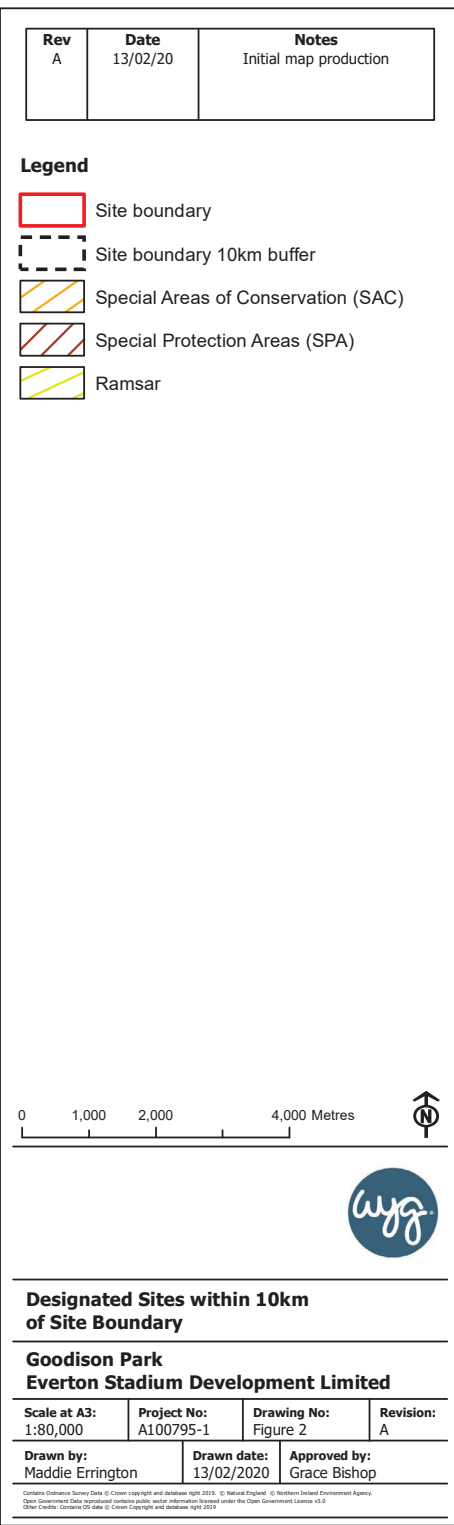
Peter McKeon  
Ecologist





## **Appendix D – Map Showing Statutory Designated Sites within 10 km**









## **Appendix E – Map Showing Public Open Space within 10km of application site**



function	Name of open Space	Size of site (hectares)
country parks	BIDSTON HILL	49.620
country parks	CROXTETH HALL	221.763
country parks	NORTH WIRRAL COASTAL	29.100
country parks	RIMROSE VALLEY	106.149
Play Space	Un named play spaces within 10km	23.59
Play Space	Anfield Playground Recreation Ground	0.038
Play Space	Fender Skatepark	0.059
Playing Field	Un named playing fields within 10km	287
Playing Field	Ackers Hall Recreation Ground	1.001
Playing Field	Adlam Park	3.605
Playing Field	Admiral Park	0.985
Playing Field	Aintree Parish Playing Field	3.511
Playing Field	Alfred Holt Athletic Ground	3.279
Playing Field	Belvidere Recreation Ground	3.544
Playing Field	Birkenhead Park Rugby Club	2.717
Playing Field	Brook Vale Playing Field	3.418
Playing Field	Doric Park	2.345
Playing Field	Geoffrey Hughes Memorial Ground	19.134
Playing Field	Grove Mount Playing Fields	1.517
Playing Field	Heron Eccles Playing Field	14.233
Playing Field	Higher Bebington Recreation Ground	4.364
Playing Field	Jubilee Park	6.324
Playing Field	King George V Memorial Field	4.002
Playing Field	King George V Memorial Playing Field	0.636



function	Name of open Space	Size of site (hectares)
Playing Field	King George V Playing Fields	10.121
Playing Field	LC McAllester Memorial Field	5.655
Playing Field	Liverpool Cricket And Football Ground	1.790
Playing Field	Lord Derby Memorial Playing Fields	6.344
Playing Field	Lower Breck Recreation Ground	14.425
Playing Field	Moss Lane Playing Field	7.581
Playing Field	North Seacombe Recreation Ground	1.194
Playing Field	Oxton Cricket Ground	3.069
Playing Field	Oxton Road Playing Fields	1.689
Playing Field	Reggie Smith Playing Fields	4.761
Playing Field	Rice Lane Recreation Ground	6.219
Playing Field	Salisbury Gardens	0.676
Playing Field	Sefton Rugby Union Football Ground	3.869
Playing Field	Sparrow Hall Playing Fields	12.053
Playing Field	Springwood Recreation Ground	3.791
Playing Field	The Bill Shankly Playing Fields	4.774
Playing Field	The Delph Recreation Ground	1.846
Playing Field	The Queen Elizabeth Diamond Jubilee Field	2.327
Playing Field	The Simpson Ground	2.333
Playing Field	The Wallacre	4.297
Playing Field	Tower Grounds	5.072
Playing Field	Walker Playing Fields	5.021
Playing Field	Wallasey Cricket Club	1.351



