

Planning & Heritage Addendum Note – Heritage Impacts & Wider Planning Balance

**Land east of Knowsley Lane, Knowsley Village
(App Ref: 25/00486/OUT)**

On behalf of Hallam Land Management Ltd

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1. Introduction

- 1.1. This addendum Planning & Heritage Note has been prepared to clearly set out the applicant's position in respect of the heritage impacts of the proposed scheme and consideration in the wider planning balance, which was an agreed action following a meeting between the applicant, LPA and Growth Lancashire on 20th May 2026.
- 1.2. The meeting was convened to discuss additional heritage evidence provided by the applicant on 30th April 2026 (See **Appendix 1**), including photomontages from the Croxteth Lodge approach drive to the south, and photography from Stanley Grange Business Park (former Home Farm) to the east. This supplemented an initial Heritage Rebuttal and photomontages provided on 27th January 2026 (See **Appendix 2**).
- 1.3. This evidence considered the proposed mitigation, comprising increased planting around the southern and eastern boundaries of the site, with the Croxteth Lodge approach and Home Farm respectively, within a 20m deep landscape buffer; against alternative scenarios on the southern edge only, of an increased landscape buffer at 30m, 40m and 60m¹.
- 1.4. Our conclusions from this exercise, as reported at the 20th May meeting, were that based on the existing baseline conditions and intervisibility with the enhanced landscape screening proposed, the proposed 20m development buffer remains entirely acceptable, and would cause:
 - **less than substantial harm** to the Grade II* Listed Knowsley Hall and the Grade II Listed Knowsley Park Registered Park and Garden (specifically a small part of the Croxteth Lodge approach to the Hall), **at the low end of the scale of harm**.
 - **less than substantial harm** to the significance of the Curtilage Listed Home Farm, **at the low to middle range of the scale of harm**.
- 1.5. We also concluded that any increased landscape buffer (between 20 and 60m) would provide no more than a limited visual or character benefit in heritage terms, and that this benefit would be outweighed by the associated negative impacts of reducing the developable area in terms of reduced market and affordable housing delivery, reduced economic benefits and inefficient use of land.
- 1.6. Accordingly, it is our position that we accept a level of heritage harm from the development as proposed (including the 20m deep landscape buffer), with our conclusions on harm as per Table 1 of our Heritage Rebuttal (at Appendix 2), which are repeated over the page, and would like the Council to confirm their position; such that this can be considered in the wider planning balance alongside the benefits of 'the Scheme', which we address in section 3.

¹ All photomontages were undertaken on a 'worst case scenario' basis using professional landscape judgment in line with the Landscape Institute Technical Guidance Note 06/19 (as set out on pages 5 and 6 within the photomontage documents).

Table 1.1: The position of Pegasus Group and Growth Lancashire, concerning the heritage assets identified as having the potential to be affected by the proposals.

Heritage Asset:	Pegasus Group Position:	Growth Lancashire Position:
Grade II* Listed Knowsley Hall	Less than substantial harm, at the low end of the scale of harm	<i>"Low to moderate less than substantial harm"</i>
Grade II Listed Knowsley Park Registered Park and Garden	Less than substantial harm, at the low end of the scale of harm	<i>"Moderate to high level of less than substantial harm"</i>
Curtilage Listed Parkland Wall	Less than substantial harm, at the low end of the scale of harm	<i>"Low level less than substantial harm"</i>
Curtilage Listed Home Farm	Less than substantial harm, at the low to middle range of the scale of harm	<i>"Moderate level of less than substantial harm"</i>
Curtilage Listed Home Farm Lodge	Less than substantial harm, at the low to middle range of the scale of harm	<i>"Moderate to high level of less than substantial harm"</i>
Curtilage Listed Ormskirk Lodge	No harm	<i>"Low level of less than substantial harm"</i>
Curtilage Listed Croxteth Lodge	No harm	<i>"Low to moderate less than substantial harm"</i>
Grade II Listed Littlewood Lodge	No harm	<i>"Negligible level of harm"</i>
Grade II Listed Croxteth Park Registered Park and Garden	No harm	<i>"Low level of less than substantial harm"</i>
Knowsley Conservation Area	Less than substantial harm, at the low end of the scale of harm	<i>"Low less than substantial harm"</i>

2. Heritage Policy Context

- 2.1. This section summarises the heritage guidance and case law relevant to the Scheme.

Heritage considerations in Safeguarded Land designation

- 2.2. As noted in the Planning Statement, the site was removed from the Green Belt in January 2016 through the adoption of the Knowsley Local Plan Core Strategy, where it formed part of a wider land parcel safeguarded to meet the development needs of the borough post 2028, and comprises the only such 'safeguarded land' parcel in the plan as set out in Policy SUE1. The safeguarded area as a whole measures 58.9 hectares and is identified for residential development with a notional capacity of 1,093 dwellings.

- 2.3. This safeguarded site was subject to detailed technical assessment through the Local Plan process, with the Inspectors report noting in respect of heritage impacts:

105. The impact of development on the setting of the Grade II designated historic park and garden would be very limited because the wall and tree belt which define the boundary of Knowsley Park provide a strong physical and visual barrier. To allow an appreciation of the wall and to respect the setting of the heritage asset I would expect some separation to be maintained between the wall and any housing, perhaps in the form of a residential road or a strip of open space, but this is a detailed design matter to be addressed at a future stage. I note that Historic England has not objected to the proposed safeguarding and, in applying the policy of the Framework, the very limited ('less than substantial') harm to the significance of the asset is outweighed by the benefit of land which has the potential to provide new homes in an area where suitable land is very difficult to find. Similar considerations apply to the setting of Knowsley Village Conservation Area, which abuts the northern tip of the safeguarded land² – any impact would be slight, particularly at the low density envisaged³, and would be outweighed by the provision of housing. There is no compelling evidence that the setting of the listed buildings within Knowsley Park or Knowsley village would be harmed by the development. (my emphasis)

- 2.4. This confirms that the whole site was considered suitable for development in heritage terms with the benefits of development considered to outweigh the 'very limited ('less than substantial') harm'.
- 2.5. The Inspector's Report also notes above that the setting of the heritage asset and the appreciation of the wall would be maintained through the provision of a separation buffer

² It should be noted that this northern tip of the safeguarded land is outside the current application boundary which only covers the southern section of the safeguarded land and does not directly abut the Conservation Area with the nearest part being circa 100m north of the north west corner of the site on Knowsley Lane.

³ The application Scheme proposes a gross density of 20.5 dph which relatively low in line with the Inspector's Assessment.

between the wall and housing – just as has been provided within the parameters plan proposed for the Scheme.

- 2.6. This paragraph from the Inspector’s Report is an important consideration as it sets out clearly that an Inspector has reviewed this Site and its heritage constraints and concluded that in principle, the development of this Site for residential is acceptable in terms of the planning balance in relation to heritage assets.

Consideration of weight to be given to harm to designated heritage assets

- 2.7. There was discussion (at the meeting on 20th May 2026) about the weight to be given to harm to designated heritage assets in the planning balance. It is the case that for this Scheme, harm has been identified by all parties to the Grade II Registered Park and Garden of Knowsley, an asset of less than the highest significance as defined by the National Planning Policy Framework (NPPF), and Home Farm, a curtilage listed building.
- 2.8. Importantly, and ultimately, this harm is acknowledged by all parties as being less than substantial. Therefore, from a policy point of view, it is paragraph 215 of NPPF against which the proposals should be assessed with the harm being required to be weighed against the public benefits, the range of which are detailed at paragraph 8 of NPPF – i.e. the totality of the social, economic and environmental benefits should be considered in the planning balance.
- 2.9. It is acknowledged that there is a small level of discrepancy with regards to the level of harm to the Knowsley RPG and Home Farm that is considered to result from the Scheme between the applicant and Growth Lancashire. Related to this point is the matter regarding the level of weight to be given to harm to designated heritage assets. It is useful to consider what case law has set out about how this is to be approached.
- 2.10. The matter of weight to be given in the planning balance is a matter entirely for the decision-maker.
- 2.11. The Barnwell Manor Court of Appeal judgment (*Barnwell v. East Northamptonshire DC, English Heritage, National Trust and Secretary of State, EWCA Civ 137 (2014)*) made it clear that it was the intention of Parliament when enacting S66 (of the Planning (Listed Buildings and Conservation Areas) Act 1990) that decision-makers should give considerable importance and weight to the desirability of preserving the setting of listed buildings when carrying out the balancing exercise. That is, where harm is found to a designated asset, they are not free to give such weight as they please but must give the desirability of preserving the setting considerable weight.
- 2.12. Further guidance on this matter was set out in the 2014 High Court Case of Forge Field (The Queen (on the application of The Forge Field Society, Martin Barraud, and Robert Rees v. Sevenoaks DC, EWHC 1895 (Admin) (2014)) where at paragraph 48 & 49 it states:

“48 When an authority finds that a proposed development would harm the setting of a listed building or the character or appearance of a conservation area, it must give that harm considerable importance and weight.

49. This does not mean that an authority’s assessment of likely harm to the setting of a listed building or to a conservation area is other than a matter for its own planning judgment. It does not mean that the weight the authority should give to

harm which it considers would be limited or less than substantial must be the same as the weight it might give to harm which would be substantial. But it is to recognize, as the Court of Appeal emphasized in Barnwell, that a finding of harm to the setting of a listed building or to a conservation area gives rise to a strong presumption against planning permission being granted. The presumption is a statutory one. It is not irrebuttable. It can be outweighed by material considerations powerful enough to do so."

- 2.13. This was further clarified in the Court of Appeal judgement of *Palmer v Herefordshire Council & Anor* [2016] EWCA Civ 1061 at paragraph 5 of the judgment it states:

"The degree of harm (if any) is a matter of judgment for the decision maker, but if the decision maker decides that there is harm, he is not entitled to give it such weight as he thinks fit. To the contrary he must give it considerable weight: East Northamptonshire DC v Secretary of State for Communities and Local Government [2014] EWCA Civ 137, [2015] 1 WLR 45 at [22]. However, this does not mean that the weight that the decision maker must give to the desirability of preserving the building or its setting is uniform. It will depend on, among other things, the extent of the assessed harm and the heritage value of the asset in question." (my emphasis)

- 2.14. At paragraph 34 it goes on:

"It is also clear as a matter both of law and planning policy that harm (if it exists) is to be measured against both the scale of the harm and the significance of the heritage asset. Although the statutory duty requires special regard to be paid to the desirability of not harming the setting of a listed building, that cannot mean that any harm, however minor, would necessarily require planning permission to be refused." (my emphasis).

- 2.15. Whilst therefore, great weight must be given to the preservation of heritage assets, that does not mean great weight must be given to any harm to a particular heritage asset in the planning balance. Rather, the weight the decision maker gives to any harm in the planning balance is matter for them, taking into account the extent of the harm and the value of the asset (in this case a grade II asset of less than the highest significance and a curtilage listed building) and bearing in mind the need to give great weight to its preservation.

Consideration of harm to area-based designated heritage assets and harm to setting of designated assets

- 2.16. When considering matters of harm to an area-based designation such as an RPG, Registered Battlefield or Conservation Area, case law dictates that the harm must be considered against the asset as a whole, and not simply to the particular plot of the Site. This requirement was set out in the *Spitfire Bespoke Homes Ltd v SoSHCLG* [2020] EWHC 958 (Admin) judgment. Whilst this was looking at a site within a Conservation Area, the principles set out apply to all area-based designations. The judgment sets out:

"15: The Inspector then referred to policy HE2 (which he quoted) before quoting s.72 of the LBCCA. He said, at paragraph 21:

"Consideration here relates to the RLSCA, not to the fact that Huntley Lodge is a non-designated heritage asset in its own right. The proposal needs to be judged in

the context of the RLSCA as a whole, not just the area in which the appeal site is located.”

This was an entirely proper approach....

21: “The current character and appearance of the conservation area is not confined to the character and appearance of the building or buildings on the development site, a point which the Inspector evidently had well in mind.”

- 2.17. For this Site then, it can be said that the contribution made by the setting of this asset and the significance of the asset is not confined to the Site alone and therefore the entirety of the asset must be considered.
- 2.18. In consideration of harm identified to the setting of designated heritage assets, it is the case that where this harm does not affect the physical fabric of the asset, the harm will most often be of a relatively low scale. This approach has been confirmed by the 2022 Secretary of State for Levelling Up, Housing and Communities call-in of the Appeal for Edith Summerskill House (APP/H5390/V/21/3277137) and endorsement at Paragraphs 11–15 of their letter of the approach of the Inspector where it is set out at IR12.50 of their Report:

“In cases where the impact is on the setting of a designated heritage asset, it is only the significance that asset derives from its setting that is affected. All the significance embodied in the asset itself would remain intact. In such a case, unless the asset concerned derives a major proportion of its significance from its setting, it is very difficult to see how an impact on its setting can advance a long way along the scale towards substantial harm to significance.”

