

Former MTL Site, Liverpool

Preliminary Ecological Appraisal Report

Morgan Sindall

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Quality Information

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The methodology adopted and the sources of information used by AECOM in providing its services are outlined in this Report. The work described in this Report was undertaken in July and August 2020 and is based on the conditions encountered and the information available during the said period of time. The scope of this Report and the services are accordingly factually limited by these circumstances. AECOM disclaim any undertaking or obligation to advise any person of any change in any matter affecting the Report, which may come or be brought to AECOM's attention after the date of the Report.

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Executive Summary

AECOM Ltd was instructed by Morgan Sindall to carry out a Preliminary Ecological Appraisal (PEA) of the former Merseyside Transport Limited (MTL) Site, Liverpool, located to the east of Innovation Boulevard and to the south of a major road corridor; Edge Lane, Liverpool.

The Site is an urban space previously used as a public realm to serve offices and buildings associated with Innovation Park. It is proposed the Site is redeveloped as a temporary film studio. The proposed redevelopment includes three plots with the northern and southern plots housing 65 m x 30 m x 12.5 m high temporary pop-up studios and the middle site being a car park.

This PEA was commissioned to identify whether there are known or potential ecological features (nature conservation designations, protected and notable habitats and / or species, including Schedule 9 invasive plants) that may constrain or influence the design and implementation of the future redevelopment.

A desk study for protected sites and species and an extended Phase 1 habitat survey were undertaken during July 2020. The information gained from the desk study and survey has been used to determine the likely ecological value of the Site, potential for protected, notable and invasive species to be present and to identify what further specific ecological survey work may be needed prior to the submission of a planning application.

The habitats present within the Site have potential to support nesting birds and as such any vegetation clearance should be undertaken outside of the period March to August inclusive when bird species are likely to be breeding.

Habitats may also support European hedgehog (*Erinaceus europaeus*) and it is recommended that precautions are adopted to avoid harm to this species during any vegetation clearance works and that, where possible, the redevelopment is planned to take account of likely mitigation requirements for this species.

Cotoneaster (*Cotoneaster sp*), was not recorded within the Site during the extended Phase 1 habitat survey, however it is not possible to exclude presence of this species from the Site due to it being commonplace in ornamental planting. Cotoneaster could be present, but visibility of this species may have been limited within the denser areas of ornamental planting within the Site. Some species of Cotoneaster are listed on Schedule 9 of the Wildlife and Countryside Act 1981 (as amended). It is illegal to plant or otherwise cause to grow in the wild any plant listed on Schedule 9 Part II of Section 14(2) of the Wildlife and Countryside Act 1981 (as amended).

The current development proposal does not impact the areas of ornamental planting but if the habitats where this species are potentially present are to be impacted by the development of the Site, then manual removal by hand pulling or digging using hand tools should be undertaken and any seeds removed from Site and disposed of as green waste (for incineration) or taken to a suitably licenced landfill. If no seeds are present, removed plants can be chipped onsite or removed from Site as green waste.

Habitats present within the Site are not of any significant ecological value, however given that there are areas of grassland, scattered trees and scrub, albeit isolated in nature, do provide green space within a largely urban environment, as much of this habitat as possible should be protected and retained during development of the Site.

Outline opportunities for wildlife enhancement have been proposed to enhance the Site for biodiversity to reflect its location within the wider surroundings.

The constraints outlined here will need to be reassessed if there are any significant changes in the use or management of the land that would affect the habitats and species. If a planning application is made one year or more after a PEA (e.g. after August 2021) it is advisable to review and update the survey data.

1. Introduction

AECOM Limited was instructed by Morgan Sindall to carry out a Preliminary Ecological Appraisal (PEA) at the former Merseyside Transport Limited (MTL) Site, Liverpool (hereafter referred to as the 'Site'). The Site is located to the east of Innovation Boulevard and to the south of a major road corridor; Edge Lane, Liverpool at Ordnance Survey National Grid Reference (OSNGR) SJ 3790 9257. The location of the Site is shown on Figure 1, **Appendix A**.

The Site is an urban space previously used as a public realm to serve offices and buildings associated with Innovation Park. It is proposed the Site is redeveloped as a temporary film studio. The proposed redevelopment includes three plots with the northern and southern plots housing 65 m x 30 m x 12.5 m high temporary pop-up studios and the middle site being a car park.

This PEA was commissioned to identify whether there are known or potential ecological features (nature conservation designations; and protected and notable habitats and species) that may constrain or influence the design and implementation of the proposed redevelopment of the Site. The approach applied when undertaking this PEA accords with the Guidelines for Preliminary Ecological Appraisal published by the Chartered Institute of Ecology and Environmental Management (CIEEM, 2017). The PEA addressed relevant wildlife legislation and planning policy as summarised in Section 2 of this report and is consistent with the requirements of British Standard 42020:2013 Biodiversity, Code of Practice for Planning and Development (British Standards, 2013).

In order to deliver the PEA, a desk study and an extended Phase 1 habitat survey was undertaken by an appropriately experienced AECOM ecologist to identify ecological features within the Site.

The purpose of the PEA was to:

- Identify and categorise the habitats present within the Site and any areas immediately outside of the Site where there may be potential for direct or indirect effects (the 'zone of influence');
- Carry out an appraisal of the potential for the habitats recorded to support protected or notable species of fauna and flora;
- Provide advice on any potential ecological constraints and opportunities in the zone of influence, including the identification (where relevant) of any requirements for follow-up habitat and species surveys and/or requirements for ecological mitigation; and
- Provide a map showing the location of the identified ecological features of relevance.

This report provides a high-level appraisal of the ecological risks associated with the Site and identifies the scope of further work that would be required to support a future planning application. High level recommendations are made on potential options for the avoidance, mitigation or compensation of the potential impacts of the proposed redevelopment (where known) on the identified ecological features.

2. Wildlife Legislation and Planning Policy

2.1 Wildlife Legislation

The following wildlife legislation is potentially relevant to the Site:

- The Conservation of Habitats and Species Regulations 2017 (as amended);
- Wildlife and Countryside Act 1981 (as amended);
- Countryside and Rights of Way (CROW) Act 2000; and
- Natural Environment and Rural Communities (NERC) Act 2006.

The above legislation has been considered when planning and undertaking this PEA using the methods described in Section 3, when identifying potential constraints to the proposed redevelopment, and when making recommendations for further survey, design options and mitigation, as discussed in Section 5.

Further information on the requirements of the above legislation is provided as **Appendix B**.

