

Heritage Rebuttal.

Land at Home Farm Road, Knowsley, Prescott.

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
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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, Prescot (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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