Consideration of requirement for clear and convincing justification

- 2.19. There is a requirement as set out in Paragraph 213 of the NPPF that where harm is found to a designated heritage asset, clear and convincing justification is required. In consideration of this, the Courts (*Pugh v SoS for Communities and Local Government [2015] EWHC 3 (Admin)*) have held that where the decision-maker works through the sequence for dealing with proposals which impact upon heritage assets in the context of Paragraphs 212–215 of the NPPF and finds that any harm to significance is outweighed by public benefits, then the ‘clear and convincing justification’ referred to at Paragraph 213 of the NPPF is in place.

Other matters relating to the Heritage aspects of this Scheme

- 2.20. There is no statutory duty to consider the setting of a Registered Park and Garden in the same way as S66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires the decision-maker to have consideration of the preservation of the setting of a listed building in decision-making – *“In considering whether to grant planning permission or permission in principle for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses”*.
- 2.21. In taking into account consultee comments, it is important to note that Historic England have no objection to the Scheme – nor indeed, any concerns. In their consultation response of 1st December 2025, they state that it is ‘not necessary for us to be consulted on this application again.’ It is pertinent that the Planning Officer double checked that this was

their final response and that they had had full sight of the proposals and they confirmed this was the case.⁴

- 2.22. It is accepted that Historic England do not state there will be no harm to these assets, but it is plain that they do not consider that the Scheme represents a level of harm sufficient for them to express concern or an objection position.
- 2.23. Historic England generally have three levels of response to consultation requests: objection, concerns and no comments. This response lies in that third category of no comment. If Historic England considered the level of harm from this Scheme to be near or at the middle of the scale of less than substantial harm to a Grade II RPG or any harm to the Grade II*listed Knowsley Hall, it is considered that they would have expressed some level of concern over the application. They have not.
- 2.24. The Gardens Trust, as set out in PPG paragraph O68, are required to be consulted for applications for developments likely to affect any park or garden on Historic England's Register of Historic Parks and Gardens of Special Historic Interest in England. As such, their views are material considerations in the decision-making process.
- 2.25. The Gardens Trust, similar to Historic England, have no objection to the Scheme. They state they have concerns regarding the suburbanisation of the Grade II Listed Knowsley Park Registered Park and Garden's setting to the west and north and with the reliance on established planting. They state:

"We agree the existing Landscape buffer currently provides a physical separation between the edge of the Grade II Listed Knowsley Park with its park wall, and the new dwellings, closing off and containing views within the parkland.

We accept that mitigation is proposed to reinforce this woodland buffer by additional shrub/tree planting on the development site side of the boundary wall, but we question whether the depth and structure of the proposed planting will provide sufficient screening should substantial felling be undertaken within the RPG belts. We would therefore advise that the 20m wide belts of planting proposed should be amended to include a higher percentage of woodland trees, capable of maintaining substantial screening cover, should the cover provided by the estate woodlands fail.

We confirm that the Gardens Trust and Lancashire Gardens Trust have concerns with this application but consider that some of these can be addressed by strengthening the proposed tree planting along the southern and eastern boundaries of the development site. This would reduce reliance on the existing cover currently offered by planting in the RPG and ensure that effective screening between the two sites was maintained for the future. We have no further comments to add at this stage."

- 2.26. It is noted that whilst the Gardens Trust have concerns about suburbanising the setting of the RPG, their concerns about this would be allayed in the main by the increase in

⁴ As confirmed in an email from Mark Quinn on 8th December 2026.

woodland planting along the edge of the Scheme, suggesting the concern does not seem to lie in the in-principle development within the Site boundary.

- 2.27. Notwithstanding this, the amended Scheme provides this increase in planting as requested, including areas of native woodland mix, native scrub mix, and suitable tree species for screening (the details and management of which can be secured by standard conditions on the outline consent). Where there are known areas of intervisibility between the proposed development and Knowsley Park, a combination of native woodland planting interspersed with scattered extra heavy standard tree planting is proposed at an increased width within these areas. The extra heavy standard tree planting would provide initial screening in the short term, with native woodland establishing in the longer term.

Knowsley RPG Grade II

- 2.28. In relation to the point made above about the fact the harm to this asset needs to be considered in terms of the harm to the significance as a whole, it is important to bear in mind that the Site is not within the boundary of the RPG, but is instead within the setting, which makes a lesser contribution to significance, and as such the assessment must not be of the level of harm to the parcel of land within which the Site is located. It is useful, therefore, to bear in mind the scale of the RPG and the surrounding landscape – as illustrated in the plan below.

Figure 2.1 – Application site and wider Registered Park and Garden Boundary



2.29. This plan illustrates the boundary of the GII RPG (in blue) in relation to the Site (in red), noting the following:

- the scale of the RPG and the size of the Site. The RPG measures approx. 950ha in area – the site is 33.75ha. Bearing in mind the Site isn't actually within the boundary, the Site represents a minor element within the wider surroundings of the asset,
- the landscape surrounding the boundary of the RPG – the expansive and open agricultural land in a sweeping arc bounding the edges of the RPG to the north, east and southeast of the Site with the western edge demonstrating a far more urban existing character.
- the amount of land in the immediate surroundings of the RPG which will not experience any change from the Scheme.

2.30. Taking into account the above, it is clear that when considering the asset as a whole, the scale of change arising from the Scheme to the agricultural landscape surrounding the asset is minimal. The agricultural land to the north, east and southeast of the RPG will not experience any change. As such, we consider that our finding of a low level of less than substantial harm is an appropriate conclusion to be drawn when considering the body of evidence put forward to support the assessment.

3. Planning Balance

- 3.1. In accordance with Paragraph 11 of the NPPF, planning decisions must apply a presumption in favour of sustainable development. This means granting permission unless any adverse impacts would significantly and demonstrably outweigh the benefits when assessed against the policies in the Framework as a whole.

Benefits of the Proposal

Housing Delivery

- 3.2. The Site will deliver up to 700 new homes, including 25% affordable housing, helping to meet both current and future housing needs in Knowsley.
- 3.3. The Site is the only safeguarded land in the borough identified for development post 2028, and its early release is justified by the Council's emerging shortfall in five-year housing land supply (4.97 years based on the latest standard method).
- 3.4. This report has mapped out the 5YHLS position and demonstrated that it will significantly deteriorate over time without additional sites' delivery, such as the application site proposed. As previously stated, this deterioration will accelerate from 1st July 2026, when the 20% buffer becomes applicable. Indeed, it shows that supply will drop from 4.63 years in 2024 to just 3.95 years in July 2026 when the 20% buffer kicks in (a shortfall of 764 homes), and will have dropped to 3.11 years (1,378 homes) by 2028 when the application site starts to deliver. The development will contribute significantly to the borough's housing trajectory, particularly from 2028 onwards, with 158 homes expected within the first five years (2026–2031), and must be given substantial weight given the significant and worsening housing supply shortfall identified

Affordable Housing

- 3.5. The scheme provides a policy-compliant 25% affordable housing offer (**equating to 175 affordable homes**), with a mix aligned to local needs, supporting social inclusion and housing affordability.
- 3.6. This must be given very substantial weight in the context of historic affordable delivery in the borough, which has only met needs in 2 of the last 14 years, generating a total shortfall of 4,889 affordable homes across the period, with average delivery of 68 affordable homes per year, meaning this scheme will deliver 2.5 years' worth of affordable housing.
- 3.7. It is also pertinent that the benefit of providing affordable homes differs from that of delivering market housing as they each respond to related yet discrete needs and as such the proposed provision of affordable housing also carries its own weight as a benefit⁵, in this instance very substantial weight as noted above.

⁵ As confirmed in the recent Hallam Land appeal at Langho, Ribble Valley (Ref: 6002485 dated 11th June 2026, and in multiple earlier appeals, details can be provided on request)

Table 3.1 – Affordable Housing Delivery and Need within Liverpool City Region (2011/12 – 2024/25)

Reporting Year	Knowsley		
	Need	Net Additions	Shortfall
2011/12	568	190	-378
2012/13	568	71	-497
2013/14	568	47	-521
2014/15	568	275	-293
2015/16	568	-47	-615
2016/17	568	-66	-634
2017/18	568	97	-471
2018/19	568	35	-533
2019/20	568	216	-352
2020/21	243	97	-146
2021/22	243	-14	-257
2022/23	243	51	-192
2023/24	243	443	200
2024/25	243	311	68
Total	5,841	952	-4,889

Economic and Social Value

- 3.8. The development will generate 1,574 social value weeks during construction, including apprenticeships, employment, and training opportunities for local residents.
- 3.9. The construction of 700 homes will also generate significant economic benefits for Knowsley Village and the wider borough, as set out in more detail in the Economic Benefits Infographic at Appendix 4 of the Planning Statement and summarised below, including:

Construction Benefits

- **£160m** in construction investment over the proposed 11-year build programme.
- **224** direct construction roles and indirect/induced jobs supported during build phase
- **£182.8m** in GVA (Economic output contribution) from jobs supported by activities at the site over 11-year build programme.

- 3.10. In combination these construction benefits can be ascribed moderate weight.

Operational Benefits

- **783** economically active and employed residents estimated to live in the new housing, with **43%** estimated to be in higher value/ higher income sectors.

- **£18.4m** total annual household expenditure.
- **£1.7m** estimated annual increase in Council Tax revenue.

3.11. In combination these operational benefits can be ascribed moderate/ limited weight.

Environmental Enhancements

3.12. The scheme delivers a Biodiversity Net Gain of 10% through a combination of on-site enhancements and off-site contributions.

3.13. It retains and enhances existing woodland and hedgerows, integrates SuDS, and provides over **5 Ha** of dedicated public open space, 20% above policy requirements (as per Landscape Masterplan), with **8.45 Ha** of total Green Infrastructure (as per the Parameters Plan).

Design and Place-Making

3.14. The development is well-designed, with a clear street hierarchy, active frontages, and green corridors that integrate with the surrounding landscape and settlement character.

3.15. It includes a central parkland, formal play areas, and walking/cycling routes, promoting health and well-being.

3.16. The proposals are also supported by a robust Strategic Design Code which has been prepared in line with the National Design Guide and National Model Design Code (both 2019) and is appropriate for a strategic site of this nature.

Infrastructure Contributions

3.17. The scheme includes provision for financial contributions towards education, active travel and off-site highways, public transport, biodiversity and outdoor sports provision ensuring that the development mitigates its impacts and supports local infrastructure.

Adverse Impacts

Landscape and Visual Effects

3.18. Some short-term adverse effects during construction and early occupation, particularly for nearby residential and recreational receptors. However, these are localised and will diminish over time as landscaping matures.

Ecology and Biodiversity Impacts

3.19. The development is expected to generate some non-significant impacts on wintering birds, local wildlife sites and ancient woodlands within the site, albeit with the mitigation package proposed (including substantial landscape buffers and connected green infrastructure) these should be given moderate/ limited weight.

Traffic and Infrastructure Pressure

- 3.20. Concerns raised by residents regarding traffic and local services are acknowledged. However, the Transport Assessment confirms that impacts can be mitigated, and contributions are proposed to support local infrastructure.

Loss of Greenfield Land

- 3.21. The Site is currently undeveloped agricultural land. However, it is not within the Green Belt and has been specifically safeguarded for future development. Furthermore it is predominantly (89%) Grade 3B agricultural land and therefore not BMV (nor is it high quality in the context of agricultural land across the wider borough which is predominantly Grade 3B with some limited areas of Grade 2)

Conclusion

- 3.22. The proposed development represents a sustainable, well-planned, and policy-compliant scheme that will deliver significant social, economic, and environmental benefits. While there are some limited adverse impacts, these are not considered to significantly and demonstrably outweigh the benefits of the scheme.
- 3.23. On balance, the proposal accords with the development plan and the presumption in favour of sustainable development. Planning permission should therefore be granted without delay.

Table 3.2 – Benefits of the Proposal and Weight Afforded to them.

Sustainable Development Thread	Matter	Weight Applied (positive)
Economic and Social	Boosting housing delivery and contributing to both the Councils 5 year housing supply shortfall, and longer term needs across the emerging plan period (given this is only site specifically identified for development post 2028).	Substantial
	Delivering 25% affordable Housing and a suitable mix of homes noting local needs and acute historic under-delivery.	Very substantial
Social and Environmental	Provision of significant amounts of open space comprising 5 Ha of dedicated public open space, 20% above policy requirements (as per Landscape Masterplan), with 8.45 Ha of total Green Infrastructure (as per the Parameters Plan).	Significant
	Provision of new foot and cycle infrastructure to and within the Site alongside proposed additional off-site Active Travel upgrades within the wider Village.	Significant
Environmental	Biodiversity Net Gain of 10% through a combination of on-site enhancements and off-site contributions.	Moderate/Limited
	Other developer contributions towards education, off-site highways, public transport, and outdoor sports provision	Moderate/ Limited

Economic and Social	ensuring that the development mitigates its impacts and supports local infrastructure.	
	Direct Economic Benefits created through jobs during the construction phase.	Moderate
	Creation of spin off expenditure (one off spending) from those moving into a new home.	Moderate/Limited
	Additional annual household expenditure, Council Tax receipts and patronage to provide expenditure for local businesses and the Council.	Moderate/Limited

Table 3.3 – Impacts of the Proposal and Weight Afforded to them.

