



ROMAN SUMMER



PLANNING STATEMENT

KIRKBY VALLEY GOLF CLUB & COURSE

SEPTEMBER 2021

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APPENDICES

Appendix 1 – LPA's EIA Screening Opinion

Appendix 2 - LPA's Pre-Application Response

1.0 Introduction

1.1 This Planning Statement supports a full planning application submitted by *L32 Trading Ltd* that promotes the following development at Kirkby Valley Golf Club and Course :

- Reconfiguration and other improvement works across the entire golf course, including the reshaping of tees / greens / bunkers to provide both an improved 18 hole course and the introduction of a new 9 hole course on currently unused land.
- New and improved irrigation / drainage works (including 2 irrigation lakes), extensive tree and shrub planting, and ecological mitigation measures across the course.
- The erection of a footbridge over the River Alt (to provide improved access around the course).
- The erection of a new 2 storey Clubhouse of 2,027.8 sqm GEA with associated operational / management offices, golf shop, café / restaurant, function room, changing and toilet facilities.
- Retention, alteration and 364 sqm (GEA) extension of the existing clubhouse, and its change of use to form a golf-related / grounds maintenance training academy with associated classroom space, cafeteria and overnight accommodation for golf professionals / teachers / trainers (existing access and car park retained / unchanged).
- A new centrally located greenkeeper's compound with an associated 720 sqm GEA portal frame building to contain welfare facilities, office, training space and equipment storage and maintenance and security fencing.
- An adventure golf course and practice putting green.
- A golf driving range with an associated 2 storey building containing 40 driving bays (over two levels), bar / lounge, pro golf shop, training and practice rooms / facilities, and external lighting and safety netting.

- 6 synthetic outdoor 5-a-side football pitches with associated lighting, means of enclosure and car parking.
 - 5 synthetic outdoor tennis courts with associated means of enclosure and lighting.
 - 1 external bowling green with associated single storey players' pavilion building, means of enclosure and lighting.
 - Car, motorcycle and cycle parking spaces to serve all of the above facilities.
 - Two new accesses created onto Valley Road.
 - The formation of a new gated access via Aintree Lane for the use of construction traffic (during construction phase) and - upon completion of development works - for the sole use of course operatives for the purposes of course management / maintenance.
- I.2 The application site extends to 80.3 hectares (see boundary marked in red on the RGP Architects' Site Location Plan ref: 9627-L01G).
- I.3 The site is located in the Green Belt. Both national and local policies confirm the type of development that is deemed 'appropriate' in the Green Belt, which includes the provision of 'appropriate facilities associated with outdoor and sport and recreation', subject to impact on openness. This Statement explains which elements of the proposal are considered to be 'appropriate' in the Green Belt, and – for those 'inappropriate' elements that do not fall within the exceptions - the 'very special circumstances' that justify approval.
- I.4 In developing these proposals, regard has been given to the provisions of Section 38(6) of the Planning and Compulsory Purchase Act 2004, which confirms that planning decisions should be taken on the basis of policies of the development plan, unless other material considerations dictate otherwise. In this Planning Statement we explain why we consider the application is consistent with all relevant policies of the development plan, including those relating to development in the Green Belt.

I.5 The proposal (in concept form) has been the subject of formal EIA screening. The LPA's response is reproduced at *Appendix 1*, and confirmed that the application does not need to be subjected to EIA procedures. It is acknowledged that the scheme details submitted deviate from those that were subjected to EIA Screening, but the scheme is not materially different, and those elements that have been adjusted since EIA Screening was undertaken (for example, the change of use of the existing clubhouse) do not raise environmental issues or concerns that would elevate the proposal such that EIA should be demanded.

I.6 During pre-application discussions with the LPA, the content of this application was scoped out and agreed (refer to LPA's pre-application feedback at *Appendix 2*). A comprehensive set of drawings and documents are submitted to support the application. These should be considered alongside one another to provide a rounded, informed and comprehensive assessment of the proposal. The application as a whole comprises :

- Application forms and certificates (completed by Roman Summer Associates Ltd);
- This Planning Statement (Roman Summer Associates Ltd);
- Design & Access Statement (RGP Architects);
- Materials Schedule Revision B (IDG);
- Landscape and Visual Impact Assessment (LVIA) (IDG);
- Adventure Golf Area Concept Document (IDG);
- Arboricultural Impact Assessment (Tree Solutions Ltd);
- Transport Assessment (including MASA) (Prime Transport Planning) – to be read alongside the following drawings :
 - Ref: PI8122-200C 'Proposed Signals' (Prime Transport Planning)
 - Ref: PI8122-001C 'Proposed Access Strategy' PI8122-001C
- Travel Plan Framework (Prime Transport Planning);
- Archaeological Assessment (AHP);

- Heritage Assessment (Graeme Ives Heritage);
- Preliminary Desk Study Report (Ian Farmer Associates);
- Flood Risk Assessment and Drainage Management Strategy (Betts Hydro);
- KMBC Pro-Forma 1: Sustainable Drainage System (Betts Hydro), to be read alongside :
 - Surface Water Run-Off Calculation Sheet (Betts Hydro); and
 - Preliminary Proposed Drainage Strategy Plan ref: HYD444 Rev 2.2 (dated 18/02/2021) (Betts Hydro)
- External Lighting Strategy (Parker Wilson) to be read alongside :
 - I544-0-E301 Rev P2 - Electrical Services – Proposed Lighting Strategy - Sheet 1 of 2 (Parker Wilson)
 - I544-0-E302 Rev P2 - Electrical Services – Proposed Lighting Strategy - Sheet 2 of 2 (Parker Wilson)
- Energy and Sustainability Assessment (Parker Wilson);
- The following Ecology Reports / Assessments (Ecology Services) :
 - Ecological Appraisal Report (which provides an overview / summary of all of the reports below)
 - Amphibian Survey report
 - Badger Survey report
 - Bat Survey report (buildings)
 - Bat Survey report (trees)
 - Bat Transect and Automated Survey report
 - Breeding Bird survey report

- Otter Survey report
 - Water Vole Survey report
 - Health Impact Assessment (DPP)
 - Town Centre and Leisure Impact Assessment (DPP)
 - Viability Report (Grasscroft)
 - Social Value Strategy (Fusion 21)
 - The following proposed 'buggy bridge' structural drawings (Booth King) :
 - I3758-BKP-VI-XX-DR-S-900 Revision P1 – Proposed Buggy Bridge (Sheet 1 of 2)
 - I3758-BKP-VI-XX-DR-S-901 Revision P1 – Proposed Buggy Bridge (Sheet 2 of 2)
 - The hard / architectural works drawings as per the submitted drawing register (RGP Architects):
 - The course works drawings as per the submitted drawing register (IDG) – *nb totem / signage details are provided for information only at this stage, and will be subject to a separate application seeking Advertisement Consent*
- I.7 The application fee has been calculated at £28,241, based on the erection of a total of 6,610 sqm GEA floorspace [ie new clubhouse @ 2,727 sqm GEA + extension of existing clubhouse @ 364 sqm GEA + driving range building @ 2,852 sqm GEA + bowling green pavilion @ 61 sqm GEA + greenkeeper's maintenance building @ 606 sqm GEA].
- I.8 The remainder of this Planning Statement is structured as below :
- Section 2.0 describes the site, surroundings, background and proposed development (including pre-application advice);
 - Section 3.0 summarises national and local planning policies relevant to the application;
 - Section 4.0 assesses the proposed development against planning policy and addresses other material considerations;
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- Section 5.0 sets out our conclusions.

2.0 Background and Proposal

Background

- 2.1 Kirkby Valley Golf Course was founded in 1928. It comprises an 18 hole municipal parkland course located in the Green Belt, dissected by the River Alt (which is a protected Green Space and Ecological Corridor).



- 2.2 Typical of many municipal golf courses of this age, there are numerous health and safety concerns relating to the layout which does not adhere to the PGADC Guidelines for the safe design golf courses.
- 2.3 Whilst located in Knowsley, the course is owned by Liverpool City Council. Due in part to the City Council's budget cuts, the Council has sought an experienced and reputable golf operator to assume management of the facility. As such, in 2014, the Council opted to lease the course to the Applicant, L32 Trading Ltd, which operates the course on a 150 year lease (from March 2019).
- 2.4 By way of context, L32 Trading Ltd forms part of Green Circle Estates. It controls Allerton Manor Golf Club in south Liverpool, which is the subject of considerable ongoing investment and improvement, with a recently approved application that will result in a further £15 million of investment to deliver a range of additional golf-related facilities.
- 2.5 The Applicant is also delivering similar much needed improvements at Sherdley Park Golf Club (St. Helens), with more to follow.
- 2.6 Until fairly recently, the Applicant was the owner-operator of Formby Hall Golf Course Resort and Spa in Sefton. That facility employs approximately 250 local people and is one of Sefton's largest leisure industry employers. It is affiliated with the PGA under Licence, and the Par 3 course is considered to be one of the finest in the UK and has been played and praised by the likes of Nick Faldo and Tommy Fleetwood (who started his career as a Junior at the Club).
- 2.7 It will be seen, therefore, that the Applicant has exceptional credentials, and understands how to improve, deliver and operate a successful golf facility as well as (and arguably better than) any other developer or golf operator in the North West.
- 2.8 It is against that context that this proposal at Kirkby Valley Golf Course falls to be considered. The aim is to transform what is currently an ailing, not fit for purpose, unsafe, unattractive, unviable facility into a modern, exciting, fit for purpose golf destination, with a range of complementary high quality sports-related facilities and associated functions.
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The Site & Context

- 2.9 The application site is 80.3 hectares. The application red line boundary includes the entirety of the golf course and its limited facilities, namely its very poor quality clubhouse, car park and greenkeeper's compound. The site also includes an area of land to the south-west that historically formed part of the golf course, but is now vacant and of scrub-like appearance (see reference to 'unused land' below). That part of the site has been the subject of ongoing anti-social behaviour and fly-tipping.



- 2.10 The site is located between Aintree (to the west) and Kirkby (to the east). It is flanked along its southern edge by the dual-carriageway Valley Road, which provides the site's only access point. The site is flanked by the M57 on part of its eastern side, by Aintree Lane to the west, and a railway line to the north. The River Alt sub-divides the site, running in a north / south direction.
- 2.11 The golf course itself comprises 18 holes and the vacant disused open space (described above) which abuts the main golf course, the A506 and Aintree Lane.
- 2.12 The site is relatively flat, albeit with gentle undulations, and largely contained by mature trees and hedgerow belts (most of which will be retained and supplemented by the proposal). As such, it is very well screened and affords very few views into it from the wider public realm (please refer to separate LVIA for an analysis of important views and vistas).
- 2.13 The site is occupied by a single building – the current clubhouse (image below) and its car park. This is a peculiar single storey structure of dated, utilitarian and unprepossessing appearance, which has been extended incrementally and in untidy fashion over past decades. This accommodates a small cafeteria and cramped changing / toilet facilities. The facility is no longer fit for purpose, and – following the proposed course works and reconfiguration – will be in entirely the wrong location.



- 2.14 The application site abuts the *Ingoe Lane Conservation Area* on its south eastern side. Views into and out of the Conservation Area are very restricted as a result of the mature landscaping along the boundary. The Conservation Area was originally the site of the Tile and Brick works established in 1850 to serve the Croxteth Estate of Lord Sefton. Those works have since been demolished, but the three pairs of cottages dated 1857 built for employees and the manager's house remain.

The Proposal

- 2.15 The proposed layout drawings (by both RGP Architects and IDG Landscape Architects) show the extent of the proposed development in relation to the nearest roads, surrounding land uses and wider area. Careful thought has been paid to ensure that the scheme responds to the site's Green Belt status, topography, visibility, and surrounding land uses (including the housing to the south and east), and to heritage, ecology and trees.
- 2.16 The application is submitted in full detail. It seeks permission for a comprehensive series of phased works across the entire golf course, including engineering works in respect of the reconfiguration / remodelling of the course to deliver much needed improvements to its quality, playability, attractiveness, safety and drainage. The course works will involve :
- The re-routing, reconfiguration and reshaping of the golf course to create a superior and more interesting / challenging and safer layout.
 - New and reconfigured tees and greens, involving a degree of raising and lowering levels to create relief / undulation, golf challenges and a more attractive and playable championship-style course.
 - The above will involve the importation of circa 316,000 cubic metres of inert (clean) fill material so that the topography can be aesthetically sculpted. This will improve safety, drainage and the visual character of the course, introducing exciting golf challenges that the course is currently lacking.
 - A new irrigation system across the entirety of the course to address the current drainage problems which render large parts of the course unplayable during wet weather.
 - 2 new irrigation lakes.

- The creation of a new 9 hole golf academy course on the south western part of the site that is not currently used as part of the golf course (albeit it was used as such historically).
 - All of the above course works will be constructed to modern golf course construction and golf safety standards.
 - Improved woodland management and the planting of considerable numbers of new native trees and shrubs.
 - The construction of a footbridge over the River Alt to enable safe, easy and convenient access around the reconfigured course.
 - Introduction of ecological mitigation areas on the advice / recommendations of Ecology Services (see their separate ecological reports).
- 2.17 Four new buildings are proposed – a new clubhouse; a building to serve the proposed driving range; a small ‘pavilion’ to be erected adjacent to the proposed bowling green; and a groundkeeper’ maintenance building. The only other new build floorspace will be focused on the existing clubhouse, which is to be refurbished and converted to form a Golf Training Academy, and will be subject to modest extension. No other new buildings are proposed.
- 2.18 The new Clubhouse is proposed to be constructed close to the new main entrance into the club / course, adjacent to the reconfigured 1st tee and 18th green (where golfers start and end their rounds), and overlooking the proposed Adventure Golf Course (see below).
- 2.19 The new Clubhouse will comprise 2,727 sqm gross external area (GEA) :
- Ground Floor Area @ 1,739 sqm GEA
 - First Floor Area @ 988 sqm GEA
- 2.20 It has been designed as a two storey building of traditional design, finished with variants of red facing brickwork and artstone detailing, an antique brown tile roof, and a small clock tower. External terraces and first floor balconies (cedreral board panels and glass balustrading) will be incorporated.
- 2.21 The ground floor of the new clubhouse will comprise bar / restaurant facilities, toilets and changing rooms, a golf pro-shop, and state-of-the-art training / tuition rooms / resources. The first floor is primarily to serve golf-related (and other) functions and to cater for prestigious
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competitions. Dedicated parking and outside space is provided for the delivery yard and buggies.

CGI of the proposed clubhouse :



- 2.22 This will provide a new, fit for purpose clubhouse facility for golfers in the ideal location. It will replace the existing clubhouse, which is of very poor quality, cramped and not fit for purpose to serve a modern, progressive golf complex with aspirations to hold prestigious events and competitions. Crucially, the current clubhouse does not allow for adequate surveillance and security of the course. There is increasing abuse of the course by ‘golfers’ (and others with no intention of playing golf) arriving and playing the course for no charge, in turn disrupting the play of legitimate golfers who have paid their fees and await their turn to play.

2.23 While there is no policy requirement (at national or local level) to explain the ‘need’ for a new clubhouse at a golf club, it is critical that these facilities are grouped together in one Clubhouse building, and not disparate across the site. They cannot function effectively if split, and will not be fit for purpose. The existing clubhouse is far too cramped to offer the range and quality of golf-related goods that any prestigious course ought to offer, and so too are the changing facilities.

2.24 Once the new Clubhouse becomes operational, the existing clubhouse will be refurbished (externally and internally) and converted into a Golf Academy, providing golf-related / grounds maintenance training with associated classroom space, cafeteria and overnight accommodation for golf professionals / teachers / trainers (existing access and car park retained / unchanged). To accommodate the range of facilities, the existing building will also be subject to modest extension, as below :

	Existing Clubhouse	Proposed Extension
Floorspace	652 sqm GIA	329 sqm GIA
	676 sqm GEA	364 sqm GEA
Built Volume	2,718 cubic metres	815.4 cubic metres

2.25 Crucially, the new clubhouse is proposed to be located precisely where it needs to be, close to / visible from the main course entrance, adjacent to the practice putting green, and overlooking both the 1st tee and 18th green, and the proposed Adventure Golf facility (as described below). It is essential that, if parents are to allow their children to play the Adventure Golf course, this must be overlooked, and the new Clubhouse will serve that specific purpose.

2.26 As noted above, the application also promotes an 18 hole Adventure Golf course adjacent to (and overlooked by) the new Clubhouse Pavilion. This is an important facility for modern, enterprising golf complexes, and particularly those which have suffered from poor management, lack of investment and historically poor trading (as in this case).

- 2.27 Not only do well designed Adventure Golf courses appeal to families (thereby widening the attraction of the facility to an extended range of visitors), but these are an excellent, fun and informal introduction into the sport of golf for young people. Aside from that, they are a very popular family recreation facility. The facility will be suitable for all age groups and abilities. It will be very affordable to use and requires no specialised equipment. This facility is critical to introducing more people to outdoor activity in an inclusive way.
- 2.28 This new facility at Kirkby Valley is an important part of this proposal, which aims to create one of the best municipal golfing facilities in the UK. The Adventure Golf course has been designed around a wider sporting theme, which each hole inspired by a different sport. It has been sympathetically designed to sit within the landscape, with sensitive, low features (to retain openness) without compromising quality, accessibility or fun. It will be heavily planted with ornamental planting and surrounded by a 1.2m black steel bow top fence.
- 2.29 Further details are set out in the 'World of Sport' Concept document produced by the International Design Group (IDG), which explains that the Adventure Golf Course takes its inspiration from the world of sport : Bobsleigh, Ten Pin Bowling, Football, Tennis, Horse Racing, Sailing, White Water Rafting, Darts, Boxing, Cricket, FI, Baseball, Curling, Ski Jumping, Gymnastics, Cycling and Snooker. The references to this variety of sports is hoped to entertain, but also inspire players to engage with more outdoor activity in a creative way.
- 2.30 It is also important to highlight that, in common with all other facilities promoted by this application, the Adventure Golf course has been designed to be fully accessible to disabled persons, including those dependent on wheelchairs.
- 2.31 The application also promotes a driving range, illuminated with pit lighting to minimise light pollution. The driving range building will comprise a total of 2,852 sqm GEA of floorspace over two levels. It will provide 40 all-weather driving range bays over two levels, a bar / lounge / relaxation space designed to appeal to families and social groups, golf shop, training and practice rooms / facilities, and external lighting and safety netting.

- 2.32 The front façade of the driving range buildings will offer a crisp, contemporary appearance (zinc cladding, aluminium framing and frosted glass) facing towards the main entrance red cedar cladding on the rear and side facades (see extract below showing front elevation).

Front of driving range building :



- 2.33 Driving ranges are very popular with a variety of golfers, from improvers to learners. It will provide golfing opportunities to those who may find the accessibility of a traditional golf course challenging.
- 2.34 The application also proposes the introduction of non-golf outdoor sports and recreational facilities, namely 6 synthetic outdoor 5-a-side football pitches, 5 synthetic outdoor tennis courts, and bowling green with associated single storey pavilion building (61 sqm GEA / 54 sqm GIA). All of these will necessitate their own means of enclosure and lighting to enable use during the evenings and during poor natural light conditions.