2.2 National Planning Policy

The National Planning Policy Framework (NPPF), which was first published on 27th March 2012 and revised on 19th June 2019, sets out the Government's planning policies for England and how these are expected to be applied. Promoting a strong theme of sustainable development, the Framework aims to strengthen local decision making and reinforce the importance of up-to-date plans. Core aims of the NPPF include:

- A presumption in favour of Sustainable Development;
- Delivering Sustainable Development – Building a strong competitive economy and ensuring the vitality of town centres;
- Promoting sustainable transport;
- Meeting the challenge of climate change, flooding and coastal change;
- Conserving and enhancing the natural environment; and
- Conserving and enhancing the historic environment.

The NPPF confirms the commitment of the UK Government to minimising impacts on biodiversity and providing net gains in biodiversity where possible, contributing to the Government's commitment to halt the overall decline in biodiversity. It specifies the obligations that the Local Authorities and the UK Government have regarding statutory designated sites and protected species under UK and international legislation and how this is to be delivered in the planning system. Protected or notable habitats and species can be a material consideration in planning decisions and may therefore make some sites unsuitable for particular types of development, or if development is permitted, mitigation measures may be required to avoid or minimise impacts on certain habitats and species, or where impact is unavoidable, compensation may be required.

Section 15, paragraphs 170-177 of the 2018 NPPF includes provision for measurable net gain and creating/maintaining coherent ecological networks. These paragraphs are material considerations when making planning decisions, whether plans or specific development projects.

Further information on the relevant parts of the NPPF is provided as **Appendix B**.

2.3 Local Planning Policy

Relevant local planning policies for the Site are detailed within the Liverpool Unitary Development Plan (UDP), a City-wide statutory document adopted in November 2002. A Liverpool Local Plan has been submitted for examination which will, once adopted, replace the Unitary Development Plan. Although the policies within the Liverpool Local Plan are still in draft, they have been provided in the table below for information.

Table 1 provides a summary of relevant local planning policies. For the precise wording of the policies please refer back to the source document.

These planning policies have been considered when assessing potential ecological constraints and opportunities identified, and when assessing requirements for further survey and ecological mitigation.

Table 1: Summary of Local Planning Policy

Document	Planning Policy	Purpose
Liverpool Unitary Development Plan	Policy OE5 – Protection of Nature Conservation Sites and Features	The City Council will seek to protect the nature conservation interest of open land and the water environment in the City.
	Policy OE7 – Habitat Creation and Enhancement	The City Council will seek to enhance the nature conservation interest of open land and watercourses in the City.
	Policy OE11 – Protection of Green Space	Planning permission will not be granted for built development on part or all of any green space unless the proposed works can be accommodated without material harm.
	Policy HD22 - Existing Trees and Landscaping	In order to protect and integrate existing trees and landscape features within new developments, the City Council will require the retention of key ecological and natural site features, such as trees, hedges, walls and ponds; require the submission of a full independent tree survey to enable the effect of the proposal on the trees to be fully assessed; and refuse planning permission for proposals which cause unacceptable tree loss, or which do not allow for the successful integration of existing trees identified for retention following consideration of the tree survey.
	Policy HD23 - New Trees and Landscaping	All new development proposals should make proper provision for the planting and successful growth of new trees and landscaping, including any replacement planting provided as compensation for the loss of any trees due to development and promote nature conservation through the use of native species and the creation of wildlife habitats where appropriate.
Liverpool Local Plan (draft submission)	Policy GI 1 Green Infrastructure Resources	The recreational function, visual amenity, historic and structural quality and value of the City's green infrastructure resource will be protected and enhanced.

2.4 North Merseyside Biodiversity Action Plan (BAP)

The North Merseyside BAP (NM BAP) was published in 2001 and last reviewed in 2008, by the Merseyside Biodiversity Group. Like other Local Biodiversity Action Plans (LBAPs) its purpose is to focus local conservation on national priority species and habitats. However, LBAPs also embrace the idea of 'local distinctiveness' and species which are not considered UK conservation priorities can be

catered for by LBAPs if they are of particular local significance. Such is the case with the NM BAP which currently names 74 species of which; 57 are not conservation priority species but are included because their conservation is considered to be a priority in North Merseyside.

Species in the BAP include urban trees, urban green infrastructure, urban birds, song thrush (*Turdus philomenos*) and bats (all species).

2.5 Biodiversity Net Gain

The NPPF requires that planning decisions should follow the principles of the mitigation hierarchy and provide net gain for biodiversity.

Biodiversity net gain requires developers to ensure habitats for wildlife are enhanced and left in a measurably better state than they were prior to development. Where a development has an impact on biodiversity it encourages developers to provide an increase in appropriate natural habitat and ecological features over and above that being affected, with the aim of halting the current loss of biodiversity through development and restoration of ecological networks.

The process is becoming more mainstream and will soon be a mandatory requirement for planning applications. In such cases, applicants must assess the type of habitat, and habitat condition before submitting plans and then demonstrate biodiversity will be improved.

In order for a development to achieve net gain it is important that the principles of the mitigation hierarchy are followed. This process involves first trying to avoid adverse impacts on biodiversity before finding ways to minimise or mitigate effects and as a last resort compensating for any residual impacts.

There are four sequential steps that must be taken throughout the lifecycle of a project:

- Avoidance – actions taken to avoid causing impacts to the environment prior to beginning development (for example, moving the development to a different location);
- Minimisation – measures taken to reduce the duration, intensity, extent and/or likelihood of the unavoidable environmental impacts caused by development (for example, adapting the development design to minimise impacts);
- Restoration or rehabilitation – actions taken to repair environmental degradation or damage following unavoidable impacts caused by development; and
- Offsets – Measures taken to compensate for any adverse environmental impacts caused by development which cannot be avoided, minimised and/or restored (e.g. including habitat creation to offset losses).

Biodiversity metrics provide a measure of overall Biodiversity Value based on habitat type, area, condition and distinctiveness. A metric is a tool that allows the value of a site to be measured pre- and post-development. The change in Biodiversity Units indicates either a net loss or net gain.

3. Methods

3.1 Desk Study

A desk study was carried out to identify nature conservation designations; and protected and notable habitats and species potentially relevant to the Site.

The desk study identified any statutory nature conservation designations within 2 km of the Site boundary, local non-statutory nature conservation designations and protected and notable habitats and species within approximately 1 km of the Site boundary.

The desk study was carried out using the data sources listed in Table 2. All measurements stated in Table 2 are approximations. Protected and notable habitats and species include those listed under Schedules 1, 5 and 8 of the Wildlife and Countryside Act 1981 (as amended); Schedules 2 and 5 of the Habitats Regulations; species and habitats of principal importance for nature conservation in England listed under Section 41 (S41) of the NERC Act; and other species that are Nationally Rare, Nationally Scarce or listed in national or local Red Data Lists and the NM BAP Biodiversity Action Plan.

