



Campaign to Protect Rural England  
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*working locally and nationally for a  
beautiful and working countryside*

## Lancashire Branch, including Merseyside and Greater Manchester

Mr Paul Vertigen  
Planning & Building Control  
Municipal Buildings  
Dale Street  
Liverpool L2 2DH

8 November 2016

Dear Mr Vetigen,

1. Planning Application No. 16O/1191; Outline Application for Construction of 160 Houses at the Former Allerton Priory Playing Fields on the "Calderstones / Woolton Green Wedge", City of Liverpool, Merseyside L18 9UZ.
2. I am writing on behalf of the Lancashire Branch of the Campaign to Protect Rural England to object to the abovementioned proposal.
3. CPRE believes that a beautiful, quality green space is important for everyone, no matter where they live. Increasingly we are receiving enquiries for concerned urban dwellers about the protection and enhancement of their urban green spaces. Millions of town and city dwellers recharge their batteries with a walk in local parks, green spaces, protected Green Belt land and the wider countryside. We promote the reuse of previously developed land, brownfield land, in advance of green space. Green space is of immense value to us all, and 'Once it is gone, it is gone for good'.
4. CPRE objects to the above planning application for the following material planning considerations:  
**Open Environment**
5. Local Plan Policy GEN 2 States that the council aims to 'protect and enhance a network of open space' with emphasis on:
  - i) *protecting the City's strategic open land (Green Wedges) from inappropriate development - this application is contrary to this policy;*
  - ii) *protecting areas of intrinsic landscape value, - this application is contrary to this policy;*
  - iii) *protecting ecologically important sites in the City - the application would incur the loss of an ecologically important site.*

6. The function of a Green Wedge provides the following: Local Plan Policy OE3 8.25 iii) This site provides 'A mature ecological environment for birds, animals plants & trees.' iv)'contain a building of historical, architectural and educational interest. Allerton Priory is in close proximity. v) Green Wedge's 'give the appearance of a 'parkway' approach to the City along this particular transport route.' Local Plan Policy OE11 & OE12.

*ii) 8.26-The City Council is determined to protect and conserve the natural character of the Green Wedges and to maintain their integrity as predominantly open land against the encroachment of new development.*

*iii) 8.27- 'The fact that land has been allowed to become derelict or is underused will not be regarded as sufficient reason for permitting inappropriate development.'*

### **Ecological Implications**

7. The site is a potential Local Wildlife Site, (land within Calderstones/Woolton Green Wedge) and is considered likely to meet many of the Merseyside Environmental Advisory Service selection guidelines for full designation. It lies within a biodiversity hotspot area (Green Review 2015) and as part of the Green Wedge local planning policy states (OE3) *“the Council will seek to protect the nature conservation interest of open land by not allowing development which would destroy, fragment or indirectly affect a Site of Local Conservation Value, or “have an adverse effect on legally protected species”*. The mosaic of grassland and bluebell deciduous woodland supports many species that are highly protected under the Wildlife and Countryside Act 1981, including legally protected species. Other nesting birds known to be present on the site, eg, kestrel and various songbirds are listed in Section 41 of the Natural Environment and Rural Communities Act(NERC) 2006.(data Merseyside Biobank 2016).
8. Various habitats and species on site are listed under North Merseyside Biodiversity Action Plans, and listed as “priority conservation importance” eg grassland habitats, song thrush, bluebells and dragonflies. All the trees, many veteran also have TPOs. Liverpool Council is also reminded of its “biodiversity duty” under Section 40 of the NERC Act 2006, To achieve no net loss of Biodiversity in accordance with the National Planning Policy Framework.

### **Housing on Brownfield**

9. Local Plan Policy GEN 4 5.30 This policy advises local authorities to place emphasis on reusing previously developed sites (brownfield), rather than greenfield sites. There is also a surplus of housing provision.
10. The local areas of Liverpool 25 & Liverpool 18 has recently been the focus of extensive housing developments, which are listed below. This proposed development would add additional pressure on local services already under capacity including schools and health facilities.
- Former New Heys school and playing field - extensive housing development - 2 phases (100 + houses)

- Block of apartments -Church Rd South Woolton Village - 8 apartments being built
- Former Sunflower Centre ( former special school ) - Speke Rd - housing development.
- Former Williams Garden Centre - Woolton Rd - housing development - 10 exclusive 4/5 bedroom houses
- Land at St Julie's School - future housing development planned
- Former Gateacre Comprehensive School site - extensive housing development, of over 200 family houses

### **General Design Reasons**

11. The proposed development is contrary to Local Plan Policy HD18 concerning general design requirements.

### ***Scale, density and massing***

12. The proposed development does not, in our view, relate well to the local context. The proposed development does not include characteristics of local distinctiveness in terms of design, layout or materials, especially as the proposed development is in close proximity to the Grade 11\* listed building known as Allerton Priory. There will be a loss of outlook to the detriment of residential amenity, which is a material consideration.