Rear of driving range building :



- 2.35 We maintain elsewhere that these facilities are all ‘appropriate facilities’ for outdoor sport and recreation, albeit we have acknowledged that their infrastructure requirements (fencing and lighting) will have limited impacts on ‘openness’ (see our assessment of appropriate and inappropriate development in Section 4.0 of this Statement).
- 2.36 These high quality outdoor sports and recreational facilities will be complementary to the primary golfing use of the complex. They will introduce entirely new and exciting facilities for the health and well-being of the local community, and – crucially – will generate new income streams that will play a critical part in rendering viable the project as a whole.
- 2.37 The application also promotes the relocation of the existing greenkeeper’s compound to a discrete and central area within the golf course. This is clearly an essential component of any golf course. It will comprise a 606 sqm portal frame maintenance building, which will house welfare facilities (mess room, changing rooms, washroom and a small office). The building will be used as a workshop and for secure machine storage / maintenance. Petrol, oil / diesel tanks and an air compressor are to be located next to a ‘wash down’ pad, which will have a hydrocarbon filter attached to the drainage outfall. The yard will be finished as a

concrete apron, capable of safely supporting 8 ton vehicles. The maintenance compound will be secured by colour coated 2.4m high steel palisade triple point security fencing with automatic vehicular gates.

2.38 To service all of the above, new car parking areas will be provided. The car park that serves the existing clubhouse will be retained, to serve the change of use of that building. That car park is capable of accommodating 152 spaces (23 for staff and 129 for patrons / visitors).

2.39 Additional parking space will be provided across the remainder of the site. These new spaces will be broken into the following six areas (A – F – as marked on the submitted drawings) to serve the corresponding components of the project :

CAR PARK AREA A @ 108 car spaces + 6 disabled spaces + 4 motorcycle spaces for shared use between bowling/ tennis & football pitch use

CAR PARK AREA B @ 38 car spaces + 3 disabled spaces for shared use between bowling / tennis and football pitch use

CAR PARK AREA C @ 121 car spaces + 21 disabled spaces + 4 motorcycle spaces for shared use between bowling/ tennis / football pitch and driving range use

CAR PARK AREA D @ 56 car spaces + 6 disabled spaces for golf use

CAR PARK AREA E @ 82 car spaces + 4 disabled spaces + 8 motorcycle spaces for golf use

CAR PARK AREA F @ 18 car spaces + 6 disabled spaces for golf clubhouse use

Total = 423 spaces + 46 disabled spaces + 16 motorcycle spaces [plus the 152 existing spaces retained for new use of existing clubhouse]

2.40 All parking will be provided with low level bollard lighting.

2.41 72 secure customer cycle parking spaces and 13 staff cycle spaces will be provided, split across the site area.

2.42 While the new hardstanding and building areas / footprints combined equate to is 48,620 sqm. In the context of a site area of 803,000 sqm, that represents only 6% of the entire site area. The remaining Green Belt / Greenspace will be considerably improved through re-contouring of the landscaping and the introduction of considerable new tree and other planting, and the provision of substantial ecological mitigation areas.

2.43 The application will involve the selective removal of trees and other vegetation, and comprehensive new soft landscaping across the course. The submitted Arboricultural Assessment confirms the following tree losses.

TREE RETENTION CATEGORY	NUMBER OF TREES TO BE REMOVED FOR DEVELOPMENT
A	0
B	40
C	227
U	12

2.44 It is clear from the above table that most trees to be removed are 'C' category i.e. those of no material conservation or cultural value and or those offering low or only transient landscape benefit to the site and wider area. Most of these trees are located within the area of unkempt land to the south-east of the golf course and are predominantly naturally colonised scrub. The removal of these low-quality trees should not form a material consideration of this planning application particularly as all will be replaced with better quality specimen trees on an almost 4:1 basis. The replacement trees (see numbers below) will radically enhance the landscape setting well into the future making this a significant improvement in terms of tree cover augmentation and amenity enhancement. Furthermore, the Landscape & Visual Impact Assessment (LVIA) undertaken by IDG clearly indicates that the development area is almost entirely screened by established trees and hedgerows around the boundaries making the removal of trees internal to the site almost unnoticeable.

2.45 There are no anticipated adverse impacts to retained trees and hedgerows as they have been well integrated within the design in order to safeguard the amenity and screening value, they afford the site and locale. As such, there are no special engineering solutions required and no future pressures to fell or remove trees in the future.

- 2.46 To replace the loss of those mainly poor quality trees, it is proposed to plant 1,049 new trees (refer to IDG Tree Schedule). That equates to close 4 for 1 replacement.
- 2.47 In addition to new trees, the Planting Schedule of IDG confirms that the scheme will deliver 541 metres of new native hedgerow, 17,666 sqm of shrubs, 2,360 sqm of ornamental grasses, 4,181 sqm perennial planting, 333 sqm ferns and over 16,000 sqm of mixed seeding. Most of this new vegetation will be selected for both its visual softening / greening and biodiversity value.
- 2.48 To facilitate the proposed works, the application proposes to retain the existing site access to continue to serve the existing clubhouse (the change of use of which is proposed – as described above). It is also proposed to create two new main access points directly from Valley Road, to provide safe and efficient access and internal circulation.
- 2.49 To avoid the need for all construction traffic to utilise the main entrance via Valley Road and to distribute such traffic more widely across the network, it is also proposed to introduce a new access via Aintree Lane for use during the course works operations. This is to be retained upon completion of works and will be reserved for the sole use of operatives for the purposes of ongoing course maintenance.
- 2.50 The development will be phased over the course of approximately 5 years. At this stage, a two-phase delivery strategy is envisaged. The initial phase of development will include:
- The new 9-hole Academy golf course
 - The two-tier state-of-the-art driving range
 - The new golf clubhouse, golf shop café/ restaurant and function space
 - The Adventure Golf course
 - The refurbishment, conversion and extension of the existing clubhouse to form the Golf Academy
 - The reconfiguration and enhancement of the 18-hole Championship Course
 - Provision of parking facilities to serve the above Phase 1 elements

- 2.51 The second phase will focus on the provision of the new and ancillary sporting facilities (bowling green and pavilion, football pitches and tennis courts) to complete the vision for an integrated family sporting and leisure destination.
- 2.52 The delivery of components (and any overlap in bringing those forward) will be reliant on detailed phasing information that will need to be discussed with the individual contractors charged with bringing forward different parts of the scheme, and at different stages. At this stage in the process, the Applicant does not wish to second guess the likely programme (beyond the indicative phases above), which will need to be interrogated in detail once contractors are in place. That said, we anticipate that a condition that will be attached to the consent to require details of phasing in advance of any works.
- 2.53 The phasing strategy will be developed in such a way that the golf club can remain operational at all times, and – insofar as possible – will continue to offer a full 18 hole course. Remaining fully operational is important to sustaining the ongoing viability of the club. If the club was to close for any period of time, not only would it inconvenience customers, but the need to rebuild the regular golfing trade would be slow and would jeopardise the long term viability of the facility (which would in turn undermine the rationale behind this proposal).
- 2.54 During the course of the construction period, porta-cabin site offices and welfare facilities will be required for workers. Initially these are likely to be located in the existing greenkeepers compound, but will inevitably need to be located elsewhere once construction work commences on the proposed hotel. Construction staff parking will also need to be provided on-site throughout the full course of the works. For much of the construction phase, there is likely to be sufficient space within the existing golf club car park, but it is likely that, during different phases, demand will fluctuate and the parking might need to be supplemented with additional temporary spaces closer to the location of the works, to prevent unnecessary traversing of the site on foot, or with plant. Again, all such details will be determined once contractors have been appointed, and we anticipate will be the subject of a condition relating to phasing and the logistics of construction and its associated traffic.
- 2.55 The main construction traffic impacts will arise from the importation of recovered inert (clean) soils (to be brought to the site by a licensed earthworks contractor), which will be used to

remodel the course and to provide the topographic features in line with the detailed course design by IDG. It is proposed to bring materials into site at two points, as below :

- Via the existing main entrance on Valley Road.
- Via the new entrance to be formed onto Aintree Lane.

Pre-Application Feedback

- 2.56 The application has been discussed at pre-application stage (3 meetings and separate correspondence) with the LPA. The LPA's EIA Screening request is reproduced at *Appendix 1*, and its written pre-application response at *Appendix 2*, albeit it should be noted that – while the core elements of the scheme have remained consistent – elements of the proposal have evolved during the course of the past 2.5 years of pre-application discussion.
- 2.57 From the outset, the LPA has been positive and supportive of the proposal, recognising the currently poor quality of the club and course, and the wide-ranging economic, social and environmental benefits that are likely to accrue as a result of development. At the same time, the LPA has been clear that any 'inappropriate development' (in Green Belt terms) needs to be robustly justified.
- 2.58 The LPA has encouraged the highest standards of design quality, and requested a layout that retains views and vistas between the built elements insofar as possible, to retain openness between buildings.
- 2.59 Officers have also encouraged the highest standard of landscaping, including the retention and creation of green buffering along the main road frontages (particularly along Valley Road).
- 2.60 The LPA's EIA Screening Opinion (*Appendix 1*) confirms that the proposal does not raise environmental concerns sufficient to trigger the need for EIA. It is acknowledged that that Opinion was sought on the basis of moderately different scheme details, but it is not uncommon for scheme details to evolve leading up to submission stage, and the core details of the project are largely the same as those screened by the LPA.

3.0 Overview of Planning Policy

- 3.1 This section summarises the planning policy context against which the application falls to be considered. These policy strands will then be considered further in Section 4.0 of this Statement. Before consideration of Development Plan policies, we first summarise the strategic policies set out at national level.

National Planning Policy Framework (NPPF) [July 2021]

- 3.2 Paragraph 8 explains that achieving ‘sustainable development’ means that the planning system has three overarching objectives (economic, social and environmental), which are interdependent and need to be pursued in mutually supportive ways, so that opportunities can be taken to secure net gains across each of the different objectives.
- 3.3 Paragraph 10 reinforces this by confirming that, at the heart of the Framework, is a presumption in favour of sustainable development, while paragraph 11 states that LPAs should apply this presumption. For decision-taking this means:
- approving development proposals that accord with an up-to-date development plan without delay; or
 - where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:
 - the application of policies in the Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or
 - any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.
- 3.4 Paragraph 12 states that the presumption in favour of sustainable development does not change the statutory status of the development plan as the starting point for decision making. Where a planning application conflicts with an up-to-date development plan, permission should not usually be granted. Local planning authorities may take decisions that depart from

an up-to-date development plan, but only if material considerations in a particular case indicate that the plan should not be followed.

- 3.5 The focus of Part 13 of NPPF is on 'Protecting Green Belt Land. Paragraph 137 explains that:

'The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.'

- 3.6 Paragraph 138 confirms that the Green Belt serves the following five purposes:

- a) to check the unrestricted sprawl of large built-up areas;
- b) to prevent neighbouring towns merging into one another;
- c) to assist in safeguarding the countryside from encroachment;
- d) to preserve the setting and special character of historic towns; and
- e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

- 3.7 §147 states that *'inappropriate development'* is, by definition, harmful to the Green Belt and should not be approved except in *'very special circumstances'*.

- 3.8 §148 states that, when considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. It explains that *'very special circumstances'* will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is *'clearly outweighed'* by other considerations.

- 3.9 §149 confirms that local planning authorities should regard the construction of new buildings as inappropriate in the Green Belt, but that exceptions include :

- *The provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it.*

- *The extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building.*

3.10 §150 is also relevant to this proposal in that it confirms that certain other forms of development are not inappropriate in the Green Belt provided they preserve its openness and do not conflict with the purposes of including land within it. These include :

- *engineering operations;*
- *the re-use of buildings provided that the buildings are of permanent and substantial construction; and*
- *material changes in the use of land - such as changes of use for outdoor sport or recreation*

3.11 Paragraph 38 states that local planning authorities should approach decisions on proposed development *‘in a positive and creative way’*.

3.12 In Chapter 8 ‘Promoting healthy and safe communities’, paragraph 92 suggests that planning policies and decisions should aim to achieve healthy, inclusive and safe places which :

- a) promote social interaction;
- b) are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion; and
- c) enable and support healthy lifestyles, especially where this would address identified local health and well-being needs – for example through the provision of safe and accessible green infrastructure, **sports facilities**, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.

3.13 Paragraph 93 states that, to provide the social, recreational and cultural facilities and services the community needs, planning policies and decisions should, *inter alia*, **plan positively** for the provision and use of shared spaces, community facilities (such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments.

- 3.14 Considering open space and recreation, paragraph 98 suggests that access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities.
- 3.15 Chapter 9 is concerned with promoting sustainable transport. Paragraph 104 states that transport issues should be considered from the earliest stages of plan-making and development proposals, while paragraph 110 states that, in assessing sites or specific applications for development, it should be ensured that:
- a) appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;
 - b) safe and suitable access to the site can be achieved for all users; and
 - c) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.
- 3.16 Paragraph 111 states that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be 'severe'. Paragraph 112 explains that, within this context, applications for development should:
- a) give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use;
 - b) address the needs of people with disabilities and reduced mobility in relation to all modes of transport;
 - c) create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards;

- d) allow for the efficient delivery of goods, and access by service and emergency vehicles; and
- e) be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.

3.17 Chapter 11 promotes the effective use of land. Paragraph 119 states that planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions.

3.18 Paragraph 120 advises that planning policies and decisions should:

- a) encourage multiple benefits from both urban and rural land, including through mixed use schemes and taking opportunities to achieve net environmental gains – such as developments that would enable new habitat creation or improve public access to the countryside;
- b) recognise that some undeveloped land can perform many functions, such as for wildlife, recreation, flood risk mitigation, cooling/shading, carbon storage or food production;
- c) give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land;
- d) promote and support the development of under-utilised land.

3.19 Paragraph 124 reinforces this in stating that planning policies and decisions should support development that makes efficient use of land.

3.20 Chapter 12 is concerned with achieving well-designed places. Paragraph 126 states that the creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make

development acceptable to communities. Paragraph 130 stipulates that planning policies and decisions should ensure that developments:

- 1 will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;
- 2 are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;
- 3 are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);
- 4 establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;
- 5 optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and
- 6 create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.

3.21 Paragraph 134 states that permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions, taking into account any local design standards or style guides in plans or supplementary planning documents. Conversely, '*significant weight*' should be given to :

- a) development which reflects local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes; and/or
- b) outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings.

- 3.23 Chapter 14 is concerned about meeting the challenge of climate change, flooding and coastal change. Paragraph 152 states that the planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change.
- 3.24 Paragraph 159 states that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future), while paragraph 169 confirms that major developments should incorporate sustainable drainage systems unless there is clear evidence that this would be inappropriate.
- 3.25 Chapter 15 focuses on conserving and enhancing the natural environment. Paragraph 174 states that planning policies and decisions should contribute to and enhance the natural and local environment by, *inter alia* :
- 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.
- 3.26 In respect of the historic environment, paragraph 190 states that, in determining applications, local planning authorities should take account of:
- a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
 - b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
 - c) the desirability of new development making a positive contribution to local character and distinctiveness.
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- 3.27 Paragraph 199 states that, when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.
- 3.28 Paragraph 200 states that any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification.
- 3.29 Paragraph 202 states that, where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.

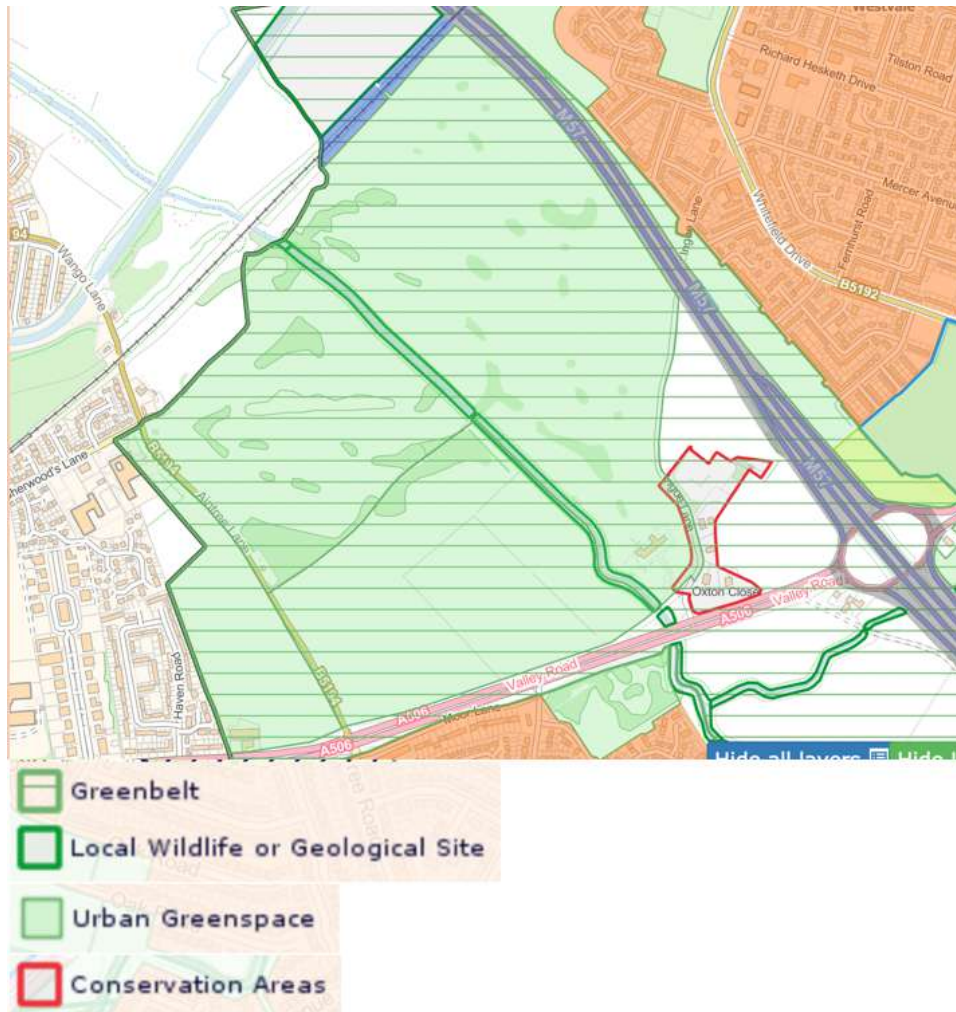
The Development Plan

- 3.30 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the statutory development plan, unless material considerations indicate otherwise.
- 3.31 The adopted development plan comprises :
- Saved policies of Knowsley Replacement Unitary Development Plan (UDP) (2009)
 - Knowsley Local Plan: Core Strategy (adopted in January 2016)
 - Joint Merseyside and Halton Waste Local Plan (adopted in 2013)

Knowsley Replacement Unitary Development Plan (Saved Policies, 2009)

- 3.32 The Knowsley Replacement Unitary Development Plan (UDP) was adopted in June 2006. Following adoption of the Local Plan Core Strategy, 39 UDP policies continue to be saved.

- 3.33 The Proposals Map extract below confirms that the application site falls within the Green Belt, Urban Greenspace and a Local Wildlife / Geological Site. The site is also adjacent to (but not within) the Ingoe Lane Conservation Area (highlighted by the red boundary).



- 3.34 Considering the relevant Saved UDP policies, *Policy T5: Location of Major Traffic Generating New Development* states that major developments should be or be capable of being located within safe and convenient walking distance of public transport facilities (ie no more than 400 metres from a bus stop and/or 800 metres from a rail station or Merseytram stop).
- 3.35 Part 2 of the policy states that developments that are likely to generate significant movement should be located at sites which have good access to, and which will not cause an unacceptable amount of congestion on the rail network or the Strategic Road Network.

