

PLANNING STATEMENT

PERIMETER FENCE

Knowsley Safari, Prescott, L34 4AN

February 2024

Carter Jonas

Date: February 2024

Client: The Honourable Edward William Richard, The Earl of Derby

Job Number: J0077344

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Project Ref:	J0077344	J0077344	J0077344
Status:	Draft	Draft	Final
Issue/Rev:	01	01a	01c
Date:	26/01/24	05/02/24	
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1.0 INTRODUCTION

- 1.1 This Planning 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 retrospective planning application at Knowsley Safari, Prescott, L34 4AN (hereafter referred to as the “site”).
- 1.2 The application seeks full planning permission for:

“Erection of a replacement perimeter fence (retrospective)”

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 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
 - Completed Application Form & Ownership Certificates (PP- 12732872)
 - Site Location Plan Prepared by Carter Jonas LLP, Dwg.No. 11
 - Fence Section Elevations Prepared by Carter Jonas LLP, Dwg.No. 5
 - Archaeological Desk Based Assessment (prepared by Prospect Archaeology, dated July 2023, report no KNO03-01)
 - Perimeter Fence Specification Details and Photos
- 1.5 This Planning Statement seeks to assess the proposal in the context of relevant material planning considerations and is structured as follows:
- 1.6 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 Knowsley Safari 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 southeast 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 southeastern corner. It is around 494.2 acres (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.



Figure 1: Knowsley Park Location

- 2.4 To the east of Knowsley 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 perimeter fence which relates to this application encompasses Knowsley Safari from Prescott Lodge in the north around Mizzy Darn to the margins of Chain Acre Wood and is shown in red on the Site Plan in **Figure 2** below.



Figure 2: Site Plan



Figure 2: Site Location Plan Key

Designations

- 2.6 The site is not located within a conservation area, nor are there any ancient monuments located nearby.
- 2.7 There are no listed buildings on or near the site, however the site is designated as a Historic Park and Garden. As shown below in **Figure 3**, the site is located within Flood Zone 1 (lowest probability of flooding)

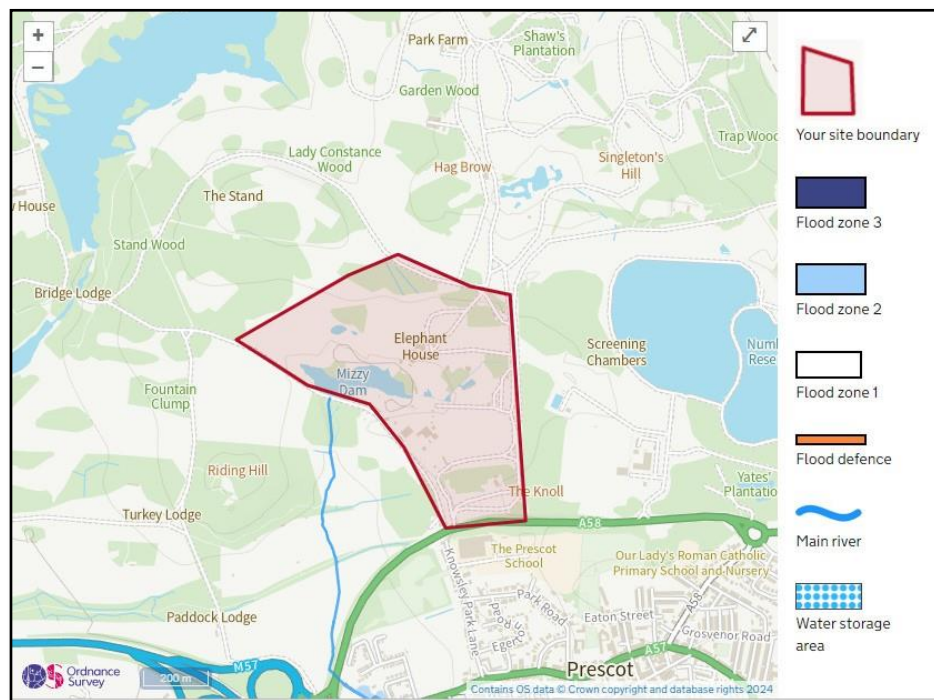


Figure 3: Extract from Environment Agency website

- 2.8 Within the Knowsley Local Plan, the site is situated within the Green Belt, a Historic Park and Garden and a Local Wildlife Site. The site's designations can be seen in the extract from the Knowsley Local Plan Policies Map in **Figure 4**.

