Application: SCO/26/01368
Vineyard Farm Poulton Rd Spital

Objection in Principle from Wirral Wildlife and comments on Scoping Report
Dear [redacted]

We do not appear to have been consulted on this screening opinion but we would like to submit a response.

Wirral Wildlife objects in principle to the proposed residential development at Vineyard Farm. The proposal would permanently lose a substantial area of agricultural land and urbanise open land adjacent to Dibbinsdale SSSI, ancient woodland, and associated habitats.

We consider that the suitability of this location for residential development must be carefully examined in the context of the adopted Wirral Local Plan, the protection of agricultural land, the conservation of biodiversity and the need to protect the character and function of the surrounding landscape. The Scoping Report must therefore assess all these things, as below.

We request that Wirral Council confirm the site's current planning designation, including whether it falls within the Green Belt, and assess the proposal against the relevant policies in the adopted development plan, including Green Belt and Nature Improvement Area. Under the National Planning Policy Framework (NPPF), residential development in the Green Belt is usually considered inappropriate, requiring "Very Special Circumstances" (VSC) to be justified. If the site is designated Green Belt, the implications of the proposed development for Green Belt purposes and the applicable national planning policy must be explicitly addressed. The current Local Plan, adopted in March 2025, remains in force until such time as the next Plan is sufficiently advanced to become a material consideration. A Green Belt review is being conducted by Liverpool City Region, and a LCR Spatial Development Strategy is being prepared. Liverpool City Region Local Nature Recovery Strategy is a material consideration. All these must be taken into account in assessing this site.

Irrespective of its designation, we consider that the scale of the proposed development and the sensitivity of its location should justify a robust assessment of reasonable alternatives, the permanent loss of agricultural land and the potential effects on the adjacent designated site and wider ecological network. The Environmental Statement should fully address these concerns and consider them when determining whether development at this location is appropriate.
Wirral Wildlife considers that the proposed scope of the Environmental Statement should be expanded to ensure that the potential environmental effects of the development are adequately identified and assessed. The Environmental Statement should be informed by sufficiently detailed, site-specific surveys and assessments, undertaken at appropriate times of year and in accordance with relevant guidance (Local Plan Biodiversity and Geodiversity 6.31).

The following receptors and accompanying surveys should be included within the Environmental Statement..

Agricultural land and soil assessment

The Scoping Report proposes to scope out agricultural land and soils on the basis that the area of

best and most versatile (BMV) agricultural land affected is below the 20-hectare threshold for consultation with Natural England. Wirral Wildlife does not consider this, in itself, to be sufficient justification for excluding agricultural land and soils from further assessment.

The proposed development would permanently lose a substantial area of agricultural land, including land identified in the Scoping Report as Grade 2 and Grade 3a. We request a proportionate assessment of agricultural land quality and soil resources, supported by a site-specific Agricultural Land Classification (ALC) survey where existing information is insufficient to reliably establish the extent and quality of BMV land. The assessment should quantify the loss of each agricultural land grade and consider the implications of the permanent loss of productive land.

The assessment should also address soil resources, including the potential for soil compaction, erosion, contamination and loss of soil structure during construction. The Local Plan also requires an assessment of the effects on the viability of the farm holding.

Hedgerows, trees and other habitat features

The Scoping Report identifies native hedgerows, treelines, scattered trees, mature and potentially veteran trees, scrub and woodland mainly on the boundaries of the site. We request that the Environmental Statement provides a comprehensive assessment of these features, including accurate mapping, ecological condition, connectivity and their contribution to the wider ecological network.

A detailed hedgerow assessment should be undertaken to establish the ecological value and condition of the hedgerows, including their potential importance as wildlife corridors and foraging and commuting routes for bats and other species. The assessment should identify any hedgerows that may qualify as important under the Hedgerows Regulations 1997, where applicable, and identify the extent of any proposed losses or severance.