function	Name of open Space	Size of site (hectares)
Playing Field	Walton Clubmoor Recreation Ground	9.797
Playing Field	Warbreck Moor Recreation Ground	1.166
Playing Field	Waterloo Grammar School Playing Field	3.164
Playing Field	Wayfarers Cricket Club	1.033
Public Park Or Garden	Un named Parks or Gardens	113.03
Public Park Or Garden	Adelaide Garden	0.852
Public Park Or Garden	Alderman John Village Garden	3.187
Public Park Or Garden	Alexandra Park	1.593
Public Park Or Garden	Alt Meadows	2.866
Public Park Or Garden	Alt Park	3.656
Public Park Or Garden	Alt Park	2.777
Public Park Or Garden	Atlantic Park	1.282
Public Park Or Garden	Bankfield Park	1.097
Public Park Or Garden	Baycliff Road Gardens	0.865
Public Park Or Garden	Beach Lawn Garden	1.219
Public Park Or Garden	Belle Vale Park	5.079
Public Park Or Garden	Bidston Community Garden	0.028
Public Park Or Garden	Bidston Court Gardens	2.867
Public Park Or Garden	Bidston Hill	48.511
Public Park Or Garden	Bidston Moss	32.812
Public Park Or Garden	Birkenhead Park	55.106
Public Park Or Garden	Black Wood	6.456
Public Park Or Garden	Blundellsands Park	8.333
Public Park Or Garden	Bootle South Recreation Ground	6.126



function	Name of open Space	Size of site (hectares)
Public Park Or Garden	Bowersdale Park	0.841
Public Park Or Garden	Brow Side Gardens	16.173
Public Park Or Garden	Calderstones Park	37.993
Public Park Or Garden	Canalside Park	1.085
Public Park Or Garden	Central Park	18.590
Public Park Or Garden	Chavasse Park	1.747
Public Park Or Garden	Childwall Woods	27.347
Public Park Or Garden	Clair Gardens	0.279
Public Park Or Garden	Clarke Gardens	7.956
Public Park Or Garden	Clock Community Garden	0.169
Public Park Or Garden	Copy Farm Park	2.028
Public Park Or Garden	Coronation Park	2.968
Public Park Or Garden	Court Hey Park	15.098
Public Park Or Garden	Courtney Park	0.112
Public Park Or Garden	Cross Lane	14.154
Public Park Or Garden	Crown Street Park	2.626
Public Park Or Garden	Croxteth Hall and Country Park	223.813
Public Park Or Garden	Cullen Street Green	0.101
Public Park Or Garden	Cyril Cook Park	2.500
Public Park Or Garden	Deerbarn Park	0.736
Public Park Or Garden	Derby Park	8.795
Public Park Or Garden	Devonwall Gardens	17.012
Public Park Or Garden	Dovecot Park	4.756
Public Park Or Garden	Duck Pond Lake Park	10.138





function	Name of open Space	Size of site (hectares)
Public Park Or Garden	Earlston Gardens	1.752
Public Park Or Garden	Edward Kemp Community Garden	0.569
Public Park Or Garden	Elleray Park	1.746
Public Park Or Garden	Everton Park	4.519
Public Park Or Garden	Falkner Square	0.644
Public Park Or Garden	Fazakerley Hall Recreation Ground	5.837
Public Park Or Garden	Fern Grove Green	0.161
Public Park Or Garden	Festival Gardens	29.502
Public Park Or Garden	Field Lane Park	1.150
Public Park Or Garden	Flynn's Piece	0.635
Public Park Or Garden	Gorse Millennium Green	0.513
Public Park Or Garden	Grant Gardens	1.704
Public Park Or Garden	Greenbank Park	7.170
Public Park Or Garden	Harthill Estate	11.476
Public Park Or Garden	Henderson Green	0.346
Public Park Or Garden	Kensington Fields	0.268
Public Park Or Garden	Larkhill Estate Gardens	2.289
Public Park Or Garden	Lester Gardens	1.090
Public Park Or Garden	Mab Lane Community Woodland	14.018
Public Park Or Garden	Marian Gardens	5.039
Public Park Or Garden	Marine Garden	1.393
Public Park Or Garden	Martin's Garden	0.063
Public Park Or Garden	May Pole Green	0.083
Public Park Or Garden	Mayer Park	4.650



