



PRESCOT TOWN COUNCIL

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Dear Councillor Moorhead,

I am writing to provide a formally agreed initial response from Prescot Town Council to the KMBC Cabinet decision of 28 November 2017 on 'shaping a new future for Knowsley's Parks - the report of the Knowsley Parks and Green Spaces Board'.

As you would expect, the Town Council has given this matter serious and extensive consideration. This response has been produced following a meeting of some of the Town Council and the Town Clerk with KMBC officers on Friday 2 February. The Town Council has also taken account of representations from residents of Prescot and users of King George V Memorial Playing Fields (known locally as Brown's Field) and a Friends Group who have of course started to express their views and concerns on the proposal. The Town Council met formally on 27th February to consider and approve the contents of this response, which we anticipate will form part of the comprehensive consultation that the Cabinet report committed to.

The response sets out our position in detail, but in summary I can confirm that the Town Council **cannot support the recommendations** as they stand because they substantially exclude many Prescot residents from the potential benefits of this policy proposal and of a future Parks Trust, whilst stripping the town and local area forever of a much valued, used and loved local asset in KGV Prescot (Brown's Field) to provide a major financial contribution to fund the required endowment. The Town Council's view is that the selection of KGV Prescot (Brown's Field) for disposal is neither consistent with the recommendations of the Independent Review or the Cabinet decision, justified through the published assessment process, legitimate or deliverable without major constraint.

However, **we are committed to work constructively with KMBC** to ensure that the objectives of the Strategic Review Board and the Council are met for Prescott people whilst retaining and improving KGV Prescott as a crucial part of the town's offer. We have worked to generate local cross political party support for specific proposals for an alternative approach that are completely consistent with the recommendations of the Cabinet decision and the report of the Independent Review Board, set out below. In each case, we have set out the issues we are concerned with, with a constructive, reasonable and viable proposal to address these concerns.

Firstly, I would like to make clear that the Town Council cares passionately about the maintenance and quality of parks and green spaces within Prescott. We see these as vital to the overall offer of Prescott as a place, important in social, family, health and well - being and environmental terms. They are also a crucial contributor to the town's economic and social regeneration, which we appreciate KMBC is working with the Town Council and other stakeholders to advance. This in itself is a crucial factor for us, in that the level of already planned housing and economic developments in Prescott make those parks and play areas we have all the more important as places to escape, breathe, relax, exercise and enjoy. In short, our parks are a critical success factor to Prescott's long term prospects, which the Town and Borough Councils share a long-term interest in.

The Town Council also fully understand the need for Knowsley MBC to look for creative solutions to respond to the very challenging funding environment it is faced with, and in principle we are not unsupportive of the proposal to develop a Knowsley Parks Trust as a sustainable solution for the maintenance of Parks in the future. We are committed to a collaborative relationship with KMBC, a future Knowsley Parks Trust and any other body that can make a positive contribution to preserving our green spaces and enhancing the quality of life of Prescott residents.

The Town Council's concerns relate not to the basis of the proposal itself, but specifically to the manner in which the recommendations of the Independent Review Panel and the decisions of the Council's Cabinet are being implemented, which we see as wholly inconsistent with both the letter and the intent of the recommendations. I have set out below our specific concerns: -

- i) Issue: There has been no consultation on the selection of the sites for surrender despite this being expressly recommended by the Independent Review Panel.**

Proposals: Follow the advice of the Independent Review Board and engage the public in meaningful consultation on site selection as they would legitimately expect on such a major issue affecting their communities and lives.

The report of the Independent Knowsley Parks and Green Spaces Review Board and the specific advice of its chair in presenting the report to the Leader of Knowsley Council were very clear about the importance of further public engagement in the site selection process.

The Review Board's report (recommendation 9. P26, next steps p202) stated the need to manage risks associated with public concern over which parkland will be included in the 10% for sale. The report noted that this could be mitigated through the application of the strategic site criteria, collaborative engagement and close dialogue with the Parish and Town Councils as part of a detailed assessment of sites that could be part of the 10%. The report also

recommended explaining the criteria that have been used and the method by which they have been applied.

Furthermore, the covering letter from Dr Gideon Ben - Tovim the Chair of the Review Board to you as Council leader stated that “The people of Knowsley will need more information about how parks and green spaces will be selected to fund its endowment. This is an important part of the next steps that Knowsley Council will need to undertake”. The Panel’s work itself did of course engage in consultation, but not about the site selection process or specific sites, hence the advice.

Despite this clear advice and emphasis, no further public engagement or consultation was conducted by the Council about the criteria or the selection of the sites, nor with elected ward members or Town and Parish councils. A major concern for us is that this in itself is an action that undermines public trust and confidence in the whole proposed venture, not least in relation to Prescot. As politicians this has placed us in a position of being on the ‘back - foot’ from the outset in terms of public engagement, and this is not helpful to the implementation process at all.

ii) Issue: The site selection process has been constrained, producing a perverse outcome of proposing the sale of some of the parks and green spaces most valued by communities and users - the worst-case example being KGV Prescot

Proposals: a) Revisit the site selection process to ensure selection only of sites with low levels of community value. b) Treat parks with highest community value and protected status (including Fields in Trust) as you have treated Green Flag parks, excluding them from selection.

