

PLANNING AND DESIGN STATEMENT

AFRICA HOUSE

Knowsley Safari, Prescott, L34 4AN

September 2023

Carter Jonas

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Client: The Honourable Edward William Richard The Earl of Derby

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Africa House
Knowsley Safari, Prescott, L34 4AN

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1.0 INTRODUCTION

1.1 This Planning and Design Statement has been prepared and submitted by Carter Jonas LLP on behalf of The Honourable Edward William Richard The Earl of Derby (“the applicant”). It supports a full planning application at Knowsley Safari, Prescott, L34 4AN (hereafter referred to as the “site”).

1.2 The application seeks full planning permission for:

“The construction of a new Africa House and all associated infrastructure and engineering works”

Application Context

1.3 This Statement draws in part upon the findings of the supporting technical reports and should be read in conjunction with the accompanying application documents to provide an understanding of the proposed development, its effects and associated benefits.

1.4 The scope and nature of the application submission has been prepared in line with national and local planning application validation requirements. The following documents and plans are therefore submitted as part of the application package.

Documents

- Covering Letter (prepared by Carter Jonas LLP)
- Site Location Plan prepared by Carter Jonas
- Existing Site Plan of Proposed Africa Hoof House (Drg. No: 01)
- Proposed Site Plan of Proposed Africa Hoof House (Drg. No: 02)
- Proposed Elevations (No Cladding) (Drg. No: 04)
- Proposed Elevations (with Cladding) (Drg. No: 05)
- Proposed Ground Floor (Drg. No: 10)
- Ecological Scoping Assessment Report (prepared by Mulberry, dated 8 September 2023)
- Archaeological Desk Based Assessment (prepared by Prospect Archaeology, dated July 2023, report no KNO02-01)
- Arboricultural Impact Assessment (prepared by Aire Valley Tree Consultancy Ltd, dated 22 August 2023)
- Tree Constraints Plan (prepared by Aire Valley Tree Consultancy Ltd)
- Tree Impact Plan (prepared by Aire Valley Tree Consultancy Ltd)

1.5 This Planning Statement seeks to assess the proposal in the context of relevant material planning considerations and is structured as follows:

- Section 2: Describes the site and its surrounding context;
- Section 3: Describes the proposal;
- Section 4: Identifies the Development Plan and other material planning considerations relevant to the determination of this application;
- Section 5: Assesses the proposal in the context of the identified relevant Development Plan policies and other material considerations;
- Section 6: Summarises the planning case in support of the scheme

2.0 CONTEXT

- 2.1 This section will set out the context in which the proposal is situated by considering the application site and its surroundings, the proposal and other relevant background information.

Site and Surroundings

- 2.2 The site is located within Knowsley Safari, which is located north of Prescott, a town in the county of Merseyside. The site is located three miles south-west of St Helens town and approximately eight miles east of Liverpool City Centre. The town of Warrington is situated approximately 11 miles south-east of Prescott (less than a 30-minute drive). Manchester is situated about 28 miles east, accessible within an hour's drive.
- 2.3 Knowsley Safari is located within Knowsley Park, approximately 2,500 acres (1,011 ha) of parkland, which also contains Knowsley Hall. Knowsley Park was included on the Register of Historic Parks and Gardens of special historic interest in England at Grade II. The safari occupies one part of Knowsley Park in its south-eastern corner. It is around 200ha in extent with a primary access at Prescott Lodge, off the A58, which lies on the northern edge of the built-up area of the town of Prescott. The plan in **Figure 1** shows the location and boundary of Knowsley Park.



Figure 1: Knowsley Park

- 2.4 To the east of the safari lies Prescott Reservoir and Solar Farm. To the west and north of the Safari is the Knowsley Estate. To the south of the safari is the A58, beyond which is Prescott Secondary School and Prescott.
- 2.5 The site is located centrally within the safari, to the east of existing livestock buildings, immediately west of Park Farm.
- 2.6 The site's location plan can be seen in **Figure 2** below.

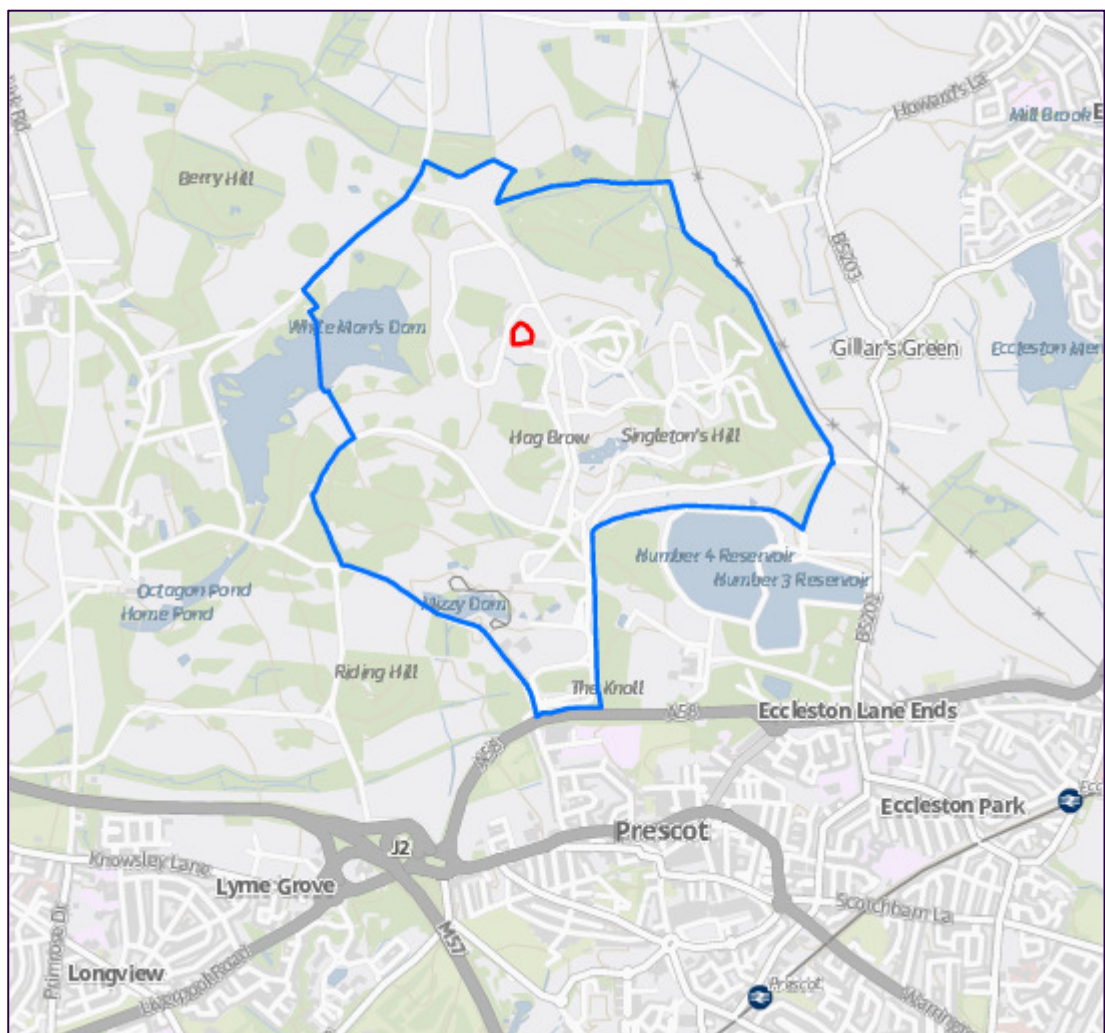


Figure 2: Site Location Plan

Designations

- 2.7 The site is not located within a Conservation Area, nor are there any ancient monuments located nearby.
- 2.8 There are no Listed Buildings on or near the site, however, as highlighted above the site is located within a Grade II registered Park & Garden, Knowsley Park, as can be seen by **Figure 3**.