Sustainable Development Thread	Matter	Weight Applied (negative)
Environmental / Social	Impact on the neighbouring Heritage Assets (Grade II* Listed Knowsley Hall & Grade II Listed Registered Park and Garden) is afforded moderate weight, noting the less than substantial harm to their setting at the lower end of this scale, as set out within Table 1.1 and explained in more detail within section 2, and that this does not outweigh the benefits of the proposal.	Moderate weight (with less than substantial harm at the lower end of the scale).
Environmental	Impact to the open countryside and landscape which is confirmed to be moderate at the localised level.	Moderate
Environmental	Non-significant impacts on wintering birds, local wildlife sites and ancient woodlands (with mitigation accounted for).	Moderate/ Limited
Environmental	Highway impacts (after mitigation measures have been put in place).	Moderate/ Limited
Environmental	Conflict with Policy SUE1 which safeguards the site for development beyond 2028 (to come forward through a LP review); however the weight to be given is limited by the Council's increased housing requirements, lack of 5 year housing land supply, and the fact that this is the only site specifically identified for development post 2028, and which will not come forward until 2028 under the current outline application proposals in any event.	Accepted conflict but limited weight
Environmental	Pollution (Air / Noise / Lighting) and impacts during the construction phases of development (which will be controlled via planning conditions).	Limited impacts and harm / limited weight
Environmental	Loss of Agricultural Land and food production (site is only 4.7% Grade 3A/ BMV and is not high quality relative to agricultural land in the wider borough).	Negligible harm

Environmental	Flood risk and drainage (flood zone 1) and after appropriate SUDS are implemented	Negligible / no harm
Environmental	Tree and hedgerow loss which is very limited with all protected and mature trees retained. The loss of hedgerows is greater but has been limited to where it is necessary to provide safe access points, and wider connectivity through the site, with this loss offset by BNG provision on site.	No net harm

4. Conclusions

- 4.1. This Planning & Heritage Addendum Note concludes that the proposed development, including the 20m landscape buffer, is entirely acceptable in heritage terms, as whilst it will generate a level of harm to the adjacent designated assets, **this harm is less than substantial at no more than the low to middle range of the scale of harm** and is significantly outweighed by the substantial benefits of the scheme, not least its contribution of up to 700 homes including 175 affordable homes.
- 4.2. This position is wholly endorsed by the Inspector who safeguarded the site within the 2016 Knowsley Core Strategy.
- 4.3. We would also reiterate that any increased landscape buffer (between 20 and 60m) would provide no more than a limited visual or character benefit in heritage terms, and that this benefit would be outweighed by the associated negative impacts of reducing the developable area in terms of reduced market and affordable housing delivery, reduced economic benefits and inefficient use of land.
- 4.4. On this basis we respectfully request that the Council confirm their position in respect of the level of harm and undertake their own planning balance exercise based on the scheme as proposed.



Appendix 1 – Additional Heritage Evidence (30/04/2026)

From: Graham Lamb
Sent: 30 April 2026 16:46
To: Quinn, Mark; Sheridan, Jo (Planning & Regeneration); Olivia Birks
Cc: Anna Chew (achew@hallamland.co.uk); Joseph Empsall; Laura Garcia
Subject: 25/00486/OUT Land at Knowsley Estate - Photomontages in respect of intervisibility/ heritage impacts
Attachments: P21-3399_EN_15A PHOTOMONTAGES - MASSING LR.pdf; P21-3399_EN_17A PHOTOMONTAGES - HOUSING LR.pdf; P21-3399_EN_1006_RevA - Home Farm Views.pdf

Dear All,

Land at Knowsley Estate (App: 25/00486/OUT)
Photomontages in respect of intervisibility/ heritage impacts

We have now produced the photomontages showing the view from the Croxteth Lodge approach drive, as attached. There have been several amendments to the existing design following the production of the originally supplied photomontages, which have been integrated within the attached photomontages.

Previously, the proposed development included a buffer of c.20m, followed by a section of two-storey development for 20m, with 2.5 storey development to the rear of this. The updated designs will now only include two-storey dwellings within the area of the open section along the southern Site boundary, from the southern development edge up to the edge of the ancient woodland to the north. These changes have been shaped by an understanding of the significance of the identified heritage assets, and the degree of visibility and impacts possible.

The photomontages also include the updated landscape mitigation with dense woodland screening, which has been enhanced since the production of the first round of photomontages.

EN_15A Photomontages - Massing

This illustrates continuous built form at two-storey height, shown at distances of 20/30/40/60m buffers. The photomontages include the existing view, a photo wire view, Year 1 of development view, and Year 15 of development view.

As you will see, the continuous built form is visible at each buffer distance as part of the Year 1 views of the scheme, with each including a degree of landscape screening from the treeline mitigation; however the difference in visual impact of the built form between 20m and 60m is negligible, whilst it should be noted that all Year 1 impacts are only temporary anyway, to allow for the proposed landscape mitigation to mature. At Year 15, there is no clear visibility of the built form within the photomontages at the 20m buffer, with views screened by the enhanced landscape mitigation proposed.

It should be noted that these montages represent a worst-case scenario in terms of massing heights, and the grey colouring is not realistic in terms of what material colour palette would be visible from the drive for any new dwellings, which would be carefully chosen as part of the reserved matters application to be more sympathetic and in keeping with the wider landscape and heritage assets.

EN_17A Photomontages - Housing

We also thought it would be useful to provide photomontages showing more detailed housing, so that a more realistic view of what dwellings within the Site may look like from the drive could be captured. It should be

noted that these are for illustrative purposes only, and should not be relied upon to provide specific details on housing types, with this representing an outline application only.

Like EN_15A, the photomontages show house types at two-storey height, across the distances of 20/30/40/60m, including the existing view, a photo wire view, Year 1 of development view, and Year 15 of development view. As with the worst-case scenario massing (EN_15A), these show negligible differences in visibility of built form between 20m and 60m in Year 1 of development, with no clear visibility of any houses at 20m in the Year 15 view.

On the basis of the limited impacts identified, particularly the negligible difference in visual impacts between 20m and 60m buffers, we hope that you agree that two-storey development set back at a 20m buffer along the open section of the boundary is acceptable, utilising the vegetation screening we have proposed.

We hope that based on the visuals provided, any the concerns raised regarding visibility of development from the Croxteth Lodge approach drive are alleviated, and that you now agree with the level of harm we ascribed.

Home Farm Photomontages

We note that Growth Lancashire had also requested photomontages from Home Farm, considering views from the western side of the complex when facing to the west and north towards the Site.

Following this request, our landscape team visited the Site and captured photography from these areas, see attached. As you will see from the photography, views are taken from a highly modern car park on the western side of the Home Farm complex, with this area having a negative contribution to the significance through setting overall. These views already include a strong degree of visibility of modern built form, contributing suburban character to the surrounds of the complex. There is only limited understanding of the open nature of the Site beyond the parkland boundary within these views, and no semblance of any agricultural character. The Site is not clearly appreciable as a notable buffer between the modern built form and the edge of Home Farm, particularly when facing northwards towards Parklands. It should also be noted that these do not constitute key views outwards from the complex, with historic cartographic sources previously showing a line of dense trees along the boundary, which would have limited views outwards.

Given the visibility of built form demonstrated, and the lack of clear significance that these views contribute to the curtilage Listed Building, we do not believe it is reasonable or proportionate to produce photomontages from this location. As part of the designs, we have included a new dense line of tree screening along the eastern Site boundary adjacent to Home Farm, which will help to contain views to the complex, closer to how it would have been experienced historically. Whilst it is anticipated there would be visibility of the new dwellings, the photography attached demonstrates that there is already strong visibility of modern dwellings along Parklands and Berry Hill Avenue.

We remain of the opinion that the proposed development would cause **less than substantial harm** to the significance of the Curtilage Listed Home Farm, at the **low to middle range of the scale of harm**. We hope based on the photography provided that you now share this conclusion.

We trust this now provides you with sufficient information to justify that the proposed development (included the latest landscape proposals and massing/ storey heights as set out above) is acceptable in heritage terms; however if there are still areas of dispute regarding the levels of harm on Croxteth Lodge and Home Farm, we are still more than happy to have an in-person meeting in the coming weeks to bring to a resolution, as we are keen to understand how the conclusions on heritage harm would be weighed in the overall planning balance, against other material considerations such as emerging housing need and the efficient use of land (noting the wider site's identification for 1,093 dwellings).

If you think a further meeting is required can you provide availability in the coming weeks.

Kind regards,
Graham



EXISTING



PHOTOWIRE



YEAR 1

PEGASUS
GROUP

Camera make & model
Lens make & focal length
Date & time of photograph
OS grid reference

- Canon EOS 5D Mark III
- Canon EF 50mm, f/1.4 USM
- 08/07/2025 @ 13.41
- 343773, 394266

Viewpoint height (AOD)
Distance from site
Projection
Enlargement / Sheet Size

- 34m
- 151m
- Cylindrical
-

Visualisation Type
Horizontal Field of View
Height of camera AGL
Page size / Image size (mm)

-
- 90°
- 1.5m
- 841 x 297 / 406 x 124



YEAR 15

VIEWPOINT 4 – MASSING MODEL – 20M OFFSET
Knowsley Hall grounds, from track, looking North



EXISTING



PHOTOWIRE



YEAR 1

PEGASUS
GROUP

Camera make & model
Lens make & focal length
Date & time of photograph
OS grid reference

- Canon EOS 5D Mark III
- Canon EF 50mm, f/1.4 USM
- 08/07/2025 @ 13.41
- 343773, 394266

Viewpoint height (AOD)
Distance from site
Projection
Enlargement / Sheet Size

- 34m
- 151m
- Cylindrical
-

Visualisation Type
Horizontal Field of View
Height of camera AGL
Page size / Image size (mm)

-
- 90°
- 1.5m
- 841 x 297 / 406 x 124



YEAR 15

VIEWPOINT 4 – MASSING MODEL – 30M OFFSET
Knowsley Hall grounds, from track, looking North



EXISTING



PHOTOWIRE



YEAR 1

PEGASUS
GROUP

Camera make & model
Lens make & focal length
Date & time of photograph
OS grid reference

- Canon EOS 5D Mark III
- Canon EF 50mm, f/1.4 USM
- 08/07/2025 @ 13.41
- 343773, 394266

Viewpoint height (AOD)
Distance from site
Projection
Enlargement / Sheet Size

- 34m
- 151m
- Cylindrical
-

Visualisation Type
Horizontal Field of View
Height of camera AGL
Page size / Image size (mm)

-
- 90°
- 1.5m
- 841 x 297 / 406 x 124



YEAR 15

VIEWPOINT 4 – MASSING MODEL – 40M OFFSET
Knowsley Hall grounds, from track, looking North



EXISTING



PHOTOWIRE



YEAR 1

PEGASUS
GROUP

Camera make & model
Lens make & focal length
Date & time of photograph
OS grid reference

- Canon EOS 5D Mark III
- Canon EF 50mm, f/1.4 USM
- 08/07/2025 @ 13.41
- 343773, 394266

Viewpoint height (AOD)
Distance from site
Projection
Enlargement / Sheet Size

- 34m
- 151m
- Cylindrical
-

Visualisation Type
Horizontal Field of View
Height of camera AGL
Page size / Image size (mm)

-
- 90°
- 1.5m
- 841 x 297 / 406 x 124



YEAR 15

VIEWPOINT 4 – MASSING MODEL – 60M OFFSET
Knowsley Hall grounds, from track, looking North

METHODOLGY

Overview

Pegasus Planning Group use methodologies compliant with relevant sections of the current guidelines for photography, photomontage and TYPE 3 production included within:

- The Landscape Institute Technical Guidance Note 06/19
- Scottish Natural Heritage (SNH) Visual Representation of Wind Farms (February 2017, Version 2.2).

The Type 3s within this document have been produced using a consistent methodology using Camera Matching techniques. Camera matching is the process of replicating real-world camera parameters (position, orientation, projection and focal length) in a 3d virtual environment, enabling the production of mass models and photo-realistic renders of development proposals to be overlaid on baseline photography to the correct scale and orientation.