- 3.36 Part 3 of the policy states that, where a site for a proposed major development is not already within safe and convenient walking distance of a station, stop or interchange on passenger rail, bus or tram networks, planning permission will only be granted if improvements to the public transport network are made.
- 3.37 *Policy T7: New Development and Walking / Cycling Routes* states that new development should preserve and where possible enhance the walking and cycling network.
- 3.38 *Policy T8: Transport Assessments* states that development proposals that would prejudice the primary function of any part of the highway network (i.e. the motorway, trunk road, primary and local highway network) by generating a material increase in traffic, which would overload the access to, or any part of the network, will not be permitted, unless the necessary mitigation measures required are undertaken.
- 3.39 *Policy T9: Travel Plans* states that major traffic generating development will require the submission and implementation of a Travel Plan.
- 3.40 *Policy T10: Access for the Less Mobile* states that all development will be required to have adequate access for the less mobile or those who have sensory impairments, and shall have adequate adaptability to meet lifetime design standards for homes and inclusive design standards for all other buildings and shall also be in accordance with the principles of the Disability Discrimination Act 1995 and its successors.
- 3.41 *Policy DQ2: Security in the Built Environment* states that new development should be designed so as to provide good levels of personal and property security.
- 3.42 *Policy DQ3: Gateway Sites And Corridors* states that new development which is within or adjacent to, or visible from, any of the following road and rail routes should seek to enhance the visual appearance of the route:
- The M57 (which flanks part of the site to the east)
 - All passenger rail lines (flanking the site to the north)
 - Any other routes which link the above routes to any of Knowsley's town or district centres (Valley Road connects Kirkby with Aintree).
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- 3.43 *Policy DQ4: Trees and Development* states that all new development should include appropriate planting of trees or other soft landscaping, which shall have regard to the character of the surrounding area. Development that affects existing trees, woodlands and other vegetation should make provision for their retention, and where tree loss is unavoidable, adequate replacement shall be made - normally two new trees for each tree lost.
- 3.44 *Policy ENV2: Noise and Vibration* states that development that will either cause an unacceptable increase in noise or vibration levels or itself be subject to unacceptable noise or vibration from an existing source will not be permitted.
- 3.45 *Policy ENV3: Light Pollution* states that development requiring external lighting must satisfy the following criteria:
- a) The lighting scheme proposed must be the minimum required for security and working purposes to undertake the task;
 - b) There must be no unacceptable impact on visual amenity in the surrounding area;
 - c) The scheme must not have an unacceptable effect on road safety;
 - d) The scheme must not harm wildlife; and
 - e) There must be no unacceptable loss of residential amenity.
- 3.46 *Policy ENV5: Contaminated Land* states that new development will not be permitted if there is existing contamination on the site which could, as a result of the proposed development, place the occupiers or users of the development, ecological systems, the water environment or surrounding land uses at unacceptable risk.

Local Plan: Core Strategy (2016)

- 3.47 Chapter 2 of the Core Strategy (CS) summarises Knowsley as 'a place'. At §2.41 it notes that, according to the Index of Multiple Deprivation in 2010, Knowsley was ranked the fifth most deprived district in the country. *[The most recent English Indices of Deprivation 2019 (IoD2019) confirms that, together with Middlesbrough, Liverpool, Kingston upon Hull and Manchester, Knowsley remains among the most deprived in England]*

3.48 It is also noted that :

- Knowsley has high levels of worklessness.
- Educational attainment levels in Knowsley are low.
- The level of educational attainment for boys is particularly low.
- Knowsley has the fourth highest proportion of 16 to 18 year olds that are not in education, employment or training.
- The borough's life expectancy levels are among the lowest in the country.
- The borough has high mortality rates from cancer (particularly lung cancer), cardiovascular disease (including coronary heart disease and stroke) and respiratory disease.
- It explains that these are issues which can be associated with lifestyle choices such as smoking, alcohol consumption and diet, but also with wider environmental factors such as housing standards, quality of employment opportunities, access to health and other services/facilities, open space and the natural environment.
- Knowsley's population structure is ageing, with the number of persons aged under 65 projected to decrease by 4,600 between 2008 and 2028, while the number of those aged 65 and over is projected to increase by 8,600.
- The borough has a disparity in income levels, with Knowsley residents having the lowest incomes on Merseyside.

3.49 The above issues are reiterated Chapter 6 Area Priorities. §6.18 suggests that the key issues for Kirkby include :

- High levels of deprivation exist across most of Kirkby, including health inequalities, low life expectancy, worklessness, low educational attainment, and high levels of crime;

3.50 Chapter 3 of the CS sets out the '*Vision and Objectives*'. Its Spatial Vision suggests that, by 2028:

1. Knowsley will be known for its successful suburban townships that provide a sense of place and community, having sustainable, diverse, more prosperous and healthy populations.
2. Knowsley's economy will be stronger and more diverse
3. Knowsley's people will be able to access a wider range of jobs

4. Knowsley will provide a wide choice of housing to meet needs.
5. Knowsley's communities will be better connected to local employment opportunities, health care, education, shopping, leisure and recreation provision.
6. Knowsley's open spaces and indoor and outdoor sporting, recreation and leisure opportunities will be enhanced so that residents and visitors can choose to become more active and pursue healthier lifestyles.
7. Open spaces will become well-used multi-functional areas incorporating attractive walking and cycling links between homes and destinations, and complementing the wider environmental benefits of the Green Infrastructure network, which assist the response to the impacts of climate change.

3.51 The Spatial Vision translates into the 'Strategic Objectives', which include :

- *Strategic Objective 1* – To deliver sustainable economic and employment growth
- *Strategic Objective 3* - To regenerate and transform areas of social and economic deprivation so they become more sustainable, safer, healthier and more cohesive communities
- *Strategic Objective 5* - To promote the quality of place within Knowsley by protecting historically important features and enhancing the character, quality and diversity of Knowsley's built environment, green spaces, key gateways and transport routes.
- *Strategic Objective 9* - To address existing health inequalities and encourage enhancements to the health and wellbeing of Knowsley's residents by ensuring a health promoting environment and provision of healthy lifestyle options for those living and working in the borough.

3.52 Chapter 4 of the CS is entitled 'Sustainable Development'. *Policy SD1 'Sustainable Development'* confirms that, when considering development proposals, a positive approach will be taken, which reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. It states that work will be undertaken proactively with applicants jointly, to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area. It confirms that planning applications that accord with the policies in the Local Plan (and any relevant policies in Neighbourhood Plans) will be approved without delay, unless material considerations indicate otherwise.

3.53 Policy CS1 'Spatial Strategy for Knowsley' reflects the Strategic Objectives (as above) and, at part 2, confirms that the Spatial Development Priorities include :

- Maintain and enhance the Green Infrastructure network, areas of environmental importance and heritage assets.

3.54 Policy CS2 'Development Principles' states that new development will be expected to support the 5 development principles, the most relevant in this case being :

- **Principle 1** - Promote sustainable economic development, tackle the causes of deprivation and disadvantage and narrow the gap between the richest and poorest neighbourhoods by, *inter alia* :
 - Meeting needs for new housing, employment, retail and other service provision;
 - Improving business productivity and employment levels in Knowsley;
 - Reducing economic, environmental, education, health and other social inequalities between Knowsley and other parts of the UK; and
 - Providing opportunities for positive lifestyle choices and health improvement for people of all ages.
- **Principle 4** - Recognise environmental limits, protect and enhance environmental assets, enhance local character and promote quality of place by, *inter alia* :
 - Understanding and respecting the character and distinctiveness of places and landscapes;
 - Protecting and enhancing the historic environment;
 - Promoting good quality design and ensuring that development respects its setting taking into account relevant design requirements, and best practice;
 - Maintaining or enhancing the quantity and quality of biodiversity and habitats, including potential impacts on nationally and internationally important sites for biodiversity;
- **Principle 5** - Make the most efficient use of available resources and infrastructure.

- 3.55 *Policy CS5 'Green Belt'* reflects the policy advice set out in the NPPF, confirming that inappropriate development will not be permitted except in very special circumstances, when it has been demonstrated that the harm to the Green Belt (including any harm to its openness, purposes or to its visual and recreational amenities) would be clearly outweighed by other considerations.
- 3.56 *Policy CS4 'Economy and Employment Overall Employment Development Strategy'* states that planning interventions will be used to support sustainable economic growth and meet the development needs of established and emerging employment sectors, and to improve accessibility to an appropriate range of jobs - for example by encouraging mixed use employment/residential schemes where appropriate, and encouraging recruitment targeted towards communities living in and around the development site.
- 3.57 Part 5 of the policy relates to proposals for new retail and other main town centre uses, stating that these will be primarily located within existing town centres in accordance with *Policy CS6: Town Centres and Retail Strategy*. It states that a sequential approach to site selection shall be applied, with locations in existing town, district and local centres of an appropriate scale being considered first, then edge of centre locations and then, only if suitable sites are not available, should out of centre sites be considered.
- 3.58 Part 2 of *Policy CS6 'Town Centres and Retail Strategy'* states that proposals for retail and other 'main town centre uses' outside the above centres will only be permitted if they would complement regeneration opportunities, avoid significant impact upon the viability and vitality of the town, district and local centres, and comply with the sequential test in *Policy CS4*.
- 3.59 Part 2 of *Policy CS7 'Transport Network'* states that new development will be required to be:
- a) Located and designed to prioritise accessibility and sustainable modes of travel through a choice of walking, cycling, public transport, and incorporate access for private vehicles. Where deficiencies are identified, developer contributions will be required to improve the accessibility of the location;
 - b) Located and designed to ensure that larger scale proposals (attracting a lot of visitors, customers and/or employees) are located in the most accessible locations;

- c) Where subject to a planning application, accompanied (except in the case of smaller scale proposals) by Transport Assessments and/or Travel Plans;
- d) In compliance with adopted cycle, car, disabled and service vehicle parking standards for different types and scales of new development;

3.60 *Policy CS8 'Green Infrastructure'* states that Knowsley's existing Green Infrastructure and its beneficial functions will be protected, managed and/or enhanced, primarily to:

- a) Ensure more attractive and cleaner residential neighbourhoods;
- b) Sustain and promote biodiversity (including designated sites, priority habitats and protected and endangered species) in accordance with importance and contribution to ecological networks;
- c) Preserve the character and function of historic environments and valued landscapes;
- d) Mitigate the effects of climate change and flood risk;
- e) Mitigate air, water and noise pollution;
- f) Provide local opportunities for sport, recreation

3.61 Part 2 of the policy states that, to achieve the above, planning powers and other interventions will be used to:

- a) Protect and enhance strategically important areas of greenspace;
- b) Ensure an appropriate quantity and improved quality of locally important open spaces, including outdoor sports provision (and ancillary facilities of appropriate scale);
- c) Promote effective movement of wildlife through a network of strategic green links, by protecting, maintaining and improving existing and new open spaces, water courses (including water quality) and biodiversity assets;
- d) Protect, enhance and/or introduce biodiversity into existing areas of Green Infrastructure, through integration into the design of new development and public realm projects;
- e) Improve accessibility for communities to greenspace offering leisure and recreation opportunities;
- f) Protect and where possible improve green paths and cycleways linking residential areas, existing strategic areas of greenspace, employment locations, local community services and leisure facilities

3.62 *Policy CS19 'Design Quality and Accessibility in New Development'* states that, to enhance local distinctiveness, identity and accessibility of places, new development within Knowsley will be expected to:

- a) Respond to and integrate positive characteristics of immediate surroundings, including local materials, scale, mass, form, layout, alignment and density of the existing built environment; b) Complement and enhance (where possible), existing landscape, topography, Green Infrastructure; and features of local importance and historic interest;
- c) Consider provision of landmark buildings and additional detailing at and adjacent to main gateways, movement corridors, town centres and strategic regeneration opportunities;
- d) Create spaces and places as a focal point, accommodating social interaction and active lifestyles, including provision and integration of high quality public realm and open spaces, public art (as appropriate); and landscaping which promotes biodiversity and integrates existing local habitats;
- e) Provide safe, secure and convenient routes for movement (including signage), with priority for walking, cycling and public transport, to meet the access needs of all users, particularly pedestrians, cyclists, less mobile people and the elderly;
- f) Integrate effectively with existing development

3.63 *Policy CS20 'Managing the Borough's Historic Environment'* states that development proposals should preserve or enhance the borough's historic and architectural assets, including Conservation Areas. The Council will:

- a) Require preservation of the local distinctiveness and character of historic assets through sensitive design of new development, including appropriate integration with their setting and immediate landscape;
 - b) Prevent demolition and/or development which would result in substantial harm or the loss of a designated historic asset or its setting, unless the proposal would result in substantial public benefits which clearly outweigh the harm or loss;
 - c) Where a development proposal will result in less than substantial harm to a designated heritage asset or its setting, assess such harm against the benefits of the proposal;
 - d) Facilitate long term conservation and enhancement of local assets and areas of historic importance, including through the preparation of Conservation Area Management Plans.
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- 3.64 Part 3 of the policy requires development proposals on sites which have the potential to impact on heritage assets to be accompanied by a heritage impact statement.
- 3.65 *Policy CS21 'Greenspaces and Trees'* states new development which would result in the loss of urban greenspace will not be permitted unless at least one of the following criteria are met:
- a) A surplus of provision for all types of greenspace would be maintained relative to local standards;
 - b) The land is considered unsuitable in terms of size, location or character to prevent or address individual deficiencies of different types of greenspace relative to local standards;
 - c) Appropriate mitigation is provided through replacement facilities of at least an equal quantity, quality and accessibility;
 - d) The development is required to improve greenspace provision or for ancillary facilities to support sport or recreation; or
 - e) Where the proposal relates to the loss of indoor or outdoor sports provision, and there is no evidence of future or continuing need for sports use, or alternatively only land incapable of forming a playing pitch or sporting facility is affected and its release accords with either clause 2)a) or 2)b).
- 3.66 Part 3 of the policy states that, irrespective of whether the above criteria are met, unless the benefits of a proposal clearly outweigh the loss of urban greenspace, development will be resisted where it would significantly harm any existing or potential special qualities of greenspace in the area in terms of:
- a) Visual amenity;
 - b) Residential amenity;
 - c) Biodiversity and environmental benefits;
 - d) Historical, cultural or community value;
 - e) Recreational benefits; or
 - f) Physical and/or visual linkages between adjoining urban greenspaces.

3.67 Part 7 of the policy states that the Council will support improvements to existing and new areas of greenspace in accordance with best practice standards, to achieve the following requirements:

- a) Accessible, safe and secure locations for all members of the community to use;
- b) Clean and well maintained facilities, equipment and open spaces; and
- c) Conservation of natural features, wildlife, fauna, landscapes, buildings and other structural features, as appropriate.

3.68 Part 10 of the policy states that the Council will encourage proposals for new development to incorporate:

- a) Retention of existing trees, woodland, vegetation and other habitat features which offer a positive contribution to the local environment in terms of visual amenity, recreation value or biodiversity/wildlife interest;
- b) Appropriate planting of trees, other soft landscaping and installation of habitat features for the benefit of biodiversity; and
- c) Adequate replacement provision where tree loss is unavoidable, comprising two additional trees for every tree lost and taking account of species and size.

3.69 Policy CS22 '*Sustainable and Low Carbon Development Sustainable Construction Principles*' states that new development will be required to meet high standards of sustainable design and construction and minimise carbon emissions. This should be achieved by:

- a) Designing new buildings for flexible uses throughout their lifetime;
 - b) Avoiding the creation of adverse local climate conditions by using natural systems to avoid internal overheating and excessive heat generation;
 - c) Ensuring developments are comfortable and safe for users;
 - d) Making the most effective and sustainable use of water, aggregates and other resources;
 - e) Limiting energy use by incorporating high standards of insulation, heat retention, natural ventilation and passive solar techniques;
 - f) Landscaping (including measures such as green walls or roofs) to create shelter and reduce any heat island effect;
 - g) Using sustainable materials from local suppliers where possible;
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- h) Supplying energy efficiently and incorporating decentralised energy systems, using renewable and low carbon energy where feasible;
- i) Managing flood risk, including through the use of Sustainable Drainage Systems (SuDS) and flood resilient design for infrastructure and property.

3.70 *Policy CS24 'Managing Flood Risk'* states that new development that may cause an unacceptable risk of flooding on the site or elsewhere will not be permitted. Part 2 states that new development should preferably be located in areas of low probability of flooding, and that development in areas of medium or high flood risk will only be permitted if evidence has been submitted demonstrating that the development could not be practicably located in an area of lower flood risk and if applicable the 'exception test' has been complied with, in accordance with national guidance.

3.71 *Policy CS26 'Waste Management'* states that the Council will promote sustainable forms of waste management in accordance with the waste hierarchy. As set out in the Merseyside and Halton Joint Waste Local Plan, it will work to:

- a) Identify and safeguard (where appropriate) waste management sites in appropriate locations;
- b) Ensure that the borough contributes to meeting the identified sub-regional waste management needs;
- c) Encourage good design in new development in order to minimise waste, promote the use of reclaimed and recycled materials and to facilitate the collection and recycling of waste;
- d) Encourage the sustainable transport of waste and promote use of site waste management plans; and
- e) Ensure that waste management facilities are developed whilst minimising any negative impacts on the environment and communities of the borough.

3.72 *Policy CS27 'Planning and Paying for New Infrastructure'* states that proposals for new development will be required to demonstrate that any negative impacts that the development may have on the improvement, replacement or provision of new infrastructure will be avoided and/or appropriately mitigated as part of the planning process. New development will be expected (where necessary given the scale and nature of the proposal) to:

- a) Demonstrate compliance with Local Plan policies which specifically require developer contributions;
- b) Provide additional on-site or directly ancillary infrastructure as required to make the development acceptable in planning terms. This may include provision of infrastructure and/or financial contributions; and
- c) Provide financial contributions towards the provision of strategic infrastructure to support local communities together with borough-wide and other strategic development requirements.

3.73 Part 7 of the policy confirms that, where the Council is satisfied that viability evidence demonstrates that a developer is unable to fully fund all of the developer contributions sought, it will make a balanced assessment of whether planning permission should be granted notwithstanding that not all the contributions sought can be fully provided.

Merseyside and Halton Waste Local Plan (2013)

3.74 *Policy WM 9 'Sustainable Waste Management Design and Layout for New Development'* states that the design and layout of new built developments and uses must, where relevant, provide measures as part of their design strategy to address the following:

- Facilitation of collection and storage of waste, including separated recyclable materials;
- Provide sufficient access to enable waste and recyclable materials to be easily collected and transported for treatment;
- Facilitate small scale, low carbon combined heat and power in major new employment and residential schemes, where appropriate.

Supplementary Planning Documents (SPDs)

3.75 Regard has been had to all of the following SPDs adopted by Knowsley Council :

- Ensuring a Choice of Travel SPD
- Design Quality in New Development SPD
- Developer Contributions SPD

- Town Centre Uses SPD
- Trees and Development SPD
- Adding Social Value to Development : Employment and Skills SPD

4.0 Planning Assessment

4.1 The key planning policy issues arising in this case are summarised in Section 3.0. The purpose of this section is to consider these further and to present the level of compliance with those policies and the benefits likely to accrue from the development to be factored into the overall planning balance. Each of the key issues will be addressed in turn, namely:

- Appropriate Development in the Green Belt;
- Inappropriate Development and Very Special Circumstances;
- Compliance with the Development Plan;
- Compliance with the Emerging Local Plan;
- Sustainable Development and Compliance with the NPPF;
- Landscape and Visual Impacts;
- Design Quality;
- Ecology;
- Transport and Access;
- Flood Risk and Drainage.