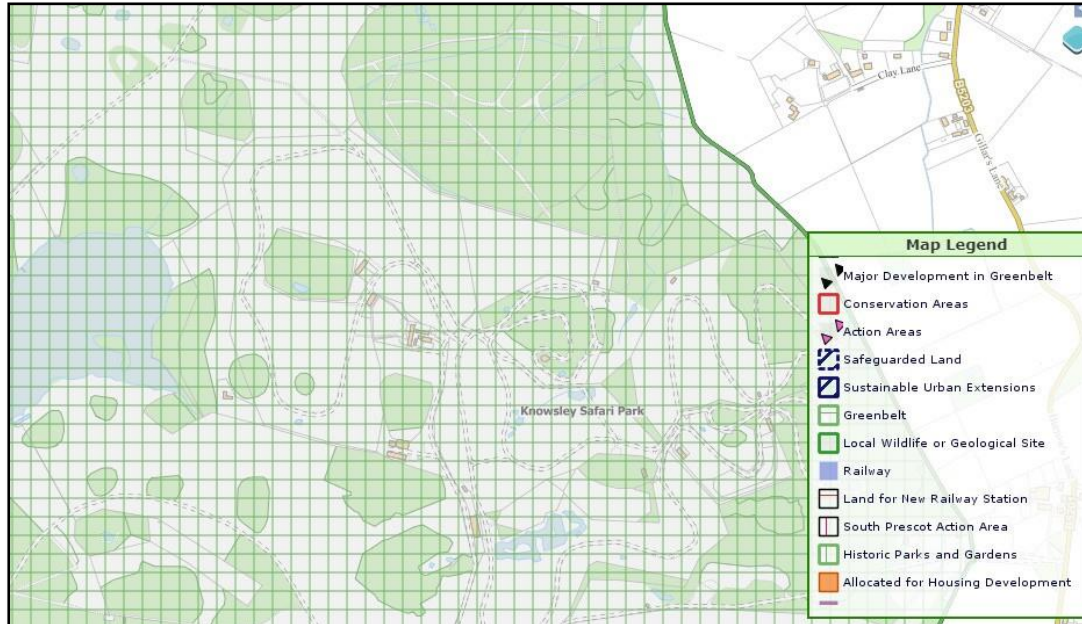


Figure 4: Extract from Knowsley Local Plan Policies Map

Planning History

- 2.9 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 location of the retrospective fencing there is no Planning History.

Background to the Proposal

- 2.10 Knowsley Safari opened in 1971 and since this time it has grown with limited investment in infrastructure.
- 2.11 It 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 and supports a considerable number of jobs.
- 2.12 The Safari 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 to this there are 45 full-time equivalent staff who are outsourced. The staff work variable hours and on average have 150 staff 'on the books' at any given time. It is therefore a significant local employer.

- 2.13 Given the growth of the Safari since it opened in 1971 and the aspirations for the future, the Safari is currently reviewing the infrastructure and investment needed to ensure that they continue to remain a key visitor attraction within the Liverpool City Region and comply with the Zoo Licensing requirements.
- 2.14 During the zoo licence inspection on the 7th and 8th September 2021 the zoo was found to have deficiencies in multiple areas of the perimeter fence where it was either missing or damaged and consequently breached and thus inadequate. The inspection highlighted that the zoo failed to comply with the following licence condition: *“Condition 1 The operator of the Zoo must ensure that the following measures are implemented in the Zoo: -preventing the escape of animals and putting in place measures to be taken in the event of any escape or unauthorised release of animals.”*
- 2.15 A direction was issued on 10th November 2021 requiring Knowsley safari to meet the requirements of this condition. To meet the requirements of condition 1 and comply with Section 8.29 of the SSSMZP (2012) and Section 1A(d) of the ZLA 1981 needed to ensure Knowsley must ensure that the perimeter boundary, including access points must be designed, constructed and maintained to discourage unauthorised entry and so far as is practical as an aid to the confinement of all the animals in the zoo. These actions must be completed within 2 years from the date on which this direction comes into effect (8th December 2021).
- 2.16 As result, the Safari have undertaken a proactive review of the perimeter fencing. It was identified that there were sections of fencing which required immediate replacement. The fencing and installation of automatic gates commenced in June 2022 was completed during 2023.

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 accompanying supporting information.

3.2 The application seeks full planning permission for:

“Erection of a replacement perimeter fence (retrospective)”

3.3 The section of the perimeter fence to which this application relates is shown in red on the Site Plan, Dwg. No. 11, provided in **Figure 5** below for reference.