Table 2: Desk Study Data Sources

Data Source	Accessed	Data Obtained
Multi-Agency Geographic Information for the Countryside (MAGIC) website	July 2020	<ul style="list-style-type: none"> • Statutory designations within 2 km. • Ancient woodlands and notable habitats within 1 km. • Information on habitats and habitat connections (based on aerial photography) relevant to interpretation of planning policy and assessment of potential protected and notable species constraints. • European Protected Species Mitigation Licences (EPSML) within 1 km of the Site.
Local Records Centre: Merseyside BioBank	July 2020	<ul style="list-style-type: none"> • Non-statutory designations within 1 km. • Protected and notable species records within 1 km (records for the last 10 years only).
Ordnance Survey 1:2500 Pathfinder maps and aerial photography	July 2020	<ul style="list-style-type: none"> • Information on habitats and habitat connections (based on aerial photography) relevant to interpretation of planning policy and assessment of potential protected and notable species constraints.
North Merseyside Biodiversity Action Plan (LBAP)	July 2020	<ul style="list-style-type: none"> • General information on Local Biodiversity Action Plan Priority Habitats and Species.

3.2 Field Survey

The field survey comprised a Phase 1 habitat survey where an appraisal was made of the potential suitability of the habitats present to support protected and notable species.

3.2.1 Phase 1 Habitat Survey

A Phase 1 habitat survey was undertaken in accordance with the standard survey method (Joint Nature Conservation Committee, 2010). Phase 1 habitat survey is a standard method of environmental audit. It involves categorising different habitat types and habitat features within a survey area. The information gained from the survey can be used to determine the likely ecological value of a site, and to direct any more specific survey work which may need to be carried out prior to the submission of a planning application. The standard Phase 1 habitat survey method can be “extended” to record target notes on protected, notable and invasive species.

The survey was undertaken on 21st July 2020 by a suitably experienced AECOM ecologist who recorded and mapped all habitat types present within the Site boundary, along with any associated relevant ecological features observed. The Site encompassed all safely accessible parts of land as shown within **Appendix A**.

Where relevant ecological features were present, target notes (**Appendix C**) were recorded and the position of these shown on the Phase 1 habitat map (Figure 1 in **Appendix A**). Typical and notable plant species were recorded for different habitat types and reflect the conditions at the time of survey. This was not intended to be a detailed inventory of the plant species present in the Site, as this is not required for the purposes of Phase 1 habitat survey.

3.2.2 Appraisal of Potential Suitability of Habitats to Support Protected and Notable Species

An appraisal was made of the potential suitability of the habitats present to support protected and notable species of plants or animals. Field signs, habitat features with potential to support protected species and any sightings or auditory evidence were recorded when encountered; no detailed surveys were carried out for any particular species.

In addition, specific attention was given to identifying instances of invasive non-native plant species listed under Schedule 9 of the Wildlife and Countryside Act 1981 (as amended). Locations of plants or stands of any such invasive non-native plant species if found were recorded.

Section 5 of this report identifies further requirements for species surveys based on the results of the desk study and habitat survey. These surveys should be completed prior to submission of a planning application as the results are likely to be material for determination of the planning application.

4. Results

4.1 Nature Conservation Designations

4.1.1 Statutory Designations

There are no statutory sites designated for nature conservation within 2 km of the Site.

4.1.2 Non-Statutory Designations

There is one non-statutory designated site for nature conservation within 1 km of the Site boundary. Stanley Sidings Local Wildlife Site (LWS) is located approximately 900 m north-east of the Site boundary at its closest point. The main feature is a small pond which has developed from open water to swamp, dominated by reedmace (*Typha*) and containing a variety of other aquatic species including water forget-me-not (*Myosotis scorpioides*) and water mint (*Mentha aquatica*). The site supports a good population of smooth newts (*Lissotriton vulgaris*) as well as small numbers of great crested newts (*Triturus cristatus*). The newts breed in the pond but depend equally for their survival upon the surrounding terrestrial habitats

4.2 Phase 1 Habitat Survey

4.2.1 Phase 1 Habitat Types

The habitats recorded and their approximate extent are detailed below and shown in Table 3 and on the Figure 1 in **Appendix A**. The associated target notes are provided in **Appendix C**.

Table 3: Habitats Present

Habitat	Area (m ²)	% of Site
Semi-improved grassland	21,959	59%
Hardstanding	9,251	25%
Amenity grassland	3,191	9%
Introduced shrub	2,348	6%
Scrub - scattered	183	1%
Metal shelters	53	1%
Breeze block arches	53	1%
Habitat	Length (m)	% of Site area
Scattered trees	565	N/A
Metal fence	483	N/A
Sloping embankments	389	N/A
Wall	45	N/A

The habitats are described in greater detail below.

Semi-Improved Grassland

Species poor semi-improved grassland is present in the majority of the Site and comprises grasses including perennial rye grass (*Lolium perenne*), Yorkshire fog (*Holcus lanatus*), cock's foot (*Dactylis*

glomerata) and red fescue (*Festuca rubra*). Scrub species including, bramble (*Rubus fruticosus* agg), blackberry (*Rubus*), dog rose (*Rosa canina*) and hawthorn (*Crataegus monogyna*) is also present within this habitat, particularly along the embankments.

Other species within this habitat include buddleia (*Buddleja davidii*), thistle (*Cirsium* sp.), buttercup (*Ranunculus* spp.), clover (*Trifolium* sp.), ragwort (*Senecio jacobaea*) and tall ruderals including common nettle (*Urtica dioica*) and broad-leaved dock (*Rumex obtusifolius*) and rushes (*Juncaceae* sp.).

Hardstanding/Bare Ground

Hardstanding is present throughout the Site and comprises of the two public roads; Innovation Boulevard and Digital Way. Hardstanding in the form of paved footpaths run adjacent to these roads and also form part of a pedestrianised public realm area towards the south of the Site where stone steps and defunct stone water features (Target Notes 1 & 2) are present. Small patches of bare ground (Target Notes 3, 4 & 5) are present to the north and south of Digital Way within the semi-improved grassland.

Amenity Grassland

Amenity grassland is present in the form of grass verges adjacent to the roads and pavements within the Site, particularly along Innovation Boulevard on the western side of the Site. The amenity grassland comprises of species including perennial rye grass, ribwort plantain, buttercup (*Ranunculus* spp.), Yorkshire fog, dandelion (*Taraxacum* agg.) and clover (*Trifolium*). The majority of this habitat had been closely mown at the time of survey.

Scattered Trees/Introduced Shrub/Scrub

Planted trees line the hardstanding areas throughout the Site, including along the south side of Edge Lane and along both sides of Innovation Boulevard and both sides of Digital Way. Semi-mature silver birch (*Betula pendula*) predominantly line the hard-standing areas alongside other species including Scots pine (*Pinus sylvestris*), sycamore (*Acer pseudoplatanus*) and ornamental planted trees.