‘Appropriate’ development in the Green Belt

4.2 Before turning to consider the extent to which the application accords with the Development Plan in overall terms, it is important to determine the extent to which elements of the proposal constitute ‘*appropriate development*’ in the Green Belt, and which fall to be classed as ‘*inappropriate development*’ (which in turn requires demonstration of ‘*very special circumstances*’).

4.3 As noted in Section 3.0, §149 and §150 of the NPPF set out the limited types of development that are deemed to be ‘*appropriate*’ in the Green Belt. Parts (b) and (c) of §149 are applicable (in part) to aspects of this proposal, namely :

- b) the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments;*

as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it;

c) the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building;

4.4 Starting with part (b), the Applicant contends that the entirety of the proposal constitutes *'appropriate facilities for outdoor sport and recreation'*. Much of the proposal is intrinsically related to the sport of golf, and all of those elements will play an important role in improving the quality, attractiveness, usability, safety and viability of the golfing facility. Those parts of the proposal that are not linked directly with golf (ie the tennis and soccer courts, and bowling green) are also *'appropriate facilities for outdoor sport and recreation'*.

4.5 A fit-for-purpose clubhouse - in the correct location and containing the correct facilities - is a pre-requisite (an *'appropriate facility'*) for any successful golf club. A golf driving range and an associated building is also an *'appropriate facility'*, in that it is clearly associated with / complementary to the sport of golf and has direct synergy with the wider golfing complex. The proposed bowlers' pavilion will serve the new bowling green, and as such that too is an *'appropriate facility'* associated with outdoor sport and recreation.

4.6 That said, it is our contention that all elements of the proposal (including all new structures / buildings) are *'appropriate facilities'* insofar as those will relate directly to, and support the wider use and functioning of the overall complex as a facility for outdoor sport and recreation.

4.7 However, Framework §149 goes beyond that, and confirms that any such *'appropriate facilities'* can only be deemed *'appropriate development'* if they preserve the openness of the Green Belt and do not conflict with the purposes of including land within it. It is here that the Applicant acknowledges that much of the development proposed by this application calls to be classed as *'inappropriate development'*, in that most elements of the scheme – regardless of how critical those are to the improvement of this sporting facility - will have an inevitable / unavoidable impact on openness, and in turn the Green Belt purpose of *'encroachment'*. All new structures and buildings – the new Clubhouse; the driving range building; the bowling pavilion; the greenkeepers' maintenance building; the bridge over the River Alt; features of the Adventure Golf facility; and fencing and lighting generally – will cause a degree of harm to openness (to

greater and lesser degrees). Accordingly, we accept that those must be treated as *'inappropriate development.'*

4.8 Parts of the course improvement works might also be considered to be *'inappropriate development'*, whereby certain tees will be raised modestly and sections of the course reconfigured. Part (b) of Framework §150 confirms that *'engineering operations'* are not inappropriate in the Green Belt provided they preserve its openness and do not conflict with the purposes of including land within it. On global terms, we contend that course works involving the modest reshaping of the course will not result in any harm to the overall openness of the Green Belt. It is acknowledged that discrete parts of the course will be raised slightly (to create a better quality, safer, more attractive and much improved course and landscape), and that any such relief increases will result in a negligible impact on openness. Conversely, other parts of the course will be reduced to create relief and features, which will arguably result in a small (negligible) increase in openness. In most cases, this reshaping of the course – and any associated impact on openness - will be negligible and imperceptible when considered against the context of the wider course. That said, it is our contention that the course works in themselves – including the new 9-hole course - call to be treated as *'appropriate development'* in the Green Belt.

4.9 The proposed tennis courts, soccer pitches and bowling green (and associated surface level car parking) are – by definition – flat and 'open', and in those terms we contend are 'appropriate' forms of development. However, it is acknowledged that those facilities will require features that will have the effect of eroding openness to a very small (arguably negligible) extent. For example, safety / security netting, fencing and lighting stanchions will impact (to a small degree) on openness, and while car parking areas are intrinsically flat and open, those will inevitably be less 'open' when occupied by parked vehicles. Those extraneous features are accordingly accepted to be *'inappropriate development'* in the Green Belt.

4.10 In view of the above assessment, while it is contended that all aspects of the proposal start life as *'appropriate facilities for outdoor sport and outdoor recreation'*, many of those fall to be classed as *'inappropriate development'* by virtue of their inevitable and unavoidable impact on openness and encroachment.

4.11 Part (c) of Framework §149 confirms that the following is ‘appropriate development’ :

‘the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building’

4.12 In this case, modest extensions are proposed to the clubhouse, as summarised below :

	Existing Clubhouse	Proposed Extension
Floorspace	652 sqm GIA	329 sqm GIA
	676 sqm GEA	364 sqm GEA
Built Volume	2,718 cubic metres	815.4 cubic metres

4.13 The above extensions equate to a volumetric increase of 30% over and above the existing building, which we maintain is not disproportionate and calls to be treated as ‘appropriate development’.

4.14 Furthermore, part (d) of §150 confirms that the re-use of buildings in the Green Belt is appropriate, provided the building is of permanent and substantial construction. In this case, while the quality and visual appearance of the existing clubhouse is very poor, it is unquestionably of permanent and substantial construction. As such, its re-use is an appropriate form of development that will have no material bearing on the openness of the Green Belt or the purposes of including land within it.

4.15 Finally (in our consideration of ‘appropriate’ elements), we noted above that part (b) of Framework §150 confirms that ‘engineering operations’ are not inappropriate in the Green Belt, provided they preserve its openness and do not conflict with the purposes of including land within it. Aside from course works (described above), the proposal involves wider ‘engineering works’, such as the formation of new accesses and laying out of internal roads, which are intrinsically ‘open’ in character, and in turn we suggest is ‘appropriate development’. However, we acknowledge that those engineering works will require associated infrastructure such as barriers, banking and signage, which will have a small (arguably negligible) impact on openness, and are in turn ‘inappropriate development’.

4.16 In overall conclusion, therefore, we contend that the works fall into the *'appropriate development'* and *'inappropriate development'* categories below.

Appropriate Development	Inappropriate Development
Reconfiguration / alteration of golf course, including creation of new 9 hole course	New clubhouse
Adventure golf course	Any raised features on adventure golf course
Tennis courts	Fencing / netting and lighting associated with tennis courts
Soccer pitches	Fencing and lighting associated with soccer pitches
Bowling green	Bowlers' pavilion and fencing / lighting associated with bowling green
Driving range	Driving Range building
Re-use and extension of the existing clubhouse	Bridge over River Alt
New vehicular accesses	Car Parks [in view of parked vehicles harming openness in a transient sense] and related infrastructure (signage, bollards, barriers, embankments)
Irrigation lakes	Greenkeeper's compound / building and security fencing

Inappropriate Development and Very Special Circumstances

4.17 NPPG §147 states that *'inappropriate development'* is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.

4.18 §148 states that, when considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt, and that *'very special circumstances'* (VSCs) will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is *'clearly outweighed'* by other considerations.

- 4.19 We identified above those elements of the proposal we consider to be ‘*appropriate development*’, and those that are ‘*inappropriate development*’. To justify the latter, it is necessary to demonstrate VSCs, which we set out below.

The Baseline Position

- 4.20 As noted earlier, Kirkby Valley Golf Course was founded in 1928. It is owned by Liverpool City Council, but has suffered from lack of investment, improvement, good management and maintenance for decades. Large parts of the course suffer from serious drainage issues, rendering it unplayable for much of the year. There are health and safety issues arising from blind spots, which does not adhere to the PGADC Guidelines for the safe design golf courses. The condition, playability and attraction of the course and associated facilities (ie the clubhouse) has suffered, leading to declining membership and associated income, which barely covers the base operational costs and leaves no room for investment to improve the course or to introduce any new or better facilities. Put simply, the course as it stands is neither fit-for-purpose nor viable / sustainable beyond the short term.
- 4.21 Due in part to Liverpool City Council’s budget cuts, it has sought an experienced and reputable golf operator to take over management of the facility. In March 2019, it opted to lease the course to the Applicant on a 150 year lease, on the proviso that the course and club would be subject to heavy investment and improvement, transforming it from its currently tired state into one of the finest municipal golf courses in the North West. It is that aspiration that sits at the heart of this proposal and the case for ‘very special circumstances’ (VSCs).
- 4.22 Without the extent of investment and improvement proposed by the Applicant (via this application), the outlook for the club / course is bleak. Liverpool City Council has neither the funds nor the specialist knowledge, acumen or experience required to resurrect a very poor quality, failing golf facility. That said, the stark reality is that, unless the club and course is transformed in the manner proposed by this application, the strong likelihood is that it will continue to deteriorate, and will ultimately decline to such extent that it may need to close, resulting in the wholesale loss of this important community asset. At very best, it might continue to operate on a weak ‘shoe string’ basis, but as a poor quality, unfit, unsafe and partly unplayable facility of limited value or benefit to the community and achieving nothing for the status of Knowsley Borough.
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- 4.23 That bleak, but realistic outlook is the cornerstone of the case for VSCs. In essence, this proposal has been formulated to not only maintain the community asset, but to sustain it for the benefit of future generations, transforming what is currently an ailing, not fit for purpose, unattractive, unviable facility into a modern, exciting, fit for purpose golf destination, with a range of complementary, high quality sports-related facilities and associated functions.

The Future?

- 4.24 That bright and sustainable future can only be delivered through very serious change, including comprehensive course improvements to deliver a truly championship level course, but also complementary facilities that will attract a wider range and number of visitors, thereby generating the level of income that would be required by any developer to warrant the very considerable investment that is required to reverse the fortunes of the course.
- 4.25 The package of proposals promoted by this application has been formulated to deliver that aspirational ‘sea change’, and will generate the extent and mix of customers / visitors, and the resultant income that will justify the necessary investment.
- 4.26 Considering each of the proposed works in turn, it is essential to undertake comprehensive improvement works across the entire golf course. It is our contention (as explained above) that all of the course works call to be treated as ‘*appropriate development*’ in the Green Belt, but – in the event that the LPA determines otherwise – the VSCs are self evident. The course is unplayable for large parts of the year, largely due to poor drainage. It is dangerous to play in parts, with numerous blind shots. The quality of surfaces is poor and boggy. Ultimately, it is a poor quality, unchallenging course designed a century ago, when the game of golf was markedly different. To bring the course up to good, safe, modern standards, and transform it into one of championship character and quality, suitable for prestigious competitions (which is an aspiration of this proposal), it needs to be fundamentally reworked, re-shaped, re-configured and re-landscaped. It is also proposed to introduce an entirely new 9 hole course as complementary to the principal course, and this too will involve extensive ground works and landscaping to create a course of majesty and prestige.

- 4.27 The Financial Viability Report (prepared by Grasscroft) has calculated the cost of undertaking those course works alone to be circa £1 million. It is self evident that, aside from a charity, no party (including Liverpool City Council as the landowner) would countenance investing that level of resource without the prospect of achieving a solid commercial return.
- 4.28 However, undertaking works to the course itself will not in itself transform the fortunes of this golf facility. Successful modern golf clubs and courses go well beyond 'just' the golf course, and offer a range of high quality, complementary facilities that attract customers (of all ages, gender and socio-economic background) and generate income (via different streams) throughout the year. Such a package of measures is presented by this application.
- 4.29 The first crucial element of the proposal (aside from the course works) is to provide a new, fit-for-purpose Clubhouse as the heartbeat of the golf club. We acknowledged earlier that this is '*inappropriate development*' in the Green Belt, which calls for demonstration of VSCs. The current clubhouse is not only unfit in respect of its size, layout and appearance, but it is in entirely the wrong location. It is cramped and not fit for purpose, and – crucially - does not allow for adequate surveillance and security of the course. There is increasing abuse of the course by visitors (and many others with no intention of playing golf) arriving and playing / using the course for no charge, in turn disrupting the play of legitimate golfers who have paid their fees and await their turn to play. We understand that many traditional members have stopped playing at the club as a direct consequence of this type of unsociable behaviour.
- 4.30 The new Clubhouse will provide a new, fit for purpose facility for golfers and wider customers, in the ideal location. It will comprise 1,202 sqm gross external area over two levels (ground and first floor). It will contain a golf shop, reception area, refreshment zone / cafe, toilets and changing rooms, state-of-the-art tuition and training rooms, and golf buggy facilities.
- 4.31 It is critical that these facilities are provided, and grouped together in one Clubhouse building - not disparate across the site. They cannot function effectively if split and will not be fit for purpose. Crucially, the new clubhouse is proposed to be located precisely where it needs to be, close to and visible from the main course entrance, adjacent to the practice putting green, and close to both the 1st tee (where golfers start their rounds) and 18th green (where golfers finish). The Clubhouse must also be adjacent to the proposed Adventure Golf facility (as described below). It is essential that, if parents are to allow their children to play the
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Adventure Golf course, this must be overlooked, and the new Clubhouse has been designed to serve that specific purpose.

- 4.32 The cost of delivering the new Clubhouse will be very substantial (refer to Financial Viability Report). It is important to emphasise that a smaller Clubhouse will not be sufficient to accommodate the correct level and quality of facilities that are needed and aspired to if the future of the club is to be maintained and taken forward. It is not feasible to ‘shrink’ the Clubhouse, as that would compromise its purpose and result in a cramped, unsatisfactory and unattractive facility. That would largely replicate the existing not-fit-for-purpose clubhouse, and would undermine the whole rationale behind the proposition.
- 4.33 The application also promotes an 18 hole Adventure Golf course adjacent to (and overlooked by) the new Clubhouse. This is an important facility for modern, enterprising golf complexes, and particularly those which have suffered from poor management, lack of investment and historically poor trading (as in this case). Not only do well designed Adventure Golf courses appeal to families (thereby widening the attraction of the course to an extended range of visitors), but these are an excellent, fun and informal introduction into the sport of golf for young people. Aside from that, they are a popular recreation facility, which serves to widen the appeal of the golf facility to families (which in turn introduces a further important revenue stream in respect of ‘spin off’ spending).
- 4.34 We argued earlier that the Adventure Golf Course is *‘appropriate development’* as an *‘appropriate facility for outdoor sport and recreation’* which – in itself – will not harm openness. But even in the event that the LPA adopts a contrary view, it is – as explained above - an essential component of the overall proposition, which aims to create one of the best golfing facilities in the North West.
- 4.35 It is important to highlight that, in common with all other facilities promoted by this application, the Adventure Golf course has been designed by International Design Group to be fully accessible to disabled persons, including those dependent on wheelchairs.
- 4.36 The Viability Appraisal provided by Grasscroft identifies a cost of £750,000 to deliver the Adventure Golf Course as a crucial element of the proposal.

- 4.37 The application also promotes the creation of a 40 bay driving range with associated building and facilities (to enable its use during rain and to accommodate hi-tech training facilities and refreshment area), safety netting and low level lighting to enable use during hours of darkness in early evenings. To facilitate the required number of bays, a two storey structure is proposed.
- 4.38 It is important to provide 40 bays in order to cater for the demands of the various user groups. These are anticipated to be Golfer Improvers, Golfer Learners, Junior/Children Golfers and Golfers with sensory or mobility impairments. The quality and variety of bays available are critical to providing this full extent of amenity safely and appropriately.
- 4.39 This is a further critical component of the proposal, which is clearly an *'appropriate facility'* associated with outdoor sport and recreation. It will, however, inevitably harm openness, and is therefore *'inappropriate development'*. The VSCs that justify this element are :
1. It is self evidently an *'appropriate facility'* for a modern golf course, with obvious synergy with the wider golf operation;
 2. It will create the best state-of-the art driving range facility in Knowsley, for the use of all of the community;
 3. It will assist in golf training, tuition and development;
 4. It will provide a crucial income stream that will serve to cross-subsidise the wider works proposed for the course;
 5. It will create new jobs and training opportunities in one of the UK's most deprived boroughs;
 6. Having regard to all of the above, it will play a critical role in securing the future longevity, sustainability, appeal and attraction of the golfing / sports facility.
- 4.40 The cost of delivering the driving range and clubhouse combined is estimated to be £22,566,203.
- 4.41 The application also promotes synthetic outdoor tennis courts, 5-a-side football pitches and a bowling green, which in themselves are *'appropriate development'*, given that they are intrinsically flat and 'open'. These new outdoor sports facilities will complement the principal golf-related use of the complex, and at the same time will serve to broaden the appeal of the
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sports complex, providing an attractive mix of modern, high quality facilities to the Knowsley community, creating new local jobs and assisting in improving health and well-being. These facilities will also generate a crucial income stream to ensure the future viability / sustenance of the sports complex.

- 4.42 However, those ‘*appropriate facilities*’ need to be contained by means of enclosure, and will be floodlit to enable their use during evenings. The bowling green will also need to be served by a small bowlers’ pavilion, which will provide shelter and a refreshment / viewing area for bowlers and their guests during inclement weather. We acknowledge that those specific ‘add on’ elements will impact (to varying degrees) on openness, and as such are ‘*inappropriate development*’. The VSC for those parts of the development is that those are essential to the proper functioning of the courts, pitches and bowling green. Given that those complementary outdoor sports facilities are a crucial component of the overall development, those ‘add on’ works are similarly crucial.
- 4.43 The application also proposes creation of car parking and servicing areas to accommodate the above facilities. Surface level car parks are, by definition, ‘open’, and so in themselves do not harm openness. However, we have acknowledged that the parking of cars and other vehicles will have an impact on openness, albeit that will be small scale and transient in nature. The car park and new vehicular accesses will necessitate ‘add on’ elements (such as barriers and signage) which will have a small (arguably negligible) impact on openness.
- 4.44 The VSC for those elements that will impact (to small extent) on openness is that those are critical to the overall proposition, and without them it will obviously fail. A modern, successful golf / sports complex can hardly function without satisfactory access and servicing arrangements or car parking, and their associated infrastructure.
- 4.45 The application also promotes a greenkeeper’s compound in a central area within the course. This will comprise a portal frame maintenance building, housing a welfare unit (mess room, changing rooms, washrooms and small office).

- 4.46 The above works are *'inappropriate development'* in that they will harm openness and represent a degree of *'encroachment'*. The VSC is that it is self evident that any successful golf course must be maintained, which in turn necessitates a secure, fit for purpose groundkeeper's compound and associated storage / maintenance facilities. Such a compound already exists at the course, but that is not well located and needs to be relocated in order to accommodate the other works proposed by the application. For logistical reasons, the compound is ideally located in a central location to enable easy access to all parts of the course. It is also important that the compound is available and suitable for use as part of training to be offered in the proposed grounds maintenance training academy (which will be located in the existing clubhouse).
- 4.47 Finally – in terms of *'inappropriate development'* – a new bridge is proposed across the River Alt. This will have a very small (negligible) impact on openness. The VSC for the new bridge is that it will facilitate much improved and critical access / circulation around the reconfigured course, which is inevitably compromised by the fact that one side of the course is split from the other by the River Alt. Providing good quality, convenient and safe access around the course is essential, and as such the proposed bridge (which is very modest in scale) is a *'very special'* requirement.

Summary of 'Very Special Circumstances'

- 4.48 We have set out above which aspects of the proposal we consider to be *'appropriate development'*, and which are *'inappropriate development'*. We have explained what the Applicant considers to be the potential harm to the Green Belt by reason of inappropriateness, and why it is considered that such harm is clearly outweighed by other very special considerations (VSCs). The VSCs are summarised below :

1. The current golf club / course is of very poor quality and not fit for purpose.
2. Membership has been declining for decades, and unless the club / course is transformed, the prospect is that it may cease to operate and the sports / recreation asset will then be lost to the community. This in itself is, we suggest, a VSC of great magnitude.