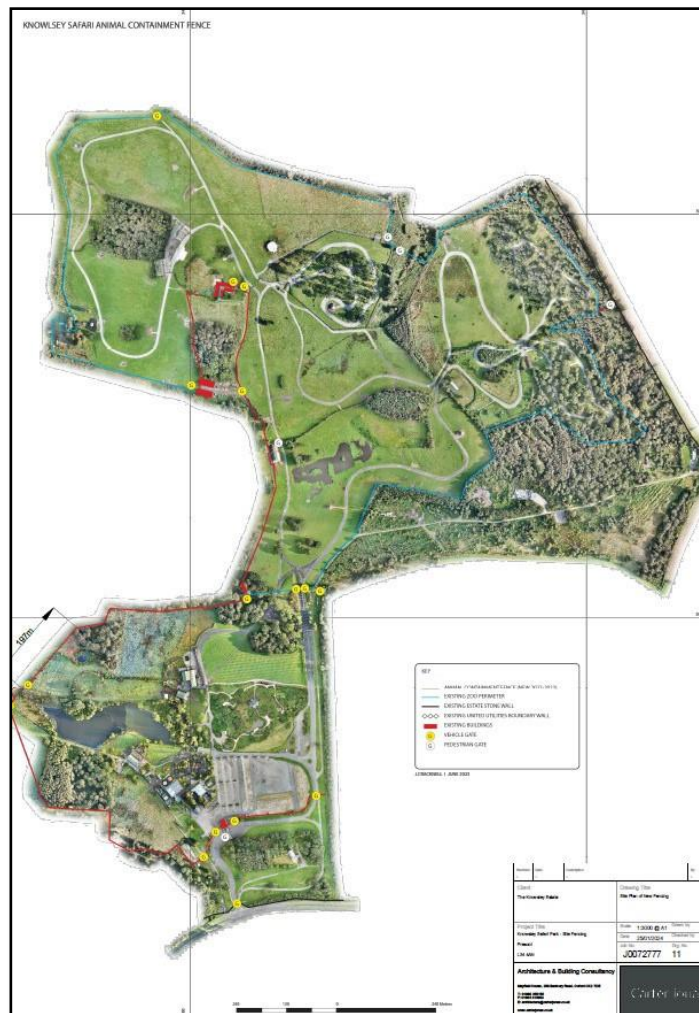


Figure 5: Site Plan

- 3.4 This section of the fence replaced a smaller older perimeter fence that was inadequate in terms of size and operational requirements, the new existing fence improves the safety and security of the animals, visitors and staff.
- 3.5 The new perimeter fence covers approximately 2,974 metres and includes a total of 1,310 posts. The fence predominantly comprises a 2.8m tall panel system fence (sections A to I on the Site Plan, Dwg. 11) however there is one section (J) of post and deer fencing which is 2.4m in height. Details of the fence panels are provided on the Elevations, Dwg. No. 05 and are provided in **Figure 6** below.