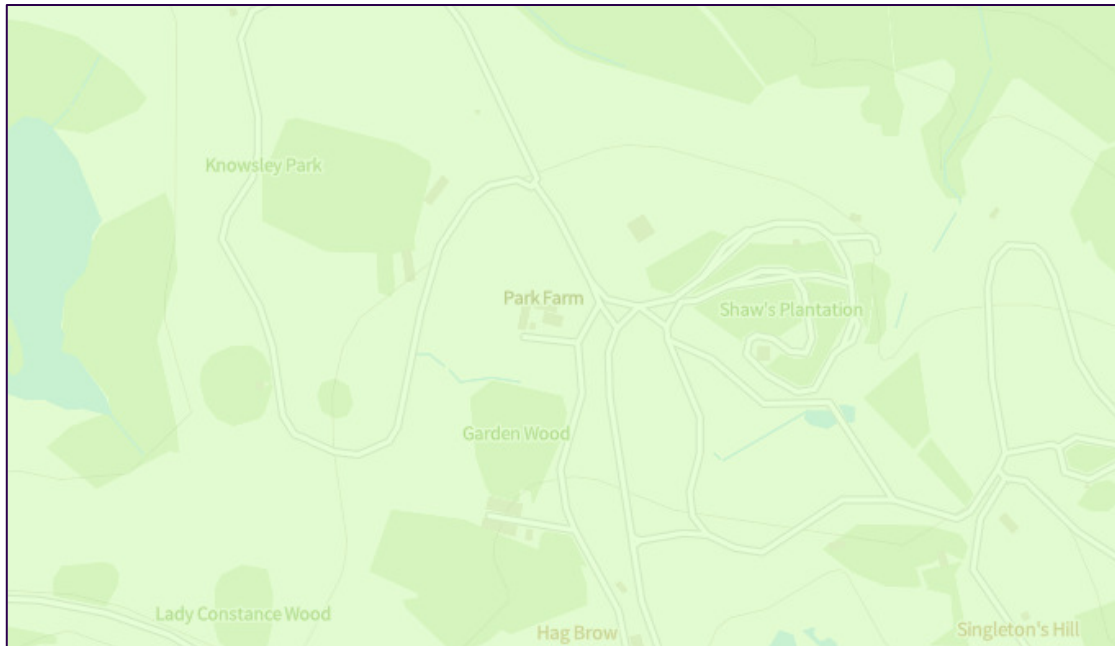


Figure 3: Extract from Historic England

- 2.9 An Archaeological Desk Based Assessment (prepared by Prospect Archaeology, dated July 2023, report no KNO02-01) is submitted support of the application and should be read alongside this report.
- 2.10 The Environment Agency Flood Risk Map in **Figure 4** shows the site falls within Flood Zone 1, the lowest risk of flooding. The definition of Flood Zone 1 is set out in National Planning Policy Guidance and is defined as land assessed as having a less than 1 in 1,000 annual probability of river or sea flooding (<0.1%).

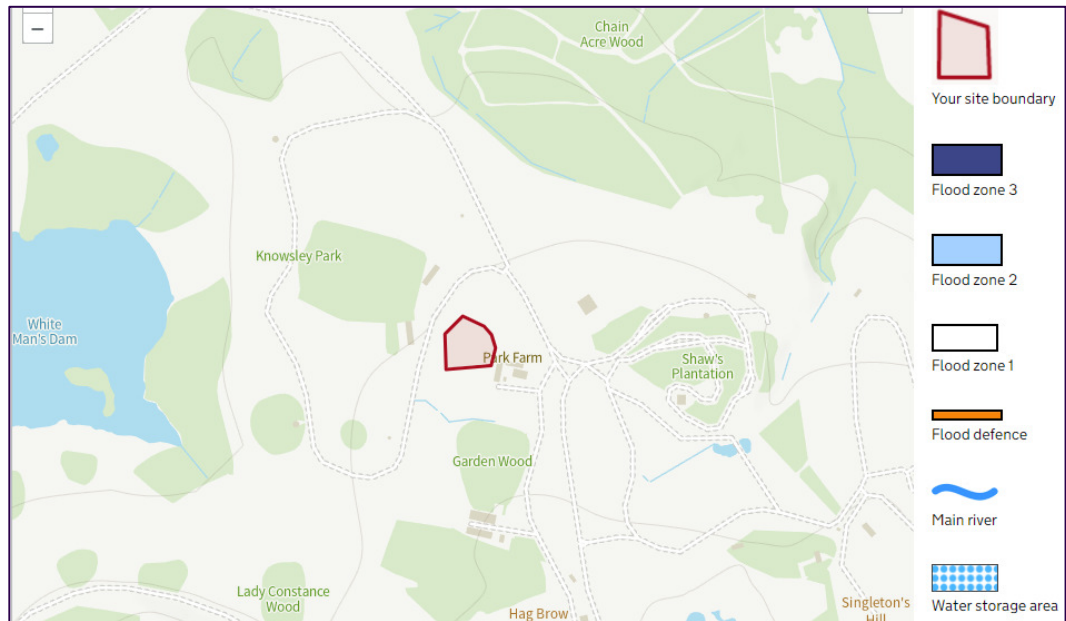


Figure 4: Extract from Environment Agency website

- 2.11 The Knowsley Local Plan Policies Map identifies that the site is situated within the Green Belt, Historic Park and Garden, and a Local Wildlife Site. An extract from the Local Plan Policies Map can be seen in Figure 5.

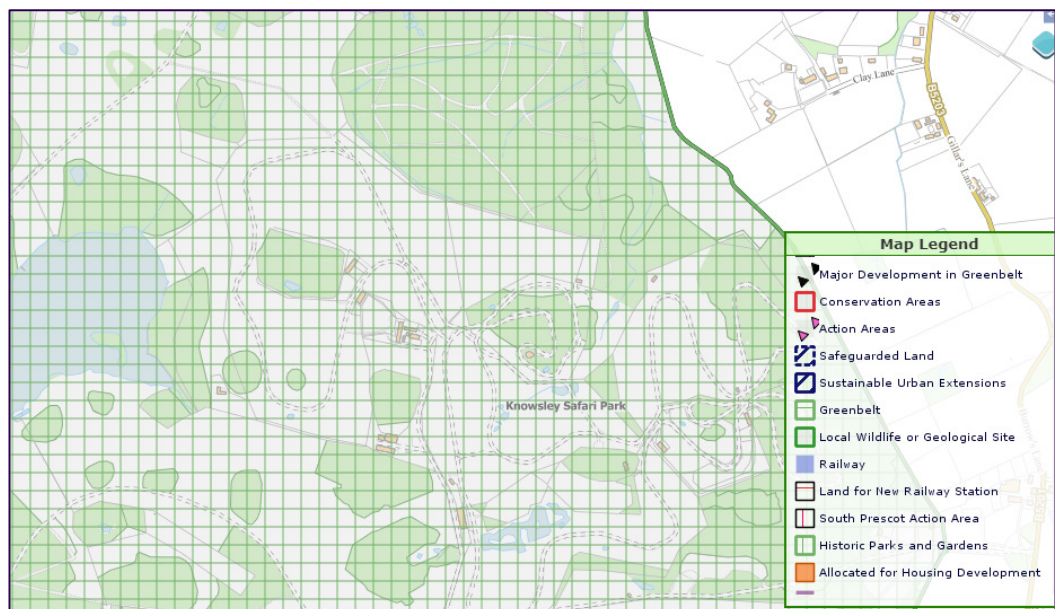


Figure 5: Extract from Knowsley Local Plan Policies Map

Planning History

- 2.12 A review of Knowsley Council's public access system has identified that Knowsley Safari has a lengthy and complex planning history. In relation to the proposed site there is no Planning History.