function	Name of open Space	Size of site (hectares)
Public Park Or Garden	McGoldrick Park	4.973
Public Park Or Garden	Memorial Park	5.324
Public Park Or Garden	Mersey Park	8.437
Public Park Or Garden	Mill Dam Park	16.799
Public Park Or Garden	Mill Lane Open Space	0.958
Public Park Or Garden	Millbrook Park Millennium Green	15.057
Public Park Or Garden	Moorside Park	6.631
Public Park Or Garden	Muirhead Avenue Gardens	1.814
Public Park Or Garden	New Ferry Park	4.849
Public Park Or Garden	Newsham Park	40.979
Public Park Or Garden	Norris Green Park	6.981
Public Park Or Garden	Northwood Forest Hills	11.394
Public Park Or Garden	Oak Vale Park	1.040
Public Park Or Garden	Oakdale Park	1.226
Public Park Or Garden	Olive Mount Gardens	0.442
Public Park Or Garden	Otterspool Park	37.715
Public Park Or Garden	Parklands	0.555
Public Park Or Garden	Penny Lane Millennium Green	1.130
Public Park Or Garden	Phythian Park	1.870
Public Park Or Garden	Potter's Barn Park	1.359
Public Park Or Garden	Rainbow Park	1.803
Public Park Or Garden	Reynolds Park	5.491
Public Park Or Garden	Rimrose Valley Country Park	116.397
Public Park Or Garden	River Park	27.572

