

To: Wirral Borough Council Planning Department
Post: P.O. Box 290 Brighton Street Wallasey Wirral CH27 9FQ
Planning Department Email: Planningapplications@wirral.gov.uk
Case Officer Mr C Heather Email: christopherheather@wirral.gov.uk

Regarding : EIA Scoping Report Representation

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Application Reference: SCO/25/01850

Site: Land near Station Road, Thurstaston, Wirral

Applicant: Chint Solar / SLR Consulting

Grid Reference: 323906, 384151

Ward: West Kirby and Thurstaston

Officer: Mr C Heather

Document reviewed: *EIA Scoping Report Revision 02 – 1 December 2025 – Rose Cottage Solar Farm* (prepared by SLR Consulting Limited)

Prepared for submission to Wirral Borough Council
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Dear Sir/Madam

I would like to confirm that I agree with the comments and requests in the attached '**EIA Scoping Report Representation**' document produced by **WGSA - Thurstaston Group** and would ask for the points within it to be considered accordingly.

I/We understand it to be acceptable and require that this Representation is recorded as a distinct Representation made by the undersigned.

Many thanks and kind regards

Name(s): _____

Address: _____

Date: _____

EIA REPORT RECOMMENDATIONS

Of Wirral Green Space Alliance – Thurstaston Group

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Wirral Green Space Alliance – Thurstaston Group is a sub-group of Wirral Green Space Alliance (WGSA)

We consider the proposed scope of the required EIA is deficient in many respects. We provide here an outline of our Objection but reserve the full detail which would be lodged in the event that a full Planning Application is forthcoming. We request a comprehensive and robust Environmental impact Assessment (EIA) is required from Chint Solar, in response to the above scoping report application.

It is our opinion that the scoping report identifies substantive weaknesses, omissions, and inaccuracies that materially undermine the adequacy of the proposed EIA.

The central concern is that the Applicant seeks to scope out multiple key environmental topics **before baseline evidence is complete and before the development design is defined**, contrary to the purpose of the EIA Regulations.

It is essential that the EIA provides sufficient, transparent and accurate information to ensure the full impact is appropriately assessed, especially given the designations on the land and its surrounds.

We would respectfully ask for the following points to be considered:

1. Procedural and Legal Deficiencies in the Scoping Approach

1.1 Failure to Support Informed Decision-Making

The EIA Regulations exist to ensure that planning decisions are taken in *full knowledge* of likely significant environmental effects. The Scoping Report repeatedly requests that entire impact categories be excluded despite:

- An undefined final layout
- Unknown panel specifications
- Unconfirmed construction compounds
- Undefined traffic routing
- Ongoing ecological surveys

This approach undermines Regulation 18 and relevant case law (Rochdale, Milne).

Objection point:

The Council cannot lawfully scope out impacts where the parameters that define those impacts remain undecided.

2. Inappropriate Scoping-Out of Key Environmental Topics

The applicant proposes to exclude the following from the Environmental Statement:

- Transport and Access
- Noise
- Air Quality
- Glint and Glare
- Land Use and Soil
- Geology, Hydrology and Hydrogeology

These topics are **standard assessment components** for large-scale solar farms, particularly in rural and Green Belt locations.

Objection point:

The proposed scope is artificially narrow and prevents a holistic understanding of environmental harm.

3. Transport and Highway Safety Impacts

3.1 Lack of Traffic Data

The Scoping Report:

- Confirms HGV use
- Proposes 5.5 m-wide access tracks
- Identifies Station Road as the main access
- Anticipates construction lasting up to 12 months

However, it provides:

- No vehicle numbers
- No daily or peak movements
- No swept-path analysis
- No assessment of cumulative disruption

Despite this, transport is scoped out and clearly should not be

Objection point:

Without quantified traffic data, highway safety, residential amenity, and rural road capacity cannot be properly or fully assessed.

4. Glint and Glare – Solar-Specific Impact Ignored

National policy and guidance explicitly identify glint and glare as a key consideration for solar farms. The Scoping Report acknowledges this in policy sections but seeks to exclude it from assessment.

Site characteristics increasing risk:

- Panel height up to 3.5 m
- Open rural setting
- Elevated and 360-degree perimeter public viewpoints
- Nearby roads and dwellings

Objection point:

Excluding glint and glare prevents assessment of road safety, residential amenity, and heritage setting impacts.

5. Green Belt Harm and Failure to Demonstrate Very Special Circumstances

The Site lies entirely within the Wirral Green Belt.