Pre-Application Enquiry

- 2.13 Informal discussions have taken place with John Fleming, Planning Officer at Knowsley Council in relation to the proposed development.
- 2.14 John Fleming has indicated that the Council is supportive of the proposals subject to the submission of a special circumstances case to justify development within the Green Belt and technical information.

Background to Knowsley Safari and the Proposal

- 2.15 Knowsley Safari Park opened in 1971, with the original safari drive through the park being 3.5 miles. The park became popular with tourists, and as a result the drive route was extended by 1.5 miles. It covers 550 acres of land and is now the longest safari drive in England. It has grown organically over the past 50 years, adding new attractions and animals. There are now more than 800 animals covering over 70 species.
- 2.16 Knowsley Safari operates at a local, national and international level in relation to their conservation activities. Knowsley Safari's conservation programmes are a fundamental part of the business' operation, demonstrated by its dedicated conservation, and learning and discovery teams that work to educate visitors and the wider public about the conservation of biodiversity.
- 2.17 Knowsley Safari's conservation programmes extend from local native species programmes ensuring the survival and monitoring of local wildlife populations, to active international field programmes acting with partners to save critically endangered animals, and participating in multiple Europe-wide breeding programmes that see animals regularly moved between zoos to ensure their future survival. Knowsley Safari is also active in conservation research, regularly publishing innovative and world-class research working with local and national institutions. Examples of Knowsley Safari's recent conservation programmes include leading the veterinary health care programme for reintroducing the critically endangered wild camel (*Camelus ferus*) back into the wilds of the Gobi desert in Mongolia; developing innovative drone and other remote conservation monitoring technologies on site with real-world trials in

Cambodia; and striving hard as an active partner of the red squirrel reintroduction programme, working with the local community to promote natural land bridges and population management for this charismatic species.

- 2.18 On a more local level Knowsley Safari has good connections with the wider Liverpool city region community. It has an active education programme on site that welcomes countless visits from schools.
- 2.19 It also has a charitable arm, the Knowsley Safari Foundation. One of its partnership programmes is Wild & Well, which is a fully-funded drive that has so far worked with more than 900 primary school children to connect them with nature and support their own well-being. An adult version of the programme, working with a number of local community groups has recently been launched.
- 2.20 Knowsley Safari is a key part of the visitor economy in the Liverpool City Region, attracting approximately 600,000 visitors each year, including 18,250 children on school trips. As a result, in 2021 the Park was awarded Large Visitor Attraction of the Year at the Liverpool City Region Tourism Awards. The Safari therefore brings direct and indirect expenditure to Knowsley and the City Region.
- 2.21 Knowsley Safari is a significant local employer and currently employs 83 staff. There are a further 25 employees who work within shared services (finance, HR, groundskeepers, maintenance etc) across the Safari and the Knowsley Estate. In addition, there are 45 full-time equivalent staff who are outsourced. The staff work variable hours, and on average 150 staff are 'on the books' at any given time.
- 2.22 Given the growth of the Safari Park since it opened in 1971 and the aspirations for the future, the Safari is currently reviewing its infrastructure and the investment needed to ensure that it continues to remain a key visitor attraction within the Liverpool City Region whilst complying with the zoo licensing requirements.
- 2.23 As part of this process the Safari have undertaken a proactive review of the animal species held within the Safari, their welfare needs and the existing facilities provided. The Africa Reserve forms part of the safari drive and is divided into three distinct areas which are home to 11 different species and nearly 100 animals. The review has identified several areas for improvement facing the management of hoofstock in this area which are related to paddock topography and insufficient housing, resulting in an inability to fully meet their welfare needs.

- 2.24 As part of this review, it has been established that there is an immediate need for additional modern housing to service these paddocks and the associated animals. The proposed new building is ideally located where it can service multiple paddock/reserve areas creating a centralised hub, increasing staff efficiency and ensuring high standards of animal husbandry and welfare. By creating housing with yard areas facilitates their husbandry and management, particularly in the wet and winter months. A central hoofstock facility that is not species-specific also creates a flexible building designed for a diverse range of hoofstock species, therefore future-proofing the building and allowing diversification of the animal species held at Knowsley Safari.
- 2.25 The need for the building is discussed in further detail within section 5 of this report.

3.0 THE PROPOSAL

- 3.1 This section provides a summary of the proposed development and sets out the design principles. It should be read alongside the proposed plans and other accompanying supporting information.
- 3.2 The application seeks full planning permission for:

"The construction of a new Africa House and all associated infrastructure and engineering works"

- 3.3 The proposed building is located to the west of the Park Farm within the Africa Reserve. This is central to a number of paddocks. Due to the topography of the site, existing trees and fencing the building is proposed to be located within the northern area of the existing paddock as shown on the Proposed Site plan in **Figure 6**.

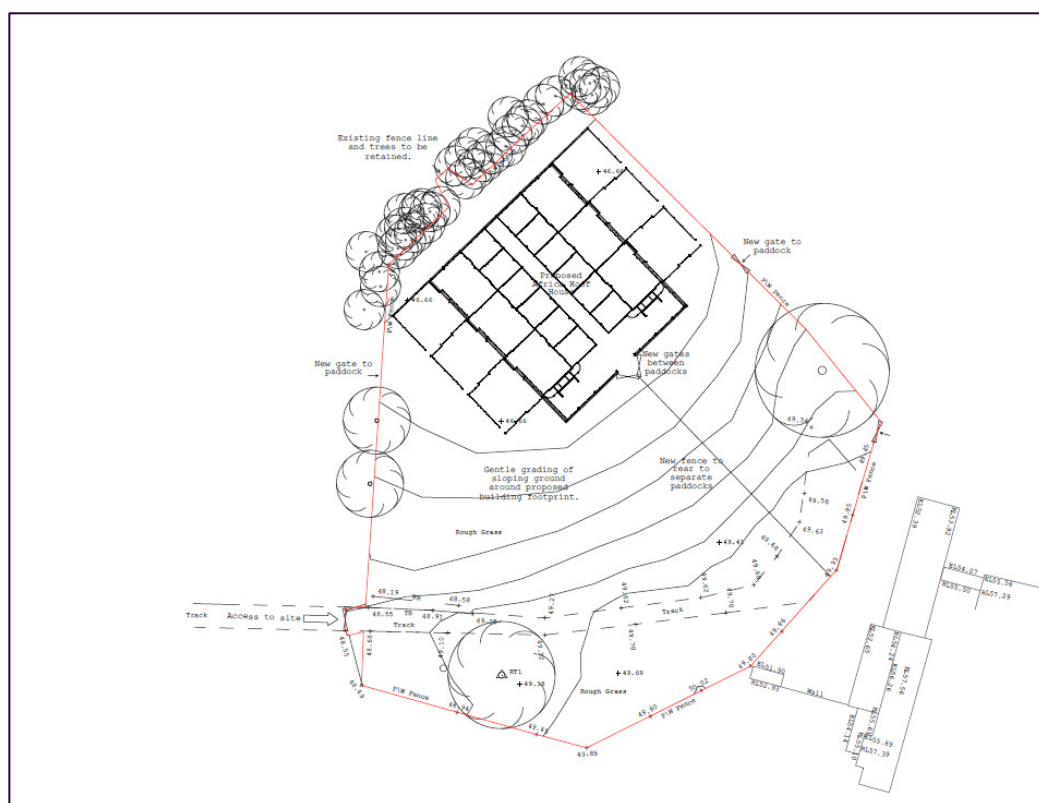


Figure 6: Proposed Site Plan

- 3.4 The building proposed is 29m in length and 24.5m in width. It has a Gross External Area of 710.5m². The external compounds are 193m² each.