Definition and Classification of TYPE 3s

Landscape Institute Technical Guideance Note: Visual Representation of Development Proposals (17 September 2019) defines an Type 3 as:

Type 3 visualisations are photomontages or photowires (photographs with wireline overlays) where site photography forms the basis of the imagery, which is then overlaid by a 3D wireframe, massing or rendered model. Type 3 are suitable for representing proposals where precise perception of scale of the printed image, and the highest levels of locational accuracy, are not necessary. If the key criteria for Type 4 cannot be guaranteed, then the visualisation will be classified as a Type 3. ‘Type 3’ should be clearly stated on all visualisations.

Site Visit and Viewpoint Locations

Each viewpoint is carefully chosen based on a combination of information, these include; zone of theoretical visibility (ZTV) analysis, strategic importance, open dialogue with local authority, and site walkover. Once the project team had agreed the exact locations, a photograph was taken which formed the basis of the study. The surveyor established the precise location of the camera.

Site photography was taken in **July 2025** by Pegasus Planning Group. The viewpoint locations were recorded using photography and the exact GPS data of the position of the camera was recorded.

Photography

For each agreed viewpoint location, a high resolution photograph was taken with a 35mm (full frame) digital SLR camera, The camera was set up at a height of 1.5m to replicate an eye level view from the specified position. The location at which the photograph was taken and GPS positions recorded and photographed. The camera was levelled horizontally and vertically by means of a tripod mounted levelling base and two camera mounted spirit levels.

Lens Selection

In order to capture the full extent of the proposed development and an appropriate amount of contextual built form a 24mm lens (73.7° horizontal field of view), or a 50mm lens (39.6° horizontal field of view), were used.

Photography Equipment

- Canon EOS 5D Mark III (35mm)
- Canon EF 24mm f/1.4 USM Lens
- Canon EF 50mm f/1.4 USM Lens
- Tripod indexed pan head
- Levelling base with spirit level

Photography stitch

The frames are stitched in PTGui software to the fied of view required and specified in guidance documents. The detail is documented in the footer of each presentation page.

Photography Post Production

Where necessary standard image post production techniques were used, including curves, sharpening and levels. Should post production be required to a baseline viewpoint image the details of such are included in the Viewpoint Information table. Any exceptions to the applied policies or deviations from the methodology are clearly described.

The Development Proposal

Pegasus Planning Group created the models using 2D elevations/ site plan drawings provided by the project architect.

Documentation

- The images are annotated with the following information:
- Unique identification code (Viewpoint Reference Number)
 - Textual description of viewpoint location and direction of view
 - Method
 - Co-ordinates of camera position, height and tripod height
 - Camera model and lens
 - Focal length
 - Image orientation
 - Image horizontal field of view (HFOV)
 - Time of day and date for any source photography
 - Map and site photography showing location of camera position
 - Peripheral annotation to the image to confirm the direction of view in the original photography (the optical axis)
 - Definition of the field of view depicted each side of the optical axis, either in the form of peripheral annotation, textual description or more sophisticated maps

Photographic Alignment within the 3D Environment

The 3D model is combined with Environment Agency Lidar data where available into one file, this is then imported to 3ds Max, a 3D visualisation software package.

A virtual camera is created within 3ds Max using the real-world camera location and field of view (FOV) based on the camera and lens combination selected for the shot .

The annotated photograph is inserted as a background to the view, to assist the Visualiser in aligning the surveyed data to each corresponding background point, based on the Camera Matching Technique.

Using this virtual camera, a render is created of the aligned model at a resolution to match the baseline photograph. This is overlaid onto the baseline photograph to assess the accuracy of the alignment.

Final Rendering and Post-Production

The final render is exported to the same resolution as the baseline photography. Multi pass renders are exported to give the visualiser more control in enhancements of the final image. These multi passes may included but not limited to Selection Mattes, Reflections, Refractions, Shadows, Lighting, Ambient Occlusion and Global Illumination.

The multi pass renders are layered within Adobe Photoshop and blended together to produce the correct level of detail and photo-realism. Finally masking is applied to the image. Endless aesthetic effects can be applied to the rendered image to enhance the realism of the final image and/or make adjustments as a result of proposed material changes. However, the visualiser always attempts to be faithful to the proposed design within it's chosen site.

The final images are then saved in an appropriate format for inclusion within the visual document.

Photowire Output

When shown in Photowire output, the process is the same as fully rendered with exception presentation in the photo. The 'wire' is produced using the alpha chanel of the render, this uses the most outerlying edge of the model form. This edge is marked with a solid line where it appears visible in the view, and a dashed line where the view is mitigated by foreground elements present in the view including vegetation, terrain, existing and proposed structures.

Software Used

- AutoCAD
- 3ds Max 2024
- V-Ray 6 for 3ds Max
- PTGui 12.2
- Adobe Photoshop
- Adobe InDesign



EXISTING



PHOTOWIRE



YEAR 1

PEGASUS
GROUP

Camera make & model
Lens make & focal length
Date & time of photograph
OS grid reference

- Canon EOS 5D Mark III
- Canon EF 50mm, f/1.4 USM
- 08/07/2025 @ 13.41
- 343773, 394266

Viewpoint height (AOD)
Distance from site
Projection
Enlargement / Sheet Size

- 34m
- 151m
- Cylindrical
-

Visualisation Type
Horizontal Field of View
Height of camera AGL
Page size / Image size (mm)

-
- 90°
- 1.5m
- 841 x 297 / 406 x 124



YEAR 15

VIEWPOINT 4 – HOUSING MODEL – 20M OFFSET
Knowsley Hall grounds, from track, looking North



EXISTING



PHOTOWIRE



YEAR 1

PEGASUS
GROUP

Camera make & model
Lens make & focal length
Date & time of photograph
OS grid reference

- Canon EOS 5D Mark III
- Canon EF 50mm, f/1.4 USM
- 08/07/2025 @ 13.41
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- Cylindrical
-

Visualisation Type
Horizontal Field of View
Height of camera AGL
Page size / Image size (mm)

-
- 90°
- 1.5m
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YEAR 15

VIEWPOINT 4 – HOUSING MODEL – 30M OFFSET
Knowsley Hall grounds, from track, looking North



EXISTING



PHOTOWIRE



YEAR 1



Camera make & model
Lens make & focal length
Date & time of photograph
OS grid reference

- Canon EOS 5D Mark III
- Canon EF 50mm, f/1.4 USM
- 08/07/2025 @ 13.41
- 343773, 394266

Viewpoint height (AOD)
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- Cylindrical
-

Visualisation Type
Horizontal Field of View
Height of camera AGL
Page size / Image size (mm)

-
- 90°
- 1.5m
- 841 x 297 / 406 x 124



YEAR 15

VIEWPOINT 4 – HOUSING MODEL – 40M OFFSET
Knowsley Hall grounds, from track, looking North



EXISTING



PHOTOWIRE



YEAR 1

PEGASUS
GROUP

Camera make & model
Lens make & focal length
Date & time of photograph
OS grid reference

- Canon EOS 5D Mark III
- Canon EF 50mm, f/1.4 USM
- 08/07/2025 @ 13.41
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- 151m
- Cylindrical
-

Visualisation Type
Horizontal Field of View
Height of camera AGL
Page size / Image size (mm)

-
- 90°
- 1.5m
- 841 x 297 / 406 x 124



YEAR 15

VIEWPOINT 4 – HOUSING MODEL – 60M OFFSET
Knowsley Hall grounds, from track, looking North

METHODOLGY

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Lens Selection

In order to capture the full extent of the proposed development and an appropriate amount of contextual built form a 24mm lens (73.7° horizontal field of view), or a 50mm lens (39.6° horizontal field of view), were used.

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- Tripod indexed pan head
- Levelling base with spirit level

Photography stitch

The frames are stitched in PTGui software to the fied of view required and specified in guidance documents. The detail is documented in the footer of each presentation page.

Photography Post Production

Where necessary standard image post production techniques were used, including curves, sharpening and levels. Should post production be required to a baseline viewpoint image the details of such are included in the Viewpoint Information table. Any exceptions to the applied policies or deviations from the methodology are clearly described.

The Development Proposal

Pegasus Planning Group created the models using 2D elevations/ site plan drawings provided by the project architect.

Documentation

The images are annotated with the following information:

- Unique identification code (Viewpoint Reference Number)
- Textual description of viewpoint location and direction of view
- Method
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- Camera model and lens
- Focal length
- Image orientation
- Image horizontal field of view (HFOV)
- Time of day and date for any source photography
- Map and site photography showing location of camera position
- Peripheral annotation to the image to confirm the direction of view in the original photography (the optical axis)
- Definition of the field of view depicted each side of the optical axis, either in the form of peripheral annotation, textual description or more sophisticated maps

Photographic Alignment within the 3D Environment

The 3D model is combined with Environment Agency Lidar data where available into one file, this is then imported to 3ds Max, a 3D visualisation software package.

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Using this virtual camera, a render is created of the aligned model at a resolution to match the baseline photograph. This is overlaid onto the baseline photograph to assess the accuracy of the alignment.

Final Rendering and Post-Production

The final render is exported to the same resolution as the baseline photography. Multi pass renders are exported to give the visualiser more control in enhancements of the final image. These multi passes may included but not limited to Selection Mattes, Reflections, Refractions, Shadows, Lighting, Ambient Occlusion and Global Illumination.

The multi pass renders are layered within Adobe Photoshop and blended together to produce the correct level of detail and photo-realism. Finally masking is applied to the image. Endless aesthetic effects can be applied to the rendered image to enhance the realism of the final image and/or make adjustments as a result of proposed material changes. However, the visualiser always attempts to be faithful to the proposed design within it's chosen site.

The final images are then saved in an appropriate format for inclusion within the visual document.

Photowire Output

When shown in Photowire output, the process is the same as fully rendered with exception presentation in the photo. The 'wire' is produced using the alpha chanel of the render, this uses the most outerlying edge of the model form. This edge is marked with a solid line where it appears visible in the view, and a dashed line where the view is mitigated by foreground elements present in the view including vegetation, terrain, existing and proposed structures.

Software Used

- AutoCAD
- 3ds Max 2024
- V-Ray 6 for 3ds Max
- PTGui 12.2
- Adobe Photoshop
- Adobe InDesign



VIEWPOINT 01
View looking north towards Parklands from Home Farm



VIEWPOINT 02
View looking north-west towards Berry Hill Avenue from Home Farm



Appendix 2 – Initial Heritage Rebuttal (27/01/2026)

Graham Lamb

From: Graham Lamb
Sent: 27 January 2026 14:51
To: Quinn, Mark; Sheridan, Jo (Planning & Regeneration)
Cc: Anna Chew (achew@hallamland.co.uk); Joseph Empsall
Subject: RE: 25/00486/OUT - Hallam, Knowsley Village - Applicant response to Heritage comments
Attachments: R004v1 HT Heritage_Rebuttal_P21-3399.pdf; P21-3399_EN_1004_RevA - Landscape Mitigation Amends to support Heritage Rebuttal.pdf; Heritage assessment - Photomontages of southern boundary/ Croxteth Lodge approach

Dear Mark,

Please find attached an amended version of our heritage rebuttal note, which picks up a minor change in the text, so please share this version on and disregard previous version issued on 21/01. The supporting landscape plan is also reattached but is unchanged.

In respect of the 20 and 30m photomontages, we are happy for these to be considered as part of the application and so re-attach the original email they were sent with on 6th August 2025, which includes some additional explanation and context.

In terms of the request for 20m, 40m and 60m photomontages we would reiterate our position as set out at paras 2.71 to 2.73 (extracted below) that the submitted 20m and 30m montages are sufficient to understand the impact of the proposals, and clearly demonstrate that the proposed 20m development buffer is more than sufficient. As such, we do not believe the request for further photomontages is proportionate or reasonable, with no policy justification for this to withhold or delay a decision, instead we would ask that the merits of the application are assessed based on the extensive information provided.

- 2.71. Growth Lancashire have requested that illustrative viewsheds should be submitted, showing the development at 20m/40m/60m from the open section of Knowsley Park. In light of the request, photomontages were produced illustrating the negligible difference to views of the proposed dwellings at 20m and 30m from the edge of the Site. However, we consider that the visual material submitted to date is sufficient to understand the impact of the proposals. The proposals have been submitted with a 20m buffer zone, which was decided upon following a robust assessment of the affected heritage assets and the contribution the Site makes to the significance of these assets through setting. The proposed development must be assessed based on its own merit, as well as from the extensive information provided.
- 2.72. It should also be noted that the Gardens Trust had concluded that a 20m buffer was sufficient with appropriate tree planting, stating: ***"We agree the existing landscape buffer currently provides a physical separation between the edge of the Grade II Listed Knowsley Park with its park wall, and the new dwellings, closing off and containing views within the parkland."***
- 2.73. In light of the concerns raised by Growth Lancashire on the visibility of the new dwellings, the proposed development has been updated to include enhanced woodland screening along the open section of the southern Site boundary.

Finally, as noted in the previous email, this is intended to be reviewed internally between Officers and consultees and subject to agreement the changes can be incorporated into updated plans and a wider ES Addendum for formal resubmission/ reconsultation, once all consultee responses have been received.