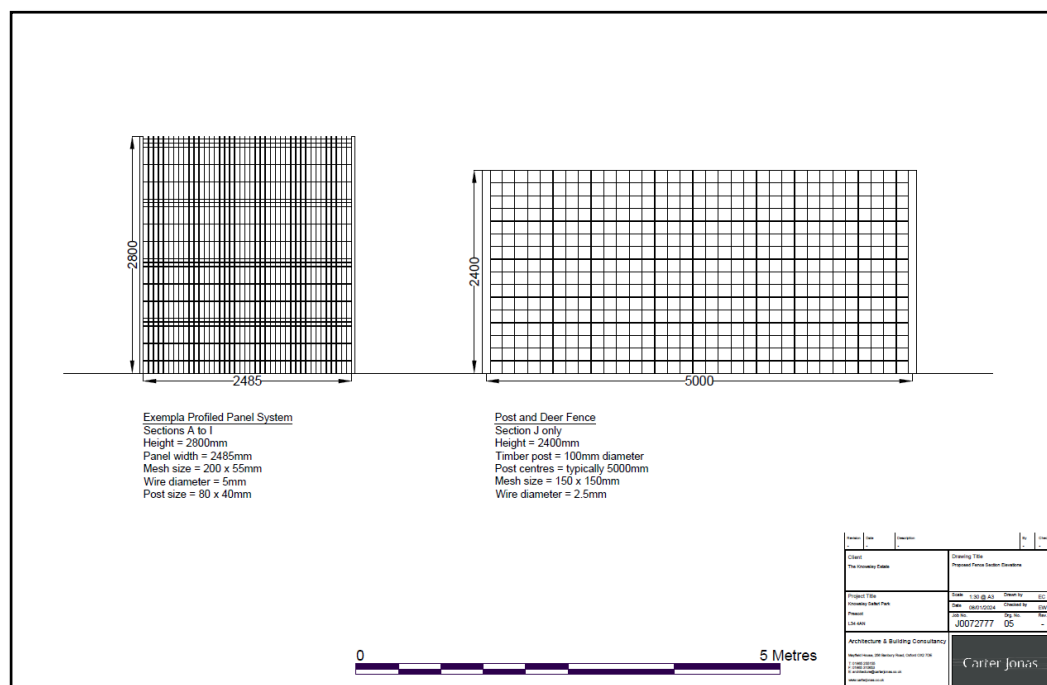


Figure 6 : Fence Section Elevations

- 3.6 The Site Plan highlights the location of vehicle and pedestrian access gates.
- 3.7 Photographs of the sections of the fence accompany the application.
- 3.8 A full set of plans and 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) (December 2023) and associated Guidance (NPG) must also be considered. These documents provide the policy context against which any future proposals will need to be assessed.

National Policy

National Planning Policy Framework (December 2023)

- 4.4 The revised National Planning Policy Framework ('The Framework') was revised on 19th December 2023 in response to the Levelling-up and Regeneration Bill: reforms to national planning policy consultation. 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. 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 a well-designed,

beautiful and safe built environment 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 **Paragraph 142** 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.

Paragraph 143 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.

4.10 **Paragraph 152** 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.

4.11 **Paragraph 153** 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.

Paragraph 155 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)

- 4.12 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.
- 4.13 **Paragraph 200** 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.
- 4.14 **Paragraph 206** 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.
- 4.15 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)

- 4.16 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

- 4.17 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 the relevant policies.
- 4.18 **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.
- 4.19 **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.
- 4.20 **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.

- 4.21 **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.
- 4.22 **Policy CS5: Green Belt.** This policy outlines the restrictions of development within the Green Belt. It states that new inappropriate development will not be permitted, except in very special circumstances. It also states that limited infilling and redevelopment of Major Previously Developed Sites in the Green Belt is considered appropriate provided it would not have a greater impact upon the openness of the Green Belt and the purposes of including land within it. It goes on to discuss that a number of locations have been removed from the Green Belt to accommodate development needs up to and beyond 2028.
- 4.23 **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.
- 4.24 **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.

The Knowsley Replacement Unitary Development Plan (UDP) (adopted in 2006)

- 4.25 **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.
- 4.26 **Saved Policy G5: Existing Major Developed Sites in the Green Belt.** Proposals for the limited infilling or redevelopment of the major developed sites identified on the Proposals Map will be considered appropriate in principle provided they meet a number of criteria, including having no greater impact on the openness of the Green Belt or purposes of including land in it and preferably have less.

- 4.27 **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.

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
- Archaeology and Heritage

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 limit new development in the Green Belt.

The first requirement of assessing development in Green Belt is to consider the planning policy position. In this regard, national policy, included within the NPPF confirms at Paragraph 142 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.

5.4 Paragraph 143 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.

5.5 In the Green Belt, “inappropriate development” is considered harmful to the Green Belt and should only be accepted in very special circumstances (paragraph 147 of the NPPF).

Green Belt Exceptions

5.6 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 154 and 155 of the NPPF.

5.7 It is considered that the proposal does not fall under any of the exceptions listed within paragraphs 154 and 155 of the NPPF and therefore very special circumstances need to be demonstrated to outweigh the harm resulting from the proposal.

Very Special Circumstances

- 5.8 Policy and guidance neither prescribe nor limit 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.

Need

- 5.9 The actual need for the new fence which is the subject of this application, on an existing established 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.
- 5.10 The Safari opened in 1971 and since this time it has grown organically over the past 50 years with limited investment in infrastructure. The Safari is therefore currently reviewing the infrastructure and investment needed to ensure that they continue to remain a key visitor attraction within the Liverpool City Region and comply with the Zoo Licensing Requirements.
- 5.11 During the zoo licence inspection on the 7th and 8th September 2021 the zoo was found to have deficiencies in multiple areas of the perimeter fence where it was either missing or damaged and consequently breached and thus inadequate. The inspection highlighted that the zoo failed to comply with the following licence condition: *"Condition 1 The operator of the Zoo must ensure that the following measures are implemented in the Zoo: -preventing the escape of animals and putting in place measures to be taken in the event of any escape or unauthorised release of animals."*
- 5.12 A direction was issued on 10th November 2021 requiring Knowsley safari to meet the requirements of this condition. To meet the requirements of condition 1 and comply with Section 8.29 of the SSSMZP (2012) and Section 1A(d) of the ZLA 1981 needed to ensure Knowsley must ensure that the perimeter boundary, including access points must be designed, constructed and maintained to discourage unauthorised entry and so far as is practical as an aid to the confinement of all the animals in the zoo. These actions must be completed within 2 years from the date on which this direction comes into effect (8th December 2021).
- 5.13 As result, the Safari have undertaken a proactive review of the perimeter fencing. It was identified that there were sections of fencing which required immediate replacement. The fencing and installation of automatic gates commenced in June 2022 was completed during 2023.