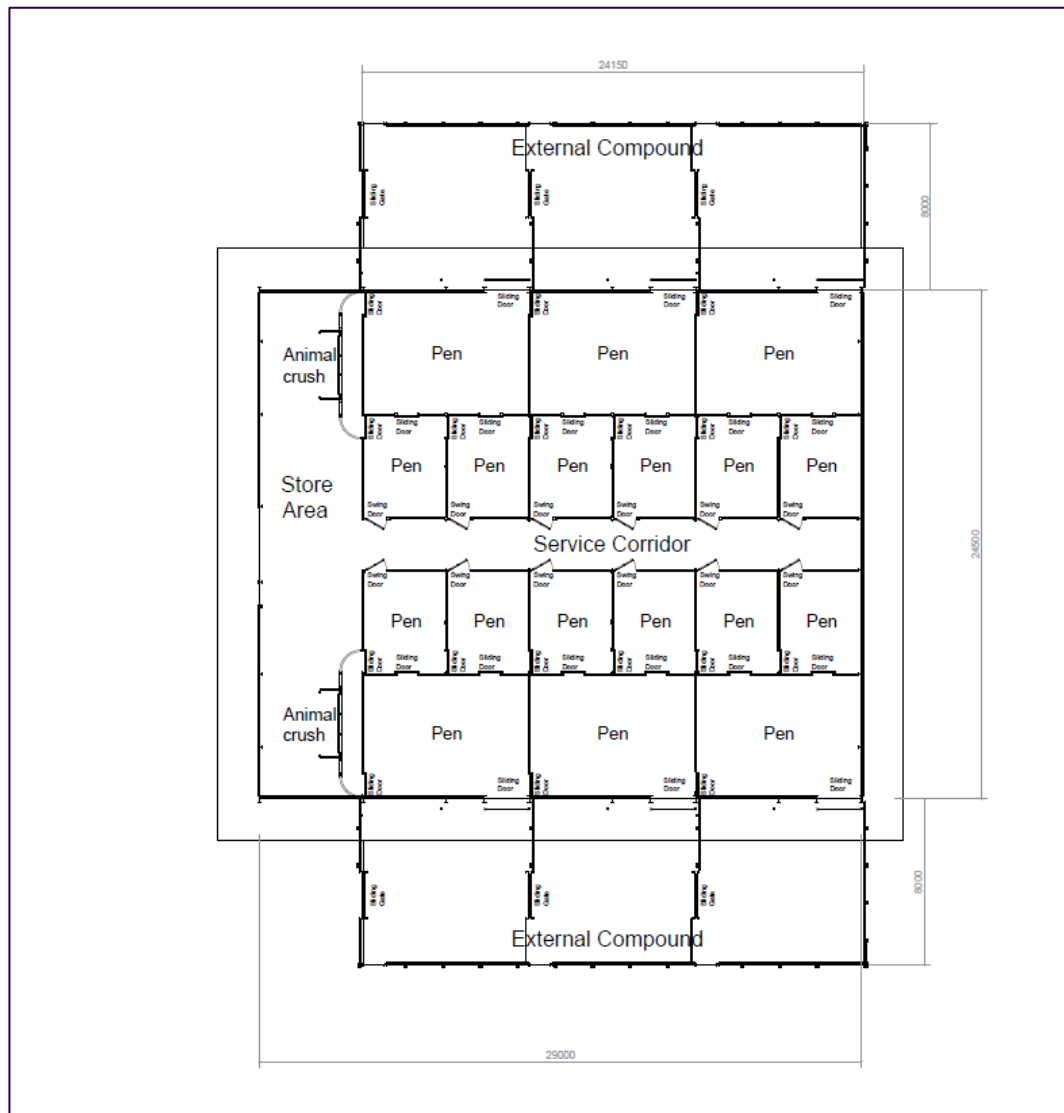


Figure 7: Internal Layout

- 3.5 The proposed Africa House has been designed to be a simple flexible agricultural building with insulation and pen systems which are suitable for multiple different species. The proposals include 18 pens which comprise of six pens of circa 56m² and 12 pens of 20m² accessed via a service corridor (see proposed internal layout). One of the pens will be designated for veterinary use for safe and effective animal weighing, training, and medical management. An internal barrier system is proposed that is safe for horned antelope (boarded with simple mesh access panels that can be uncovered where necessary).

This also creates an area where animals feel safer and secure. There will also be a restraint and handling chute for safe loading and handling of animals.

- 3.6 Off each of the larger pens there will be sand yard areas with access into paddocks to enable animals to be split off/separated. This will facilitate safe and quick movement of hoofstock between the reserve and housing but also provide an area to take animals off wet paddocks where required. The external yard areas are 36m².
- 3.7 A central storeroom is included at the front of the building for feed prep and forage storage.
- 3.8 A trailer bay is also proposed to facilitate a muck trailer which will increase staff efficiency and reduce the need to double handle muck.
- 3.9 The proposed building has a ridge height of 5.67m and eaves height of 2.67m.

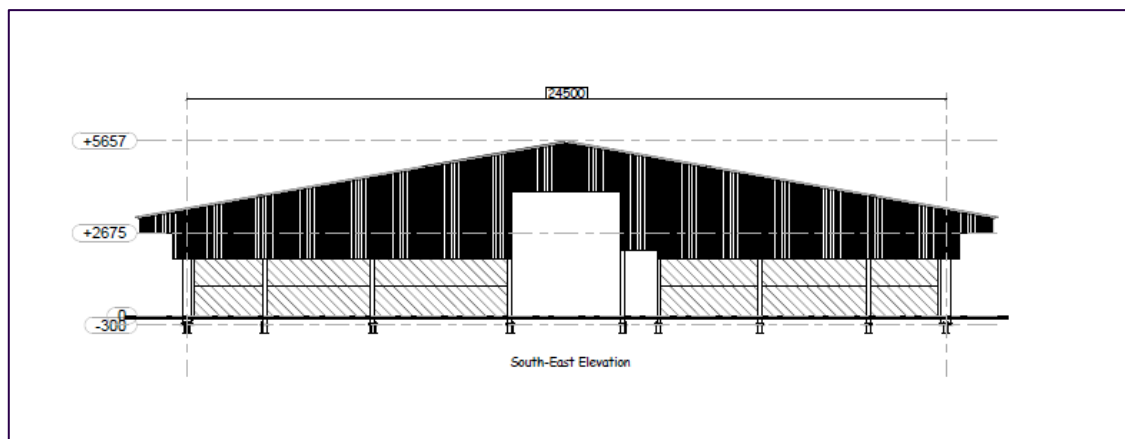


Figure 8: South East Elevation

- 3.10 The building will be constructed from a steel portal frame with composite cladding on the roof and also on the walls. The pedestrian doors will be steel, with an insulated roller shutter door to the front elevation. Rooflights will match the profile of the cladding. Fencing will be timber post and rail with intermittent castle boarding.
- 3.11 A full set of planning drawings have been submitted, accompanying the application.

4.0 PLANNING POLICY CONTEXT

- 4.1 Under Section 70(2) of the Town and Country Planning Act 1990 and Section 38(6) of the Planning and Compulsory Purchase Act 2004, the starting point for the consideration of this application is the Development Plan for the area.
- 4.2 The Development Plan for Knowsley currently comprises the Local Plan Core Strategy (2016), saved policies from the Unitary Development Plan (2006), the Joint Merseyside and Halton Waste Local Plan (2013), and any made Neighbourhood Plans. The relevant policies relating to this proposal are set out below.
- 4.3 The National Planning Policy Framework (NPPF) and associated National Planning Practice Guidance (NPG) must also be considered along with Supplementary Planning Documents. These documents provide the policy context against which any future proposals will need to be assessed.