I trust this sets out our position clearly and allows you to begin reconsulting with heritage consultees, but do let us know if there are any further queries, and be good if you can confirm when you've spoken with

consultees and have a likely timescale for a response, noting we'd be amenable to a further meeting to discuss if it would help expedite things.

Kind regards,
Graham

Graham Lamb

Senior Director – Planning

E graham.lamb@pegasusgroup.co.uk

M 07557 160596 | T 0161 393 3399

Queens House | Queen Street | Manchester | M2 5HT



Expertly Done. [LinkedIn](#) | [Instagram](#) | [Our Charity](#) | [Our Website](#)

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Please exercise extreme caution with attachments and website links or instructions to undertake financial transactions.

From: Quinn, Mark mark.quinn@knowsley.gov.uk

Sent: 23 January 2026 08:43

To: Graham Lamb <graham.lamb@pegasusgroup.co.uk>

Subject: RE: 25/00486/OUT - Hallam, Knowsley Village - Applicant response to Heritage comments

Hi Graham

Notwithstanding the fact that we have asked for photomontages at 20m/40m and 60m if you wish the photomontages at 20m and 30m to be considered in support of this application could you please re submit these .

Regards

Mark Quinn
Principal Planner
Planning

Telephone: 0151 443 2223

Knowsley Council, Huyton Library, Civic Way, Huyton, Knowsley, L36 9FB



Heritage Rebuttal.

Land at Home Farm Road, Knowsley, Prescot.

On behalf of Hallam Land Management.

Date: January 2026 | Pegasus Ref: P21-3399

LPA Ref: 25/00486/OUT



Document Management.

Version	Date	Author	Checked/ Approved by:	Reason for revision
1	January 2026	Joseph Empsall Principal Heritage Consultant	Laura Garcia Senior Director (Heritage)	-



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Growth Lancashire – 14 th November 2025	6
Historic England – 1 st December 2025.....	16
3. Conclusions	17

1. Introduction

- 1.1. This Heritage Rebuttal has been prepared by Pegasus Group to provide a commentary and response to consultation comments received regarding the proposed residential development on land at Home Farm Road, Knowsley, Prescott (Application Ref. No. 25/00486/OUT).
- 1.2. This document addresses any specific comments made within the consultation responses, providing further clarification or rebuttal; where necessary.
- 1.3. This document has been produced in addition to the Heritage Technical Baseline and Environmental Statement prepared to support this application. Historic background information and a detailed discussion of significance and the contribution made by setting of relevant heritage assets can be found within the Heritage Technical Baseline, with an assessment of the potential impacts produced within Chapter 8 of the Environmental Statement. Relevant information is reproduced here, but these documents should be read in conjunction.

2. Discussion of Consultation Comments

The Gardens Trust – 30th October 2025

- 2.1. The Gardens Trust **did not object** to the proposals. They have concerns over the application.
- 2.2. They stated that the Grade II Knowsley Park Registered Park and Garden represented the only asset within their statutory remit that had the potential to be impacted by the development proposals. They stated:
- “Having studied the information we consider that the proposal would be unlikely to result in harm to the significance of nearby Croxteth Hall Park RPG, also registered at Grade II and have restricted our comments to the potential impact on Knowsley Park RPG.”***
- 2.3. This conclusion regarding the Grade II Listed Croxteth Hall Park Registered Park and Garden aligns with our assessment.
- 2.4. For Knowsley Park, the Gardens Trust note that their concerns are associated with the suburbanisation of the parkland’s setting, as well as the potential increased visibility in the future, should the estate tree management see further tree removal. They stated the following:
- “Where our concerns lie are with the increased suburbanisation of the agricultural setting of Knowsley Park RPG along its western and northern boundaries and the seeming reliance being placed on the established estate woodlands for screening the proposed development. We agree the existing Landscape buffer currently provides a physical separation between the edge of the Grade II Listed parkland. But, as stated in the Cultural Heritage section of the Environmental Statement, recent felling in the Ash Plantation has already increased the intervisibility between the two sites and future management of the woodlands will be reliant on the estate’s activities. We have no detailed knowledge of the species mix of the woodlands, nor the management regime intended but the name Ash Planation (sic) suggests this species might be present and therefore susceptible to Ash die-back, requiring removal in the future.***
- We accept that mitigation is proposed to reinforce this woodland buffer by additional shrub/tree planting on the development site side of the boundary wall, but we question whether the depth and structure of the proposed planting will provide sufficient screening should substantial felling be undertaken within the RPG belts. We would therefore advise that the 20m wide belts of planting proposed should be amended to include a higher percentage of woodland trees, capable of maintaining substantial screening cover, should the cover provided by the estate woodlands fail.”***
- 2.5. On the suburbanisation, it should be noted that the western side of the parkland has already seen substantial suburbanisation, which has seen incremental change from the 20th century onwards. These surrounds do not represent a relic of the original agricultural surrounds, which survive to a far greater degree to the north and east of the parkland.
- 2.6. On the surrounding tree belts adjacent to the Site, it should be made clear that this existing vegetation is substantial and dense in most areas. This was a design intent, to limit visibility

into and out from the parkland. Our assessment demonstrated that visibility would be contained to one small section of c.50m along the southern boundary where there has been recent tree felling. To ensure there is limited visibility of any new dwellings, the proposals have included a belt of trees along the southern boundary.

- 2.7. The Garden Trust refer to the potential for trees bounding the Site to be susceptible to Ash die-back, requiring removal in the future, given the name of the woodland as Ash Plantation. A detailed botanical survey was undertaken on the Ash Plantation on 12th May 2025 as part of the Ecological Assessment. Appendix 7.8 of the Ecology Chapter within the Environmental Statement included a list a species identified within the Ash Plantation. No Ash trees were noted within the woodland during the survey, with the canopy dominated by Sycamore trees.
- 2.8. The Garden Trust have requested additional tree coverage within the proposals, to mitigate against any further tree felling within Knowsley Park, which would increase visibility of the proposed dwellings. They also clarify within their conclusions that this should look at ***“strengthening the proposed tree planting along the southern and eastern boundaries of the development site.”*** We would challenge this request. It is not reasonable or proportionate to mitigate against a future scenario of which there is no evidence to suggest will actually take place. No evidence has been presented by the Gardens Trust to demonstrate there is a realistic prospect of the felling of trees within the parkland, with the Ecology Chapter of the ES confirming that there are no Ash trees present within the Ash Plantation, which would be susceptible to die-back. The assessment of the proposals is required to be undertaken against the existing baseline conditions. At present, there is a substantial belt of trees within the parkland to the east of the Site, with the southern boundary also including dense trees, albeit with one small and open section. The estate tree felling is not within our control, and it is not reasonable to request that the proposals reflect tree felling that may or may not happen within the future.
- 2.9. Furthermore, the proposed works have already mitigated against the existing baseline conditions, which include the open section along the southern boundary. The proposals include a tree belt to screen visibility of the new dwellings, with development also set back from the parkland boundary with a 20m buffer. Importantly, the Garden Trust agree with the approach of this buffer, stating ***‘We agree the existing Landscape buffer currently provides a physical separation between the edge of the Grade II Listed Knowsley Park with its park wall, and the new dwellings, closing off and containing views within the parkland.’***
- 2.10. Whilst we conclude that the existing landscape mitigation is sufficient, and although we do not consider the need for additional screening to be an issue, to further alleviate the concerns the Gardens Trust has with the tree belts, we have updated our proposals to include a denser section of trees along the open section of the southern boundary. With this enhanced mitigation, the proposals would ensure that there is highly limited to no visibility of the new dwellings within the open section, including in the winter months when the trees are not in leaf.
- 2.11. On the impacts to Knowsley Park, the Gardens Trust concluded that the works would cause ***“less than substantial harm, at the lower end of the scale, resulting from further loss of its agricultural setting and visual intrusion of the new development”.***

- 2.12. We concur with this, and have concluded the works would cause **less than substantial harm**, at the **low end of the scale of harm**.

Growth Lancashire – 14th November 2025

- 2.13. Growth Lancashire represent a non-statutory consultee, which provide Knowsley Council with heritage and conservation consultation advice and responses. Growth Lancashire have **not formally objected** to the proposals. They have identified areas where they believe harm would occur, and have provided a series of recommendations.
- 2.14. Growth Lancashire have provided comment on each of the heritage assets identified within the Heritage Technical Baseline and ES Chapter, which will be taken in turn and discussed below.
- 2.15. The following Table provides an overview of the position of Pegasus Group and Growth Lancashire, on the assets identified as having the potential to be affected by the development proposals. There is broad agreement in the positions of Growth Lancashire and Pegasus where harm is identified in that this harm is less than substantial.

Table 1: The position of Pegasus Group and Growth Lancashire, concerning the heritage assets identified as having the potential to be affected by the proposals.

Heritage Asset:	Pegasus Group Position:	Growth Lancashire Position:
Grade II* Listed Knowsley Hall	Less than substantial harm, at the low end of the scale of harm	<i>"Low to moderate less than substantial harm"</i>
Grade II Listed Knowsley Park Registered Park and Garden	Less than substantial harm, at the low end of the scale of harm	<i>"Moderate to high level of less than substantial harm"</i>
Curtilage Listed Parkland Wall	Less than substantial harm, at the low end of the scale of harm	<i>"Low level less than substantial harm"</i>
Curtilage Listed Home Farm	Less than substantial harm, at the low to middle range of the scale of harm	<i>"Moderate level of less than substantial harm"</i>
Curtilage Listed Home Farm Lodge	Less than substantial harm, at the low to middle range of the scale of harm	<i>"Moderate to high level of less than substantial harm"</i>
Curtilage Listed Ormskirk Lodge	No harm	<i>"Low level of less than substantial harm"</i>
Curtilage Listed Croxteth Lodge	No harm	<i>"Low to moderate less than substantial harm"</i>
Grade II Listed Littlewood Lodge	No harm	<i>"Negligible level of harm"</i>

Grade II Listed Croxteth Park Registered Park and Garden	No harm	<i>"Low level of less than substantial harm"</i>
Knowsley Conservation Area	Less than substantial harm, at the low end of the scale of harm	<i>"Low less than substantial harm"</i>

Grade II* Listed Knowsley Hall

- 2.16. On the Site's association with Knowsley Hall, Growth Lancashire stated: ***"... the loss of the agricultural land in the same ownership as the hall and the parkland will result in some less than substantial harm through loss of grazing land, and through its prominence on the approach to the hall."***
- 2.17. We concur that less than substantial harm would occur from the loss of historically associated land beyond the boundary of the parkland. However, we dispute the statement that the Site has ***"prominence on the approach to the hall."*** Whilst there is some visibility along the open section of the southern boundary, this comprises a small section of c.50m in length. Visibility within this area is primarily directed along the linear approach drive, with longer views of the wider landscape contained by the designed tree belts. Along this approach, the agricultural land of the Site is not itself appreciable, due to the trees and parkland wall. It does not represent a prominent element along this approach, but there is some limited understanding of the wider landscape being undeveloped from the small open section.
- 2.18. On the approach to Knowsley Hall from the Croxteth Lodge drive, Growth Lancashire noted the following:
- "This access route leads directly to the principal elevation of the hall and provides a considerable contribution to its significance through an understanding of how the hall was intended to be experienced on the approach from the Croxteth Lodge entrance. The asset will be harmed by the presence of modern development which will be highly prominent from this approach. The harm will be exacerbated in the winter months with limited tree cover and the presence of lighting."***
- 2.19. Whilst the route does lead to the Hall, this statement fails to acknowledge that the visibility towards the Site forms one small part of a long approach to the Hall. From Croxteth Lodge, the approach to the Hall covers a distance of c.1.5km, with the open section along the southern side of the Site covering only a distance of c.50m. Furthermore, the Site does not form an important part of this approach, with the tree belts representing a design intent to shield longer views outwards, and contain visibility to the parkland. It should also be noted that there are no co-views between the Site and the Hall along any part of this approach, and there are no direct views of the Site from the Hall, due to the intervening trees and distance between them.
- 2.20. Whilst we conclude that the existing landscape mitigation that we have proposed is sufficient, and although we do not consider this to be an issue, to further alleviate the above concerns, the proposals have included enhanced screening within this area, to ensure that there is little to no visibility of the dwellings, including in the winter months when the trees are in leaf.

2.21. On the potential impacts to the Grade II* Listed Knowsley Hall, Growth Lancashire concluded: **"This is likely to cause low to moderate less than substantial harm to the Grade II* Listed Knowsley Hall."**

2.22. We dispute the level of harm ascribed by Growth Lancashire. Given the proposed mitigation, and that there is only the potential to change one small part of the Croxteth Lodge approach to the Hall, it would not be proportionate to attribute a moderate level of less than substantial harm. We concluded that the works would cause **less than substantial harm**, at the **low end of the scale of harm**.