Ornamental planting of introduced shrubs is present within the linear trees throughout the Site and are particularly present within the public realm area of the Site (Target Note 9). Species including ivy (*Hedera helix*) and willow (*Salix* sp.) is found within the introduced shrub.

The southern section of the Site contains an area of scattered trees and scrub (Target Note 10) predominantly comprised of willow saplings (Target Note 11) and other species including thistle, bramble and rushes.

Structures

Structures within the Site include two archways (Target Notes 6 & 7) at either side of the entrance on to Innovation Boulevard to the north of the Site. These structures are comprised of breeze block and are both adjacent to concrete walls. Metal canopies (Target Note 8) and seating areas are located within the pedestrianised area of the Site. A metal fence runs along the northern, eastern and southern boundaries of the Site.

4.2.2 Protected and Notable Species

Where species are identified in Table 4 as present or potentially present, they are likely to represent legal constraints or may need to be considered in relation to a planning application if present.

No other habitats potentially suitable for protected species is present within the Site (other than those considered in Table 4 below) due to the urban nature of the Site which is relatively isolated within the built-up area of Innovation Boulevard with limited habitat connectivity. None of the other desk study records received in respect of protected species are therefore relevant.

Table 4: Protected and Notable Species Relevant or Potentially Relevant to the Site

Species	Legally Protected Species?	Species of Principal Importance?	Other Notable Species?	Present on Site?	Present / Potentially Present in Wider Zone of Influence?	Supporting Comments
Bats	✓	✓	x	x	✓	<p>The desk study identified a small number of records of soprano pipistrelle (<i>Pipistrellus pygmaeus</i>) and pipistrelle bat species (<i>Pipistrellus</i> sp.) within 1 km of the Site.</p> <p>No European Protected Species Mitigation Licences (EPSML) for bats have been granted within 1 km of the Site.</p> <p>Bats (all species) are listed on the North Merseyside LBAP.</p> <p>There are no habitats present within the Site boundary that could support roosting bats.</p> <p>The habitats present within the Site provide limited foraging and commuting habitats for bats, and these habitats lack connectivity and are surrounded by hardstanding / buildings associated with Liverpool Innovation Park. Roosting and foraging/commuting bats are therefore not considered further within this report.</p>
Breeding birds	✓	✓	✓	✓	✓	<p>Merseyside BioBank returned no records of bird species within 1 km of the Site within the last 10 years.</p> <p>Song thrush (<i>Turdus philomelos</i>), lapwing (<i>Vanellus vanellus</i>) and urban birds (House martin (<i>Delichon urbicum</i>); swift (<i>Passer domesticus</i>); house sparrow (<i>Sturnus vulgaris</i>) and starling (<i>Apus apus</i>)) are listed on the North Merseyside LBAP.</p> <p>Habitats present within the Site could support a common assemblage of breeding birds.</p>
European hedgehog (<i>Erinaceus europaeus</i>)	x	✓	x	?	✓	<p>Merseyside Biobank identified fourteen records of hedgehog within 1 km of the Site, the nearest record is located adjacent to the eastern boundary of the Site, south of Digital Way.</p> <p>Habitats present within the Site could support hedgehog.</p>
Great crested newts (<i>Triturus cristatus</i>)	✓	✓	✓	x	x	<p>No recent records or European Protected Species Mitigation Licences (EPSML) for great crested newt within 1 km of the Site were identified by the desk study.</p> <p>There are no suitable breeding habitats for great crested newt within the Site boundary, however, there are three potential ponds to the east within 250m of the Site; the nearest being approximately 100 m from the Site boundary. These ponds are separated from the Site by roads and large industrial buildings associated with Innovation Park and it is reasonable to assume that this represents a substantial barrier to the movement of great crested newts onto the Site. Suitable terrestrial habitat that</p>

Species	Legally Protected Species?	Species of Principal Importance?	Other Notable Species?	Present on Site?	Present / Potentially Present in Wider Zone of Influence?	Supporting Comments
						may support great crested newt are present within the Site boundary, however due to the lack of suitable terrestrial habitat connectivity from the ponds to the Site; great crested newts and amphibians are not considered further within this report.
Reptiles	✓	✓	x	?	?	<p>No recent records of reptiles were returned by the desk study.</p> <p>Common lizard (<i>Zootoca vivipara</i>) is listed on the North Merseyside LBAP.</p> <p>The semi-improved grassland, embankments and small patches of bare ground present within the Site are potentially suitable habitats to support reptile species, however due to these habitats lacking connectivity and being surrounded by buildings and a major road corridor it is considered unlikely that reptiles are present within the Site and are therefore not considered further within this report.</p>
Schedule 9 Invasive Plants	x	x	✓	✓	x	<p>The desk study returned several records of invasive non-native plant species within 1 km of the Site: one record of Himalayan cotoneaster (<i>Cotoneaster simonsii</i>) approximately 430 m east of the Site boundary, eleven records of Japanese knotweed (<i>Reynoutria japonica</i>), the nearest being approximately 300 m south-west of the Site boundary and fourteen records of Rhododendron (<i>Rhododendron ponticum</i>), the nearest being approximately 230 m west of the Site boundary.</p> <p>No Schedule 9 invasive plants were identified during the Phase 1 Habitat Survey, however due to cotoneaster (<i>Cotoneaster sp.</i>) being commonplace within ornamental planting there is potential for cotoneaster to be present which may not have been possible to identify due to the density of vegetation in some areas of ornamental planting.</p>

Key to symbols: ✓ = yes, x = no, ? = possibly, see Supporting Comments for further rationale.

Legally protected species - those listed under Schedules 1, 5 and 8 of the Wildlife and Countryside Act 1981 (as amended); and, Schedules 2 and 4 of The Conservation of Habitats and Species Regulations 2017 (as amended).

Species of Principal Importance - those listed under Section 41 of the NERC Act. Planning Authorities have a legal duty under Section 40 of the same Act to consider such species when determining planning applications.

Other notable species - native species of conservation concern listed in the LBAP (except species that are also of Principal Importance), those that are Nationally Rare, Scarce or Red Data List, and non-native controlled weed species listed under Schedule 9 of the Wildlife and Countryside Act 1981 (as amended).

5. Identification of Ecological Constraints and Recommendations

5.1 Approach to the Identification of Ecological Constraints

Relevant ecological features that may represent constraints to the redevelopment are identified in Section 4 of this report.

The NPPF and local planning policy (summarised in Section 2 of this report) specify requirements for the protection of features of importance for biodiversity. Such considerations are a material consideration when determining planning applications.