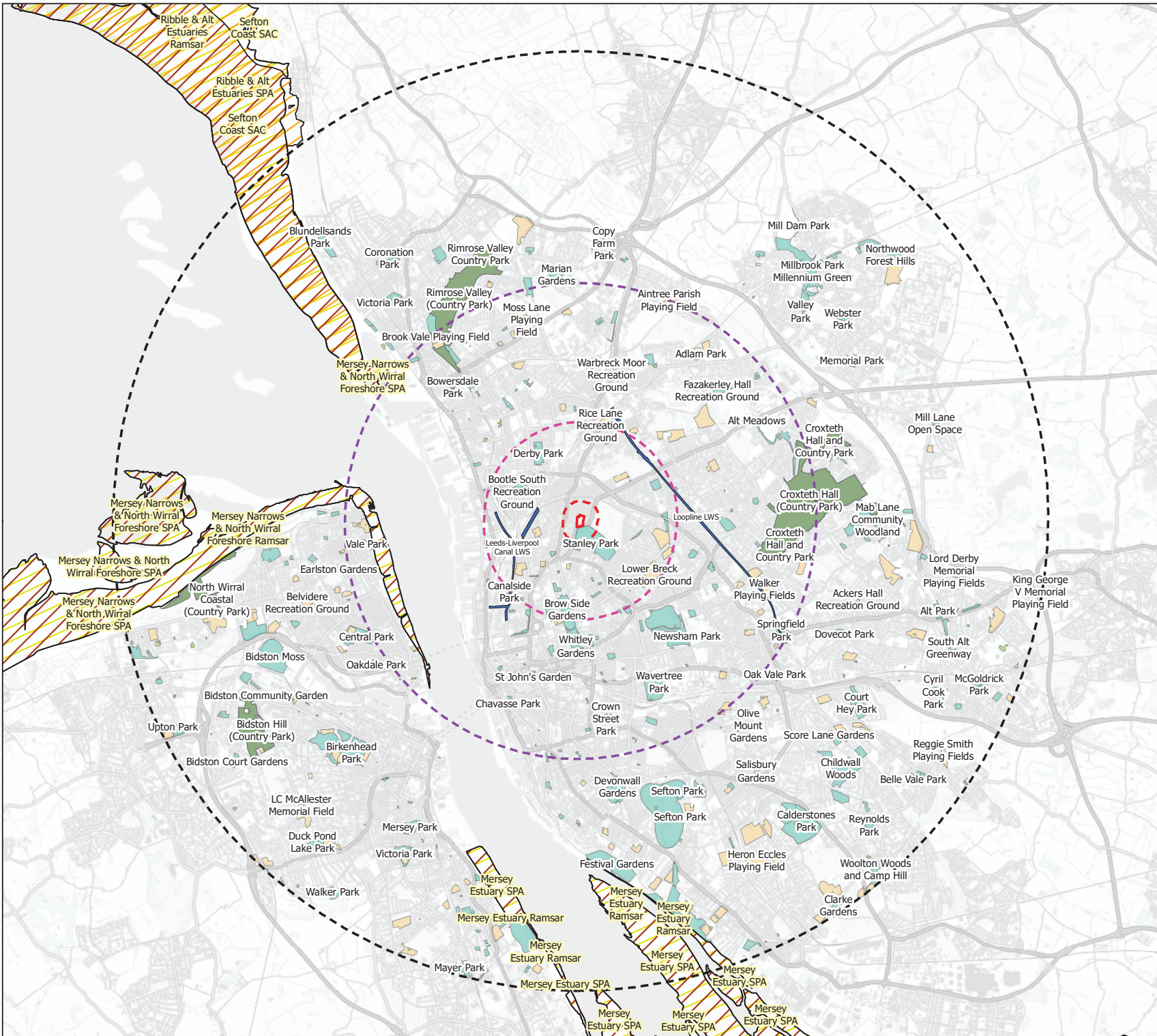


function	Name of open Space	Size of site (hectares)
Public Park Or Garden	Sawpit Park	1.156
Public Park Or Garden	Score Lane Gardens	4.139
Public Park Or Garden	Seeds Lane Park	3.907
Public Park Or Garden	Sefton Park	93.553
Public Park Or Garden	South Alt Greenway	4.174
Public Park Or Garden	Springfield Park	4.967
Public Park Or Garden	St Chad's Park	1.132
Public Park Or Garden	St Hilary Gardens	0.272
Public Park Or Garden	St John's Garden	1.260
Public Park Or Garden	St John's Millenium Green	2.159
Public Park Or Garden	St Martin's Recreation Ground	0.597
Public Park Or Garden	St Mary's Garden Of Rest	0.894
Public Park Or Garden	Stalmine Road Gardens	0.585
Public Park Or Garden	Stanley Garden	0.650
Public Park Or Garden	Stanley Park	33.602
Public Park Or Garden	Stanley Park	0.442
Public Park Or Garden	Ten Acre Pits	1.404
Public Park Or Garden	The Bowley	1.318
Public Park Or Garden	The Breck	1.927
Public Park Or Garden	The Lawn	0.300
Public Park Or Garden	The Woodlands Community Park	0.589
Public Park Or Garden	Thirlmere Park	0.896
Public Park Or Garden	Unicorn Park	0.373
Public Park Or Garden	Upton Park	11.823



function	Name of open Space	Size of site (hectares)
Public Park Or Garden	Utting Avenue Gardens	0.694
Public Park Or Garden	Vale Park	3.972
Public Park Or Garden	Valley Park	5.399
Public Park Or Garden	Victoria Park	7.425
Public Park Or Garden	Victoria Park	11.362
Public Park Or Garden	Village Green	0.140
Public Park Or Garden	Walker Park	5.584
Public Park Or Garden	Wallasey Grange	0.520
Public Park Or Garden	Walton Clubmoor Recreation Ground	1.270
Public Park Or Garden	Warbreck Park	0.087
Public Park Or Garden	Wavertree Park	18.152
Public Park Or Garden	Webster Park	3.439
Public Park Or Garden	Whitley Gardens	7.276
Public Park Or Garden	Woolton Woods and Camp Hill	11.155
<b>Total area of public open space</b>		<b>2,298.201</b>





Rev	Date	Notes
A	09/12/19	Initial map production

Legend

- Site boundary
- Site boundary 300m buffer
- Site boundary 2km buffer
- Site boundary 5km buffer
- Site boundary 10km buffer
- Special Areas of Conservation (SAC)
- Special Protection Areas (SPA)
- Ramsar
- Local Wildlife Site (LWS) (3)
- Country Parks (4)
- Play Space (176)
- Playing Field (132)
- Public Park Or Garden (221)



Designated Sites, Local Wildlife Sites, Country Parks and Public Open Spaces within 10km of Site Boundary

Goodison Park Legacy  
Everton Stadium Development Limited

Scale at A3: 1:78,599	Project No: A100795-1	Drawing No: Figure 1	Revision: A
Drawn by: Maddie Errington	Drawn date: 09/12/2019	Approved by: Phil Preston	

Contains Ordnance Survey Data © Crown copyright and database right 2019. © National England © Northern Ireland Environment Agency  
Open Government Data approved content public water information licensed under the Open Government Licence v3.0  
Other Credits: Content © Map © Crown Copyright and database right 2019





**[ecology@wyg.com](mailto:ecology@wyg.com)**

**WYG Environment Planning Transport  
Limited.**

Registered in England & Wales Number:  
3050297

Registered Office: Arndale Court, Headingley,  
Leeds, LS6 2UJ



**creative minds** safe hands