3. The cost of delivering the works / improvements proposed by this application is extremely high – over £27 million of private sector investment.
 4. No operator will invest anywhere near that level of monies unless they are comfortable that they will secure a reasonable and solid commercial return sufficient to both continue to fund the operation into the future and to service the debt on borrowed capital. The combined income forecasted arising from the works is £3.5 million per annum.
 5. That said – to render the project viable, and to sustain the future of the club and course – very considerable development needs to take place, elements of which will inevitably impact (to varying degrees) on the openness and purposes of the Green Belt. The need for and importance of the various aspects of the proposal has been explained. All of the development is associated with (*‘appropriate’* for) outdoor sport and recreation.
- 4.49 In viability terms, the submitted Financial Viability Report confirms that the quantum of development proposed represents the minimum that will secure the long term sustainability of the golf course. The sensitivity figures presented in that report confirm that there is no scope for reducing or removing elements of the proposal, or any scaling back, because the effect of that would be to undermine the viability and deliverability of the proposal.
- 4.50 This application presents a simple choice over two options. Option I is that the course and club continue to ailing, devoid of investment and improvement, and could ultimately fail in the short to medium term. In turn, the community of Knowsley might lose this important sports / recreation asset that has existed for close to a century. At very best, the asset will continue to operate, but on the same ‘shoe string’ basis, and the same poor quality, not fit-for-purpose provision will remain (and in all likelihood will continue to deteriorate).
- 4.51 The second option is that the works proposed by this application are accepted and approved, which will result in the following *‘very special’* public / community benefits :
- An inevitable and unfortunate modicum of harm to the openness of the Green Belt and an element of encroachment, thereby prejudicing (to an extent) one of the purposes of Green Belt designation; and

- Safeguarding 15 existing jobs; and
- Creating 200 new jobs covering a diverse range of skills, sectors and career paths in retail, green keeping, hospitality, management and marketing.
- During construction we will be creating / sustaining a further 250 jobs to deliver the whole project over an approximate 4 year construction period, including quality apprenticeships for local young people.
- Through the Applicant's relationship with the Professional Golfers Association (PGA), they will continue to develop accredited apprenticeships in green keeping and staff development programmes across every strand and aspect of the Kirkby Valley operation. The overwhelming majority of staff will live in and will recruited from Knowsley and the wider City Region.
- The Applicant commits to working closely with Knowsley Works and its recently launched Restart Initiative to maximise employment and training opportunities for local people especially those disadvantaged in the labour market. As part of our Social Value strategy, we have already committed to a partnership with Fusion 21 to deliver a comprehensive package of employment, apprenticeship and placement opportunities targeted at local unemployed adults and NEETs (Not in Education, Employment or Training).
- Sustaining and vastly improving the club and course as an asset of genuine quality for future generations, and as a signature 'statement of intent' for the Borough of Knowsley. This proposal represents a transformational improvement in sporting and recreational facilities for Kirkby and wider Knowsley. It is an opportunity to deliver transformational life-changing opportunities for local people to access employment, training and skills.
- Sport, leisure, tourism and retail are at the core of Liverpool and Knowsley's plans for economic growth. Creating new high quality, attractive and accessible destinations like Kirkby Valley has important indirect as well as direct economic benefits. It stimulates spend in the local economy and supply chain, encourages visitors and enhances the attractiveness of the area and the wider city to new residents and investors.

- Enhancing landscape character and biodiversity through new planting and ecological mitigation; and
- Introducing a range of new, exciting, complementary, high quality facilities associated with outdoor sport and recreation for the health and recreational benefit of the entire community; and
- Introducing a *Community Benefits Package* (in the form of a S106 and Social Value Strategy) which will provide opportunities for local schools and disadvantaged groups to access the facilities during term time, including free golf coaching, inter-school golf tournaments, and a job brokerage scheme focused on placing Knowsley residents in jobs and training both during the construction phases and operational phases; and
- The creation of an exemplar Academy dedicated to providing best practice grounds maintenance training (through the change of use of the existing clubhouse), which will generate a surfeit of new spin off jobs and training opportunities; and
- Benefits to the local economy and profile of Knowsley arising from what is anticipated to be a considerable increase in visitor / user numbers and job creation. The proposal will refocus and vastly improve the golfing elements and introduce complementary sports activities of the highest quality, providing better balance and more stability, reflecting the aspiration to provide a year-round family-based attraction which will be far more resilient to the market than the current narrow-focused, deteriorating facility.

4.52 It is the Applicant's case that the above benefits combined '*clearly outweigh*' the moderate harm to the Green Belt by reason of inappropriateness, reduction in openness and encroachment. That said, we consider that '*very special circumstances*' have been demonstrated which justify the development, in line with the requirements of the Development Plan and the Framework.

4.53 The VSC case is even more compelling when the above benefits are measured against the socio-economic context of Knowsley. The English Indices of Deprivation 2019 (IoD2019) confirms that, together with Middlesbrough, Liverpool, Kingston upon Hull and Manchester, Knowsley remains among the most deprived in England, and the Core Strategy highlights that:

- Knowsley has high levels of worklessness.
- Educational attainment levels in Knowsley are low.
- The level of educational attainment for boys is particularly low.
- Knowsley has the fourth highest proportion of 16 to 18 year olds that are not in education, employment or training.
- The borough's life expectancy levels are among the lowest in the country.
- The borough has high mortality rates from cancer (particularly lung cancer), cardiovascular disease (including coronary heart disease and stroke) and respiratory disease.
- It explains that these are issues which can be associated with lifestyle choices such as smoking, alcohol consumption and diet, but also with wider environmental factors such as housing standards, quality of employment opportunities, access to health and other services/facilities, open space and the natural environment.
- Knowsley's population structure is ageing, with the number of persons aged under 65 projected to decrease by 4,600 between 2008 and 202830, while the number of those aged 65 and over is projected to increase by 8,600.
- The borough has a disparity in income levels, with Knowsley residents having the lowest incomes on Merseyside.

4.53 Reinforcing the above bleak picture, the Councils' Local Area Profile for Kirkby confirms that:

- Kirkby is the most deprived part of Knowsley
- Over two fifths of its children and older people are deprived
- It has the highest prevalence for depression, obesity and hypertension, all of which are higher than Knowsley and national averages.
- Respiratory and Cardiovascular disease both significantly higher than national averages.
- Both male and female life expectancy is lower than the rest of Knowsley showing extent of inequality

- Childhood obesity levels in reception and year 6 are consistently higher than in Knowsley and England
- It has the highest rates of childhood obesity of the four locality areas in both reception and year 6 years in 2016/17
- Childhood obesity in both reception and year 6 have increased over the last 5 years at a faster rate when compared to Knowsley and England
- Adult obesity is higher than in Knowsley and England
- 13.8% of residents claim Employment Support Allowance, higher than Knowsley and the 2nd highest in England
- 3.4% of residents claim Job Seekers Allowance and universal credit, higher than England.

4.56 We contend that, against that socio-economic backdrop, the delivery of the new, high quality, transformational sports and recreational facilities, healthy lifestyle opportunities for the entire community, and 200 new jobs (all as promoted by this application) ought to be accepted as a ‘**very special circumstance**’ that ‘**clearly outweighs**’ harm to the Green Belt. Indeed, it is difficult to conceive of a more ‘very special’ set of planning circumstances.

4.57 This proposal will assist in addressing the above issues. It will retain jobs. It will create new jobs. It will create training and education opportunities. It will deliver a sports complex of excellence, open to all members of the community, thereby facilitating healthier lifestyles and better mental health.

Compliance with the Development Plan

4.58 In determining this application, regard must be had to Section 38(6) of the Planning and Compulsory Purchase Act 2004, which requires that proposals be determined in accordance with the development plan.

4.59 We noted in Section 3.0 that the principal components of the development plan for the purposes of this application are :

- Saved policies of Knowsley Replacement Unitary Development Plan (UDP) (2009)
- Knowsley Local Plan: Core Strategy (adopted in January 2016)
- Joint Merseyside and Halton Waste Local Plan (adopted in 2013)

4.60 The application site sits within the Green Belt, Urban Greenspace and a Local Wildlife / Geological Site. The site is also adjacent to (but not within) the Ingoe Lane Conservation Area.

4.61 Core Strategy Policy CS5 'Green Belt' reflects the policy advice set out in the NPPF, confirming that inappropriate development will not be permitted except in very special circumstances, when it has been demonstrated that the harm to the Green Belt (including any harm to its openness, purposes or to its visual and recreational amenities) would be clearly outweighed by other considerations. We addressed Green Belt considerations above, and will not repeat those same points. The Applicant contends that the proposal is consistent with Policy CS5 in that parts of the proposal are '*appropriate development*', and whilst parts are '*inappropriate development*', a compelling case for 'very special circumstances' has been presented to justify the proposal.

4.62 Before turning to other specific policies, it is worth highlighting that the proposal will assist in achieving certain of the Core Strategy's specific '*Vision and Objectives*', namely that :

- It will assist in providing a sense of place and community.
- It will assist in making Knowsley's economy stronger and more diverse.
- It will offer Knowsley's people access a wider range of jobs and training opportunities.
- It will better connect Knowsley's communities to leisure and recreation provision.
- It will enhance Knowsley's open spaces and indoor and outdoor sporting, recreation and leisure opportunities '*so that residents and visitors can choose to become more active and pursue healthier lifestyles.*'

- It will create a better and well-used multi-functional area incorporating attractive walking and cycling links, complementing the wider environmental benefits of the Green Infrastructure network.

4.63 *Policy SD1 'Sustainable Development'* confirms that, when considering development proposals, a positive approach will be taken, which reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. We explain later in this section why the proposal constitutes sustainable development in economic, social and environmental terms, and in doing so we conclude that the proposal is consistent with Policy SD1.

4.64 The application is also consistent with Core Strategy *Policy CS1 'Spatial Strategy for Knowsley'* in that it reflects and will help to deliver the CS 'Strategic Objectives' (as highlighted above) and, in response to part 2 of the policy, it responds to the 'Spatial Development Priority' to 'maintain and enhance the Green Infrastructure network, areas of environmental importance and heritage assets.'

4.65 The application is also consistent with CS *Policy CS2 'Development Principles'* in that it will support the following 'principles' :

- **Principle 1** – the application is promote sustainable economic development, assisting in tackling deprivation and disadvantage by improving business productivity and employment levels in Knowsley; reducing economic, environmental, education, health and other social inequalities between Knowsley and other parts of the UK; and providing better opportunities for positive lifestyle choices and health improvement for people of all ages.
- **Principle 4** – the application proposes development that will protect and enhance environmental assets, enhance local character and promote quality of place in respect of the protection of the historic environment (the adjacent Conservation Area); the promotion of good quality design; respect for setting; and the maintainance and enhancement of the quantity and quality of biodiversity and habitats
- **Principle 5** – the proposal will make the most efficient use of available resources and infrastructure.

- 4.66 The application also complies with CS Policy CS4 '*Economy and Employment Overall Employment Development Strategy*' in pledging its support for sustainable economic growth which meets the development needs of established and emerging employment sectors (in this case the sport and leisure industries), and improves accessibility to a wide range of jobs and training opportunities.
- 4.67 The application is in accordance with Part 5 of the policy and also Part 2 of Policy CS6 '*Town Centres and Retail Strategy*', which require a sequential approach to site selection to be applied to the limited 'main town centre uses' that form part of the scheme, and will only be permitted if they would complement regeneration opportunities, avoid significant impact upon the viability and vitality of the town, district and local centres.
- 4.68 The Sequential Assessment prepared by DPP concludes that, due to the scale of the proposed development, the assessment has focused on large sites, primarily in edge-of-centre locations. Due to the land requirements of the proposed development it is simply not possible to identify any sequentially preferable sites. Even the large sites identified cannot accommodate the proposed development as a whole, and in the majority of cases would not be suitable as they would require building on public parkland (these are the only sites of a large scale within sequentially preferable locations).
- 4.69 It is therefore concluded that there are no sites which are sequentially preferable to the application site due to a lack of sites of a suitable scale or availability to accommodate the proposals. This reflects and confirms the assertion that the proposals by their nature have specific locational requirements as per NPPG notes on the requirements of the sequential assessment.
- 4.70 The Transport Assessment prepared by Prime Transport demonstrates compliance with the various transport-related policies of the Development Plan, including Part 2 of Policy CS7 '*Transport Network*', which requires new development to be located and designed to prioritise accessibility and sustainable modes of travel, and to ensure that larger scale proposals (attracting a lot of visitors, customers and/or employees) are located in the most accessible locations, and are provided with the correct level of cycle, car, disabled and service vehicle parking.

- 4.71 The application is also consistent with CS Policy CS8 ‘Green Infrastructure’ in that – whilst acknowledging that it promotes an extent of justified ‘inappropriate development’ in the Green Belt – it will, in overall terms, protect, manage and enhance Knowsley's Green Infrastructure. The proposal will sustain and promote biodiversity. It will preserve the character and function of the historic environments (the adjacent Conservation Area). Fundamentally, it will :

‘Provide local opportunities for sport and recreation.’

- 4.72 The application responds to Part 2 of the policy in its enhancement of what is a strategically important area of greenspace, and by improving the quality of this locally important open spaces, including new and better outdoor sports provision *‘and ancillary facilities of appropriate scale’*. It will protect, maintain and improve existing and provide new open spaces, water features and biodiversity habitat and assets. It will improve accessibility for communities to greenspace by offering and vastly improving leisure and recreation opportunities.
- 4.73 The application is also consistent with CS Policy CS19 ‘Design Quality and Accessibility in New Development’ which seeks to enhance local distinctiveness, identity and accessibility of places. The proposed new buildings have clearly been designed to serve specific sports / leisure purposes, and their form therefore reflects their intended function. The submitted Design & Access Statement reinforce the extent of attention that has been paid to design quality and materiality. The proposed buildings are of excellent design quality, and the appearance of the existing clubhouse will be much improved via modest extension, with an associated improvement to the setting of the adjacent Conservation Area and the wider landscape quality. Whilst due respect has been paid to preserving the openness of the Green Belt insofar as possible (by maintain gaps between buildings and keeping height and massing to discrete levels (allowing for the purpose of the buildings), the impact of the proposal has also had regard to the site’s ‘main gateway’ and ‘movement corridor’ location, and seeks to enhance that corridor with quality new buildings and new quality landscaping to soften and ‘green’ the proposal, and promote biodiversity.

- 4.74 The separate Heritage Appraisal (Graeme Ives Heritage) explains how the proposal responds to CS Policy CS20 '*Managing the Borough's Historic Environment*', in that it will preserve and enhance the setting of the adjacent Conservation Areas.
- 4.75 The application complies with Policy CS21 '*Greenspaces and Trees*'. This states that new development which would result in the loss of urban greenspace will not be permitted unless at least one of its criteria is met. In the case of this application, while the new hardstanding and building areas / footprints combined equate to is 48,620 sqm, that represents only 6% of the entire site area. The remaining Greenspace will be considerably improved through re-contouring of the landscaping and the introduction of considerable new tree and other planting, and the provision of substantial ecological mitigation areas. No Greenspace deficiency will arise from the proposal. Appropriate mitigation and landscape management will be secured, and we would also maintain that – in the context of a site area of 80.3 ha - the development is required to both improve greenspace provision or to provide ancillary and much needed facilities to support and improve sport and recreation.
- 4.76 Part 3 of the policy states that, irrespective of whether the above criteria are met, unless the benefits of a proposal '*clearly outweigh*' the loss of urban greenspace, development will be resisted where it would significantly harm any existing or potential special qualities of greenspace in the area in terms of its visual amenity; residential amenity; biodiversity and environmental benefits; historical, cultural or community value; recreational benefits; or physical and/or visual linkages between adjoining urban greenspaces. In these terms, the proposal will deliver a series of important and impressive enhancements over and above the current condition and value of the land.
- 4.77 The application is consistent with Part 7 of the policy, which confirms that the Council will *support improvements* to existing and new areas of greenspace in accordance with best practice standards, to achieve accessible, safe and secure locations for all members of the community; clean and well maintained facilities, equipment and open spaces; and conservation of natural features, wildlife, fauna, landscapes, buildings and other structural features, as appropriate. In all those respects, the proposal is compliant.

- 4.78 The application is also responsive to Part 10 of the policy, in that it incorporates the retention of existing trees, woodland, vegetation and other habitat features, will deliver new planting of trees and other soft landscaping, and new /improved habitat features.
- 4.79 The application is consistent with *Policy CS22 'Sustainable and Low Carbon Development Sustainable Construction Principles'*. The proposed buildings will meet high standards of sustainable design and construction, and minimise carbon emissions. Unlike the existing clubhouse (which is unattractive, in the wrong location, and no longer fit for purpose), the new buildings have been designed to be comfortable and safe for users, and to minimise energy use by incorporating high standards of insulation, heat retention, natural ventilation and passive solar techniques. The intention is to sustainably source as many materials as possible, and to adopt renewable and low carbon energies where feasible.
- 4.80 In this regard, the application is supported by an *Energy Statement Report* prepared by Parker Wilson. This confirms that the scheme will be designed to meet national planning policy with regard to limiting energy use and carbon emissions. Passive design measures and envelope efficiency will be maximised, with on site low and zero carbon technologies utilised to further offset carbon emissions where necessary. The report identifies potential technologies, including the use of Photovoltaic (PV) panels, high efficiency / condensing boilers, an air source heat pump (ASHP) system, the installation of a ground source heat pump, Heat Recovery Ventilation Units, and High Efficiency Lighting & Lighting Control.
- 4.81 The Applicant is committed to utilising low and zero carbon technologies where these are practically and financially viable. Appropriate design solutions will be selected for each building on the site based on its usage and energy demands.
- 4.82 The information provided by Betts Hydro demonstrates compliance with *CS Policy CS24 'Managing Flood Risk'*, which seeks to avoid unacceptable risks of flooding (see further commentary later in this section).
- 4.83 The application is consistent with *CS Policy CS26 'Waste Management'*, by promoting good design in new development in order to minimise waste, and use (where feasible) reclaimed and recycled materials.
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- 4.84 The application accords with CS Policy CS27 '*Planning and Paying for New Infrastructure*', in that the Applicant has committed to agreement to S106 payments in respect of the submitted Social Value Strategy.
- 4.85 It is therefore the Applicant's contention that the proposal complies with all relevant Core Strategy policies, as one of the main components of the Development Plan.
- 4.86 The Knowsley Replacement Unitary Development Plan was adopted in June 2006. Following adoption of the Local Plan Core Strategy, 39 UDP policies continue to be saved, and these form another part of the Development Plan. We consider the extent of compliance with the relevant policies below.
- 4.87 The work of Prime Transport demonstrates compliance with Saved Policy T5: *Location of Major Traffic Generating New Development*, which requires developments that are likely to generate significant movement to be located at sites which have good access to, and which will not cause an unacceptable amount of congestion on the rail network or the Strategic Road Network. The application also accords with Policy T8: *Transport Assessments* in that it will not prejudice the primary function of any part of the highway network.
- 4.88 The Travel Plan Framework prepared by Prime Transport demonstrates compliance with UDP Policy T9: *Travel Plans*.
- 4.89 The application complies with UDP Policy T10: *Access for the Less Mobile*. All new build elements of the proposal have been designed to have good access for the less mobile.
- 4.90 The application complies with UDP Policy DQ2: *Security in the Built Environment* in that the scheme has been designed with security in mind. The entire complex will be installed with a monitored CCTV operation.