National Policy

National Planning Policy Framework (2023)

- 4.4 The revised National Planning Policy Framework ('The Framework') published in September 2023 replaces the Framework published in July 2021. Achieving sustainable development remains a key part of the revised Framework with the presumption in favour of sustainable development (paragraph 11) remaining at the heart of the document.
- 4.5 The NPPF refers to the planning system as having 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). These consist of:
- an economic role;
 - a social role;
 - and an environmental role.
- 4.6 The weight and importance attributed to each is a matter of judgement but must be considered in the whole, not independently – the objective is that to achieve sustainable development; economic, social and environmental gains should be sought jointly and simultaneously through the planning system.

- 4.7 Emphasis on the importance of the social element of sustainable development is clearly identified at paragraph 8 of the NPPF, it states that the planning system should support:

“...strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being...”

- 4.8 Development which accords with the development plan should be approved without delay; or where the development plan is absent (not adopted) or has no relevant policy or such are out of date, permission again should be granted unless *“any adverse impacts of doing so would significantly and demonstrably outweigh the benefits”* or specific policies in the Framework indicate development should be restricted. In accordance with the approach (**Paragraph 11**), development which accords with the up-to-date development plan should be approved without delay.

- 4.9 The NPPF also considers matters of design. **Paragraph 126** states that good design is a key aspect of sustainable development. **Paragraph 130** states:

“Planning policies and decisions should ensure that developments:

- a) 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;*
- b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;*
- c) 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);*
- d) 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;*
- e) 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*
- f) create places that safe, inclusive and accessible and which promote health and wellbeing, 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”.

- 4.10 **Paragraph 134** states *development that is not well designed should be refused, especially where it fails to reflect 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. 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.*

- 4.11 **Paragraph 137** states 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.

- 4.12 **Paragraph 138** states that the Green Belt serves 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.*

- 4.13 **Paragraph 147** states the definition of inappropriate development which is defined as development harmful to the Green Belt and should not be approved except in very special circumstances.

- 4.14 **Paragraph 148** details when considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. ‘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.

- 4.15 **Paragraph 149** states that a Local Planning Authority should regard the construction of new buildings as inappropriate in the Green Belt. The paragraph goes on to list numerous exceptions to this.
- 4.16 **Paragraph 150** allows for certain other forms of development provided they preserve the openness and do not conflict with the purposes of including land within the Green Belt, some of the exceptions under paragraph 150 allow for:
- b) engineering operations*
 - d) the re-use of buildings provided that the buildings are of permanent and substantial construction*
 - e) material changes in the use of land (such as changes of use for outdoor sport or recreation, or for cemeteries and burial grounds)*
- 4.17 **Section 16** of the National Planning Policy Framework is titled 'Conserving and enhancing the historic environment' and sets out how planning authorities should endeavour to contribute to and enhance heritage assets.
- 4.18 **Paragraph 194** states local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting.
- 4.19 **Paragraph 195** states local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal.
- 4.20 **Paragraph 202** states where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weight against the public benefits of the proposal including, where appropriate, securing its optimum viable use.
- 4.21 Overall, in their decision-taking, the NPPF encourages a proactive approach by Local Planning Authorities (LPAs). LPAs should support applications where they support the local community and should work proactively with applicants to secure developments that improve the economic, social and environmental conditions of the area.

National Planning Practice Guidance (NPPG)

- 4.22 The NPPG provides further detailed guidance on the application of policies within the NPPF. In particular, there is guidance relating to the importance of good design and Green Belt issues amongst others.

Local Planning Policy

Knowsley Local Plan Core Strategy (January 2016)

- 4.23 The Knowsley Local Plan Core Strategy was adopted in January 2016. The Core Strategy is the central, overarching strategy within the Local Plan. It sets out a vision, key objectives and strategic planning policies for Knowsley up to and beyond 2028. Below is a summary of policies relevant to this proposal.
- 4.24 **Policy SD1: Sustainable Development.** This policy states that when considering development proposals, a positive approach will be taken, which reflects the presumption in favour of sustainable development contained in the NPPF.
- 4.25 **Policy CS1: Spatial Strategy for Knowsley.** This policy sets out how the spatial development of Knowsley to 2028 will be achieved. This includes a focus on development within existing urban areas, maintenance of the existing settlement hierarchy and an efficient and sustainable use of land and infrastructure. The policy also sets out the priorities for the development of Knowsley to 2028. Including re-balancing the housing stock and enhancing existing employment areas.
- 4.26 **Policy CS2: Development Principles.** This policy lists five principles, to guide both new development in Knowsley and the preparation of subsequent stages of the Local Plan.
- 4.27 **Policy CS4: Economy and Employment.** This policy sets out the overall employment development strategy, the scale and distribution of development for employment uses and their allocations, land supply for employment uses, 'town centre' employment uses, and safeguarding of existing employment land. In particular, the policy supports:
- i) Support the diversification of the rural economy; and
 - j) Support the appropriate development of tourism facilities.

- 4.28 Paragraph 5.28 identifies that the Liverpool City Region Local Enterprise Partnership has identified four key sectors which includes the Visitor Economy and states *“the Council has identified considerable scope to further develop the established tourist destination of Knowsley Safari Park and to develop new facilities, for example connected with the historic heritage of Prescot and the borough’s extensive Green Infrastructure network”*.
- 4.29 **Policy CS5: Green Belt.** This policy restricts development within the Green Belt. It states that new inappropriate development will not be permitted, except in very special circumstances in which 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.
- 4.30 **Policy CS19: Design Quality and Accessibility in New Development.** This policy sets out how to enhance the local distinctiveness, identity and accessibility of places, new development within Knowsley will be expected to address the seven criteria identified. Of relevance to this proposal are the following criteria:
- 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”*
- 4.31 The policy also includes requirements in relation to climate change and future changes in social, economic and environmental priorities, setting out how new development should integrate:
- “a) Sustainable design principles, with regard to Policy CS17: Housing Sizes and Design Standards and Policy CS22: Sustainable and Low Carbon Development as appropriate;*
 - b) Biodiversity (in accordance with Policy CS8);*
 - c) Flood risk mitigation (in accordance with Policy CS24);*
 - d) Waste recycling; and e) Energy and resource efficiency”.*
- 4.32 **Policy CS20: Managing the Borough’s Historic Environment.** This policy states that development proposals in Knowsley should preserve or enhance the borough’s historic and architectural assets, including Listed Buildings, Conservation Areas, Historic Parks and Gardens and archaeological remains, together with other local areas, buildings and structures of historic importance.
- 4.33 **Policy CS21: Greenspaces and Trees.** 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.

- 4.34 **Policy CS24: Managing Flood Risk.** This policy states that new development that may cause an unacceptable risk of flooding on the site or elsewhere will not be permitted, and that new development should preferably be located in areas of low probability of flooding. All development which affects an area of flood risk or is larger than 1 hectare in size shall be accompanied by a site-specific Flood Risk Assessment (FRA). The drainage of new development shall be designed to reduce surface water run-off rates to those associated with a green-field site by treating it at its source.