The report correctly states that:

- Solar development in the Green Belt is inappropriate
- Very Special Circumstances (VSC) are required

However:

- No site-specific necessity is demonstrated
- No alternative site assessment is provided when there are alternative sites and locations
- Climate benefits are presented in generic terms only

Objection point:

Generic renewable energy benefits do not, on their own, amount to Very Special Circumstances capable of outweighing Green Belt harm. The proposal appears driven by land opportunity rather than policy.

6. Landscape and Visual Impact Concerns

6.1 Premature Scoping Without Fixed Design

The applicant presents a “maximised layout” but states the design will evolve. Landscape and Visual Impact Assessment (LVIA) is therefore being requested to be scoped before:

- Final panel extents are known
- Substation size and location are fixed and impacts assessed
- Mitigation planting is confirmed

The Site is within:

- Dee Estuary Area of Special Landscape Value
- A highly sensitive rural setting
- Green Belt Land
- Nature Improvement Area

Objection point:

Landscape and visual harm cannot be meaningfully scoped without a defined worst-case development scenario. The direction in which the panels will face will also be an important factor on the visual impact.

7. Ecology and Functionally Linked Land (FLL)

7.1 SPA-Linked Bird Use Acknowledged

The report confirms:

- Moderate potential for Functionally Linked Land
- Use by SPA qualifying species (curlew, black-tailed godwit)
- Pink-footed goose recorded at >1% SPA population threshold
- Surveys are still ongoing

Despite this, impacts are being downplayed.

Objection point:

Decisions should not be made until full multi-season survey data is complete and independently assessed. Assessment of great crested newts, bats, barn owls and badgers should also be completed as they are regularly observed in the proposed area. We would request consultation with Natural England on these very important and sensitive points given protected species are involved. In view of the significance of this Site, especially in the context of its surrounds, locally, nationally and internationally, we feel surveys should be over a minimum 24 months rather than 12.

8. Heritage Setting Impacts

8.1 Over-Reliance on Vegetation Screening

The heritage assessment relies heavily on:

- Existing hedgerows
- Tree belts
- Assumed long-term screening

Affected assets include:

- Church of St Bartholomew (Grade II*)
- Thurstaston Hall (Grade II*)
- Thurstaston Conservation Area
- Registered ‘Suspected Heritage Assets – See Expert Summary’; full report being completed.

Objection point:

Vegetation is not a permanent or reliable mitigation for heritage setting harm, particularly over a 40-year operational period. Heritage significance of the Site requires perimeter of study to be 2km not 1km.

9. Decommissioning and “Temporary” Development Claims

The development seeks permission for up to 40 years.

Issues:

- No enforceable restoration methodology
- No soil compaction baseline
- Cable to be left permanently underground
- Agricultural productivity not assessed

Objection point:

A 40-year industrial use of Green Belt land cannot reasonably be described as temporary without satisfactory and enforceable restoration detail.

10. Inadequate Cumulative Impact Assessment

The cumulative assessment:

- Only considers other solar farms
- Dismisses smaller installations
- Ignores precedent-setting effects
- Ignores future policy-led pressure

Objection point:

Cumulative harm includes incremental landscape industrialisation and Green Belt erosion, not just installed capacity. The degree of precedent set by development on such an extremely sensitive, valued and supposedly-protected Green Belt site calls into unanswered question the consequential development and harm on other areas of Wirral Green Belt, and should be addressed by the EIA Scope.

11. Additional Comment

We feel that the applicant has failed to demonstrate that the environmental effects of the proposed development have been properly identified, assessed, or balanced in accordance with the EIA Regulations. The proposed scoping seeks to exclude key impacts prematurely, undermining the ability of the Council to make a lawful and informed decision.

“Very Special Circumstances” have not been demonstrated in a site-specific, evidence-led manner sufficient to outweigh the acknowledged and undisclosed harm to the Green Belt, especially as the Adopted Local Plan specifically and intentionally adds considerable ‘weight’ against development.

12. Questions

1. How can impacts be scoped out when surveys and design are incomplete?
 2. Why has no alternative site assessment been provided?
 3. How will highway safety be protected without a Transport Assessment?
 4. How can glint and glare be dismissed without modelling?
 5. How will Functionally Linked Land impacts be ruled out before surveys conclude?
 6. Will a fire safety report be required/requested?
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13. Conclusion

The Scoping Report contains significant gaps that prevent meaningful public scrutiny and lawful decision-making. We, as local residents, feel that we are justified in requesting:

- A widened EIA scope
- Completion of all baseline surveys
- Full assessment of Green Belt, landscape, transport, and glint/glare impacts
- A transparent alternatives and site selection assessment
- Consultation with Natural England for protected species and FLL
- And more, through a range of expert input supporting Council Officers

Thank you for your consideration and support with regards to this request.

On behalf of: Wirral Green Space Alliance – Thurstaston Group

Dated: 19 December 2025