Grade II Listed Knowsley Park Registered Park and Garden

2.23. Growth Lancashire noted the following on the character of the Site and the setting of Knowsley Park:

"Historic mapping shows that the application site has been open land for an extensive period of time. As such, the setting of the parkland to the north/west has long been characterised by its rural nature."

2.24. Whilst the Site has historically formed part of the wider agricultural hinterland of the estate beyond the boundary of the parkland. However, we dispute the statement that the setting of the parkland on its western side is characterised by its rural nature. The setting of the park is both rural and suburban on its western side, which is also acknowledged within the parkland's List Entry, which states: ***"The setting is urban and suburban on the south and west sides and agricultural elsewhere"***¹. The western surrounds of the parkland, which includes the Site, does not represent a relic of its original setting, having seen incremental suburbanisation from the 20th century onwards. The rural setting of the parkland survives to a far greater degree to the north and east.

2.25. On the impacts of the proposed development to Knowsley Park, Growth Lancashire concluded the following:

"The proposed scheme will result in a considerable change to the setting of the parkland and associated boundary wall through development in its immediate setting, that will appear suburban in character, eroding its parkland feel. It will be highly visible from the approach road, which is a key part of the park's character. It will be visible at close proximity, and more prominent in winter months, with limited tree screening and the presence of lighting. As a result, there will be a moderate to high level of less than substantial harm to the overall significance of the Registered Park and Garden and through development in its setting."

2.26. We dispute the degree of visibility stated by Growth Lancashire. They argue that the dwellings would be ***"highly visible from the approach road"***; however, the dwellings would not be clearly seen from the approach drive, due to the existing tree belts. There is one small and open section along the southern boundary, where the scheme has been sensitively designed to include additional vegetation screening following the woodland clearance. We believe that the existing landscape mitigation proposed is sufficient to

¹ Historic England. 1986. *Knowsley Park*. <https://historicengland.org.uk/listing/the-list/list-entry/1000997?section=official-list-entry>

address the potential visibility, and we do not consider this to be an issue. However to further alleviate the concerns presented by Growth Lancashire and the Gardens Trust, the vegetation screening has been enhanced further, and will include local non-deciduous trees. This will ensure that there is highly limited to no visibility of the proposed dwellings, including within the winter months.

- 2.27. We also dispute the level of harm ascribed by Growth Lancashire to the Grade II Listed Knowsley Park. They concluded the works would cause a ***“moderate to high level of less than substantial harm”***. However, this is not reasonable, given the need to consider the impacts to the Registered Park and Garden as a whole. The proposed residential development would see further change to the western surrounds of the parkland, and has the potential to include limited views of the dwellings from one small part of the Croxteth Lodge approach drive. We agree the works would cause ***less than substantial harm***, however, this should be considered at the ***low end of the scale of harm***, given the incremental suburbanisation that has already taken place to the west of the parkland, and the sensitive mitigation put in place to limit visibility of the new dwellings.
- 2.28. Furthermore, it should be noted that the conclusions on the level of harm ascribed to Knowsley Park by Growth Lancashire were not shared by the Gardens Trust. They reached a similar conclusion on harm to Pegasus Group, and concluded the works would cause ***“less than substantial harm, at the lower end of the scale, resulting from further loss of its agricultural setting and visual intrusion of the new development”***.

Curtilage Listed Parkland Wall

- 2.29. Growth Lancashire concluded that the works would result in a ***“low level less than substantial harm to the overall significance of the boundary wall through development in its setting.”***
- 2.30. We concur with the conclusions of Growth Lancashire for the Parkland Wall.

Curtilage Listed Home Farm

- 2.31. On the significance of the Curtilage Listed Home Farm, Growth Lancashire stated the following:
- “Its significance is derived from its association with Knowsley Hall, its completeness as a Model Farm and its extremely high quality architectural significance which is very well preserved.”***
- 2.32. We dispute the level of significance ascribed by Growth Lancashire. Whilst Home Farm is of significance, and retains buildings of architectural interest, it would not been considered to be of ***‘extremely high quality architectural significance.’*** The complex has been converted into a business park, which has seen the loss of original fixtures and features, to allow for its varied uses. They also note the ***‘completeness as a Model Farm’***; however, it is no longer operating as a farmstead, which is likely why it was excluded from the parkland designation. Whilst it does possess architectural and historic interest, these have been reduced somewhat following modern changes. Furthermore, whilst the complex is Curtilage Listed to the Grade II* Listed Knowsley Hall, it is not Listed in its own right, and its significance is not commensurate with that of a Grade II* Listing.

2.33. On the contribution that the Site makes to the significance of the Home Farm complex, Growth Lancashire stated the following:

"The site contributes considerably to the asset in provision of a rural parkland character that reflects its historic character and enables appreciation of its historic use. The tree cover to the western boundary has been reduced significantly, resulting in higher visibility between the site and the asset."

2.34. Whilst we agree the Site does contribute to the significance of Home Farm through setting, we dispute that it makes a considerable contribution. We concluded that the Site makes a **minor contribution** to the former farmstead's significance through setting. The complex no longer functions as a farmstead, now operating as a modern business park, and there is no longer a direct functional connection between the Site and Home Farm. Furthermore, if the contribution of the Site or the Home Farm complex was substantial, they each would have been included within the designation boundary of the Grade II Listed Knowsley Park Registered Park and Garden.

2.35. On the visibility towards the wider surrounds, Growth Lancashire notes that ***"Extensive views from within the Home Farm complex are limited"***. However, they go on to state that there is the potential for some visibility of the proposed development from the western and northern extents of the complex stating:

"There are, however, glimpsed views of the mid-to-late 20th century development and the application site from this perspective. Whilst the Heritage Technical Baseline provides an assessment of views, it does not provide an assessment of the harm that would be caused to Home Farm."

2.36. The Heritage Technical Baseline provided an assessment of significance for the heritage assets identified as having the potential to be affected by the proposals (see Section 6 of the Report). The assessment of impacts was contained to the ES Chapter (see Chapter 8, paragraph 8.4 onwards). This concluded that the works would result in **Moderate Adverse Effects**, which in NPPF terms would represent **less than substantial harm**, at the **low to middle range of the scale of harm**.

2.37. On the Site acting as a landscape buffer between the settlement of Knowsley and the Home Farm complex, Growth Lancashire stated:

"Whilst views of the application site are limited from within the Home Farm complex, the adjacent retained land which separates the site from the mid-late 20th century development provides a physical separation of the complex from the modern development and maintains an element of the farm's historic rural setting. Historic mapping shows that this land has never been developed and the sense of isolation and rural nature of Home Farm is maintained to an extent by the open land (the application site) in its immediate surroundings"

2.38. Home Farm is best experienced from within its complex, which has seen extensive modernisation. The outer edges of the complex up to the boundary wall also act as a buffer area, with these areas of a modern character, including areas of car parking. The isolated and rural nature of the former farmstead would also continue to be experienced from within the parkland boundary, particularly to the north, north-east, and south-east of the complex. The land within the parkland makes a far greater contribution to the significance of Home Farm through setting, comparatively, than the Site, which lies beyond the parkland

boundary. Furthermore, we believe that Growth Lancashire have not fully recognised that the setting to the west of the complex has already seen substantial incremental change. It does not represent a relic of the original rural surrounds.

- 2.39. On the proposed mitigation along the eastern edge of the Site adjacent to Home Farm, Growth Lancashire stated: ***"I do not think that low level woodland scrub will provide any meaningful buffer"***. In the Conclusions/Recommendations section of their response, they also stated the following:

"Historically, the boundary of Home Farm contained a row of trees, in order to further reduce the visual impact of the proposed dwellings on Home Farm, I feel that a more substantial treelined buffer zone should be introduced in this location."

- 2.40. We believe that the existing landscape mitigation proposed would be sufficient to mitigate against potential visibility. However, to further alleviate the concerns raised, the proposed development has been updated with taller vegetation, including belts of trees along this area of the Site boundary, to ensure that there is limited to no visibility of the proposed new dwellings from the Home Farm complex.

- 2.41. Growth Lancashire concluded the following on the impacts of the proposed works to Home Farm:

"I think the proposed development would cause a moderate level of less than substantial harm to the curtilage listed Grade II* Home Farm."

- 2.42. From the originally proposed designs, we concluded that the proposed works would cause **less than substantial harm** to the significance of the Curtilage Listed Home Farm complex, through change to its wider setting. This was considered to be at the **low to middle range of the scale of harm**. The updated proposals now include enhanced tree screening along the north-eastern boundary of the Site, which will limit the degree of visibility of the new dwellings from the complex. In light of these changes, whilst the works will see a change in character to the wider surrounds of Home Farm, we now conclude that the proposals would cause **less than substantial harm**, at the **low end of the scale of harm**. This reduction in harm will be addressed as part of a forthcoming ES Addendum.

Curtilage Listed Home Farm Lodge

- 2.43. On the significance of Home Farm Lodge, Growth Lancashire stated the following:

"It is of significance as a modest but highly decorative lodge to Knowsley Hall and forms the western approach into the parkland."

- 2.44. Whilst the lodge possesses some architectural interest, we would dispute the statement that it represents a ***"highly decorative lodge"***. The structure represents a late addition to the parkland constructed from the late 19th century, and represents a modest lodge of simplistic designs, with very limited decoration. It likely comprised a service entrance lodge to the parkland. The building is Curtilage Listed to the Grade II* Knowsley Hall; however, it is not Listed in its own right, and its significance is not commensurate with that of a Grade II* Listed Building. It does not hold architectural and historic interest at a level worthy of designation.

- 2.45. On the potential visibility of the development in association with Home Farm Lodge, Growth Lancashire stated the following:

“A gated entrance adjacent to the lodge separates the application site from the Home Farm complex. From this perspective, there are direct, uninterrupted views of the application site and the development will be extremely prominent. There are also likely to be glimpsed views of the development from the driveway/principal entry route to the north of Home Farm, off Ormskirk Road.”

- 2.46. The designs have included vegetation screening adjacent to the entrance at the Lodge, which includes splayed lines of trees. This should channel views along the track, maintaining a sense of the approach. It is acknowledged that there will be visibility of the new dwellings; however, it should be noted that this approach is no longer in use, and whilst the dwellings would add residential character to the approach, this has already taken place further westwards. At the eastern end of the former road, the Lodge will continue to be understood within its historic context, as a gatehouse lodge.

- 2.47. Growth Lancashire also refer to the likelihood of glimpsed views from the principal entry route off Ormskirk Road in combination with the Lodge. However, there would be no visibility of the residential dwellings from this location and approach, given the intervening built form at Home Farm, as well as intervening existing and proposed vegetation.

- 2.48. On the addition of a north-south access road through the former approach to the Lodge, Growth Lancashire stated the following:

“The historic east to west route to the lodge from the west will be completely eroded by the construction of an access road aligned north to south through the existing route. Even if the route is partially maintained through mowing, views from the lodge will consist entirely of the development facing west.”

- 2.49. It is important to note that this historic route is no longer functioning, which has seen a substantial reduction in its contribution to the significance of Home Farm Lodge, through setting. The designs have maintained an understanding of the historic west to east alignment of the approach, with the historic context remaining legible. The inclusion of a road within the western extent of this approach is essential to the viability of the scheme, providing a connection between the north-eastern extent of the Site and the remainder of the Site further southwards.

- 2.50. Growth Lancashire concluded the following on the impacts to Home Farm Lodge from the proposed development:

“The proposal will likely result in a moderate to high level of less than substantial harm to Home Farm Lodge.”

- 2.51. We have concluded that the works would cause **less than substantial harm**, at the **low to middle range**.

Curtilage Listed Ormskirk Lodge

- 2.52. On the visibility between the proposed development and Ormskirk Lodge, Growth Lancashire stated the following:

"Whilst there is some distance between the application site and Ormskirk Lodge, there will likely be views of the development within its setting."

2.53. The proposed development includes tree planting along the north-eastern extent of the Site, with trees already present adjacent to this area within the Home Farm complex. Any visibility of new dwellings in the winter months when these trees are not in leaf would represent long distanced glimpses, and would also be viewed in combination with existing dwellings at Knowsley. These views towards the Site do not represent designed or key views, with the Site deemed to make **no contribution** to the significance of Ormskirk Lodge, through its wider setting.

2.54. On the impacts to Ormskirk Lodge, Growth Lancashire concluded the following:

"Distance views of the mid-to-late 20th century development can be seen from its immediate surroundings and as such any new intervening development will most likely have a visual impact on its setting resulting in a low level of less than substantial harm due to the presence of further modern development in its previously rural setting."

2.55. We dispute the level of harm ascribed by Growth Lancashire. The Site does not contribute to the significance of Ormskirk Lodge through its wider setting, and does not form part of its rural setting, being screened from view. There is the potential for some highly limited visibility of the new dwellings within the Site, though these should be primarily screened by the proposed tree planting. However, the ability to glimpse the new dwellings in longer distance views would in no way change the ability to understand or appreciate the significance of Ormskirk Lodge within its setting. The ability to see new development in views of, from, or alongside a heritage asset is not necessarily harmful.