The Review Board presented the strategic site criteria to the Cabinet as a draft for further consideration, refinement and consultation. Despite this, the Council, in advance of the formal acceptance of the criteria themselves, has attempted to apply the strategic criteria to produce a list of sites for disposal, whilst aiming to release no more than 10% of the total parks and green spaces, and to reach an overall value of £40m to create an endowment and at the same time protect parks with Green Flag status.

It is now clear that this has not been a viable approach to achieving the strategic objectives of the Review Board and the Council. The incompatibility of these factors has resulted in the selection of sites of high value to communities because of their high value to developers and contribution to the endowment. This produces the perverse position of the Council planning to sell well used, highly valued parks and green spaces for development to pay for the maintenance of others with much less value to communities. This is clearly not what the Independent Review Panel or Council initially intended.

In terms of Prescot, central to our concerns is the fact that uniquely amongst the 17 sites selected, KGV Prescot (Brown’s Field) scored the highest possible marks in the Council’s own assessment process for community value and recreational use. Based on the cumulative assessment using all strategic criteria, the two listed sites at KGV Prescot ranked 89th and 90th in the list of 161 sites overall.

So, from the published information about the assessment process and the eventual recommendations, we have been left to assume that KGV Prescot’s selection has been driven

by the application of some form of informal, unofficial, unpublished weighting to the factors relating to attractiveness to developers and site value. These appear to have been deemed more important in this process than the value of the park and green space to the local community and its many users from further afield, according to KMBC's calculations, totalling over 200,000 per year. As an approach to site selection, this is completely inconsistent with the intent of the Independent Review Panel's report, and the agreed and published process. Furthermore, this gives rise to public concerns and questions about the value of the strategic criteria at all (if they are then not followed), and other public concerns about fairness and other potential motivating factors, including possible political factors.

This is clearly not an outcome that was originally intended through the process. The reality is that a basis of site assessment which was recommended by the Review Panel and promoted by you personally as the Leader of the Council as objective and fair in fact now lacks validity as well as transparency in terms of how recommendations have been reached.

This situation may have been better anticipated if the advice of the Review Board to take time to consider, refine and consult on the criteria and approach had been taken. This is not a position that is desirable or tenable in social, political, health and well-being or economic terms – a hugely damaging outcome for Prescot and for the Borough – however it is not yet irreversible.

The Town Council's view is that the correct way to deal with this is to acknowledge the technical challenges and approach the assessment in a way that would deliver an outcome that would identify for disposal only those sites that meet the criteria set by the Independent Review Panel – i.e. those of less value to communities, but with value to developers, potentially requiring flexibility over the application of the 10% limit.

Taken together with the proposals to consult with communities and to use capital receipts to part fund the endowment, whilst we are sure that no loss of green space will be without controversy, we suggest this would be an approach which limits impact on parks and green spaces that are of value to communities and is therefore a more palatable and defensible approach, consistent with your objectives.

We propose that it would also be consistent with the Independent Review Panels intent and recommendations the Council could also treat sites with high levels of community value in the same way that Green Flag parks were treated in the assessment. In the case of KGV Prescot this would protect it from selection, which the Town Council would suggest and prefer.

iii) Issue: A major determining factor was not taken into account in the decision-making process – Fields in Trust protection

Proposal: Treat parks with highest community value and protected status (including Fields in Trust) as you have treated Green Flag parks, excluding them from selection

The Town Council is concerned that a major factor was not identified in the decision-making process, which is that KGV Prescot is protected in perpetuity by Fields in Trust (formally the National Playing Fields Association) and that the site itself also has charitable status.

From the Town Council's point of view this protection relating to the sites heritage status as one of a small number of 'KGV' fields in the UK is an asset and relationship to be built upon for the

benefit of Prescott and Knowsley residents. It is also of course a major constraint to the potential release of the site for sale, as the express agreement of the Fields in Trust Full Council and the Charity Trustees and Charity Commission must be secured to enable this. The Fields in Trust disposal policy is very specific, and it is clear to us that this will be a major obstacle to KMBC in any proposal to dispose of the site.

This information (including the Heritage value) was not taken into account as part of the site selection process as it was not known to Council officers at the time, and therefore not mentioned in published papers, as were other constraints to development affecting other sites, which is a further process inconsistency.

As such this factor was not communicated to decision makers, which in our view should have been a key consideration in the selection of sites. For example, this factor could have led to a similar consideration to exclude Fields in Trust protected sites selection as was the case with Green Flag status given their value to communities and those in the green belt, which the Town Council would suggest and prefer.