Compliance with planning policy requires that the proposed development considers and engages the following mitigation hierarchy where there is potential for impacts on relevant ecological receptors:

1. Avoid features where possible;
2. Minimise impact by design, method of working or other measures (mitigation) e.g. by enhancing existing features; and
3. Compensate for significant residual impacts, e.g. by providing suitable habitats elsewhere (whether in the control of Morgan Sindall or otherwise legally enforceable through planning condition or Section 106 agreement).

This hierarchy requires the highest level to be applied where possible. Only where this cannot reasonably be adopted should lower levels be considered. The rationale for the proposed mitigation and/or compensation should be provided with planning applications, including sufficient detail to show that these measures are feasible and would be provided.

The likelihood of the relevant ecological features constraining the proposed development has been assessed with reference to the scale described in Table 5. The higher the importance of the ecological feature for the conservation of biodiversity at national and local scales, the more likely it is to be a material consideration during determination of a planning application.

Table 5: Scale of Constraint to Development

Likelihood	Definition
High	An actual or potential constraint that is subject to relevant legal protection and is likely to be a material consideration in determining the planning application (e.g. statutory nature conservation designations and European/nationally protected species). Further survey likely to be required (as detailed in this report) to support a planning application.
Medium	An actual or potential constraint that is covered by national or local planning policy and, depending on the level of the potential impact as a result of the proposed development, may be a material consideration in determining the planning application. Further survey may be required (as detailed in this report) to support a planning application.
Low	Unlikely to be a constraint to development or require further survey prior to submission of a planning application. Mitigation is likely to be covered under Construction Environmental Management Plan (CEMP) or precautionary working method statement (e.g. generic requirements for the management of nesting bird risks).

5.2 Biodiversity Net Gain

A Biodiversity Net Gain assessment may be required as part of the redevelopment at the Site.

The results of the metric calculation can be used to inform the requirements for on-site mitigation and any off-site compensation that may be needed to achieve the target of net gain in biodiversity.

The assessment is an iterative process and can be applied during the design evolution process to guide the requirements for mitigation and compensation, in terms of the type and extent of habitats to be recreated or restored (in other words, improve habitat condition) to ensure the Site results in net gain.

5.3 Constraints and Requirements for Further Survey: Designations

Based on available information, there are no statutory designated sites within 2 km of the Site boundary. There is one non-statutory designation; Stanley Sidings LWS within 1 km of the Site boundary however this designation is not considered to be relevant to the proposed development. This is due to the distance from the Site to the designated site and lack of potential impact pathways between the proposed development and the designated site.

5.4 Constraints and Requirements for Further Survey: Habitats

The semi-improved neutral grassland areas within the Site, whilst relatively species diverse, would not be considered Priority Habitat and the species present are common in the UK. The introduced shrub, scattered trees and scrub are again, relatively species diverse but would not be considered a Priority Habitat. However, the design of the redevelopment should seek to retain existing trees, scrub and grassland as these semi-natural habitats are scarce in the wider area and are valuable in the context of a largely urban environment and is a valuable area of green space. In addition, to comply with planning policy (section 2.3) then there would be an expectation to retain some of these habitats, and/or enhancement of retained habitats. The current proposed development will result in the retention of some of these habitats, including the trees and introduced shrub.

There are no other notable or particularly diverse habitats present within the Site boundary that potentially represent a constraint on any proposed development. The other habitats present within the Site i.e. amenity grassland, structures and hardstanding are considered to be of limited ecological value and the loss of these areas would not require specific habitat mitigation.

5.5 Constraints and Requirements for Further Survey: Species

5.5.1 Breeding Birds

All species of bird are protected under the Wildlife and Countryside Act 1981 (as amended) with additional protection afforded to certain species under Schedule 1 of the act. This legislation makes it an offence to intentionally:

- Kill, injure or take any wild bird;
- Take, damage or destroy the nest of any wild bird while that nest is in use or being built; or
- Take, destroy an egg of any wild bird.

Due to the limited amount and type of vegetation within the Site, no dedicated breeding bird surveys are required. However, the semi-improved grassland does offer potential for ground nesting birds and urban birds, namely house martin (*Delichon urbicum*); swift (*Passer domesticus*); house sparrow (*Sturnus vulgaris*) and starling (*Apus apus*) are listed within the North Merseyside BAP, as the Site provides valuable habitat for urban bird species, it is recommended that as much of the semi-natural habitat is retained.

To ensure compliance with legislation protecting nesting birds, removal of any habitats (e.g. trees, scrub and grassland) that might be used by nesting birds should ideally be carried out outside the nesting season (generally taken to be March to August inclusive). If the disturbance of this habitat cannot be avoided by design, then the proposed development should be undertaken outside of the period March to August inclusive when bird species are likely to be breeding. If this is not possible, then an appropriately experienced ecologist should check the areas for nests immediately (no more than 24 hours) prior to removal. If nests are found, they must be retained and remain undisturbed until an ecologist has confirmed that the young have fledged.

5.5.2 European Hedgehog

The habitats present in the Site may support European hedgehog. This species receives limited legal protection but is listed under Section 41 of the 2006 NERC Act. As such, precautions are recommended in relation to development of the Site to ensure this species are not adversely affected during construction through a precautionary working method statement. This should include, for example, ensuring that during construction any open pits/holes should be covered at night or where this is not possible a wooden plank positioned at a 45° from the base to the top of the hole so that mammals that get into the pit/hole can escape.

It is recommended that, where possible, the development is planned to take account of likely mitigation requirements for this species. It is also recommended that damage to retained semi-natural habitats (e.g. hedgerows) outside the direct footprint of the proposed development is avoided or minimised. This might include the use of temporary fencing to protect such habitats. This is concordant with the expected requirements for tree protection zones.

5.5.3 Schedule 9 Invasive Plant Species

Cotoneaster (*Cotoneaster sp*), was not recorded within the Site, however it is not possible to exclude presence of this species from the Site due to it being commonplace in ornamental planting. Cotoneaster could be present, but visibility of this species may have been limited within the denser areas of ornamental planting within the Site. Some species of Cotoneaster are listed on Schedule 9 of the Wildlife and Countryside Act 1981 (as amended). It is illegal to plant or otherwise cause to grow in the wild any plant listed on Schedule 9 Part II of Section 14(2) of the Wildlife and Countryside Act 1981 (as amended).

If the habitats where this Schedule 9 species are present are to be impacted by the development of the Site, the following guidance should be followed:

Cotoneasters are relatively shallow rooted, and as their waxy leaves reduce herbicide uptake. As such, where plants do not produce a deep underground root/rhizome system, manual removal by hand pulling or digging using hand tools (spade/ fork) can be the most appropriate control method. As much of the root system as possible should be removed; though only root stock close to the surface, near the main shoot, is likely to regrow.