2.56. We conclude that the works would cause **no harm** to the significance of Ormskirk Lodge through change to its wider setting.

Curtilage Listed Croxteth Lodge

2.57. On the visibility of the proposed development in relation to Croxteth Lodge, and the potential impacts, Growth Lancashire concluded the following:

"The proposed development would be prominent on the approach road from the lodge to the hall, resulting in a change to its wider setting, and resulting in low to moderate less than substantial harm".

2.58. We dispute this statement. The existing tree belts along the parkland boundary, as well as the proposed landscape buffer and enhanced tree belt mitigation with the Site, would ensure that there would be limited to no visibility of the dwellings within the currently open section of the southern Site boundary. There would be no direct visibility of the new dwellings from the approach drive, and the existing tree belts ensure that there would be no co-visibility between them.

2.59. It is anticipated that there would be some limited visibility of the new dwellings within the western edge of the Site, in co-views with Croxteth Lodge on Knowsley Lane. Where the new dwellings would be visible, these would represent long distanced glimpses, which would in no way change the ability to understand the significance of the Curtilage Listed Building as an entrance lodge, or the ability to appreciate the approach to the building on

Knowsley Lane. The ability to see new development in views of, from, or alongside a heritage asset is not necessarily harmful.

- 2.60. Growth Lancashire have concluded “**low to moderate less than substantial harm**”. We dispute the level of harm ascribed to the Curtilage Listed Croxteth Lodge. We concluded that the works would cause **no harm** to the significance of the Lodge, through change to its wider setting.

Grade II Listed Little Wood Lodge & Grade II Listed Croxteth Hall Park Registered Park and Garden

- 2.61. Growth Lancashire stated the following on the potential impact to the Grade II Listed Little Wood Lodge:

“There will be very little impact on views from the lodge due to surrounding tree cover, but on the approach road it will be visible resulting in a negligible level of harm through the intrusion of modern development in its wider setting”.

- 2.62. We concluded that the works would cause **no harm** to the significance of Little Wood Lodge, through change to its wider setting.

- 2.63. On the impacts to the Grade II Listed Croxteth Hall Park, Growth Lancashire concluded the following:

“Views from Croxteth Park will likely be minor, glimpsed views, resulting in a low level of less than substantial harm due to modern development in its wider setting.”

- 2.64. We dispute the level of harm ascribed to Croxteth Hall Park by Growth Lancashire. The Site makes **no contribution** to the significance of the parkland through its wider setting. As Growth Lancashire notes, the views would be “**minor**”, and any visibility of the development would be clearly viewed within the wider landscape context of the parkland. The proposed development would not form any part of the immediate setting of the parkland, with views towards the Site already including modern built form.

- 2.65. We concluded that the proposed works would cause **no harm** to the significance of the Grade II Listed Croxteth Hall Park through change to its wider setting. This conclusion is shared by the Gardens Trust, who stated the following:

“Having studied the information we consider that the proposed would be unlikely to result in harm to the significance of the nearby Croxteth Hall Park RPG.”

Knowsley Conservation Area

- 2.66. On the impacts of the proposed development to the Conservation Area, Growth Lancashire concluded the following:

“The proposed scheme will likely have a negative impact on its setting as it will reduce the rural character provided by the surrounding open landscape, resulting in low less than substantial harm.”

- 2.67. We concur with this statement, and concluded that the works would cause **less than substantial harm**, at the **lower end of the scale of harm**.

- 2.68. Growth Lancashire also provided recommendations in association with the Conservation Area, regarding the hedgerows along the western side of the Site. They stated:

"If a proposed scheme was to be found acceptable, it should be ensured that the hedgerow along the boundary of the site is retained in order to buffer views into the development from the southern approach to the conservation area."

- 2.69. This hedgerow has been retained as far as possible, to ensure that visibility of the new development is limited. The works would see some limited removal of the existing hedgerow, to create much needed new access points off Knowsley Lane. Where new dwellings would be visible on the approach to the Conservation Area, they would be viewed in conjunction with existing modern dwellings on the eastern side of Knowsley Lane.

Growth Lancashire Conclusions/Recommendations

- 2.70. Importantly, Growth Lancashire **did not object** to the proposed development, identifying areas where they believe harm would occur. They have also provided a series of additional recommendations, noted below.
- 2.71. Growth Lancashire have requested that illustrative viewsheds should be submitted, showing the development at 20m/40m/60m from the open section of Knowsley Park. In light of the request, photomontages were produced illustrating the negligible difference to views of the proposed dwellings at 20m and 30m from the edge of the Site. However, we consider that the visual material submitted to date is sufficient to understand the impact of the proposals. The proposals have been submitted with a 20m buffer zone, which was decided upon following a robust assessment of the affected heritage assets and the contribution the Site makes to the significance of these assets through setting. The proposed development must be assessed based on its own merit, as well as from the extensive information provided.
- 2.72. It should also be noted that the Gardens Trust had concluded that a 20m buffer was sufficient with appropriate tree planting, stating: ***"We agree the existing landscape buffer currently provides a physical separation between the edge of the Grade II Listed Knowsley Park with its park wall, and the new dwellings, closing off and containing views within the parkland."***
- 2.73. In light of the concerns raised by Growth Lancashire on the visibility of the new dwellings, the proposed development has been updated to include enhanced woodland screening along the open section of the southern Site boundary.
- 2.74. Growth Lancashire had requested that ***"consideration should be given to the species of tree and should include deciduous and evergreen native species such as holly and fastgrowing native trees."*** These comments have been noted.
- 2.75. Growth Lancashire also provide recommendations concerning materials, housing density, heights, and lighting. We thank Growth Lancashire for these recommendations and would address these points as appropriate as part of any forthcoming reserved matters application.

Historic England – 1st December 2025

- 2.76. Historic England **did not object** to the application, and provided the following consultation response:

“Thank you for your letter of 11 November 2025 regarding the above application for planning permission. We refer you to the following published advice which you may find helpful in determining the application.

The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3.

We also suggest that you seek the views of your specialist conservation and archaeological advisers, as relevant.

It is not necessary for us to be consulted on this application again, unless there are material changes to the proposals. If you would like detailed advice from us, please contact us to explain your request.”

3. Conclusions

- 3.1. No objections to the proposed development have been raised by any of the heritage consultee comments. For all consultees, it is acknowledged that where harm arises, it falls within the category of **less than substantial harm**, as defined by the NPPF. The Heritage Addendum has addressed areas of discrepancy between the levels of harm concluded by Pegasus Group, and the consultees.
- 3.2. Historic England **did not object** to the proposals, and did not identify any specific areas of concerns. They instead referred the decision-maker to the relevant guidance documents, and confirmed that no further consultation was required unless the proposals were to materially change.
- 3.3. The Gardens Trust **did not object** to the proposals, and only have concerns regarding the application. They agreed with our conclusions that the proposed works would cause **no harm** to the significance of the Grade II Listed Croxteth Hall Park Registered Park and Garden, through change to its setting.
- 3.4. The Gardens Trust identified concerns regarding the suburbanisation of the Grade II Listed Knowsley Park Registered Park and Garden's setting to the west, as well as the potential future tree felling by the parkland's estate management. They have requested additional tree coverage; however, we believe the extent of this request is not proportionate or reasonable. Whilst we conclude that the existing landscape mitigation is sufficient, and although we do not consider the need for additional screening to be an issue, to further alleviate the concerns the Gardens Trust has with the tree belts, we have updated our proposals to include a denser section of trees along the open section of the southern boundary.
- 3.5. We concur with the level of harm the Gardens Trust attributed to Knowsley Park from the development, and have concluded the works would cause **less than substantial harm**, at the **low end of the scale of harm**.
- 3.6. Growth Lancashire **did not object** to the proposals and have identified concerns and recommendations regarding the heritage assets identified as having the potential to be sensitive to the development proposals. In a number of instances, Growth Lancashire have ascribed a higher level of less than substantial harm than identified by Pegasus Group. We have disputed this level of harm for a number of the heritage assets.
- 3.7. For the recommendations provided by Growth Lancashire, where appropriate, these have been incorporated into updated designs. However, we found that a number of these were not reasonable or proportionate requests, including the requested photomontages. A number of the recommendations would also be addressed as part of a reserved matters application, and are not pertinent to the determination of this outline application.
- 3.8. Overall, we maintain that for the majority of the identified heritage assets, the proposed works would cause **no harm** or **less than substantial harm**, at the **low end of the scale of harm**. In EIA terms, the works would also result in **No Significant Effects** to any of the identified heritage assets.
- 3.9. As per paragraph 215 of the NPPF, any harm must be weighed against the public benefits of the proposals.

Town & Country Planning Act 1990 (as amended)
Planning and Compulsory Purchase Act 2004

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We are ISO certified 9001, 14001, 45001



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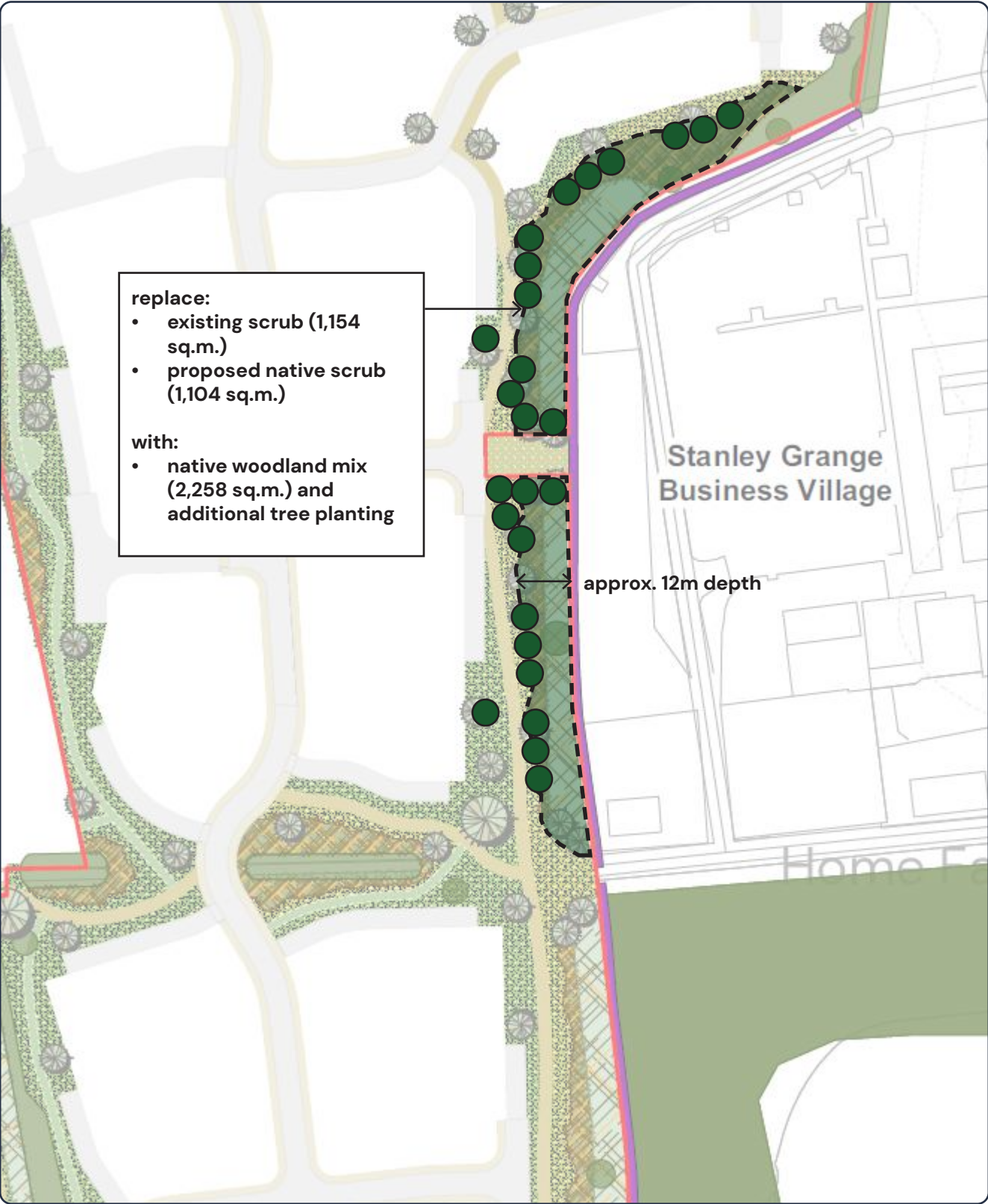


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Proposed Landscape Mitigation

Sketches to support Heritage Rebuttal (reference R004v1).



