

**KNOWSLEY CORE STRATEGY**

**MATTER 8: ENVIRONMENTAL PROTECTION AND ENHANCEMENT**

**STATEMENT BY BARTON WILLMORE**  
**ON BEHALF OF JUNCTION PROPERTY LTD (JPL)**

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**Green Infrastructure (CS8 and CS21)**

**1. Question 8.1: Biodiversity**

- 1.1 JPL considers that it is a laudable objective that new development should "*protect, maintain and enhance*" biodiversity. However this is not the test set out in national policy which would only justify refusal where adequate mitigation and compensation is not provided (NPPF paragraph 118 first bullet point). Policy CS8 clause 6c should be amended to read 'protect, maintain and where possible enhance biodiversity.'

**2. Question 8.2: Compensation for Loss of Greenspace**

- 2.1 This is a question for the Council to answer initially.

**3. Question 8.3: Sports Provision.**

- 3.1 JPL considers that clause 2e of Policy CS21 is not consistent with national policy. The NPPF (24) requires that playing fields should not be built upon unless "*an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirement*". Clause 2e seeks to reverse this presumption as it would be satisfied if there is "*no evidence*" of future or continuing need for sports use.
- 3.2 JPL considers that facilities for outdoor sports (playing fields) should be the subject of the same requirements as other forms of open space, namely clauses 2a and 2b. In other words, the local planning authority should satisfy itself that there are no deficiencies in the relevant area for other types of open space before planning permission is given for the redevelopment of redundant playing fields. This would be consistent with NPPF (74).
- 3.3 JPL agrees that Clause 3 of Policy CS21 is appropriate, including the reference to the "*existing or potential special qualities of greenspace*." We regard "*potential*" as meaning if the greenspace is maintained appropriately.

4. **Question 8.4: Local Greenspace Standards**

4.1 JPL considers that the very onerous greenspace standards set out in Tables 8.1 and 8.2 have not been properly justified, especially in the context of a CS that is proposing the development of substantial areas of Council-owned greenspace for housing development.

4.2 Policy CS21 would require the provision of between 2.56 and 2.67ha of open space per 1000 residents in the form of a mixture of on and off-site provision. Such a high level of open space would detrimentally affect the viability of many schemes, particularly on previously developed sites, when combined with other Local Plan standards. This is demonstrated by the Keppie Massie viability study Tables 7.30-7.32 (EB06). It is also not properly justified.

5. **Question 8.5-8.8: Other Matters**

5.1 No comments at this stage.