Knowsley Replacement Unitary Development Plan (UDP) Saved Policies (2006)

- 4.35 The Knowsley Replacement Unitary Development Plan (UDP) was adopted in 2006 and sets out the Council's strategy for the physical development of the Borough and sets where development is likely to take place, and which areas are to be protected from development. There are 39 UDP Policies which continue to be saved. The Local Plan Core Strategy Appendix C gives a full schedule of which UDP Policies continue to be saved. Those which are relevant to the proposed development are set out below.
- 4.36 **Saved Policy EC6: Tourism and Cultural Development.** *Proposals for new tourist and cultural facilities, extensions to or redevelopment of existing facilities and ancillary facilities will be permitted, provided that they would:*

- a) Not cause any unacceptable transport or environmental problems;*
- b) Be of a scale and type which is compatible with other land uses in the surrounding area; and*
- c) In the case of new facilities that could be located in a town centre or edge of town centre, a sequential approach to site selection has been undertaken, with suitable sites sought in town centres, edge of town centres, out of centre locations well served by public transport and only then other out of centre locations.*

- 4.37 **Saved Policy DQ4: Trees and Development.** Development proposals affecting existing trees, woodlands and other vegetation, which make positive contribution to amenity, should make provision for their retention. Applicants for planning permission will be required to provide a detailed survey of all existing trees on the site and the likely effects on them of the proposed development, as outlined in the Council's technical advice note "Trees and Development". Where the Council accepts that tree loss will

be unavoidable the applicant will be required to make adequate provision for their replacement, normally including two new trees for each tree lost. Replacement planting will take into account the number; size and species of trees lost and should contribute to the extension of tree and woodland cover across the Borough.

Supplementary Planning Documents

4.38 The following adopted Supplementary Planning Documents are considered relevant to the proposal:

- **Design Quality in New Development Supplementary Planning Document (adopted January 2016)** – this document sets out the Council's aspirations and expectations for design standards in new development.
- **Trees and Development Supplementary Planning Document (adopted June 2016)** – this document aims to assist in fully considering and justifying development proposals with regard to trees.

5.0 ASSESSMENT

5.1 This section will address the compliance of the proposed development with regard to the adopted Development Plan and other material considerations highlighted in the earlier sections. In terms of the proposal, it is considered that the principal issues relate to:

- Principle of Development;
- Design, scale and landscape impact;
- Heritage;
- Ecology and Trees; and
- Flood Risk and Drainage

5.2 These considerations are addressed in turn below.

Principle of Development

5.3 Knowsley Safari is located within an area defined as Green Belt within Knowsley Council's Local Plan. Despite being located within the Green Belt and outside the settlement boundary, the application site is located within the boundary of the existing and established safari site. Both national and local planning policy (CS5 of the Core Strategy) limit new development in the Green Belt.

5.4 The first requirement in assessing development in Green Belt is to consider the planning policy position. In this regard, national policy, included within the NPPF, confirms at paragraph 137 that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belt are their openness and their permanence.

5.5 Paragraph 138 of the NPPF sets out that Green Belt serves 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.*

- 5.6 In the Green Belt, “inappropriate development” is considered harmful to the Green Belt and should only be accepted in very special circumstances.

Green Belt Exceptions

- 5.7 The NPPF details how there is a general presumption against ‘inappropriate development’ within the Green Belt, except in ‘very special circumstances’ or unless the proposal falls within the list of exceptions detailed within paragraphs 149 and 150 of the NPPF.

- 5.8 Paragraph 149 of the NPPF relates to the construction of new buildings, which are considered to be inappropriate development in the Green Belt. The exceptions to this being:

“a) buildings for agriculture and forestry;
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;
d) the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;
e) limited infilling in villages;
f) limited affordable housing for local community needs under policies set out in the development plan (including policies for rural exception sites); and
g) limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would: – not have a greater impact on the openness of the Green Belt than the existing development; or – not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute to meeting an identified affordable housing need within the area of the local planning authority”.

- 5.9 As set out in paragraph 149 of the NPPF, exceptions exist for the provision of appropriate facilities for outdoor sport and recreation, the extension or replacement of buildings, and the partial or complete redevelopment of previously developed land.

5.10 Paragraph 150 also provides a list of exceptions to inappropriate development, with the following exceptions being most relevant to the proposed development:

- a) *“mineral extraction;*
- b) *engineering operations;*
- c) *local transport infrastructure which can demonstrate a requirement for a Green Belt location;*
- d) *the re-use of buildings provided that the buildings are of permanent and substantial construction;*
- e) *material changes in the use of land (such as changes of use for outdoor sport or recreation, or for cemeteries and burial grounds); and*
- f) *development, including buildings, brought forward under a Community Right to Build Order or Neighbourhood Development Order”*

5.11 The proposed development seeks planning permission for an Africa House for hoofstock, due to insufficient housing, resulting in an inability to fully meet the welfare needs of the animals.

5.12 In regard to the exceptions detailed within the NPPF and highlighted above, we consider that paragraph 149 (b) provides a suitable exception for the proposed development. The proposal is to provide facilities to support an existing established leisure and recreation site within the Green Belt. This exception is however subject to the proposed facilities preserving the openness of the Green Belt and not conflicting with the purposes of including land within it.

i. Preserving the openness of the Green Belt

5.13 Paragraph 137 of the NPPF identifies that openness and permanence are the two essential characteristics of Green Belts. The question therefore arises that, given this basic and over-riding context, what is the actual harm to the Green Belt – both in terms of openness and also other reasons for such designation.

5.14 The site already has a presence in the Green Belt and forms part of the safari which is a clearly defined site and area of operation/activity distinct from surrounding land. The safari is contained and enclosed. The proposed new building does not expand the safari in any undue/apparent manner either in visual terms or with respect to the general ‘openness’ of either the site or immediate/wider locality. It too is contained and enclosed.

- 5.15 The periphery of the safari is well landscaped and the proposed new building will be inconspicuous relative to surrounding vantage points. Therefore, the site is not located in a truly 'open' Green Belt location.
- 5.16 The proposed development will therefore not have a noticeable or detrimental impact in real terms on the character of this part of the surrounding Green Belt or the visual amenity of the area in line with the objectives of the NPPF.
- 5.17 The perception of any 'in principle' harm to Green Belt openness is therefore not, in reality, realised when viewed in this context.
- 5.18 It is however accepted that the proposed new building will result in the loss of openness however given the above this is limited within the immediate context and should be given only limited weight.

ii. Would not conflict with the purpose of including the site within the Green Belt

- 5.19 We acknowledge that openness is an essential characteristic of the Green Belt (NPPF paragraph 137) and that the Green Belt serves five purposes (paragraph 138).
- 5.20 As the site forms part of a wider site which is in use as a recreation and leisure facility there would be no further impact in relation to any of the five purposes set out within paragraph 138 of the NPPF and therefore it cannot be claimed to that proposal would harm the Green Belt any more than the existing development harms it.
- 5.21 We therefore consider that the proposal would have no greater impact on the purpose including this site within the Green Belt.

Conclusion on appropriate development

- 5.22 The site has formed part of an established Safari Park for over 50 years, and therefore we consider that the proposal does not constitute inappropriate development as it provides facilities for an existing established recreation and leisure facility within the Green Belt. It will have a limited impact on the openness of the Green Belt and will not conflict with the purposes of including land within it.
- 5.23 Should the Council not agree with the proposal constituting an exception, we also set out the following Very Special Circumstances. We consider that demonstrating very special circumstances would

nevertheless be beneficial to justify the need for additional facilities for the Safari, and to demonstrate that the need outweighs any potential harm by reason of inappropriateness.