Eastern boundary to Home Farm



Southern boundary to Knowsley Park (Registered Park and Garden)

Project: Land East of Knowsley Lane, Knowsley
Client: Hallam Land Management Ltd

Project No.: P21-3399
DRWG No.: P21-3399_EN_1004_RevA

Sheet No: 1 of 1
Date: 15-01-2026

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Graham Lamb

From: Graham Lamb
Sent: 06 August 2025 13:18
To: Sheridan, Jo (Planning & Regeneration)
Cc: Anna Chew (achew@hallamland.co.uk); Joseph Empsall
Subject: Heritage assessment - Photomontages of southern boundary/ Croxteth Lodge approach
Attachments: P21-3399_EN_11 PHOTOMONTAGES 20M OFFSET_LR_.pdf; P21-3399_EN_12 PHOTOMONTAGES 30M OFFSET_LR.pdf; Land south of Home Farm Road.pdf

Dear Jo,

Our visualization team has put together photomontages illustrating development offset from the southern edge of the Site at 20m and 30m respectively (Low-Res version attached with High-Res version accessible via We Transfer), as requested in the Growth Lancashire heritage comments dated 9th July 2025 (reattached).

<https://we.tl/t-09wGFOTt6R>

These have been taken from the Croxteth Lodge approach drive within Knowsley Park, facing towards the open section of the Ash Plantation, adjacent to the Site. Each PDF is 6 pages and includes the following:

- Page 1 - Current view
- Page 2 - View with the proposed built form showing total height of development
- Page 3 - View with the proposed built form showing total height of development, including the embedded landscape mitigation at Year 15
- Page 4 - Wireline view of the proposed total height of the development
- Page 5-6 – Methodology/ explanatory text

As you will see, the photomontages demonstrate that there is a highly limited difference between the development set back at 20m and 30m from the southern edge of the Site. These show that with the embedded landscape mitigation of the woodland plantation, there should only be glimpsed visibility of the new dwellings within the Site from the parkland.

We acknowledge that this will contribute some residential character to views along the approach drive, and this has been assessed accordingly as part of the Cultural Heritage ES Chapter. However, it is also worth noting that the current view shows that there is already visibility of existing built form along Home Farm Road from this view, albeit at a longer distance, demonstrating that these views are already characterised by a level of residential/urban form, due to the felled trees along this boundary, and the proposed development must be considered

It is also important to note that the photomontages consider the total height of development, illustrating the anticipated degree of visibility from the developable areas of the parameters plan. However, this is very much a worst-case scenario, as in actuality this height would only apply to the ridge of the new dwellings, and there would be sizeable gaps in between the dwellings in this area. Therefore, there would be much more limited visibility of the dwellings than shown on the photomontages, particularly in relation to the anticipated views at Year 15, with the embedded landscape mitigation.

We trust that the photomontages will provide you with sufficient information to assess the forthcoming planning application, and any impacts from the scheme to the relevant designated heritage assets.

Kind regards,
Graham



EXISTING



PHOTOWIRE



YEAR 1

PEGASUS
GROUP

Camera make & model
Lens make & focal length
Date & time of photograph
OS grid reference

- Canon EOS 5D Mark III
- Canon EF 50mm, f/1.4 USM
- 08/07/2025 @ 13.41
- 343773, 394266

Viewpoint height (AOD)
Distance from site
Projection
Enlargement / Sheet Size

- 34m
- 151m
- Cylindrical
-

Visualisation Type
Horizontal Field of View
Height of camera AGL
Page size / Image size (mm)

-
- 90°
- 1.5m
- 841 x 297 / 406 x 124



YEAR 15

VIEWPOINT 4 – MASSING MODEL – 20M OFFSET
Knowsley Hall grounds, from track, looking North



EXISTING



PHOTOWIRE



YEAR 1

PEGASUS
GROUP

Camera make & model
Lens make & focal length
Date & time of photograph
OS grid reference

- Canon EOS 5D Mark III
- Canon EF 50mm, f/1.4 USM
- 08/07/2025 @ 13.41
- 343773, 394266

Viewpoint height (AOD)
Distance from site
Projection
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- 34m
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-

Visualisation Type
Horizontal Field of View
Height of camera AGL
Page size / Image size (mm)

-
- 90°
- 1.5m
- 841 x 297 / 406 x 124



YEAR 15

VIEWPOINT 4 – MASSING MODEL – 30M OFFSET
Knowsley Hall grounds, from track, looking North



EXISTING



PHOTOWIRE



YEAR 1

PEGASUS
GROUP

Camera make & model
Lens make & focal length
Date & time of photograph
OS grid reference

- Canon EOS 5D Mark III
- Canon EF 50mm, f/1.4 USM
- 08/07/2025 @ 13.41
- 343773, 394266

Viewpoint height (AOD)
Distance from site
Projection
Enlargement / Sheet Size

- 34m
- 151m
- Cylindrical
-

Visualisation Type
Horizontal Field of View
Height of camera AGL
Page size / Image size (mm)

-
- 90°
- 1.5m
- 841 x 297 / 406 x 124



YEAR 15

VIEWPOINT 4 – MASSING MODEL – 40M OFFSET
Knowsley Hall grounds, from track, looking North



EXISTING



PHOTOWIRE



YEAR 1

PEGASUS
GROUP

Camera make & model
Lens make & focal length
Date & time of photograph
OS grid reference

- Canon EOS 5D Mark III
- Canon EF 50mm, f/1.4 USM
- 08/07/2025 @ 13.41
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Visualisation Type
Horizontal Field of View
Height of camera AGL
Page size / Image size (mm)

-
- 90°
- 1.5m
- 841 x 297 / 406 x 124



YEAR 15

VIEWPOINT 4 – MASSING MODEL – 60M OFFSET
Knowsley Hall grounds, from track, looking North

METHODOLGY

Overview

Pegasus Planning Group use methodologies compliant with relevant sections of the current guidelines for photography, photomontage and TYPE 3 production included within:

- The Landscape Institute Technical Guidance Note 06/19
- Scottish Natural Heritage (SNH) Visual Representation of Wind Farms (February 2017, Version 2.2).

The Type 3s within this document have been produced using a consistent methodology using Camera Matching techniques. Camera matching is the process of replicating real-world camera parameters (position, orientation, projection and focal length) in a 3d virtual environment, enabling the production of mass models and photo-realistic renders of development proposals to be overlaid on baseline photography to the correct scale and orientation.

Definition and Classification of TYPE 3s

Landscape Institute Technical Guideance Note: Visual Representation of Development Proposals (17 September 2019) defines an Type 3 as:

Type 3 visualisations are photomontages or photowires (photographs with wireline overlays) where site photography forms the basis of the imagery, which is then overlaid by a 3D wireframe, massing or rendered model. Type 3 are suitable for representing proposals where precise perception of scale of the printed image, and the highest levels of locational accuracy, are not necessary. If the key criteria for Type 4 cannot be guaranteed, then the visualisation will be classified as a Type 3. ‘Type 3’ should be clearly stated on all visualisations.

Site Visit and Viewpoint Locations

Each viewpoint is carefully chosen based on a combination of information, these include; zone of theoretical visibility (ZTV) analysis, strategic importance, open dialogue with local authority, and site walkover. Once the project team had agreed the exact locations, a photograph was taken which formed the basis of the study. The surveyor established the precise location of the camera.

Site photography was taken in **July 2025** by Pegasus Planning Group. The viewpoint locations were recorded using photography and the exact GPS data of the position of the camera was recorded.

Photography

For each agreed viewpoint location, a high resolution photograph was taken with a 35mm (full frame) digital SLR camera, The camera was set up at a height of 1.5m to replicate an eye level view from the specified position. The location at which the photograph was taken and GPS positions recorded and photographed. The camera was levelled horizontally and vertically by means of a tripod mounted levelling base and two camera mounted spirit levels.

Lens Selection

In order to capture the full extent of the proposed development and an appropriate amount of contextual built form a 24mm lens (73.7° horizontal field of view), or a 50mm lens (39.6° horizontal field of view), were used.

Photography Equipment

- Canon EOS 5D Mark III (35mm)
- Canon EF 24mm f/1.4 USM Lens
- Canon EF 50mm f/1.4 USM Lens
- Tripod indexed pan head
- Levelling base with spirit level

Photography stitch

The frames are stitched in PTGui software to the fied of view required and specified in guidance documents. The detail is documented in the footer of each presentation page.

Photography Post Production

Where necessary standard image post production techniques were used, including curves, sharpening and levels. Should post production be required to a baseline viewpoint image the details of such are included in the Viewpoint Information table. Any exceptions to the applied policies or deviations from the methodology are clearly described.

The Development Proposal

Pegasus Planning Group created the models using 2D elevations/ site plan drawings provided by the project architect.

Documentation

The images are annotated with the following information:

- Unique identification code (Viewpoint Reference Number)
- Textual description of viewpoint location and direction of view
- Method
- Co-ordinates of camera position, height and tripod height
- Camera model and lens
- Focal length
- Image orientation
- Image horizontal field of view (HFOV)
- Time of day and date for any source photography
- Map and site photography showing location of camera position
- Peripheral annotation to the image to confirm the direction of view in the original photography (the optical axis)
- Definition of the field of view depicted each side of the optical axis, either in the form of peripheral annotation, textual description or more sophisticated maps

Photographic Alignment within the 3D Environment

The 3D model is combined with Environment Agency Lidar data where available into one file, this is then imported to 3ds Max, a 3D visualisation software package.

A virtual camera is created within 3ds Max using the real-world camera location and field of view (FOV) based on the camera and lens combination selected for the shot .

The annotated photograph is inserted as a background to the view, to assist the Visualiser in aligning the surveyed data to each corresponding background point, based on the Camera Matching Technique.

Using this virtual camera, a render is created of the aligned model at a resolution to match the baseline photograph. This is overlaid onto the baseline photograph to assess the accuracy of the alignment.

Final Rendering and Post-Production

The final render is exported to the same resolution as the baseline photography. Multi pass renders are exported to give the visualiser more control in enhancements of the final image. These multi passes may included but not limited to Selection Mattes, Reflections, Refractions, Shadows, Lighting, Ambient Occlusion and Global Illumination.

The multi pass renders are layered within Adobe Photoshop and blended together to produce the correct level of detail and photo-realism. Finally masking is applied to the image. Endless aesthetic effects can be applied to the rendered image to enhance the realism of the final image and/or make adjustments as a result of proposed material changes. However, the visualiser always attempts to be faithful to the proposed design within it's chosen site.

The final images are then saved in an appropriate format for inclusion within the visual document.

Photowire Output

When shown in Photowire output, the process is the same as fully rendered with exception presentation in the photo. The 'wire' is produced using the alpha chanel of the render, this uses the most outerlying edge of the model form. This edge is marked with a solid line where it appears visible in the view, and a dashed line where the view is mitigated by foreground elements present in the view including vegetation, terrain, existing and proposed structures.

Software Used

- AutoCAD
- 3ds Max 2024
- V-Ray 6 for 3ds Max
- PTGui 12.2
- Adobe Photoshop
- Adobe InDesign



EXISTING



PHOTOWIRE



YEAR 1

PEGASUS
GROUP

Camera make & model
Lens make & focal length
Date & time of photograph
OS grid reference

- Canon EOS 5D Mark III
- Canon EF 50mm, f/1.4 USM
- 08/07/2025 @ 13.41
- 343773, 394266

Viewpoint height (AOD)
Distance from site
Projection
Enlargement / Sheet Size

- 34m
- 151m
- Cylindrical
-

Visualisation Type
Horizontal Field of View
Height of camera AGL
Page size / Image size (mm)

-
- 90°
- 1.5m
- 841 x 297 / 406 x 124



YEAR 15

VIEWPOINT 4 – HOUSING MODEL – 20M OFFSET
Knowsley Hall grounds, from track, looking North



EXISTING



PHOTOWIRE



YEAR 1

PEGASUS
GROUP

Camera make & model
Lens make & focal length
Date & time of photograph
OS grid reference

- Canon EOS 5D Mark III
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- 08/07/2025 @ 13.41
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YEAR 15

VIEWPOINT 4 – HOUSING MODEL – 30M OFFSET
Knowsley Hall grounds, from track, looking North



EXISTING



PHOTOWIRE



YEAR 1

PEGASUS
GROUP

Camera make & model
Lens make & focal length
Date & time of photograph
OS grid reference

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YEAR 15

VIEWPOINT 4 – HOUSING MODEL – 40M OFFSET
Knowsley Hall grounds, from track, looking North



EXISTING



PHOTOWIRE



YEAR 1

PEGASUS
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YEAR 15

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- Adobe InDesign

Town & Country Planning Act 1990 (as amended)
Planning and Compulsory Purchase Act 2004

Manchester

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T 0161 3933399
E Manchester@pegasusgroup.co.uk
Offices throughout the UK & Ireland

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