If no seeds are present, removed plants can be chipped onsite or removed from the Site as green waste. If seeds are present, removed material should be taken off Site and disposed of as green waste (for incineration) or taken to a suitably licenced landfill.

5.5.4 Summary

Summaries of ecological constraints and requirements for further survey are given in Table 6 below.

Table 6: Summary Appraisal of Features of Ecological Constraints and Recommended Further Action

Receptor	Scale of Constraint	Further Requirements, Including Potential Mitigation Requirements	Driver	When is Action Likely to be Required		
				To Inform Design	Before Planning Application	Pre-construction Onwards
Breeding birds	Low	Retain habitats used by nesting birds where possible. Where vegetation is to be cleared, this should be done outside of breeding bird season (March to August). Minimise operational impacts. Other mitigation and	WCA 1981, LBAP, NERC Act 2006	✓	✓	✓

Receptor	Scale of Constraint	Further Requirements, Including Potential Mitigation Requirements	Driver	When is Action Likely to be Required			
				To Inform Design	Before Planning Application	Pre-construction	Onwards
		replacement habitats potentially required depending on species.					
European hedgehog	Low	Retain habitats and ensure that habitat connectivity is maintained throughout the Site and into the wider area.	NERC Act 2006				✓
Grassland, scrub and trees	Low	Retention and protection of semi-natural habitats.	LBAP, Planning Policy	✓	✓		✓
Invasive plant species	Low	Check for invasive plant species before construction. Works on the Site may need to follow a Management Plan / Method Statement to ensure compliance with the requirement not to cause the spread of species listed under Schedule 9 of the Wildlife and Countryside Act, 1981.	WCA 1981	✓	✓		

If a planning application is made one year or more after this PEA has been produced it is advisable to review and update the survey data (August 2021).

5.6 Opportunities for Ecological Enhancement

At present it is proposed the Site is redeveloped as a temporary film studio. The proposed development includes three plots with the northern and southern plots housing temporary pop-up studios and the middle site being a car park. However, there are potential opportunities to enhance the Site for biodiversity to reflect its location within the wider surrounds, and to satisfy the requirements of the NPPF.

Potential opportunities for biodiversity enhancement have been identified as follows, and can be refined as and when the nature and layout of the proposed development has been determined:

- Areas of undisturbed grassland could be retained. At present much of the grassland is species poor semi-improved/amenity grassland. This grassland could be enhanced by modifying the management regime and eliminating pesticides and herbicides (where these are used);
- Retention and enhancement of existing scrub and trees;
- Provision of invertebrate boxes/habitat; and
- Provision of bird boxes.

As an overarching concept, the proposals should aim to maintain and enhance as much of the semi-natural habitat as possible.

6. References

British Standards Institution (2013), Biodiversity — Code of practice for planning and development. BS42020:2013.

Chartered Institute of Ecology and Environmental Management, (2017), Guidelines for Preliminary Ecological Appraisal Second Edition. December 2017. [pdf] Chartered Institute of Ecology and Environmental Management. Available through: Chartered Institute of Ecology and Environmental Management website
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CIEEM, CIRIA and IEMA (2019) Biodiversity net gain. Good practice principles for development A practical guide, <https://cieem.net/biodiversity-net-gain-guidance-published/>

Joint Nature Conservation Committee (2010) *Handbook for Phase 1 Habitat Survey – a technique for environmental audit*. Joint Nature Conservation Committee, Peterborough

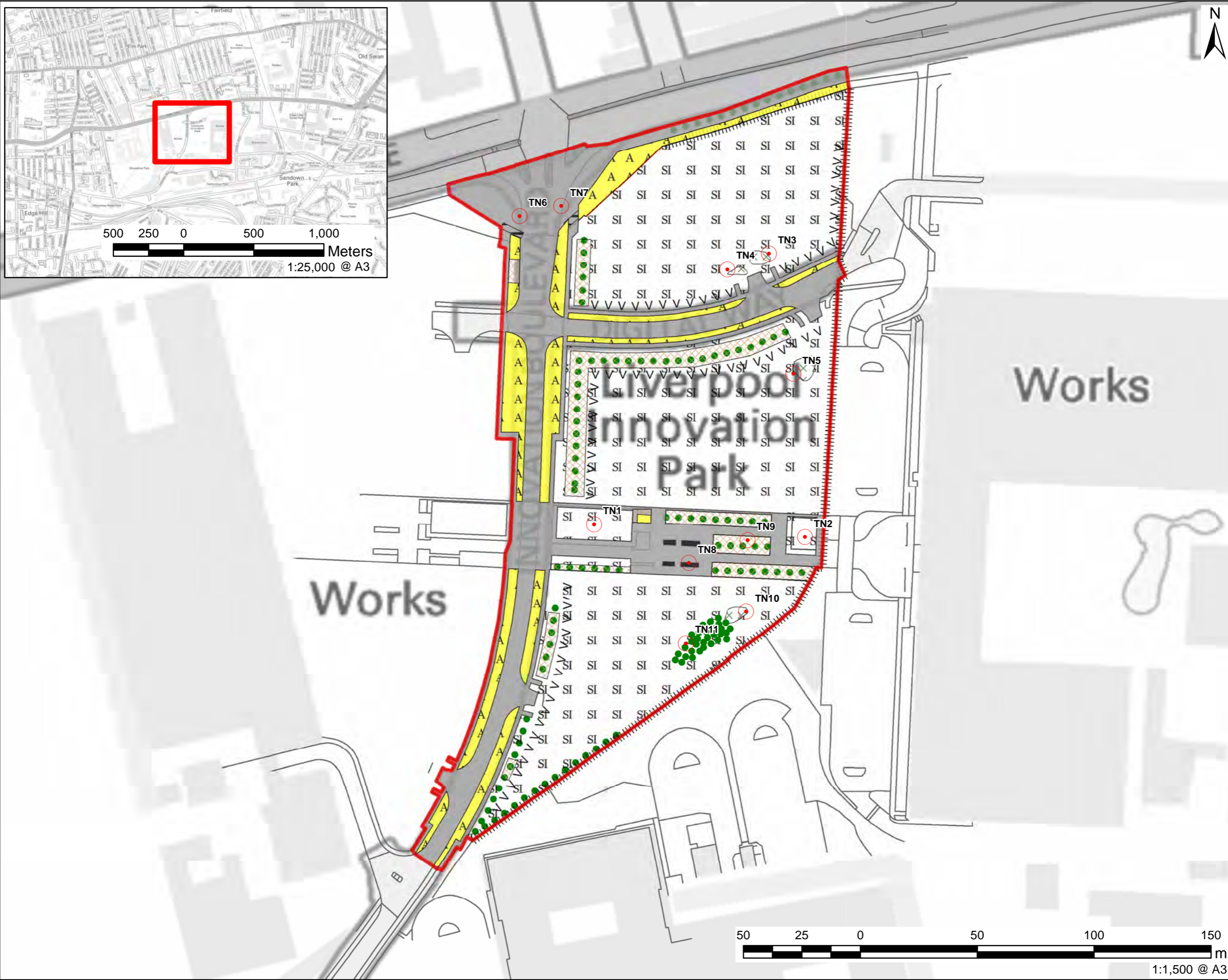
Liverpool City Council – Liverpool Local Plan 2013-2033 Pre-submission draft January 2018, <https://liverpool.gov.uk/media/1356834/01-local-plan-january-2018-final.pdf>