- 4.91 We noted earlier that, while the scheme has been designed and laid out to respect the site's Green Belt and Greenspace status insofar as possible, the Applicant has also been mindful of *UDP Policy DQ3: Gateway Sites and Corridors*, which requires new development which is within, adjacent to, or visible from, any of the following road and rail routes to enhance the visual appearance of the route :
- The M57 (which flanks part of the site to the east)
 - All passenger rail lines (flanking the site to the north)
 - Any other routes which link the above routes to any of Knowsley's town or district centres (Valley Road connects Kirkby with Aintree).
- 4.92 The scheme details have been formulated with the above policy in mind. Whilst it has been acknowledged that parts of the proposal constitute '*inappropriate development*' in the Green Belt, a case for '*very special circumstances*' has been presented, and the new buildings / structures are of excellent and sympathetic design quality, such that – when viewed behind the substantial new boundary planting that is proposed, the overall impact along the Valley Road corridor will be enhanced and reinvigorated.
- 4.93 There is no conflict with *UDP Policy DQ4: Trees and Development*, in that there will be very little tree removal, and only poor quality vegetation will be removed. A comprehensive scheme of new / appropriate planting of native trees, shrubs or other soft landscaping will be introduced across the site.
- 4.94 There is no conflict with *Policy ENV2: Noise and Vibration*. The application is not promoting unduly noisy activities, and the site is some distance from the nearest dwellings. Those dwellings are located 100+ metres to the south on Moor Lane, beyond a busy 5-lane dual carriageway with associated verges and landscaping.
- 4.95 The *External Lighting Strategy Report* prepared by Parker Wilson demonstrates compliance with *UDP Policy ENV3: Light Pollution*. It emphasises that lighting scheme will be the minimum required for security and working purposes and will not result in an unacceptable impact on visual amenity, road safety, wildlife or residential amenity.

- 4.96 The report outlines the initial proposals for the external lighting, including that associated with:
- Car parks and access roads
 - Adventure Golf Course and putting Green
 - External sports areas (bowling green, football pitches, and tennis courts)
 - External exits and walkways by buildings
 - Driving Range Lighting, which will a BERN lighting system whereby the light is installed within the ground in built up mounds, with the lighting directed out across the targets. The lighting is installed along the length of the range to avoid high power flood lights around the entire perimeter.
- 4.97 Lighting will be designed in accordance with *The Society of Light and Lighting, Lighting Guide 6 – The Exterior Environment*. All fittings will be selected to ensure light pollution and overspill from the lit area is minimised.
- 4.98 In response to UDP Policy ENV5: *Contaminated Land*, the submitted *Preliminary Desk Study Report* (Ian Farmer Associates) notes that historical maps indicate that the site has had limited historical usage, having been used as farmland until approximately 1970 when the existing golf course was constructed. It is confirmed that the site is not within a Radon Affected Area, but that compressible ground is a potential geotechnical risk to the development. The report also records that potential sources of contamination are associated with areas of landfill, filling stations, pollution incidents, contamination incidents and former structures within influencing distance of the site. As such, an intrusive investigation is recommended, and we anticipate that an appropriate condition will be attached.
- 4.99 In view of the above assessment, it is contended that the application is consistent with all relevant saved policies of the UDP.
- 4.100 In terms of the third strand of the Development Plan – the Merseyside and Halton Waste Local Plan (2013) – there is no conflict. In accordance with Policy WM 9 ‘Sustainable Waste Management Design and Layout for New Development’, the design and layout of the proposal incorporates measures for the facilitation of collection and storage of waste (including separated recyclable materials).
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- 4.101 In overall terms, therefore, we contend that the application is compliant with all relevant parts of the Development Plan and should be approved accordingly.

Sustainable Development and Compliance with NPPF

- 4.102 Before turning to wider consideration of national policy as set out in the NPPF, we will focus on the sustainability credentials of the proposal. The promotion and encouragement of sustainable development goes to the heart of the NPPF.
- 4.103 A viable, bespoke, high quality, mixed development scheme is being promoted on the site, at a time of great economic uncertainty arising from both Brexit and Covid. It will make effective and efficient use of an underused and largely unprepossessing site which currently serves only a small sector of the community and is – in many respects – not fit for purpose.
- 4.104 NPPF paragraph 8 explains that achieving ‘sustainable development’ relates to three overarching objectives (*economic, social and environmental*), which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives).
- 4.105 Paragraph 10 states that, at the heart of the Framework, is a presumption in favour of sustainable development, while paragraph 11 states that LPAs should apply this presumption. For decision-taking this means:
- i. approving development proposals that accord with an up-to-date development plan without delay; or
 - ii. where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:
 - a. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed [*Footnote 6 confirms that such policies include Green Belt*]; or
 - b. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

- 4.106 In consideration of the above, the core Development Plan policies are not out-of-date, and we have explained why we consider the proposal to be consistent with those policies.
- 4.107 As such, on any interpretation of NPPF §11, we maintain that the presumption in favour of sustainable development applies.
- 4.108 We have explained elsewhere why we consider the proposal complies with the adopted and development plan, but it is also important to demonstrate that the proposal is sustainable.
- 4.109 As noted above, the NPPF suggests that there are three core strands / roles relating to sustainable development : **economic, social and environmental**. We consider each in turn below.

Economic Benefits

- 4.110 In terms of its **economic** role, the proposal will assist in supporting sustainable economic growth, through comprehensive course improvements that will deliver a superior quality, more playable, safer, attractive, more profitable and sustainable championship-grade golf course, and a new 9 hole course. These works will attract new and more golfers. Added to which are the other new facilities – a better, fit for purpose clubhouse with state-of-the-art training facilities; a new state-of-the-art driving range (which will be open during the day and evenings); Knowsley's first and only 18 hole Adventure Golf course, designed to attract children to golf and to widen the family appeal of the sport and facility; and high quality outdoor tennis courts, soccer pitches and bowling green. These works combined will considerably improve the quality of offer and will attract new and more customers and their spending. These are obvious economic benefits.
- 4.111 In overall terms, and having seen decades of neglect, lack of investment and decline of use and membership while under the control of Liverpool City Council (as the site owner), the Applicant is committing over £27 million of private sector investment in order to deliver one of the finest municipal golfing facilities in the North West.
- 4.112 The current number of jobs at the club is 15. These will be retained, and – upon completion of the works proposed – an additional 200 new permanent jobs will be created in green-

keeping, retail, hospitality, golf tuition, marketing and events management. Opportunities will be created for Knowsley residents to access training, volunteering opportunities and employment with our partners Myerscough College, Groundwork and Transform Lives.

- 4.113 Around 250 jobs will be created / sustained during the circa 4 year construction period, plus apprenticeships for local young people. The Applicant is committed to working with local colleges and higher education institutions to provide local school leavers with jobs, training and career opportunities.
- 4.114 The existing clubhouse is to be refurbished, extended and transformed into a golf-related / grounds maintenance training academy with associated classroom space, cafeteria and overnight accommodation for golf professionals / teachers / trainers. This will not only create new jobs, but will provide valuable training opportunities for local people (and for others beyond Knowsley).
- 4.115 The creation of a transformed club and course will have important indirect as well as direct economic benefits. It will stimulate spend in the local economy and supply chain, encourages new and different visitors, and will enhance the attractiveness of the area to new residents and investors.
- 4.116 On the above basis, we suggest that there can be no question that this scheme will deliver very considerable economic benefits to Knowsley.

Social Benefits

- 4.117 **Socially**, the proposal will deliver one of the best municipal golfing facilities in the UK for the benefit of the people of Knowsley. It will reverse years of neglect and lack of investment, and create a course that is safe and attractive to play, useable throughout the year, and a greatly improved public asset. Exciting, high quality new sports / recreational facilities will be brought forward – one of the best driving ranges in the North West, Kirkby's first Adventure Golf, and complementary outdoor sports facilities.
- 4.118 All of this encourages and facilitates sporting, recreational and cultural activity, which is an important social and health benefit of the proposal, and addresses a key KMBC corporate aspiration, as well as responding to the NPPF's call to promote healthy, inclusive and safe

places which enable and support healthy lifestyles, especially where this would address identified local health and well-being needs, and to **plan positively** for the provision and use of community facilities such as sports venues :

‘access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities.’

4.119 The submitted Health Impact Assessment has considered the impacts of the proposed development on the health and well-being of local residents and users of the site. It has found that the proposals offer significant potential health and wellbeing benefits for a population that has historically suffered high rates of deprivation and poorer levels of health and activity. The main components of the proposals being a sport and leisure offer - for all ages and abilities, with a excellent variety in facilities - will encourage active lifestyles and socialisation. The facilities will be located in an accessible location with strong cycling and pedestrian infrastructure to also promote active travel to and from the site.

4.120 Appended to the Health Impact Assessment is the Council’s most recent Public Health Profile, which summarises the borough as follows:

‘The health of people in Knowsley is generally worse than the England average. Knowsley is one of the 20% most deprived districts/unitary authorities in England and 25% (7,460) of children live in low income families. Life expectancy for both men and women is lower than the England average.’

4.113 The Councils’ Local Area Profiles for Kirkby makes somewhat grim reading. It confirms that:

- Kirkby is the most deprived of the four localities within Knowsley
- Over two fifths of its children and older people are deprived
- It has the highest prevalence for depression, obesity and hypertension, all of which are higher than Knowsley and national averages.
- Respiratory and Cardiovascular disease both significantly higher than national averages.
- Both male and female life expectancy is lower than the rest of Knowsley showing extent of inequality

- Childhood obesity levels in reception and year 6 are consistently higher than in Knowsley and England
- It has the highest rates of childhood obesity of the four locality areas in both reception and year 6 years in 2016/17
- Childhood obesity in both reception and year 6 have increased over the last 5 years at a faster rate when compared to Knowsley and England
- Adult obesity is higher than in Knowsley and England
- 13.8% of residents claim Employment Support Allowance, higher than Knowsley and the 2nd highest in England
- 3.4% of residents claim Job Seekers Allowance and universal credit, higher than England.

4.121 The improvement of health and mental well-being is inarguably an important social benefit in any circumstance, but when considered against that socio-economic backdrop, we anticipate the LPA will attach considerable weight to the delivery of the new, high quality sports and recreational facilities and opportunities promoted by this application.

4.122 The creation of new jobs is a further social benefit (as well as an economic benefit). As noted earlier, the proposal will create around 200 new jobs (whilst sustaining the existing 15 jobs), resulting in the facility becoming one of Knowsley's biggest employers. Circa 250 construction-related jobs will be created / sustained during an anticipated construction period of approximately 4 years. The provision of apprenticeships is also an important social benefit.

Environmental Benefits

4.123 In considering **environmental** benefits, paragraph 8 of the NPPF states that, to achieve sustainable development, economic, social and environmental “objectives” should be sought :

‘Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives).’

4.124 The above paragraph requires ‘net gains’ across each objective, and as such it is important to explain the ‘net gain’ in environmental terms.

4.125 During the formulation of the scheme design and layout, due regard has been paid to CS Policy CS19 'Design Quality and Accessibility in New Development' which seeks to enhance local distinctiveness, identity and accessibility of places, and places emphasis on the need to deliver high quality urban design and architecture. Such issues, together with an explanation of the rationale behind the illustrative design and layout is contained in both the Design & Access Statement.

4.126 We have acknowledged the modest loss of trees, but this is inevitable if the course is to be rendered fit for purpose and a high quality facility delivered. The submitted Arboricultural Assessment confirms the following tree losses.

TREE RETENTION CATEGORY	NUMBER OF TREES TO BE REMOVED FOR DEVELOPMENT
A	0
B	40
C	227
U	12

4.127 It is clear from the above table that most trees to be removed are 'C' category i.e. those of no material conservation or cultural value and or those offering low or only transient landscape benefit to the site and wider area. Most of these trees are located within the area of unkempt land to the south-east of the golf course and are predominantly naturally colonised scrub. The removal of these low-quality trees should not form a material consideration of this planning application particularly as all will be replaced with better quality specimen trees on an almost 4:1 basis. The replacement trees (see numbers below) will radically enhance the landscape setting well into the future making this a significant improvement in terms of tree cover augmentation and amenity enhancement. Furthermore, the Landscape & Visual Impact Assessment (LVIA) undertaken by IDG clearly indicates that the development area is almost entirely screened by established trees and hedgerows around the boundaries making the removal of trees internal to the site almost unnoticeable.

4.128 There are no anticipated adverse impacts to retained trees and hedgerows as they have been well integrated within the design in order to safeguard the amenity and screening value, they afford the site and locale. As such there are no special engineering solutions required and no future pressures to fell or remove trees in the future.

- 4.129 To replace the loss of those mainly poor quality trees, it is proposed to plant 1,049 new trees (refer to IDG Tree Schedule). That equates to close 4 for 1 replacement.
- 4.130 In addition to new trees, the Planting Schedule of IDG confirms that the scheme will deliver 541 metres of new native hedgerow, 17,666 sqm of shrubs, 2,360 sqm of ornamental grasses, 4,181 sqm perennial planting, 333 sqm ferns and over 16,000 sqm of mixed seeding. Most of this new vegetation will be selected for both its visual softening / greening and biodiversity value.
- 4.131 Balanced against that are the impressive range of associated sports, recreational, cultural, health and business benefits arising from this proposal.
- 4.132 Overall, therefore, we contend that the proposal represents sustainable development, which will contribute **economically, socially and environmentally**.
- 4.133 We therefore anticipate that this application will be welcomed by Knowsley Council in respect of its deliverance of sustainable development and much needed qualitative improvements to this municipal golfing facility (all to be delivered through private investment).
- 4.134 Setting aside the topic of sustainability, the application is consistent with the remainder of the NPPF. By maintaining public access and delivering an array of quality sporting / recreational enhancements to provide wider appeal - for accomplished golfers, young people, families and disabled people - complies with NPPF paragraph 92 in its promotion of social interaction, safe and accessible environments, healthy lifestyles, and layouts that encourage walking and cycling.
- 4.135 For the same reasons, the scheme responds to NPPF Paragraph 93 which states that, to provide the social, recreational and cultural facilities and services the community needs, planning decisions should plan positively for the provision and use of shared spaces, community facilities and other local services to enhance the sustainability of communities and residential environments.
- 4.136 Likewise, the application addresses the sentiment in NPPF paragraph 98 that access to a network of high quality open spaces and opportunities for physical activity is important for the health and well-being of communities.
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- 4.137 This application addresses all of these key policy aims and objectives: excellent quality and sensitive / respectful design; making efficient use of an established sporting venue; and assisting in building the community in a sustainable, balanced fashion.
- 4.138 The NPPF retains the 'town centre first' objective, and in turn the overarching aspiration to protect and enhance our towns and cities through appropriate investment. NPPF §87 states that local planning authorities should apply a sequential test to planning applications for main town centre uses which are neither in an existing centre nor in accordance with an up-to-date plan. It confirms that main town centre uses should be located in town centres; then in edge of centre locations; and only if suitable sites are not available (or expected to become available within a reasonable period) should out of centre sites be considered.
- 4.139 The submitted *Town Centre and Leisure Impact Assessment* (DPP) concludes that, due to the scale of the proposed development and its land requirements, it is simply not possible to identify any sequentially preferable sites. Even the large sites identified cannot accommodate the proposed development as a whole, and in the majority of cases would not be suitable as they would require building on public parkland as these are the only sites of a large scale within sequentially preferable locations.
- 4.140 It is concluded that there are no sites which are sequentially preferable to the application site due to a lack of sites of a suitable scale or availability to accommodate the proposals. This reflects and confirms the assertion previously set out in this report that the proposals by their nature have specific locational requirements as per PPG notes on the requirements of the sequential assessment.
- 4.141 Regarding the NPPF Impact test, there is very limited impact on Kirkby Town Centre or any other defined centre due to a lack of competing facilities or offerings. The nature of the proposals offer potential for retention of expenditure in the wider Kirkby area which is currently being lost to other out of centre locations and Liverpool City Centre whilst offering encouragement to further investment that is proposed in the town centre and on the edge of the centre at Cherryfield Drive.

- 4.142 In NPPF terms it has clearly been demonstrated that the application proposals will not have a significant adverse impact on any defined centre. Indeed, the proposals are in an accessible, albeit out-of-centre, location which will improve leisure and recreation opportunities for local residents, encourage healthy and active lifestyles for people of all ages and abilities and assist in clawing back and retaining expenditure in the local area, improving investor confidence in Kirkby.
- 4.143 We would further add that policies (at all levels) promote sustainable economic investment and mixed use schemes that will help to build the community, particularly where those will play a role in the furtherance of regeneration and respect for heritage.
- 4.144 Having regard to all of the above, not only do we contend that the application is in accordance with the development plan, but it also complies with the NPPF as an important material consideration.

Landscape and Visual Impacts

- 4.128 The application is supported by a *Landscape and Visual Impact Assessment (LVIA)* produced by IDG. The LVIA has influenced the layout and demonstrates how the proposed development can be appropriately accommodated in landscape and visual impact terms.
- 4.129 As recognised in the LVIA, aside from its Green Belt status, the application site is not subject to any landscape-related designations. The LVIA has nevertheless carefully considered the potential landscape and visual impacts of the proposals.
- 4.130 The LVIA proposes measures to ensure the development's impact on the landscape is mitigated, all of which are proposed to be incorporated as part of the proposed development, as explained in both the Design and Access Statement.
- 4.131 The LVIA provides a robust assessment of the proposal's visual and landscape impacts. It identifies that localised views of the proposed development would be restricted to receptors immediately on or close to the boundary.
- 4.132 The LVIA notes that the immediate environment of the golf course consists of a large open area of unimproved grassland to facilitate the practise needs of golfers, set in a heavily wooded

environment. One parcel of land (where it is proposed to locate the new 9 hole course) was historically used as part of the golf course, but is no longer used, and this comprises semi improved grassland and is a vacant open land with no specified use.

- 4.133 The LVIA notes that the skyline is screened on all sides by the heavy tree planting, and that the existing golf course site is intensively managed for the purposes of golf course operations, whilst the adjacent parcel (noted above) is unmanaged.
- 4.134 The LVIA acknowledges that the proposed development will introduce two new buildings (the clubhouse and driving range building), plus a small bowlers' hut , infrastructure and new landscaping. It suggests that the Clubhouse and Driving Range buildings will only be visible from Valley Road, properties along Moor Lane, Longmore Lane and Fazakerley Sports and Social Club. It is noted that views are also possible from Aintree Lane, where breaks in the hedge occur. It notes that there is no view of the site from the M57, and the train line does not offer a clear view of the proposed works (aside from landscape improvement works).
- 4.135 The LVIA suggests that residents of Ingoe Lane will have only a disrupted view of the development due to heavy planting. The property 'Mather Cottage' on Aintree Lane is heavily screened and has no view of the proposed works. In addition, properties on Oxton Close have no direct view of the proposed works due to heavy planting.
- 4.136 The LVIA predicts that the proposed development would not have significant impact on the existing landscape character of the site, and that the development will have a positive impact on the value and quality of the site for golf players, members of the public and ecology, while the changes will not be significant for the public. It is anticipated that the proposed development retain the majority of the openness of the site. Accordingly, the LVIA suggests that the overall magnitude of change is considered to be **low** within the study area, on account that the significant alterations to the key elements about the A506, and although post development change will be clear, the underlying landscape will return to its original purpose of being active golf course and associated facilities.
- 4.137 In terms of landscape mitigation, the LVIA states that the majority of the proposed works and buildings will be well screened from the public, and that the visual envelope for such a large site is very small, due to the dense perimeter vegetation, the topography and that those areas most visible to the public will not be subject to material change.