Very Special Circumstances

- 5.24 Policy and guidance neither prescribe nor limits what can constitute a material consideration in such circumstances. Also, what constitutes 'very special circumstances' is imprecise. In general terms, such circumstances must be substantive/significant, clear and precise and not be easily replicated. Needless to say, it necessitates a planning judgement based upon a consideration of all possible issues.
- 5.25 It is considered that the following when considered in combination forms the basis of 'very special circumstances' in favour of the proposed development.

a) Need for the proposed development

- 5.26 The actual need for the development which is the subject of this application – a building for hoofstock on an existing recreation and leisure site within the Green Belt should be assessed against the need for, and importance of, the business as a whole and not just the new build element.
- 5.27 Given the growth of the Safari Park since it opened in 1971 and the aspirations for the future, the safari park is currently reviewing its infrastructure and the investment needed to ensure that it continues to remain a key visitor attraction within the Liverpool City Region whilst complying with the zoo licensing requirements.
- 5.28 As part of this process the safari park have undertaken a proactive review of the animal species held within the safari, their welfare needs and the existing facilities provided. The Africa Reserve forms part of the safari drive and is divided into three distinct areas which are home to 11 different species and nearly 100 animals. The review has identified several areas for improvement facing the management of hoofstock in this area which are related to paddock topography and insufficient housing, resulting in an inability to fully meet their welfare needs.
- 5.29 As part of this review, it has been established that there is an immediate need for additional modern housing to service these paddocks and the associated animals. The proposed new building is ideally located where it can service multiple paddock/reserve areas creating a centralised hub, increasing staff efficiency and ensuring high standards of animal husbandry and welfare. By creating housing with yard areas facilitates their husbandry and management, particularly in the wet and winter months. A central

hoofstock facility that is not species-specific also creates a flexible building designed for a diverse range of hoofstock species, therefore future-proofing the building and allowing diversification of the animal species held at Knowsley Safari.

b) Economic Benefit

- 5.30 As highlighted in section two Knowsley Safari is a key part of the visitor economy in the Liverpool City Region, attracting approximately 600,000 visitors each year, including 18,250 children on school trips. This brings direct and indirect expenditure to the local area and the City Region. Within paragraph 6.45 of the Knowsley Core Strategy, it is recognised that there should be support at a local and subregional level for Knowsley Safari and the need to ensure appropriate support for complementary development of an appropriate scale within this location. The supporting text in paragraph 6.62 of the Knowsley Core Strategy also highlights the support for visitor attractions at Knowsley Safari. It is therefore clear that there is support for development within Knowsley Safari which is of an appropriate scale.
- 5.31 Knowsley Safari are a significant local employer, currently employing 83 staff. There are a further 25 employees who work within shared services (finance, HR, groundskeepers, maintenance etc) across the Safari and the Knowsley Estate. In addition to this there are 45 full-time equivalent staff who are outsourced. The staff work variable hours, and on average the 150 staff are 'on the books' at any given time. It is therefore a significant local employer and from an economic perspective the proposals support an existing business and have a positive impact.
- 5.32 The business has an annual turnover of £10.2 million, therefore, providing direct and indirect economic benefits to Knowsley and the Liverpool City Region.
- 5.33 The site is therefore in active economic use, provides employment and is a well-established element/feature in the Green Belt.
- 5.34 The lack of suitable facilities for hoofstock could have the potential to impact on the business moving forwards as it could potentially result in the closure of this element of the Safari Drive, impacting revenue, the wider economy and employment.
- 5.35 In terms of policy, the proposed development is in accordance with the tone of the NPPF, which details how support should be given to enterprises in rural locations.
- 5.36 Therefore, from an economic perspective the proposals will have a positive impact.

c) Social Benefits

- 5.37 There are clear social benefits associated with the proposals in terms of impact upon the local community – the proposals will be supporting a major local employer to enable them to improve their facilities and continue to prosper.
- 5.38 Knowsley Safari has an active education programme on site that welcomes countless visits from schools within the city region. As part of this it also has a charitable arm, the Knowsley Safari Foundation. One of its partnership programmes is Wild & Well. This is a fully funded drive that has so far worked with more than 900 primary school children to connect them with nature and support their own wellbeing.
- 5.39 There is also an adult version of the programme, working with a number of local community groups, has recently been launched.
- 5.40 Without a new building within the Africa Reserve, the hoofstock element of the business may face closure which will have an impact on the educational programmes run by the Safari.
- 5.41 Therefore, from a social perspective the proposals will have a positive impact.

d) Environmental Benefits

Conservation of Animals

- 5.42 As highlighted within section 2 of this report the Knowsley Safari operates on a national and international level in relation to conservation.
- 5.43 Knowsley Safari's conservation programmes extend from local native species programmes ensuring the survival and monitoring of local wildlife populations, to active international field programmes acting with partners to save critically endangered animals, and participating in multiple Europe-wide breeding programmes that see animals regularly moved between zoos to ensure their future survival. Knowsley Safari is also active in conservation research, regularly publishing innovative and world-class research working with local and national institutions.
- 5.44 The new building is required to enable this conservation work to continue in relation to Africa hoofstock.

Biodiversity

- 5.45 The proposed development will be located in an existing paddock area making use of underutilised land which is of low ecological value in comparison to the rest of the site. In order to ensure that the development achieves a biodiversity net gain, it is proposed that new areas of grassland habitat of biodiversity value are created at the safari.
- 5.46 The combined net unit change between the development site and the mitigation site is a net increase of 0.13 Habitat units representing a 22.86% biodiversity net gain.
- 5.47 Further details are provided within the Ecological Scoping Assessment Report (prepared by Mulberry, dated 21 August 2023).
- 5.48 Therefore, from an environmental perspective the proposals will have a positive, sustainable impact.

Conclusions on Sustainability

- 5.49 It is therefore considered that the proposal meets the definition of sustainable development set out in the NPPF as it positively contributes towards all three roles encompassed within the definition of Sustainable Development.

Conclusions

- 5.50 Based on the above, there is a clear need for the development which is required to support an existing visitor attraction and local employer which contributes significantly to the economy of Knowsley, the Liverpool City Region and also local, national and international conservation projects.
- 5.51 When looked at as a whole it is evident that 'very special circumstances' exist, which in combination, clearly outweigh any harm by inappropriateness and limited harm to the openness of the Green Belt which results from the new building.

Design, Scale and Landscape impact

- 5.52 The proposed building has been designed to be a simple agricultural style building to provide flexibility with insulation and pen systems which are suitable for multiple different hoofstock. It will be 29m in length and 24.5m in width, with a Gross External Area of 711m². The proposed building has a ridge height of 5.67m and eaves height of 2.67m.
- 5.53 It will be constructed from a steel portal frame with composite cladding on the roof and also on the walls. The pedestrian doors will be steel, with an insulated roller shutter door to the front elevation. Rooflights will match the profile of the cladding. Fencing will be timber posts and rail with intermittent castle boarding. The style, materials and colour of the building will be chosen to reduce its visibility against the woodland beyond.
- 5.54 The Archaeology report prepared by Prospect Archaeology Ltd considers the archaeological and built heritage implications of a proposed new Africa Hoof House. The report highlights that the proposed building would not have a significant negative impact on the setting of the Registered Park & Garden.
- 5.55 It goes on to state that it will not dominate the landscape and would not be out of keeping with other buildings within the Registered Park and Garden. There would be no loss of planting or other historic features within the parkland and the Site does not form a part of any significant view.
- 5.56 Taking into account the above, we consider that the proposed development is consistent with Principle 4 of policy CS2 of the Knowsley Local Plan, which states that development will promote good quality design and ensure that development respects its setting taking into account relevant design requirements, and best practice. The proposal is also in accordance with Chapter 12 of the NPPF, which seeks the creation of high-quality, beautiful and sustainable buildings and places, specifically paragraphs 126, 130 and 134.

Archaeology and Heritage

- 5.57 An Archaeological Desk Based Assessment prepared by Prospect Archaeology is submitted in support of the application. The report identifies that Knowsley Safari is located within the Grade II Registered Park & Garden of Knowsley Park (NHL 1000997).