Economic and Social Benefit

- 5.14 As highlighted in section two, the 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.
- 5.15 The Safari is 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 there are 150 staff 'on the books' at any given time. Knowsley Safari is therefore a significant local employer and from an economic perspective the proposal supports an existing business.

- 5.16 The business has an annual turnover of £10.2 million, therefore providing direct and indirect economic benefits to Knowsley and the Liverpool City Region.
- 5.17 The site is in active economic use, provides employment and is a well-established element/feature in the Green Belt.
- 5.18 The lack of a suitable perimeter fence could have the potential to impact on the business moving forward as it could potentially result in the closure of the Safari, impacting revenue, the wider economy and employment.
- 5.19 In terms of policy, the proposed development is in accordance with the tone of the NPPF and details how support should be given to enterprises in rural locations.
- 5.20 There are clear benefits associated with the proposals in terms of impact upon the local community in maintaining a local employer. The proposal, on an existing site within the Green Belt, also follows the principles of creating a high quality built environment. Therefore, from a social perspective the proposals have a positive impact.

Harm to the Green Belt

- 5.21 The periphery of the safari is well landscaped and the proposed fence is not considered to present a significant impact on the setting of the parkland. 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.
- 5.22 The perception of any 'in principle' harm to Green Belt openness is therefore not, in reality, realised when viewed in this context.

Conclusions

- 5.23 When looked at as a whole, it is evident that 'very special circumstances' exist, which in combination, clearly outweigh the harm by inappropriateness and marginal actual harm to the Green Belt (paragraph 153 of the NPPF) discussed above.
- 5.24 Based on the above, there is a clear need for the proposal which supports an existing visitor attraction and aligns with UDP Saved Policy EC6 and Policy CS4 of the Knowsley Core Strategy and will support and sustain the operational efficiency of the Safari over the longer term. The 'very special circumstances' required for both National and Local Planning Policy to justify the development of the Green Belt is therefore in the Applicant's view demonstrated in this case.

Archaeology and Heritage

- 5.25 An Archaeological Desk Based Assessment prepared by Prospect Archaeology dated July 2023 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).
- 5.26 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.
- 5.27 The fence route extends from the safari entrance at the southern end, passing south, then west and north of Mizzy Dam to climb over Hag Brow to the east side of Park Farm then turning west along the north side of the farm and back south to the hay barns south of Garden Wood.
- 5.28 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.
- 5.29 For the majority of the fence's route, it blends into the landscape and does not stand out as incongruous within the historic landscape. There are few built heritage features with which it shares a view and where there are, it does not present a negative impact on the heritage asset. It is undoubtedly more visible in the landscape across open ground, and as such it does form a more visible demarcation between the Safari and the remainder of Knowsley Park. However, it is also recognised that an animal containment fence was in place when the park was designated.
- 5.30 The style of fencing, whilst more prominent than the standard agricultural form previously in place, is not out of keeping in the wider landscape and is not considered to present a significant impact on the setting of the parkland.
- 5.31 It is considered that the proposal is in accordance with the NPPF and Core Strategy Policy CS20.

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 perimeter fence (retrospective) at Knowsley Safari, Prescott, L34 4AN.
- 6.2 The site is located within the Green Belt and a Grade II Registered Park and Garden. It is considered that very special circumstances can be demonstrated in relation to the need for the perimeter fence to ensure the safety of visitors, staff and also animal welfare together with supporting the continued operations of the Safari which plays an important role in the wider Liverpool City Region economy. It is considered that these special circumstances outweigh any harm to the Green Belt.
- 6.3 The proposed fence would not be out of keeping in the wider landscape and is not considered to present a significant impact on the setting of Knowsley Park Registered Park and Garden.
- 6.4 As such, we consider that the proposal is acceptable when measured against local and national planning policies, and that there are no material planning considerations that would support refusal of the application. Therefore, we consider that the application can be supported and we respectfully request that planning permission be granted.