- 4.138 However, the LVIA concedes that parts of the development will impact on visual aspect, and in those cases the impact will be negative, but not significant. The impact of these views will be heavily determined by the quality of the built and landscape architecture, and the vast majority of the proposal will be well screened and are clearly enhancing the area through the introduction of good quality buildings, spaces and new landscaping.
- 4.139 In conclusion, the LVIA suggests that the proposed works to the golf course would make significant changes to the appearance of the golf course and rejuvenate a derelict area of land. The changes will be visible to users of the golf facilities, and indirectly to those passing in front of the development. It is not thought to have any significant impact on any residences. Given the current character of the site and the facilities already offered, it is envisaged the proposed development would maintain the overall character and not adversely impact on the openness of the Green Belt.
- 4.140 The landscape proposals and mitigation strategy will introduce many positive elements, including the creation of a new recreational and ecological space accessible to the public. It will also include new tree and shrub planting of further benefit to the ecology of the area, and pond and wetland areas.
- 4.141 Consequently it is clear that development should not be refused on landscape impact grounds.

Design Quality

- 4.142 The Design & Access Statement (produced by RGP Architects) reinforces the extent of attention that has been paid to design and layout.
- 4.143 From the outset, given the Green Belt designation, it was accepted by our client that only excellent design architecture and materiality would suffice. The architect's brief was therefore to work closely with IDG and the wider team to deliver an excellent, and we contend exemplar, development.
- 4.144 Careful consideration has been given to how the buildings are positioned, which reflects pre-application guidance from the LPA which suggested that gaps ought to be designed into the scheme, to retain clear vistas and assist in maintaining a sense of openness when viewed from Valley Road.
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- 4.145 Significant weight ought to be attached to the scheme's excellent design quality in the assessment and determination of this application. The quality of architecture in this case is, we suggest, both bespoke and excellent, and we would expect the LPA to welcome the proposal as setting a high benchmark for Knowsley in terms of both design quality and sustainability.

Ecology

- 4.146 Ecology Services have produced the following ecological reports to accompany the application:

- Ecological Appraisal report (which provides an overview / summary of all of the reports below)
- Amphibian survey report
- Badger survey report
- Bat survey report (buildings)
- Bat survey report (trees)
- Bat transect and activity survey report
- Breeding bird survey report
- Otter survey report
- Water vole survey report

- 4.175 Those reports combined confirm that there are no statutory designated sites within 2 km of the site, but 11 Local Wildlife Sites (including the River Alt running between the two development parcels) are present within that distance.

- 4.176 The Ecological Appraisal report identifies the following valuable ecological features within the development area:

- broadleaved plantation woodland
 - scattered trees
-

- scrub
- species-poor semi-improved grassland (unmanaged); and
- hedgerows.

- 4.177 It is recorded that the majority of the waterbodies within the site were dry at the time of survey, with more permanent waterbodies present in the wider golf course. Invasive plant species – namely Japanese knotweed, Himalayan balsam, cotoneaster and Japanese rose - are all present within the development area.
- 4.178 The development area contains habitat suitable to support bats, otter, badger, water vole, breeding birds and amphibians.
- 4.179 Existing habitats are to be retained and protected where possible, and compensation is provided for the loss of poor semi-improved grassland, scattered trees, scrub and hedgerows. Overall, there will be a net gain of 0.63 ha new woodland planting, 550 trees, 0.84km supplementary hedgerow planting and 0.97ha standing water (two lakes).
- 4.180 A further 5.86ha out of play areas in the wider golf course will be allowed to grow and be managed as rough grassland and scrub and managed to encourage species diversity.
- 4.181 Implementation of best practice pollution prevention measures is recommended to protect the River Alt from pollution.
- 4.182 Appropriate measures will also need to be implemented to ensure that the proposed development does not cause invasive plant species to spread.
- 4.183 As noted above, further surveys have been undertaken in respect of bats, otter, water vole, badger, breeding birds and amphibians, and the reader is encouraged to refer to those respective reports to establish the survey results and recommendations regarding those particular species.
- 4.184 Accordingly, there are no ecological reasons to resist the application.
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Access and Transport

- 4.185 Transport considerations are reported in more detail in the Transport Assessment (TA) and Travel Plan Framework (TPF) prepared by Prime Transport.
- 4.186 The TA concludes that the scheme accords with local and national policy which promotes development adjacent to good transport linkages and other attractions, in order to minimise trips and share trip movements.
- 4.187 It notes that the existing access off Ingloe Lane will be retained for the existing club house which will be subject to a change of use to a specialist golf training academy. The existing car park will serve this and provide overspill parking for the rest of the development.
- 4.188 A new main access will be provided off the A506 Valley Road by upgrading the 3-arm signal controlled junction with Field Lane to include a 4-arm which will serve the site. Further improvements to the junction will enable walk/cycle with traffic toucan crossing facilities across all arms of the junction. A left-in only slip road will also be provided off the A506 between the main access and Aintree Lane.
- 4.189 The TA demonstrates that the location of the site has been shown to be sustainable when considering access to and from the site by modes of travel other than the private car, particularly walking, cycling and by bus. The proposed access arrangement will connect with the existing cycleway infrastructure on the A506.
- 4.190 In order to encourage bus travel, the applicant is willing to fund the upgrade of the nearest pair of bus stops to the site in Valley Road to include shelters and seating. A separate Travel Plan has been prepared which will encourage and promote sustainable travel by both staff and visitors.
- 4.191 The TA confirms that an appropriate level of new car, cycle and motorcycle parking will be provided on the site. The internal layout will be safe and suitable for all users, including pedestrians and cyclists.

- 4.192 A review of personal injury accidents that have occurred on the local highway network has been undertaken for the most recent five-year period that the data was available for. An analysis of those accidents showed that there does not appear to be a proliferation of accidents at any one location, suggesting that highway safety is not an issue that would preclude the development of the site.
- 4.193 Detailed junction capacity assessments have been undertaken at four key junctions in the vicinity of the site. The requirement to assess these junctions was agreed with KMBC and Highways England at the pre-application stage. As part of this assessment, traffic surveys were undertaken on neutral days in March 2020, prior to when travel restrictions were imposed as a result of the Covid-19 pandemic. Following a robust traffic forecasting and trip generation exercise, the impact of the development has been considered on the local highway network weekday AM and PM and Saturday peak hours. The impact of the development has shown to be negligible on the local highway network, as such, mitigation measures should not be required.
- 4.194 It is therefore concluded that the proposed development would not result in an '*unacceptable impact on highway safety*' nor have a 'severe' impact on the operation of the highway network in terms of capacity. The impact is best described as negligible.
- 4.195 Fundamentally, Prime Transport conclude that there are no reasons why the scheme should not be approved from a transportation point of view.

Flood Risk and Drainage

- 4.196 The application is supported by a *Flood Risk Assessment & Drainage Management Strategy* produced by Betts Hydro.
- 4.197 This confirms that the site is located within Flood Zone 1 and 2. The proposals are 'recreational' in nature and as such is classified as mostly 'Less Vulnerable'. The Planning Practice Guidance confirms that this type of land-use is appropriate for Flood Zones 1 and 2, providing there is no increase in flood risk elsewhere due to the proposals.

- 4.198 The report has reviewed all sources of flood risk both to and resulting from the proposed development site. The main development area is at 'very low' to 'low' risk from most flood sources considered, including fluvial, tidal, surface water and sewer flooding.
- 4.199 Consultations with the Environment Agency, United Utilities and Knowsley MBC have been undertaken and have not identified any historical incidents of flooding directly to the site.
- 4.200 The nearest Main River is the River Alt, which flows through the site and splits the development area into an eastern and western parcel. The Environment Agency has provided in channel top water levels for the key design events to determine the potential flood risk. Based on the modelling completed by the Environment Agency and the ground levels, the main development area remains flood free in both the fluvial undefended and defended scenarios.
- 4.201 The EA modelling data has been refined and a more detailed understanding of the potential flood risks to both the existing site and the proposed development has been gained through a detailed hydraulic modelling assessment undertaken by Betts Hydro. This modelling shows that the western development parcel remains flood free in all the key design return period events, including during the proposed modelled scenarios.
- 4.202 The eastern development parcel is shown to be more susceptible to inundation in the more extreme scenarios (0.1% AEP event). However, the proposals in this part of the site will either be course reconfiguration or car parking and maintenance-related, so would be considered at low vulnerability. When the proposals in the eastern parcel are compared to the predicted low flood depths in this location, the potential flood risks overall are thought to be manageable.
- 4.203 Surface water flood risks have also been considered and, as the development proposals have the potential to increase the volumes of surface water run-off generated on the site, appropriate mitigation has been considered. The risk associated with surface water run-off will be managed and reduced as part of the proposals through implementation of mitigation proposals; including a sustainable surface water regime, appropriate levels design and permeable surfacing where feasible.

- 4.204 In terms of the drainage strategy, the principle focus of the assessment is on sustainable management of surface water run-off, to ensure surface water flood risk does not increase because of the proposals. Surface water management options have been assessed in accordance with the national and local policy to follow the sustainable drainage hierarchy.
- 4.205 Based on the ground conditions, online infiltration is considered to offer a possible means of dealing with surface water run-off, although the upper soil strata appears to be less favourable towards an infiltration based solution onsite. Soakaway Testing has therefore been undertaken on the site, in key locations where infiltration methods would likely be used (ie proposed car parking areas).
- 4.206 The proposals is therefore to manage surface water run-off generated onsite by discharging to ground via an appropriately designed infiltration-based Sustainable Drainage System. The proposals are to utilise permeable surfacing where at all feasible for external hardstanding areas, including parking bays, footways and patio areas. Where access roads are being proposed for adoption, permeable surfacing is not typically accepted for adoption by the Lead Local Flood Authority, and in these cases an alternative management regime would be required to be secured, or an alternative surfacing material would need to be incorporated for these areas.
- 4.207 Should infiltration not provide a full or part drainage solution, then the proposal will be to form a new formal connection to the River Alt, subject to formal consents and agreements from the Environment Agency. Detailed design would be required to confirm whether a gravity system can be achieved, although given the existing levels a gravity connection is anticipated.
- 4.208 In accordance with the SuDS Manual (CIRIA 753) and the Non-Statutory Technical Standards for Sustainable Drainage Systems (March 2015), the proposals will be to restrict surface water run-off to mimic a pre-development greenfield situation. The pre-development rate (Q_{Bar}) for those areas of site being considered as part of this drainage assessment (2.878ha) is 10.8l/s, using the FEH Statistical Method (based on 3.752l/s/ha).
- 4.209 Restricting the rate of discharge would however generate a stormwater storage requirement onsite during the extreme storm events. It would be beneficial to implement SuDS features
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such as a pond or swales, near to the proposed outfall location. If designed appropriately, the SuDS features such as ponds/swales can aid in the attenuation and provide added benefits in terms of water quality.

4.210 In terms of design, the proposed drainage system on-site will be sized to ensure that exceedance up to and including the 1 in 100 year return period event, with allowance for climate change is contained within site. The Flood Risk Assessment and Drainage Management Strategy has been prepared in consultation with the relevant interested parties, and incorporates their comments where possible. The report is commensurate with the scale and nature of the development proposals and in summary, the development can be considered appropriate in accordance with the Planning Practice Guidance.

4.211 Accordingly, there are no grounds to resist the application for reasons of flood risk or drainage.

Archaeology and Heritage

4.212 The application is supported by both an Archaeological Desk-Based Assessment (ARS Ltd) and Heritage Appraisal (Graeme Ives Heritage).

4.213 The Archaeological Desk-Based Assessment explains that, even though there is a paucity of evidence for prehistoric activity within the study area, Kirkby is located within the central and eastern mosslands and the River Alt (an area associated with prehistoric activity) runs through the proposed development area. Therefore, it is considered that there is moderate potential that belowground prehistoric remains survive within the site.

4.214 The report suggests that while there is little Romano-British activity recorded within the area, increasing numbers of Romano-British archaeological sites have been identified in Merseyside in recent years, and therefore it is considered that there is a low-moderate potential to discover surviving below-ground archaeological remains dating to the Romano-British period.

4.215 Regarding the medieval period, the report notes that pottery was identified during a watching brief at Ingoe Lane and, therefore it is considered that there is moderate potential for surviving below-ground archaeological remains to be present within the proposed development area.

- 4.216 It explains that multiple post-medieval archaeological remains have been identified within the site boundary, including two houses and three barns, which shows a continuation of the earlier medieval farming practices continuing well into the post-medieval period. It has been identified in the Archaeological Research Framework for North West England (Brennand 2007) that there is a need to investigate surviving below-ground deserted farmsteads and isolated cottages in order to identify the material culture associated with the individual households. Even though the known post-medieval structures associated with agriculture within the site boundary lie outside of the proposed development area, the report suggests that there is still the potential for surviving belowground archaeological remains associated with these structures to be present with the site.
- 4.217 It is recommended, therefore, that in order to mitigate any potential loss of archaeological remains, a programme of archaeological works is undertaken. As the site is of a substantial size, and further information is needed on the location of surviving below-ground archaeological remains, it is suggested that, initially, a geophysical survey be undertaken of suitable areas, to record the location of any below-ground archaeological remains. Depending on the results of the geophysical survey, further archaeological work (e.g. trial trenching, area excavation and/ or watching brief) may be required to investigate and record any significant archaeological remains surviving at the site.
- 4.218 The Applicant is agreeable to accept a condition that reflects that recommendation.
- 4.219 It terms of above ground heritage, the separate Heritage Appraisal by Graeme Ives Heritage notes that the south-eastern corner of the application site is located next to the Ingoe Lane Conservation Area, which incorporates a cluster of non-designated heritage assets. The formal townscape of the New Hall cottage homes, including the Dining Room with its tall clock tower, are located well to the west of the application site, and the Leeds and Liverpool Canal is separated from the northern edge of the site by the intervening railway line and embankment.
- 4.220 The Appraisal suggests that the proposed development will cause a slight change within the setting of the conservation area. The proposed club house will be located on the western side of the River Alt, further from the conservation area boundary, and the existing clubhouse
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will be improved and the landscaping to the boundary maintained. In this context, it is suggested that the proposed development is considered to represent a neutral impact on the character and appearance of the conservation area.

- 4.221 The report notes that the proposal is well separated from the listed buildings at New Hall, and that the setting of those listed buildings will not change. Similarly, the setting and significance of the identified non-designated heritage assets will not be harmed. Indeed, the setting of Alder Bridge would be enhanced by the improvement of the existing clubhouse and car park.
- 4.222 The proposed development is therefore considered to satisfy the requirements of S. 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990, and the policies of the NPPF and Local Plan.

5.0 Overall Planning Balance and Conclusions

- 5.1 In this Planning Statement, we have explained why the proposal complies with the development plan, the absence of other material considerations, and as such – in accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004 - it should be approved *‘without delay’*.



- 5.2 This proposal will assist in achieving certain of the Core Strategy’s specific *‘Vision and Objectives’*, namely that :

- It will assist in providing a sense of place and community.
- It will assist in making Knowsley’s economy stronger and more diverse.
- It will offer Knowsley’s people access a wider range of jobs and training opportunities.
- It will better connect Knowsley’s communities to leisure and recreation provision.

- It will enhance Knowsley's open spaces and indoor and outdoor sporting, recreation and leisure opportunities *'so that residents and visitors can choose to become more active and pursue healthier lifestyles.'*
- It will create a better and well-used multi-functional area incorporating attractive walking and cycling links, complementing the wider environmental benefits of the Green Infrastructure network.

5.3 We have acknowledged that, while all parts of the proposal are *'appropriate facilities'* relating to and required by outdoor sport and recreation, certain elements of the proposal will cause a degree of harm to openness and will impact on the purposes of Green Belt designation (specifically the purpose relating to *'encroachment'*). As such, those parts of the development are considered to be *'inappropriate development'* in the Green Belt.

5.4 §144 of the NPPF states that, when considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt, and that *'very special circumstances'* (VSCs) will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is *'clearly outweighed'* by other considerations.

5.5 We have explained in this Statement the VSCs that we contend *'clearly outweigh'* the potential harm to the Green Belt. It is the Applicant's case that the VSCs are compelling and overwhelming, as summarised below :

- The current golf club / course is of very poor quality and not fit for purpose.
- Membership has been declining for decades, and unless the club / course is transformed, the prospect is that it may cease to operate and the sports / recreation asset will then be lost to the community. This in itself is, we suggest, a VSC of great magnitude.
- At best, the club will continue as it does today, operating on a 'shoe string' budget, with a deteriorating course and facilities, serving a very small (and decreasing) sector of the community, and with no scope for real meaningful investment or improvement.

- The cost of delivering the necessary improvements is extremely high. The works proposed by the application will cost over £27 million to deliver.
- No operator (including the Applicant or Liverpool City Council as the landowner) would countenance investing anywhere near that level of monies unless they are confident that they will secure a reasonable and solid commercial return sufficient to render that extent of investment worthwhile, and to both continue to fund the operation into the future and to service the debt on the borrowed capital.
- That said – to render the project viable, and to sustain the future of the club and course – very considerable development needs to take place, elements of which will inevitably impact (to varying degrees) on the openness and purposes of the Green Belt. All of the proposed development is associated with (*‘appropriate’* for) outdoor sport and recreation.

5.6 This application therefore presents a simple choice over two options. Option 1 is that the course and club continue to ailing, devoid of investment and improvement, and could ultimately fail in the short to medium term. In turn, the community of Knowsley will lose this important sports / recreation asset that has existed for close to a century. Or - at best - the asset will continue to operate as it does today, as a poor quality, deteriorating, and in many respects not-fit-for-purpose facility, sustaining very few jobs.

5.7 The second option is that the works proposed by this application are accepted and approved, which will result in the following *‘very special’* public / community benefits :

- £27 million + of private sector investment to transform an publicly-owned municipal facility that has suffered from years of neglect and lack of investment.
- Disbenefits (as we have acknowledged) in that there will an inevitable and unfortunate modicum of harm to the openness of the Green Belt and an element of ‘encroachment’, thereby prejudicing (to a limited extent) one of the purposes of Green Belt designation; and
- The benefit of safeguarding the existing 15 jobs.

- Creating and sustaining new jobs and training opportunities into the future. 200 new jobs will be created directly the expanded operation, covering a diverse range of skills, sectors and career paths in retail, green keeping, hospitality, management and marketing.
- During construction, a further 250 construction-related jobs will be created / sustained over an anticipated 4 year construction period.
- Creation of apprenticeship opportunities for young people wishing to engage in golf course management and other sports / leisure related enterprises.
- Delivering genuine transformational change by vastly improving the club and course as an asset of genuine quality for future generations, and as a 'statement of intent' for the Borough of Knowsley.
- The proposal will introduce a range of new, exciting, complementary, high quality facilities associated with outdoor sport and recreation for the health and recreational benefit of the entire community. This will include a state-of-the-art driving range facility of the like that residents of Knowsley do not currently enjoy. The course and its facilities have been designed to be accessible to all sectors of the community, including disabled people, young children and families, which will widen the appeal and attraction of the facility, and generate an entirely new and different customer base (from both inside and outside Knowsley), introducing new footfall and spending, with obvious spin-off benefits for local shops, services and the viability and vitality of Knowsleys town centres.
- Enhancing landscape character and biodiversity through new planting and ecological mitigation. Most existing trees and vegetation will be retained, but an extent of tree loss is necessary. In total, 279 trees will be removed, but the overwhelming majority of those are of poor quality. By way of mitigation, it is proposed to plant 1,049 new trees, equating to close to 4 for 1 replacement. In addition to new trees, the scheme will deliver 541 metres of new native hedgerow, 17,666 sqm of shrubs, 2,360 sqm of ornamental grasses, 4,181 sqm perennial planting, 333 sqm ferns and over 16,000 sqm of mixed seeding. This new vegetation will be selected for both its visual softening / greening and biodiversity value.