Liverpool City Council – Unitary Development Plan <https://liverpool.gov.uk/council/strategies-plans-and-policies/environment-and-planning/plan-making-in-liverpool/current-local-plan-documents/unitary-development-plan/>

Magic website: <https://magic.defra.gov.uk/>

North Merseyside Local Biodiversity Action Plan <http://www.merseysidebiodiversity.org.uk>.

Appendix A Phase 1 Habitat Plan



LEGEND

	Target Note
	Site Boundary
	A2.2 - Scrub - scattered
	B6 - Poor semi-improved grassland
	Breeze Block Arch
	J1.2 - Cultivated/disturbed land - amenity grassland
	J1.4 - Introduced shrub
	Metal Shelter
	Z99 - Hardstanding
	A3.1 - Broadleaved parkland/scattered trees
	J2.4 - Metal Fence
	J2.5 - Wall
	Slope/Embankment

NOTES
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ISSUE PURPOSE
DRAFT
PROJECT NUMBER
60539643
SHEET TITLE
Phase 1 Habitat Survey

SHEET NUMBER
Figure 1

Appendix B Legislation and Planning Policy

The Conservation of Habitats and Species Regulations 2017 (as amended)

The original Regulations transposed the EU Directive on Natural Habitats, and Wild Fauna and Flora 9/43/EEC) into domestic legislation. Amendments in 2007 and 2009 addressed a number of gaps and inconsistencies in the original legislation and provided a greater legal certainty and clarity in a number of areas. In April 2010 the Regulations were brought up to date to consolidate changes made since 1994. The Regulations afford a high level of protection to a variety of species that are considered important at a European scale. The Regulations identify European Protected Species and various habitats of importance within the European Union, with important sites for these habitats/species or both being designated as special Areas of Conservation (SAC). Any proposed development that may have a significant effect on a SAC or Special Protection Area (SPA) should be assessed in relation to the site's 'conservation objectives', i.e. the reasons for which the Site is designated.

The new Regulations simplified the species protection regime to better reflect the Habitats Directive, providing a clear legal basis for surveillance and monitoring of European Protected Species (EPS). The Regulations also amended the WCA, updating Schedules 5 and 8 to consider provisions made by the Habitat Regulations 1994 in relation to the protection of EPS. They also offered further clarification to Part 4 of Section 9 considering "reckless" offences on wild animals, which was previously amended by the CROW Act 2000.

In 2012, the Regulations were further amended to place new duties on public bodies to take measures to preserve, maintain and re-establish habitat for wild birds. They were also amended to ensure certain provision of the Habitats Directive and the Birds Directive were transposed clearly and Section 15 was amended to make clear that Local Nature Reserves can be designated for re-establishing bird habitat

Please note that These Regulations (cited as the Conservation of Habitats and Species and Planning (Various Amendments) (England and Wales) Regulations 2018) came into force on 28th December 2018. They amend the Conservation of Habitats and Species Regulations 2017, the Neighbourhood Planning (General) Regulations 2012, the Town and Country Planning (Permission in Principle) Order 2017 and the Town and Country Planning (Brownfield Land Register) Regulations 2017.

Regulation 2 amends the Conservation of Habitats and Species Regulations 2017 ("the Habitats Regulations") applicable to special development orders, local development orders, neighbourhood development orders, simplified planning zones, enterprise zones and the conversion of footpaths into cycle tracks to incorporate the habitats assessments provisions in regulation 63 of the Habitats Regulations. With the exception of the conversion of footpaths into cycle tracks, this regulation also incorporates regulations 65 and 66 for the review of existing decisions and consents.

Regulation 2 also amends the Habitats Regulations to allow for the application of regulation 63 to applications for permission in principle.

Regulation 3 amends the Neighbourhood Planning (General) Regulations 2012 to change the prescribed condition relating to habitats for the purpose of examination of neighbourhood development plans to require that a neighbourhood development plan complies with the provisions applicable to land use plans in Chapter 8 of Part 6 of the Habitats Regulations.

Regulation 4 amends the Town and Country Planning (Permission in Principle) Order 2017 to change the definition of habitats development (for which a local planning authority may not grant permission in principle) to incorporate the habitats assessment process under regulation 63 of the Habitats Regulations.

Regulation 5 amends the Town and Country Planning (Brownfield Land Register) Regulations 2017 to change the definition of habitats development (which a local planning authority may not enter onto Part 2 of the Brownfield Land Register) to incorporate the habitats assessment process under regulation 63 of the Habitats Regulations.

Wildlife and Countryside Act 1981 (as amended)

The Wildlife and Countryside Act 1981 is the major domestic legal instrument for wildlife protection in the UK, and is the primary means by which the following are implemented:

- The Convention on the Conservation of European Wildlife and Natural Habitats ('the Bern Convention'); and
- The Council Directive 79/409/EEC on the Conservation of Wild birds (the 'Bird Directive')

Wild Birds

The Act makes it an offence (with exception to species listed in Schedule 2) to intentionally:

- kill, injure, or take any wild bird,
- take, damage or destroy the nest of any wild bird while that nest is in use or being built (also [take, damage or destroy the nest of a wild bird included in Schedule ZA1] under the Natural Environment and Rural Communities Act 2006), or
- take or destroy an egg of any wild bird.

Special penalties are available for offences related to birds listed on Schedule 1, for which there are additional offences of disturbing these birds at their nests, or their dependent young. The Secretary of State may also designate Areas of Special Protection (subject to exceptions) to provide further protection to birds. The Act also prohibits certain methods of killing, injuring, or taking birds, restricts the sale and possession of captive bred birds, and sets standards for keeping birds in captivity.

Other Animals

The Act makes it an offence (subject to exceptions) to intentionally kill, injure or take any wild animal listed on Schedule 5, and prohibits interference with places used for shelter or protection, or intentionally disturbing animals occupying such places. The Act also prohibits certain methods of killing, injuring, or taking wild animals.