### ***Building Line and Layout***

13. The building lines and layout of the proposed development in our view, does not relate to those of the locality either. This would, if allowed, detract from the views when travelling along an unspoiled route which is presently flanked by mature trees and attractive original sandstone walls.

### ***Landscape***

14. The proposed development does not, in our opinion take into account the relationship between all the elements of built and natural spaces. The treatment of spaces between is of comparable importance and this proposal we feel, does not demonstrate that this has been taken into account. It is also our opinion, that special attention has not been given to the views into and out of the adjoining Allerton Priory Grade 11\* listed, the curtilage of which, should most certainly be considered in relation to this architecturally significant building.

### ***Roofscape***

15. The proposal does not have regard for, and would therefore detract from, the roof-scape of neighbouring properties on land at Allerton Priory and for those people living alongside and adjacent to this proposed development, such as those people living along Allerton Road (close to Woolton Road). These houses front the land in question and are much lower down than Allerton Road itself, to begin with and therefore, should in our view be considered. This is particularly important, as the land slopes upwards from their properties.

### **Neighbouring Land**

16. If approved the proposal, would set a worrying precedent for the development of other local green spaces such as Allerton Towers which is also in the Green Wedge.

### **Good Design**

17. The access to this proposed development, in our view, does not promote or reinforce this particular area, which has a distinct quality and character of its own, being surrounded by original sandstone walls, creating a positive image to the outside world. The proposal would, we feel, alter this valued and much loved characteristic by the removal of the sandstone walls at its proposed access points. These original sandstone walls are a very important feature of our city and viewed by visiting tourists who may be travelling from the nearby South Parkway station and John Lennon Airport to visit a variety of attractions, including the home of the late John Lennon.

### **Amenity Value**

18. The proposal will result in the loss of natural green infrastructure. Section 11 of the National Planning Policy Framework sets out how local authorities should contribute to and enhance the natural and local environment by recognising the wider benefits of ecosystem services and minimising impacts on biodiversity and providing net gains in biodiversity where possible, contributing to the Government's commitment to halt the overall decline in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures. This proposal would cause damage to an important green space, which has positive impacts on the health and well-being of local residents.

### **Education**

19. Evidence shows that there aren't enough spaces available in local primary schools to accommodate any more children, which this proposed development will likely produce, bearing in mind that the houses are of sufficient size meant for families. This is a material consideration.

### **Traffic Reasons and Highway Safety**

20. Local Plan Policy T9 1 iii & 2 and T15 (material change in volume of vehicles on to an arterial road)

### **Local Amenity**

21. Local Plan Policy C7 The proposal will not maintain and enhance the amenity of local residents living within the locality which is contrary to this policy.

### **Flood risk**

22. Local Plan Policy EP13 -the increase of built environment is likely to lead to an increase in run off during heavy rainfall, and result in localised flooding, particularly as this land is on a gradient. Sewage and rainwater infrastructure may be breached as a consequence.

## Heritage Impact

23. The Government has set out its approach to conserving and enhancing the historic environment in Section 12 of the National Planning Policy Framework (NPPF). In determining planning applications, Liverpool City Council should take account of:
  - the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
  - the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
  - the desirability of new development making a positive contribution to local character and distinctiveness.
24. Liverpool City Council has a duty to prevent significant harm to either heritage asset or the setting of a heritage setting and the impact to Allerton Priory Grade II\* and Allerton Lodge Grade II listed heritage assets must be fully taken into consideration.
25. Local Plan Policy HD15 & HD5 The proposed development is in close proximity to an historic building, Allerton Priory. CPRE believes the proposed development would cause significant harm to the setting of this historic building, and is a material consideration in a determination of a planning application.
26. In summary CPRE Lancashire is opposed to this development, due to the multiple harmful impacts, identified above, which combined do not outweigh the benefit of new houses. Therefore we recommend the application be refused by Liverpool City Council.

If you would like further information please contact me without delay.

Yours sincerely,

**Jackie Copley MRTPI MA BA(Hons) PgCert**  
Planning Manager

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