- While the new hardstanding and building areas / footprints combined will equate to is 48,620 sqm of 'hard' development, that represents only 6% of the entire site area. The remaining Green Belt / Greenspace will be considerably improved through re-contouring of the landscaping and the introduction of considerable new tree and other planting, and the provision of substantial ecological mitigation areas.
- Introducing a *Community Benefits Package* (in the form of a S106 and Social Value Strategy) which will provide opportunities for local schools and disadvantaged groups to access the facilities during term time, including free golf coaching, inter-school golf tournaments, and a job brokerage scheme focused on placing Knowsley residents in jobs and training both during the construction phases and operational phases; and
- The creation of a unique, exemplar Training Academy dedicated to providing best practice grounds maintenance and golf / leisure related training (through the change of use of the existing clubhouse), which will generate a surfeit of new spin off jobs and training opportunities; and
- Benefits to the local economy and profile of Knowsley arising from a very considerable increase in visitors / user numbers and associated job creation. The proposal will refocus and vastly improve the golfing elements and introduce complementary sports activities of the highest quality, providing better balance and more stability, reflecting the aspiration to provide a year-round family-based attraction which will be far more resilient to the market than the current narrow-focused, deteriorating facility.

5.8 It is the Applicant's case that the above benefits combined '*clearly outweigh*' the harm to the Green Belt by reason of inappropriateness, reduction in openness and encroachment. That said, we consider that '*very special circumstances*' exist which justify the development, in line with the requirements of the Development Plan and the Framework.

5.9 It is important to highlight that the submitted Financial Viability Report confirms that the quantum of development proposed represents the minimum quantum that is required to secure the long term sustainability of the golf facility. The sensitivity figures presented in that report confirm that there is no scope for reducing or removing elements of the proposal, or

any 'scaling back', because the effect of that would be to undermine the viability and deliverability of the proposal.

5.10 The VSC case is even more compelling when the above benefits are measured against the socio-economic context of Knowsley. The most recent English Indices of Deprivation 2019 (IoD2019) confirms that, together with Middlesbrough, Liverpool, Kingston upon Hull and Manchester, Knowsley remains among the most deprived in England, and the Core Strategy highlights that :

- Knowsley has high levels of worklessness.
- Educational attainment levels in Knowsley are low.
- The level of educational attainment for boys is particularly low.
- Knowsley has the fourth highest proportion of 16 to 18 year olds that are not in education, employment or training.
- The borough's life expectancy levels are among the lowest in the country.
- The borough has high mortality rates from cancer (particularly lung cancer), cardiovascular disease (including coronary heart disease and stroke) and respiratory disease.
- It explains that these are issues which can be associated with lifestyle choices such as smoking, alcohol consumption and diet, but also with wider environmental factors such as housing standards, quality of employment opportunities, access to health and other services/facilities, open space and the natural environment.
- Knowsley's population structure is ageing, with the number of persons aged under 65 projected to decrease by 4,600 between 2008 and 2028, while the number of those aged 65 and over is projected to increase by 8,600.
- The borough has a disparity in income levels, with Knowsley residents having the lowest incomes on Merseyside.

5.9 Reinforcing the above bleak picture, the Councils' Local Area Profile for Kirkby confirms that:

- Kirkby is the most deprived part of Knowsley
- Over two fifths of its children and older people are deprived
- It has the highest prevalence for depression, obesity and hypertension, all of which are higher than Knowsley and national averages.

- Respiratory and Cardiovascular disease both significantly higher than national averages.
- Both male and female life expectancy is lower than the rest of Knowsley showing extent of inequality
- Childhood obesity levels in reception and year 6 are consistently higher than in Knowsley and England
- It has the highest rates of childhood obesity of the four locality areas in both reception and year 6 years in 2016/17
- Childhood obesity in both reception and year 6 have increased over the last 5 years at a faster rate when compared to Knowsley and England
- Adult obesity is higher than in Knowsley and England
- 13.8% of residents claim Employment Support Allowance, higher than Knowsley and the 2nd highest in England
- 3.4% of residents claim Job Seekers Allowance and universal credit, higher than England.

5.10 We contend that, against that socio-economic backdrop, the delivery of the new, high quality sports and recreational facilities and healthy lifestyle opportunities for the entire community, as promoted by this application, ought to be accepted – in isolation and its own right – as a ‘very special circumstance’ that ‘clearly outweighs’ harm to the Green Belt. Indeed, it is difficult to conceive of a more ‘very special’ case.

5.11 Looking beyond the Green Belt, in this Planning Statement we have explained how the proposal accords with other relevant policies and provisions of both the Development Plan and NPPF, such as those relating design quality, built heritage, ecology, trees, flood risk and transport.

5.12 As such, the application complies with the adopted Development Plan as a whole, and – reflecting the statutory test in Section 38 (6) of the Act – planning permission should be granted, unless other material considerations dictate otherwise. We consider that there are no such other material considerations that would prevent approval.

5.13 The proposal has been carefully formulated to provide high quality, sustainable development. The collaborative design-led approach, informed by consultation with the LPA, responds

sensitively to the site's history, heritage and setting, respecting the grain of the landscape and the established use of the site as a municipal golf course.

- 5.14 Not only does the proposal comply with the policies of the adopted and emerging development plans, it is also in accordance with relevant policies of the Framework (an important material consideration). The Framework requires sustainable forms of development that are consistent with the development plan to be approved “***without delay***”. We have explained why the development proposal constitutes ‘sustainable development’ having regard to the economic, environmental and social benefits it will deliver.
- 5.15 The application ought therefore to be welcomed by Knowsley Council as a unique and ‘very special’ proposition, and it calls to be approved “*without delay*” in line with the requirements of both Section 38(6) of the Act and paragraph 11 of the NPPF (2019).

Appendix I
LPA's EIA Screening Opinion



Richard Gee
Haweswater House
Waterfold Business Park
Bury
Lancashire
BL9 7BR

Date: 22 November 2019

Dear Mr Gee,

**SUBJECT: 19/00598/SO - SCREENING/SCOPING REQUEST - ENGINEERING WORKS
AND NEW BUILDINGS**

LOCATION: Kirkby Golf Course, Ingoe Lane, Field Lane Estate, Knowsley, L32 4SS

Thank you for your request for a screening opinion in relation to the above development and site.

On the basis of the information submitted I confirm that an Environmental Impact Assessment is not required in support of your client's planning application.

Please find attached the Council's formal screening opinion.

Should you wish to discuss the matter further or require any additional information please contact Andrew Hunt on (0151)-443 2204 or email Andrew.Hunt@knowsley.gov.uk

Yours Sincerely



Mark Cawood
Head of Planning and Highways

TOWN AND COUNTRY PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT REGULATIONS 2017)

REFERENCE NUMBER: 19/00598/SO

PROPOSAL: SCREENING/SCOPING REQUEST - ENGINEERING WORKS AND NEW BUILDINGS

1. This is an Environmental Impact Assessment (EIA) screening impact opinion in respect to a planning application for a sports and leisure development, which would involve the construction of up to a total floorspace of 10,780 sqm.
2. A request for a formal Screening Opinion has been submitted by Roman Summer Associates.¹ The Screening Request correctly identifies the proposal falls under Schedule 2 10(b) of the EIA Regulations 2017, as an urban infrastructure project.
3. The applicable screening criterion for this type of development is that if the area of the development exceeds 1 hectare, a screening impact assessment is required.
4. The site is not located in a "sensitive area" as defined by the Regulations, however, several local wildlife sites are located either within, adjacent to, or close to the development site. Furthermore, there are sites of 18th and 19th century farms and houses recorded on the Merseyside Historic Environment Record on the site, in addition to the (unknown) potential for prehistoric archaeology associated with the former course of the River Alt that ran through the site.
5. Planning Practice Guidance provides further guidance with regards to EIA screening with further indicative criteria and thresholds. For golf courses and associated developments it suggests that EIA is unlikely to be required unless the new development is a new 18 holes golf course. The current proposal is on a significantly smaller scale than this, and therefore, it is less likely that EIA will be required.
6. However, consideration must be given to the requirements of Schedule 3 of the Regulations including characteristics of the development, location of the development and types and characteristics of the potential impact.

Characteristics of the Development

7. The overall size of the development proposal will significantly exceed 1 hectare as the overall site extends to 83.67 ha. The works will cover various different areas of the golf course, but not on the scale of creation of a new 18 holes course. There are unlikely to be significant cumulative effects with other developments, other than potentially traffic impacts if there are any nearby construction sites. The proposal will use natural resources, but other than soil and aggregates, these are not expected to be significant. It is understood that the soils and aggregates will be sourced from reputable civils suppliers and waste materials will not be used. The production of waste materials is unlikely to be significant and can be managed through a site waste management plan.

¹ Environmental Impact Assessment (EIA) Screening Request, Kirkby Golf Course, Ingoe Lane, Field Lane Estate, Knowsley, L32 4SS Roman Summer Associates, October 2019.

8. The 2017 Regulations require that the risk of major accidents and/or disasters relevant to the development is also considered, including those caused by climate change. The proposal is unlikely to cause specific pollution or nuisance other than construction effects and these can be managed using a Construction Environmental Management Plan. The proposal is unlikely to result in major accidents or disasters including those as a consequence of climate change, and any adverse impacts of the proposal and climate change and human health is likely to be low.

Location of the Development

9. The site is not located in a sensitive area as defined by the regulations, although several local wildlife sites are located either within, adjacent to close to the development site. However, whilst there are potential impacts on these areas arising from the development, these are limited primarily to the development site and are capable of mitigation.
10. Given the above, the ecology issues associated with this site could be addressed within the proposed Ecological Appraisal and, therefore, EIA is not required on ecological grounds.
11. There are heritage assets with potential interest within the site. Whilst further assessment will be required during the planning process, impacts on these assets are not considered to be significant in EIA terms. The site is located in a suburb which is densely populated, although the number of properties that lie adjacent to the proposal are small in number.

Types and Characteristics of the Potential Impact

12. The types and characteristics of the impacts are largely associated with construction effects and construction traffic, and therefore will be short term and temporary. There are likely to be ecological impacts but these are capable of mitigation. A desk based assessment which assesses the impact of the proposed development on the archaeological potential of the site is required as part of the planning process.
13. Construction activities associated with the proposals can be a source of environmental impacts through noise, air pollution and emissions. However, these are temporary effects and can be readily controlled through good practice construction methods and a range of standard mitigation measures some of which will be required through planning controls. It is not considered that these effects in this instance will be environmentally significant.
14. Having reviewed the Screening Report and considered the project against the provisions of the EIA Regulations (including screening criteria presented in Schedule 3) and the relevant National Planning Practice Guidance, it is considered that the proposals are unlikely to give rise to significant environmental effects from an EIA perspective, and that EIA is therefore not required in this case.

Appendix 2
LPA's Pre-Application Feedback

Relevant Supplementary Planning Documents (see [here](#)):

- Design Quality in New Development SPD;
- Adding Social Value to Development SPD
- Developer Contributions SPD
- Trees and Development SPD
- Ensuring a Choice of Travel SPD

The Council's Validation checklist can be found using the link below.

<https://www.knowsley.gov.uk/residents/building-and-planning/planning-permission/consultation-on-planning-validation-checklist>

The most significant planning issues, and therefore risks to achieving a planning permission, are shown below. Those issues highlighted in red are considered to be of high risk to the achievement of a successful outcome.

This is a working document and will be updated during the course of the project when issues are addressed.

	High		Medium		Low
PERCEIVED RISK			CURRENT POSITION & NEXT STEPS		
Principle of Development	The site is located within the Green Belt. Para 145 of the National Planning Policy Framework states that new buildings in the Green Belt are inappropriate unless one of the exceptions is met. Part B states the following: <i>"b) the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport, outdoor recreation, cemeteries and burial</i>		Parts of the proposal are considered to be appropriate development in the Green Belt as they meet NPPF para 145 (b). However, the proposal as a whole is inappropriate development in the Green Belt and very special circumstances would need to be demonstrated with any planning application.		

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	<i>grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it";</i> Parts of the development may be appropriate development in the Green Belt as they meet NPPF Para 145 b). However, the development as a whole would have a greater impact on the openness of the Green Belt and therefore the development is inappropriate development in the Green Belt. As a result, very special circumstances would be required to be demonstrated in any planning application. Para 144 states that: <i>"Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations"</i>. Given the scale of development in the Green Belt, it is likely that any application would need to be referred to the Secretary of State for Housing Communities and Local Government. The site is also located within urban greenspace on the Local Plan policies map. However, it is considered that the development is compliant with part 2 d) of Core Strategy Policy CS21 - Greenspaces and Trees.	It particular, the planning statement will need to clearly explain the benefits of the scheme and how they will outweigh harm to Green Belt.
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Impact on Neighbouring properties	The impact of the development on the living conditions of neighbouring properties will need to be considered. It will need to be demonstrated that there will not be any harm in relation to light pollution from the proposed floodlights.	The application should demonstrate that there will be no adverse impact on the amenity of neighbouring properties from light pollution.
Design	Due to its sensitive Green Belt location, an attractive design compatible with the character of the area is required in line with the guidance within Supplementary Planning Document (SPD), titled Design Quality in New Development. The proposed entrance totem sign is considered to be too high and would need to be reduced in height.	The Design and Access Statement should explain the design principles and concepts that have been applied to the development, and demonstrate how the proposed development's context and relevant planning policies have influenced the approach to design. It is recommended that 3D visualizations of the larger buildings are provided with the planning application to enable the design of the buildings to be assessed. This should include impacts on Green Belt Views. The proposed totem entrance sign will need to be reduced in height.
Highways	A detailed Transport Assessment is required for any future planning application. The site is located close to a motorway junction and the views of Highways England would be sought on any application. A Travel Plan is required.	Details of additional parking spaces, traffic generation, visibility splays etc. will need to be shown in any planning application. A travel plan is required.

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	Electric vehicle charging points will be required for the development. There should be a minimum of 1 electric vehicle charging point per 10 parking bays. All chargepoints should be: a) A minimum of 7KW, and b) at Least Mode 3 or equivalent, and c) untethered, and d) located in order to comply with the Equality Act 2010 and the accessibility requirements set out in the Building Regulations Part M.	The proposed level of parking requires justification. The number of spaces proposed appears high and will need to be justified.
Contamination	There may be contamination associated with previous uses. A phase 1 desktop contamination survey is recommended as a minimum. The council's environmental health team would be consulted on any application.	Appropriate contamination surveys are required as part of a planning application to understand and mitigate any potential harm to human health.
Heritage	There is a conservation area next to the site (to the east). A short Heritage Assessment should be provided with the application that takes into account the impact of development on the character and appearance of the Conservation area.	A Heritage Assessment is required to be submitted with the application. It appears that it should be possible to demonstrate that the development will not significant impact on the Conservation Area.
Flood Risk	As the proposal is a major development sustainable drainage is required in line with NPPF para 165.	A Flood Risk Assessment is required. A Sustainable Drainage Strategy and proforma template is available online which should be submitted with the application.

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	As part of the development is within higher risk Flood Zones, a flood risk assessment is required. A Sustainable Drainage Strategy is required to be submitted.	
Trees	The views of the council's arboricultural officer will be sought on the development.	A Tree Survey is required to be submitted. It is acknowledged that replacement tree planting on a 2:1 basis is proposed. However, the removal of the hedgerow will require justification.
Social Value	As the proposal is for major development, a social value strategy will be required in accordance with the Social Value SPD. This will need to be secured in a section 106 agreement. A template agreement is available in relation to this agreement. The council has consultants (Fusion 21) who act on the council's behalf in relation to social value strategies. They would be able to offer advice on the content of the social value strategy. There is the following contact details: rachael.atkin@fusion21.co.uk	A Social Value Strategy is required.
Ecology	Ecological surveys will be required for the proposal. The views of Merseyside Environmental Advisory Service will be required on the application. All applications over 0.5ha in size will be screened by the Local Planning Authority to determine whether an Environmental Statement is required. This screening can be requested prior to an application being submitted.	Ecological Surveys will be required. It is recommended that an EIA screening opinion is asked for.
Crime and Anti-Social Behaviour	The views of the police architectural liaison officer will be sought on any planning application.	The need to minimise crime and anti-social behaviour should be taken into account in the design of the scheme.
Town Centres	Part of the proposal involves leisure and retail development which would be classed as Main town	A retail/leisure assessment will be required as part of the application.

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	centre uses. Sequential/impact assessments will be required. A retail/leisure assessment will be required as part of the application.	
Economy	An Economic Statement will be required to be submitted for the application as it is a major development.	An Economic Statement is required.
Sustainability	Policy CS22 requires development to incorporate measures to reduce carbon emissions.	An Energy and Sustainability Assessment will be required for the application.
Health	A Health Impact Assessment (HIA) is required.	A Health Impact Assessment (HIA) will need to be submitted with the application.

Planning Law requires the submission of certain information with a planning application dependent upon its type, scale and location. More detail about this can be found [here](https://www.knowsley.gov.uk/knowsleycouncil/media/Documents/Validation-Checklist-Nov-2018-Draft-for-Consult_2.pdf). Please see the validation checklist:
https://www.knowsley.gov.uk/knowsleycouncil/media/Documents/Validation-Checklist-Nov-2018-Draft-for-Consult_2.pdf

DOCUMENT	STATUS
Existing and Proposed Plans and Elevations	Essential
Existing and Proposed Site Plans	Essential
Details of proposed parking, access and bin storage arrangements	Essential
Details of Materials	Essential
Planning Statement	Essential
Social Value Strategy	Essential
Flood Risk Assessment	Essential
Retail/Leisure Statement	Essential
Ecological Surveys	Essential

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Retail/Leisure Assessment	Essential
Design and Access Statement	Essential
Heritage Assessment	Essential
Transport Assessment	Essential
Contamination surveys	Essential
Lighting Assessment	Essential
Economic Statement	Essential
Energy and Sustainability Assessment	Essential
Sustainable Drainage Strategy and Proforma	Essential
Travel Plan	Essential
Tree Survey	Essential
3D Visualizations	Desirable
A Construction Management Plan	Desirable – would reduce details needed before commencement of development.
Draft Section 106 Agreement	Desirable – would reduce details needed before commencement of development.
Details of Electric Vehicle Charging Points	Desirable – would reduce details needed before commencement of development.

Note: The risks and uncertainty associated with an application's outcome can be reduced if information requirements are met, when an application is submitted. It can alleviate the need for planning conditions requiring the submission and further approval of additional details.

The advice given here does not indicate any formal decision by the Council as Local Planning Authority. Any views or opinions are given without prejudice to the formal consideration of any planning application and are based on the details submitted, site observations and other available information sources. A formal decision on a proposal can only be given on the submission of a planning application after its full consideration, which will involve consultation with local residents, statutory consultees and any other interested parties. You should also bear in mind that any subsequent changes to

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planning legislation or planning policies may affect the advice given. The pre-application process involves engagement by both the Local Planning Authority and potential applicants and, as such, we would welcome further discussions as you consider necessary although protracted discussions may incur additional fees to be advised in advance.