All mature, veteran and potentially veteran trees should be subject to appropriate assessment (BS5837:2012) including consideration of their ecological features, potential roosting opportunities and the effects of construction, changes in drainage and increased lighting. The Environmental Statement should demonstrate how these features would be retained and protected, with adequate buffers (Root Protection Areas) and measures to maintain their long-term ecological function.

Invertebrate surveys

The Scoping Report should explain whether the habitats present have been assessed for their potential to support notable or protected invertebrates. Given the presence of hedgerows, mature trees, woodland edges, scrub and other potentially valuable habitat features, Wirral Wildlife requests that an assessment of invertebrate potential is undertaken by a suitably qualified ecologist.

Where habitat suitability, desk-study records or preliminary findings indicate potential for notable or protected invertebrates, targeted surveys should be undertaken using appropriate methods and at suitable times of year. The Environmental Statement should assess the potential effects of habitat loss, fragmentation, lighting and changes to the management of retained habitats, and identify appropriate avoidance, mitigation and compensation measures.

Botanical Surveys
A full botanical survey should be undertaken to assess the ecological value of a site and the potential impact of development.

Completion of ecological surveys and assessment of other species

The Environmental Statement should include the results of all outstanding surveys identified in the Scoping Report, including bat activity surveys, bat roost surveys, breeding bird surveys, great crested newt population surveys and water vole surveys, as applicable to the habitats and potential impacts identified. Survey methods, dates, effort, limitations and results should be clearly reported.

The need for further surveys for reptiles, badgers, otters and other protected or notable species should be reviewed against the habitats present, desk-study information and the findings of the completed surveys. Any decision to scope out a species should be supported by a clear, site-specific rationale rather than an unsupported assumption of absence. Where access restrictions have prevented surveys of potentially relevant areas, the implications of these limitations should be explained and addressed before the Environmental Statement is finalised.

Assessment of effects on Dibbinsdale SSSI and the wider ecological network

Given the site's proximity to Dibbinsdale SSSI, Brotherton Park and Dibbinsdale Local Nature Reserve, ancient woodland and Dibbinsdale Brook (adjacent to the east of the site) , the Environmental Statement should assess both direct and indirect effects on these sensitive receptors. This should include potential changes to surface-water drainage and hydrology, sedimentation and pollution, construction disturbance, artificial lighting, recreational pressure, effects of domestic pets, and the loss or severance of habitat corridors. The extent and management of any proposed buffer zones must be supported by evidence of effectiveness. Effects of increased traffic using Dibbinsdale Road, alongside the SSSI, should be included.

Flood risk and river ecology: the Dibbin is already a very flashy river, which because of its urban catchment rises rapidly during heavy rainfall. This affects its wildlife value and regularly closes the minor roads that cross it. Effects on the river must be scoped in. The Marfords LWS is public access and must therefore be included in studies.
The assessment should also consider cumulative effects with other existing and proposed development in the surrounding area, including extensive new housing development in Eastham, Bromborough and Bebington. Appropriate avoidance, mitigation, compensation, monitoring and long-term habitat management measures should be identified, with sufficient detail to demonstrate that significant adverse effects can be avoided or adequately addressed.

Biodiversity Net Gain and long-term management

Any development of the site should result in a measurable biodiversity net gain as set out in the NPPF 2021 and the Environment Act 2021. This requires all impacts to biodiversity to be measured using a Biodiversity Metric in order to deliver a quantitative net gain. The Environmental Statement should explain how the development would conserve and enhance biodiversity, including the treatment of existing habitats within the statutory Biodiversity Net Gain process where applicable. Any proposed habitat creation or enhancement should be supported by realistic delivery proposals, appropriate management and monitoring arrangements, and provision for long-term maintenance.

Biodiversity Net Gain should not be relied upon as a substitute for avoiding harm to existing valuable habitats or designated sites.

Wirral Wildlife requests that these matters are addressed and that the Environmental Statement is not finalised until sufficient survey evidence is available to support a robust assessment of the likely significant environmental effects of the development.

Yours sincerely
Caroline Smallthwaite Msc MCIEEM
Wirral Wildlife
The Wirral Group of Cheshire Wildlife Trust