Given the wider concerns set out above about site selection, we would suggest that challenging and seeking to overturn Fields in Trust's protection is an issue that could potentially bring the Council and whole process into disrepute and attract negative media attention on a national scale.

iv) Issue: The Council has not yet explored alternative funding opportunities, which for Prescott is a more viable option than disposing of one of only two parks

Proposal: Use capital receipts beyond parks in scope in the review and other available funds over the 15-year period to at least part fund the endowment.

The Review Board and the Council's Cabinet both recommended that the Council should consider generating other ways to contributing to the endowment, through capital receipts from the sale of sites outside of the scope of the review. However, the sites have been selected without this important step, which could have reduced the level of impact in terms of loss of valued parks and green spaces, and the amount of community and political concern this has caused.

We would therefore propose that, coupled with relaxing the 10% constraint, to limit the level of loss of valued park space as far as possible, the process should activate the KMBC proposal agreed in the Cabinet report (appendix B page 28) to use capital receipts from other land outside of the scope of the parks review or other available funding to contribute to the endowment. This should be carried out over the stated 15-year period, allowing a viable timeframe.

Our view is that this is also sensible political strategy – assuring residents that all other options are being exploited before disposing of parks and green spaces, and limiting these disposals to less valued, less controversial sites.

From a Prescott perspective, given the lack of other alternative parks and green spaces to consider, the Town Council would commit to work with KMBC constructively in this approach over the long term. This would ensure that, as other parts of the Borough, Prescott was seen to

make a significant contribution to the endowment, whilst retaining KGV Prescott (Brown's Field) intact.

v) Issue: The Town council has not been provided with the option to continue to maintain its parks through the precept as at present

Proposal: Engage with the Town Council about assuming all maintenance responsibilities for Prescott parks in line with the current lease agreement

Despite earlier references to the choices available to Town and Parish Councils in relation to assuming responsibility for capital maintenance costs, the Town Council has not been provided with this option, and we understand KMBC's current position to be that it will enforce surrender of leases.

This presumably is influenced by the value of KGV Prescott to the overall proposition but given we have made viable recommendations for alternative proposals the Town Council would like the option to retain its leases and continue to maintain the parks and improve them through relationships with Friends Groups and via available funding sources. We would of course seek and value a constructive and collaborative relationship with a future Knowsley Parks Trust from whom the Town Council could procure its parks services.

This coupled with the high levels of community use and the fact that the Town Council currently fund all maintenance of the site (a condition of the existing lease that KMBC enforced in 2015) sets Brown's Field apart from the other sixteen sites that have been identified for sale. Under the terms of the existing lease Prescott's parks carry no maintenance burden to KMBC for the next 72 years.

Our basic position here is that parks currently maintained by the Town council are not part of the problem KMBC is trying to resolve, and do not need to be part of the solution, given the approach we have suggested. We also believe we have the real potential to deliver innovative bottom up solutions through this approach, which could complement the wider approach KMBC is taking.

In light of this, we would request that our next rounds of discussions include detailed coverage of the potential transfer of Prescott's Parks to the Town Council.

To sum up, the Town Council is opposed to the loss of KGV Prescott (Browns Field) and believes that the loss of this valuable green space would severely impact on the local area. It would also affect and the value proposition of a future Knowsley Parks Trust insofar as Prescott is concerned – immediately weakening its offer and perceived value to the community and its relationship with residents at a time when citizen engagement in parks and green space has never been more important. We believe that development on KGV Prescott, which the Council's own assessment showed has great value to the local community, is not a good or defensible option for anyone, and would cause massive and irreversible damage to Prescott as a place, and to community relations.

This is a scenario we should all seek to avoid in the interests of the long term plan the Independent Review Board set out, and which Cabinet supported. Fundamentally, we do not

believe it is a desirable solution for the people of Prescot and others from across the Borough, (particularly nearby Huyton) who use the site, or for KMBC.

However, in a spirit of collaboration we have proposed an alternative approach to meeting KMBC's strategic objectives that we believe is more consistent with the recommendations of the Independent Review Panel, the Cabinet decision and the original intent of the whole process. The specific recommendations we have made are: -

- i) Follow the advice of the Independent Review Board and engage the public in meaningful consultation on site selection as they would legitimately expect on such a major issue affecting their communities and lives**
- ii) Revisit the site selection process to ensure selection only of sites with low levels of community value**
- iii) Treat parks with highest community value and protected status (including Fields in Trust) as you have treated Green Flag parks and Green Belt land, excluding them from selection**
- iv) Use capital receipts beyond parks in scope in the review and other available funds over the 15-year period to at least part fund the endowment**
- v) Engage with the Town Council about assuming all maintenance responsibilities for Prescot parks, currently outside of lease agreements**

The Town Council remain committed to a collaborative approach and welcome further meetings to discuss the proposals given above with our elected members, staff and representatives in good faith.

Yours Sincerely



Daniel Wilson

Town Clerk