- 5.58 A park was first recorded in this location in the 13th century, owned by Robert de Lathom. Through marriage, the estate passed to the Stanleys in 1385 and has remained in the family ever since. Sir Thomas Stanley was created Earl of Derby in 1485 by Henry VIII. Throughout the medieval and early post-medieval period, Knowsley Park was a hunting park surrounded by a pale. The park was landscaped in the 17th, 18th and 19th centuries. Some of the landscape may have been designed by Lancelot 'Capability' Brown.
- 5.59 The site of the proposed Africa Hoof House is in an area formerly a stand of trees within the deer park. It had been largely cleared by the time the Safari Park was established and no trees exist within the site currently. No planting or other historic park features would be lost as a result of the proposed development, and no significant impact on the setting of the park is anticipated as a result of choice of materials, style and colour.
- 5.60 There is a low potential for as yet unidentified archaeological remains to exist, there being no archaeological sites or finds recorded in the 1km search area with the exception of two prehistoric worked flints. No further archaeological investigation is considered justified in advance of development should planning permission be granted.
- 5.61 It is considered that the proposal is in accordance with the NPPF and Core Strategy Policy CS20.

Ecology

- 5.62 An Ecological Scoping Assessment has been prepared by Mulberry in support of the application. The report identifies that the development proposals will affect approximately 1130m² area of land comprising of unmanaged modified grassland and marshy grassland.
- 5.63 The grassland habitats are not considered to be of any significant botanical value in their own right; with habitats present commonly occurring within similar areas of neglected agricultural land and areas of damp unmanaged grassland.
- 5.64 Nevertheless, such habitats are still considered to be of minor biodiversity value. The grassland habitats are likely to provide habitat for various common local wildlife including small mammals, invertebrates and birds.

- 5.65 In order to compensate for the loss of grassland habitats and to ensure that the development proposal achieves a biodiversity net gain, it is recommended that other areas of low value grassland located at the Safari are enhanced to provide replacement neutral grassland habitat.
- 5.66 An appropriate area of grassland has been identified along the side the access road leading to the main car park. This is shown as grassland habitat 2 in Figure 3 of the report.
- 5.67 Further information on this grassland habitat, its future management and biodiversity net gain calculations are provided in Section 5 of the report.

Brown Hare

- 5.68 Brown hare are present in the surrounding landscape and may be present within proximity to the proposed works area
- 5.69 It is recommended that a tidy works area is maintained throughout with any hazardous substances or materials fenced off from mammals.
- 5.70 Where any trenches or pits must be left open overnight, these should be fitted with mammal ramps or be engineered with sloping sides so that animals do not become trapped within.

Breeding Birds

- 5.71 The tall grassland habitat may be used by nesting birds during the nesting bird season (March-August inclusive). Therefore, works to clear grassland habitats should be completed outside of the breeding bird season.
- 5.72 Where this is not possible, a check for breeding birds should be carried out a maximum of 48 hours before vegetation removal by an appropriately qualified ecologist.

Bats

- 5.73 To enhance surrounding habitats for bats and nesting birds, it is recommended that bat and bird boxes are installed on retained mature trees around the perimeter of the site. These should comprise of at least 2 x tree mounted bat boxes (comprising of Schwegler 2F Bat Boxes or CJ Wildlife Large

WoodStone Bat Boxes or similar); and 2 x tree mounted bird boxes (comprising of Schwegler 1B nest boxes with 26mm entrance holes or similar).

- 5.74 The tree mounted bat boxes should be positioned on retained mature sycamore trees located around the existing perimeter fence. The boxes should be installed at a minimum height of 4m, positioned to avoid having a north facing aspect, and positioned so that the bat box entrance and bat flight lines below the entrance are not obstructed by vegetation (this may require some twigs and young branches to be removed within at least 1m beneath the bat box entrance).
- 5.75 The tree mounted bird boxes should also be positioned on mature trees around the fence. The boxes should be installed at a minimum height of 3m, located in a sheltered location and positioned so that the bird box entrances are not obstructed by vegetation.

Biodiversity Net Gain

- 5.76 In order to ensure that the development achieves a biodiversity net gain, it is proposed that new areas of grassland habitat of biodiversity value are created at the safari park.
- 5.77 An appropriate area of mitigation grassland has been identified on the access roads leading to/from the main entrance to the carparks. This is shown as Grassland Area 2 on Figure 3 of the Ecological Scoping Assessment has been prepared by Mulberry.
- 5.78 The combined net unit change between the development site and the mitigation site would therefore be a net increase of 0.16 Habitat units representing a 30.65% biodiversity net gain.

Trees

- 5.79 An Arboricultural Impact Assessment has been prepared by Aire Valley Tree Consultancy Ltd in support of this planning application. The report identifies that details for eight individual and groups of trees were recorded as part of the Tree survey. A Tree Constraints Plan included in Appendix A of the Agricultural Impact Assessment and shows the current site and its tree stock. A Tree Impact Plan, also included in Appendix A shows the current site trees and area of proposed development.
- No trees need to be removed in order to enable the development
 - Some birch trees may need to be pruned to allow post development access, but this would likely need to be undertaken whether development goes ahead or not

- Trees could be adequately protected with temporary tree protective fencing through the development. A Tree Protection Plan can be produced as a planning condition if required

5.80 It is considered that the proposal is in accordance with the NPPF, Core Strategy Policy CS21, saved UDP policy DQ4 and Trees and Development SPD.

Flood Risk and Drainage

5.81 The Environment Agency Flood Risk Map in **Figure 4** in section 2 shows the site falls within Flood Zone 1, the lowest risk of flooding. The definition of Flood Zone 1 is set out in National Planning Policy Guidance and is defined as land assessed as having a less than 1 in 1,000 annual probability of river or sea flooding (<0.1%).

5.82 In accordance with Policy, a Drainage Strategy is being prepared and will be submitted in support of the planning application.

6.0 CONCLUSION

- 6.1 This Planning Statement has been prepared on behalf of The Honourable Edward William Richard The Earl of Derby, in support of the full planning application for the erection of a new Africa House and all associated infrastructure and engineering works at Knowsley Safari, Prescott, L34 4AN.
- 6.2 The site is located within the Green Belt and a Grade II Registered Park and Garden. Whilst the majority of development in the Green Belt is deemed inappropriate, it is considered that this proposal falls within both the NPPF's remit for certain exception development and additional Very Special Circumstances can be demonstrated.
- 6.3 There is a clear need for, and notable benefits associated with the proposed new Africa House and associated infrastructure and engineering works. A review of animal species held within the safari, their welfare needs and the existing facilities has identified several areas for improvement facing the management of hoofstock which are related to paddock topography and insufficient housing, resulting in an inability to fully meet their welfare needs.
- 6.4 The development is an essential part of the safari's development to enable:
- the conservation activities which operate on a local, national and international level to continue;
 - the business to remain a key visitor attraction within the Liverpool City Region;
 - compliance with zoo licensing requirements;
 - continued education and charity programmes;
 - employment opportunities; and
 - biodiversity enhancements
- 6.5 The nature of the activity that the development facilitates has clear characteristics and benefits associated with 'sustainable development' and, as national guidance states, there should be a presumption in favour of sustainable development.
- 6.6 It is considered that the benefits identified individually amount to Very Special Circumstances and when taken together, cumulatively, they are material. Accordingly, weight can be attached to those positive aspects of the development proposal as set out above.

- 6.7 The scale, extent, location and agricultural style and nature of the proposed development on the site mitigates any other material harm being caused to the Green Belt and the basic purposes of including land in such a designation. The proposal would not give rise to unrestricted urban sprawl; result in coalescence of neighbouring towns; encroach into open countryside; or affect the setting/special character of Knowsley Park.
- 6.8 The application details, together with supporting evidence, represent an appropriate and comprehensively justified scheme that suitably addresses the policies contained in the local plan and national planning policy framework. While a balance of all the considerations needs to be made, it is considered that the application can be fully supported and we respectfully request that planning permission be granted.