Flora, Fungi and Lichens

The Act makes it an offence (subject to exceptions) to intentionally pick, uproot or destroy: any wild plant listed in Schedule 8, or

- unless an authorised person, to intentionally uproot any wild plant not included in Schedule 8,
- to sell, offer or expose for sale, or possess (for the purposes of trade), any live or dead wild plant included in Schedule 8, or any part of, or anything derived from, such a plant.

Non-native Species

The Act contains measures for preventing the establishment of non-native species which may be detrimental to native wildlife, prohibiting the release of animals and planting of plants listed in Schedule 9 in England and Wales. It also provides a mechanism making any of the above offences legal through the granting of licences by the appropriate authorities.

The Countryside and Rights of Way (CroW) Act, 2000

Part III of this Act deals specifically with wildlife protection and nature conservation in England and Wales. The CroW Act strengthened the safeguards afforded to SSSIs.

Natural Environment and Rural Communities (NERC) Act 2006

Section 41 of the NERC Act requires the listing of habitats and species that are considered to be of principle importance for the conservation of biodiversity in England, including habitats and species in England that have been identified as priorities within the UK Biodiversity Action Plan (UKBAP).

The NERC Act requires that the Section 41 list be used to guide decision-makers such as public bodies, including local and regional authorities, in implementing their duty under section 40 of the

NERC Act 2006 'to have regard' to the conservation of biodiversity in England, when carrying out their normal functions.

The EU Invasive Alien Species Regulations 2014

The EU Invasive Alien Species Regulations sets out to address the problems concerned with invasive alien species (IASs) in order to protect native biodiversity and ecosystem services and minimize and mitigate the human health and/or economic impacts that IASs can have. It sets out rules to prevent and manage the introduction and spread of IASs in the EU through prevention, early detection and rapid eradication, and management.

National Planning Policy Framework

The NPPF came into being in March 2012 and was revised and updated in July 2018 and published in February 2019, relevant sections are as follows (although full details should be considered, which are found at <https://www.gov.uk/government/publications/national-planning-policy-framework--2>):

Section 15 of the NPPF relates specifically to "Conserving and Enhancing the Natural Environment".

Paragraph 170 states that "*Planning policies and decisions should contribute to and enhance the natural and local environment by:*

- a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);
- b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;
- c) maintaining the character of the undeveloped coast, while improving public access to it where appropriate;
- d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;
- e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans;
- f) remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.."

Paragraph 171 states that Plans should: distinguish between the **hierarchy of international, national and locally designated sites**; allocate land with the least environmental or amenity value, where consistent with other policies in this Framework; take a **strategic approach to maintaining and enhancing networks of habitats and green infrastructure**; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries

Paragraph 174 states that: *To protect and enhance biodiversity and geodiversity, plans should:*

- a) Identify, map and safeguard components of local wildlife-rich habitats and wider **ecological networks**, including the hierarchy of international, national and locally designated sites of importance for biodiversity; **wildlife corridors and stepping stones** that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and
- b) promote the **conservation, restoration and enhancement of priority habitats, ecological networks** and the protection and **recovery of priority species**; and identify and **pursue opportunities for securing measurable net gains for biodiversity**.

Paragraph 175 states: *When determining planning applications, local planning authorities should apply the following principles:*



- a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;
- b) **development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it** (either individually or in combination with other developments), **should not normally be permitted**. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest;
- c) **development resulting in the loss or deterioration of irreplaceable habitats** (such as ancient woodland and ancient or veteran trees) **should be refused**, unless there are wholly exceptional reasons and a suitable compensation strategy exists; and
- d) development whose primary objective is to conserve or enhance biodiversity should be supported; while **opportunities to incorporate biodiversity improvements in and around developments should be encouraged**, especially where this can secure measurable net gains for biodiversity.

Paragraph 176 states: *The following should be given the same protection as habitats sites:* potential Special Protection Areas and possible Special Areas of Conservation;

- a) listed or proposed Ramsar sites; and
- b) sites identified, or required, as compensatory measures for adverse effects on habitats sites, potential Special Protection Areas, possible Special Areas of Conservation, and listed or proposed Ramsar sites.



Paragraph 177 states: **The presumption in favour of sustainable development does not apply where development requiring appropriate assessment** because of its potential impact on a habitats site is being planned or determined.


Appendix C Target Notes


Target Note	Description	Photograph
Target Notes 1 & 2	Defunct stone water features covered with semi-improved grassland located within the pedestrianised public realm area of the Site.	 
Target Notes 3, 4 & 5	Small areas of bare ground within semi-improved grassland on the northern and southern side of Digital Way.	

Target Note	Description	Photograph
		
Target Notes 6 & 7	Archways at either side of the entrance on to Innovation Boulevard to the north of the Site. These structures are comprised of breeze block and are both adjacent to concrete walls.	

Target Note	Description	Photograph
		
Target Note 8	Metal canopies and seating areas located within the pedestrianised area of the Site.	


Target Note	Description	Photograph
		
Target Note 9	Ornamental planting of introduced shrubs is present within the linear trees in the public realm area of the Site. <i>Cotoneaster</i> (<i>Cotoneaster sp.</i>) could be present within the introduced shrubs and ornamental planting.	 

Target Note	Description	Photograph
		 <p>The first photograph shows a narrow, light-colored gravel path cutting through dense, tall green and yellowish vegetation. In the background, a blue building and a cloudy sky are visible.</p> <p>The second photograph shows a wider, paved path made of light-colored rectangular stones. To the left is a large, dense green bush, and to the right is a tall, leafy tree. A blue building is visible in the distance under a cloudy sky.</p> <p>The third photograph shows a dense thicket of green bushes and trees, with a large tree trunk visible in the center-right.</p>

Target Note	Description	Photograph
		
Target Notes 10 & 11	<p>The southern section of the Site contains an area of scattered trees and scrub (Target Note 10) predominantly comprised of willow (<i>Salix</i> sp.) saplings (Target Note 11) and other species including thistle (<i>Cirsium</i> sp.), bramble (<i>Rubus fruticosus</i> agg), and rushes (<i>Juncaceae</i> sp.).</p>	 

Target Note	Description	Photograph
		 <p>The photographs show the site's vegetation and surrounding context. The top photo is a close-up of tall, dense grasses and shrubs. The middle photo shows a large glass-fronted building and a parking lot in the background, with a field of tall grass in the foreground. The bottom photo shows a line of trees and shrubs under a blue sky with clouds.</p>

Appendix D Illustrative Photographs

Photo Number	Description	Photograph
1 - 5	Semi-improved grassland covering the majority of the Site.	



- 6 - 8 Sloped embankments around the edges of the semi-improved grassland.



- 9 - 15 Hardstanding in the form of public roads and paved footpaths adjacent to a combination of amenity grassland, semi-improved grassland and introduced shrub.







